

ESG Score of India Inc: 2014

One Year Post SEBI's BRR mandate: Moving from Disclosure to Performance



SUSTAINABLE BUSINESS
LEADERSHIP FORUM

India Responsible Investment Working Group



About the India Responsible Investment Working Group

Sustainability disclosure and reporting in India has received a fillip in the last couple of years - driven to a large extent by investors and policy makers. The Sustainable Business Leadership Forum (SBLF) has been working closely with businesses, investors, catalyst organizations and policy makers to identify the link between investment/capital flows and Environmental, Social and Governance (ESG) disclosure in India and have an integrated conversation about the expectations, concerns, challenges and realities surrounding ESG measurement/management/disclosure in the Indian market.

About the Working Group 2014

Currently there exists a disconnect between companies and the investors (especially equity investors): where companies have the information and feel that investors don't value it and hence are not disclosing. At the same time investors are unaware of information that companies have. Enhanced ESG disclosure communicated appropriately provides an opportunity to the listed companies to attract investors with long-term perspective by enhancing and communicating their ESG performance.

Agenda for 2014: In this context, the aim of the 2014 industry working group has been to create 'Information Instruments' and 'Information Enablers' to help generate action related to ESG.

Members of the Working Group

GIZ

Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH is a German federally-owned international cooperation enterprise for sustainable development which operates worldwide. It has been operating in India for over 50 years and led several initiatives. More recently it has been actively engaged in the IICA-GIZ CSR Initiative to help develop a country specific common understanding of CSR, and to enable the adoption of Business Responsibility by businesses. Recently it has also been developing a program on Responsible Finance which is expected to be rolled out in late 2012. www.giz.de

cKinetics

cKinetics is a specialized Sustainability advisory firm that works with investors and businesses. It has a practice focused on Investments and Sustainability Finance that amongst other topics works to deploy capital based on Environmental and Social (E&S) measures and create an impact going beyond a pure financial return. cKinetics has also been working for the past 18 months on working with investor groups to build an understanding of the E&S landscape in India.

www.cKinetics.com/crackingtheconundrum

Indian Institute of Corporate Affairs (IICA)

Indian Institute of Corporate Affairs (IICA) is a think tank and capacity building institution that has been established by the Indian Ministry of Corporate Affairs for matters relevant to corporate regulation and governance. The Institute has been designed with an eye on the future to provide a platform for dialogue, interaction and partnership between governments, corporate, investors, civil society, professionals, academicians and other stake holders in the emerging 21st century environment. www.iica.in

The SBLF and the India Responsible Investing Working Group is thankful to the all our partners and advisors and investors, standards bodies, progressive businesses, policy-makers and many other experts who participated in the development of this scorecard.

To stay updated with the happenings in this space as it rapidly evolves; and to get involved in the future please visit:

<http://SBLF.SustainabilityOutlook.in/about-the-forum/sustainability-disclosure-and-reporting>

The Journey: Evolution of ESG Disclosure in India

The India Responsible Investing Working Group has been tracking the ESG disclosure and performance of India Inc. since 2009. It was in the course of this period that the National Voluntary Guidelines for Social, Environmental and Economic Responsibilities of Businesses was introduced. It was also during this period that India’s indigenous sustainability reporting framework – The Annual Business Responsibility Report – was introduced and thereafter mandated by the Securities and Exchange Board of India (SEBI).

Due to the confluence of these regulatory changes and resultant push by the government, along with an increasing realization on part of businesses that ESG actions and disclosure is no longer a “good to have” and there is an inherent business case for the same - ESG disclosure has been on a rise in India.

More importantly, even as more businesses have started to report, even more are saying that they are prepared to disclose. This is apparent from the fact the in 2013, research by the India Responsible Investment Working Group, spanning both large corporates as well as Small and Medium Enterprises (SMES), indicated that more than 50% businesses are now prepared to provide ESG information to investors / other stakeholders.

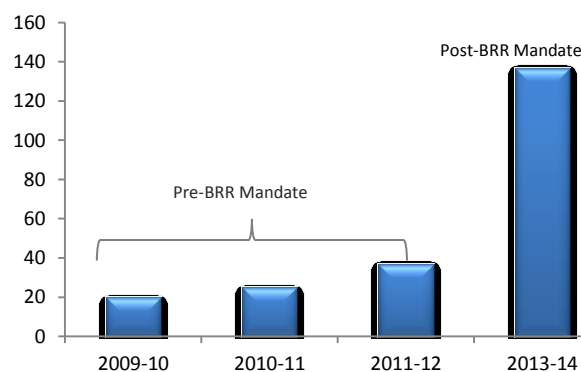
Thus the transition toward consistent and timely sustainability disclosure and reporting by businesses is firmly underway – and this evolution is getting manifested in the following ways:

- Number of companies disclosing has gone up
- Completeness of business disclosure has gone up
- More businesses are prepared to provide sustainability disclosure

1

Number of companies disclosing has gone up

The number of companies measuring, managing and disclosing the ESG impacts has increased in the past 2 years post SEBI’s mandate for the top 100 listed companies regarding their Business Responsibility Reports (BRR). As of November 2014, 137 companies had released a sustainability report (including the business responsibility reports). This number was 37 for 2011-12 (pre BRR mandate).



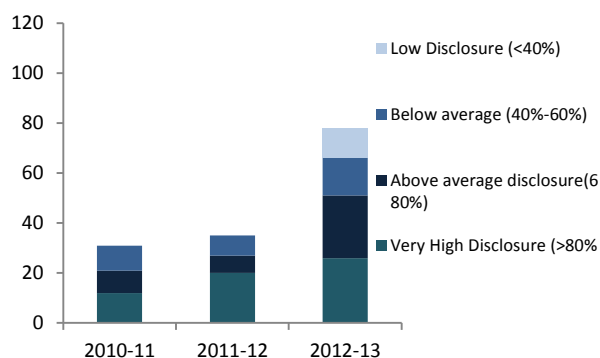
Source: Sustainability Outlook

2

Increase in number of metrics being disclosed on

The working group, every year has been tracking between 50 and 80 metrics, taken from reporting formats. Post release of BRR, there has also been a marked increase in the average metrics every company has been disclosing on. In 2011, less than 10% of the companies had high disclosure (classified as business disclosing on more than 80% of the metrics. This is has now in 2014 increased to 30%.

More importantly – the number of businesses with low disclosure (identified as disclosure being made on less than 40% of the metrics has diminished



Source: cKinetics’ Research and Analysis

3

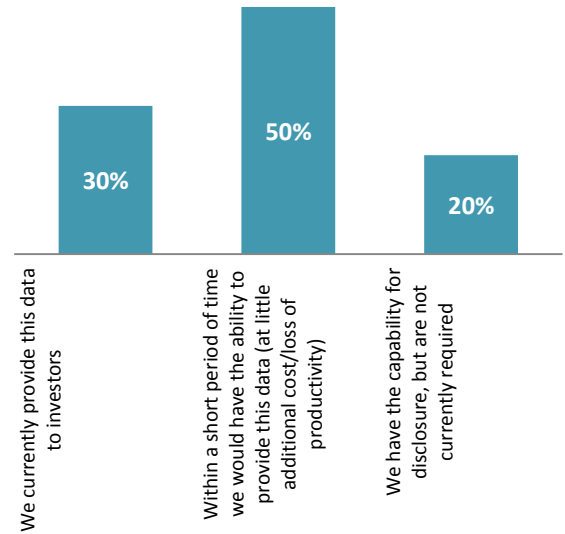
More businesses are prepared to provide sustainability disclosure

A survey of Indian businesses across sectors and sizes (both large corporates and MSMEs) indicates that, even as sustainability disclosure is increasing, the more encouraging trend is that more businesses are prepared to disclose – **should investors ask for it.**

In this context, the working group also did an analysis to understand what particular parameters and metrics are businesses most prepared to disclose on.

An analysis of the existing quality of disclosure indicates that, as expected, businesses are most prepared to provide information on governance metrics. Environmental issues on the other hand have a mixed response – while businesses are prepared to provide information on their policies and strategies, quantitative disclosure on resource consumption and efficiency has been found to be weak.

A question wise breakup of the preparedness of disclosure is given on the next page.



Source: cKinetics' Research and Analysis

TABLE 1: Principle wise analysis: Does Corporate India have policies to address business responsibility

Principle	Percentage of businesses reporting to have policies
Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability	97%
Principle 2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle	91%
Principle 3: Businesses should promote the wellbeing of all employees	81%
Principle 4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalised	87%
Principle 5: Businesses should respect and promote human rights	92%
Principle 6: Business should respect, protect, and make efforts to restore the environment	95%
Principle 7: Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner	92%
Principle 8: Businesses should support inclusive growth and equitable development	91%
Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner	96%

Increasing role for ESG disclosure

As an increasing number of investors are becoming aware of the ESG related risks faced by their investments, Responsible Investing / Finance has been on an upswing globally. However, these investors, known as Finance+ investors¹ - which signifies their disposition to look beyond pure profit, have been sitting on the periphery of India for the past few years. They have been experimenting a bit, but mostly waiting for a critical mass of businesses to reach a stage where responsible investment practices can be easily implemented – i.e. be able to provide ESG information that is high quality, periodic, standardized and comparable (akin to financial information that is disseminated through annual reports).

Cracking the Conundrum (research by cKinetics) has also indicated that as more businesses begin to measure and disclose on their ESG practices, more such capital will begin to come in to India - **the Assets Under Management (AUM) of Finance+ investors are expected to grow from Rs. 3 trillion (\$55 billion) presently to Rs. 5.5 trillion – Rs. 9.6 trillion (\$100 billion - \$175 billion) in 5 years and forecasted to be at Rs. 13.2 trillion – Rs. 17.3 trillion (\$240 billion - \$315 billion) in 10 years².**

Key challenges faced by Responsible / Finance+ Investors

Finance+ Investors / Responsible investors are facing the following challenges in follows in performing the ESG assessment of businesses

- **Lack of Standardization:** The information used by different groups of investors is not standardized and there is no consistent way of conducting risk and impact assessment – a gap which affects all investors (from impact investors to large, mainstream investors).
- **Limited depth of market:** Only a handful of companies make ESG disclosure / reporting, which increases the cost of screening and due-diligence, particularly for impact and equity investors evaluating ESG data.

ESG Disclosure has increased in India

At the same time, the Indian government has been working on institutionalizing policy, guidelines and frameworks for driving ESG disclosure – or in Indian parlance – disclosure on Business Responsibility in India. The initiatives undertaken in this regard include:

- **Introduction of the National Voluntary Guidelines for Social, Environmental and Economic Responsibilities of Business (NVGs) in August 2011**

The Indian Government has introduced in the National Voluntary Guidelines for Social Economic and Environmental Responsibilities of Business (NVGs) in August 2011, which contain a framework which provides 9 all-encompassing principles to guide businesses toward business responsibility.

- **Release of the Annual Business Responsibility Reporting Framework (BRR) in 2012**

The release of the guidelines was augmented by the development of the Business Responsibility Report framework (BRR), which was released in July 2012. BRR is a principle-wise (as per NVGs' 9 principles) disclosure / reporting framework which details metrics businesses should disclose information on.

- **Annual Business Responsibility Reporting Framework (BRR) being mandated by SEBI in 2012**

The Securities and Exchange Board of India (SEBI - the stock exchange regulator) – the voice of capital markets in India and the watch-dog of investors has adopted the BRR) framework (which is based on the NVGs)³ and mandated the top 100 listed companies to report per it. The intent to roll – out this mandated to all listed companies has also been stated at the onset.

The India Responsible Investing Group, under the aegis of the Sustainable Business Leadership Forum, has been tracking the Environment, Social and Governance (ESG) Disclosure of the top 100 listed businesses in India since 2009, over which period, there has been a significant improvement in both the number of people disclosing as also the quality of disclosure.

The aforementioned initiatives have resulted in a substantial increase in both quality and quantity of disclosure. In this context, **the working group is releasing the 1st Annual ESG Scorecard of India Inc. – this benchmarking report provides an overview of the ESG disclosure of India Inc. and (for the first time) introduces ESG Benchmarks – a tool for investors to rank and compare businesses.**

1 <http://ckinetics.com/crackingtheconundrum/>

2 <http://ckinetics.com/crackingtheconundrum/>

3 SEBI (the voice of capital markets in India and the watch-dog for investors) mandated that the top 100 largest businesses (by market cap) furnish BRR reports http://www.sebi.gov.in/cms/sebi_data/attachdocs/1344915990072.pdf

ESG Disclosure by India Inc: Metric-wise Analysis

Disclosure and labelling	Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?		Product life cycle use impact	List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.
Board structure and independence	For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.		Biodiversity	For each such product, provide the details in respect of resource use per unit of product during sourcing/production/distribution throughout the value chain.
	Frequency with which the Board/Chief Executive meets			Strategies, current actions, and future plans for managing impacts on biodiversity.
	Details on who is responsible for the sustainability/ BR practices and performance of the company		Climate Change Risk	Does the company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc.?
Policies, standards, codes of conduct	Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance?			Does the company identify and assess potential environmental risks? Y/N
	Indicate whether the organization has a written code of ethics that has been communicated to employees.			Does the company have any project related to Clean Development Mechanism? If Yes, whether any environmental compliance report is filed?
	Does the policy relating to ethics, bribery and corruption cover only the company? Yes/ No. Does it extend to the Group/Joint Ventures/ Suppliers/Contractors/NGOs /Others?		Energy management	Total energy consumed by the business entity for its operations
	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.			Statement on use of energy saving processes and the total energy saved due to use of such processes
	Has the policy been formally communicated to all relevant internal and external stakeholders?			Use of renewable energy as percentage of total energy consumption
	Does the company have in-house structure to implement the policy/policies.			Has the company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc. Y/N. If yes, please give hyperlink for web page etc.
	Does the Company have a grievance redressal mechanism related to the policy/policies to address stakeholders' grievances related to the policy/policies?		GHG emissions and air pollution	Total direct and indirect greenhouse gas emissions by weight.
Communications and engagement	Has the company carried out independent 3 audit/evaluation of the working of this policy by an internal or external agency?			Emissions of ozone-depleting substances by weight
	List of stakeholder groups engaged by the organization			NO, SO, and other significant air emissions by type and weight.
	Key topics and concerns raised through stakeholder engagement, and how the organization has responded to them			Statement on discharge of water / effluents indicating the treatment done before discharge and the destination of disposal
	How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management?			Total weight of waste by type and disposal method
	Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders.			Amount of hazardous waste created by the organization's operations during the reporting period. Note: hazardous waste as defined by national legislation at the point of generation.
Marketing and ethical advertising	Is there any case filed by any stakeholder against the company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of financial year.			Amount of non-hazardous waste created by the organization's operations during the reporting period.
	Programs for adherence to laws, standards, and voluntary codes related to marketing and voluntary codes related to marketing promotion, and sponsorship.		Waste management and effluents	Waste reductions achieved during the reporting period through programs for substitution, recycling or recovery.
	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes.			Does the company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste
Child and forced labour	Does the company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A. /Remarks (additional information)			Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported?
	Is there a policy against child labor / forced labour in the supply chain / partners / contractors?			Water sources significantly affected by withdrawal of water.
Employee health, safety and wellness / Training and Development	Have there been any number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.			Total water consumed and the percentage of water that is recycled and reused
	Average hours of training per year per employee by employee category.		Lobbying and political contributions	Total environmental protection expenditures and investments by type.
Customer satisfaction	What percentage of your under mentioned employees were given safety & skill up-gradation training in the last year?			Public policy positions and participation in public policy development and lobbying.
	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region.			Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.
Regulatory and legal challenges	What percentage of customer complaints/consumer cases are pending as on the end of financial year.		Community development	Does the company have specified programmes/initiatives/projects in pursuit of the policy related to Principle 8? If yes details thereof.
	Did your company carry out any consumer survey/ consumer satisfaction trends?			Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/any other organization?
	Monetary value of significant fines for noncompliance with laws and regulations concerning the provision and use of products and services.			What is your company's direct contribution to community development projects- Amount in INR and the details of the projects undertaken.
Supply chain standards and selection	Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.			Details of community investment and development work undertaken indicating the financial resources deployed and the impact of this work with a longer term perspective
	Are there any court cases being reported?			Details of innovative practices, products and services that particularly enhance access and allocation of resources to the poor and the marginalized groups of the society
	Percentage and total # of significant suppliers and contractors that have undergone screening on human rights & actions		Labour relations and union practices	Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so.
	Total number of incidents of discrimination and actions taken.			Please indicate the total number of employees hired on temporary/ contractual/ casual basis
	Does the company have procedures in place for sustainable sourcing (including transportation)? i. If yes, what percentage of your inputs was sourced sustainably?			What percentage of the permanent employees are members of formal employee association?
	Has the company taken any steps to procure goods and services from local & small producers			Health and safety topics covered in formal agreements with trade unions.
	Does the policy of the company on human rights cover only the company or extend to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/Others?			
	Does the policy related environment cover only the company or extends to the Group/ Joint Ventures/ Suppliers/ Contractors / NGOs/ others			

Outlook for 2015: Moving from Disclosure to Performance

At this stage, as we release the 1ST Annual Scorecard for India Inc.'s ESG Disclosure, there is already an expressed need on behalf of investors to go beyond disclosure and create performance metrics to compare and evaluate the ESG PERFORMANCE of businesses on.

Needless to say, from the perspective of investors, not only should these metrics be standard and comparable across businesses, they should also translate into **monetary** value for investors – through risk mitigation and identification of opportunities. Thus, it is imperative to identify these standardized metrics to enable India Inc. to move from ESG disclosure to ESG disclosure that is standardized comparable and quantitative (as necessary).

A comprehensive evaluation of the data disclosed by businesses assessed in this scorecard indicates that certain key trends are emerging in the way sustainability performance is getting both reviewed and addressed by companies. These trends imply that as businesses and investors, in those businesses begin assimilate ESG performance in their exchange - certain metrics and performance data can emerge as the “performance benchmarks”.

The key trends identified are as follows:

1. Increased involvement of the Top management in sustainability related issues
 2. Pointed, quantitative data to become a part of Investor - Business dialogue
 3. Measures impacting long term business continuity and performance will start getting benchmarked; and get used
- Renewables is one such area

The following section provides indicative performance indicators and benchmarks for certain metrics.

1

Increased involvement of the Top management in sustainability related issues

In response to the question “who is responsible for the sustainability/ BR practices and performance of the company” (Fig. 1) over 50% of the respondents have indicated the involvement of top management. The seniority and suitability of the person responsible for the sustainability performance of businesses is not only an indication of how integral is sustainability is to businesses, but also who has the executive responsibilities of the same. While answers have varied from sector to sector and type of businesses (private / PSU etc.), it is clear that one important performance benchmark is the involvement of top management in making sustainability a priority.

As a corollary to the above question, the frequency and review of business responsibility performance of the company is also crucial to determine how integral it is. From an investor standpoint, this is an important criterion for assessing how serious a business is about sustainability.

Fig. 1: Who is Responsible for Sustainability Performance

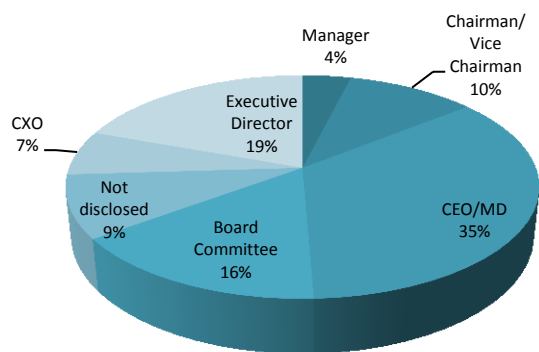
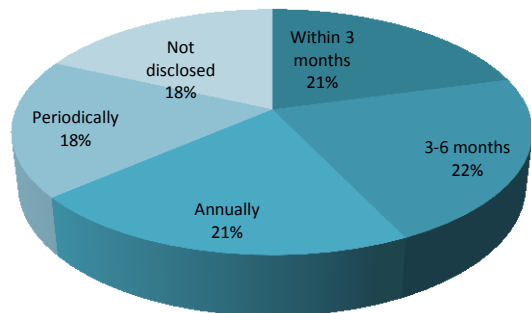


Fig. 2: Frequency of Review of Sustainability Performance



The current BRR framework has some pointed questions, which reveal, for investors and other stakeholders, the key regulatory risks that the businesses currently face and have faced in the year. In the current scenario, as regulatory noose relating to ESG issues is tightening on businesses, these metrics are crucial to assessing how well the company is governed.

Examples of these as include:

Cases filed by stakeholders regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour: Number of stakeholder complaints in formal is an interesting metric to determine how well governed a company is. While many businesses have not revealed the same in this year, it seems that 0 is the benchmark at which corporate India is holding itself accountable.

Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year: Interestingly, most companies have revealed a trend of dealing with court cases and notices in an expedited manner. This is the reason why most companies have reported that there are no notices pending. While it will be important to get businesses to report on the overall number of notices received, whether they are addressed in a timely fashion is also important for investors to understand.

Fig. 3: Cases filed by stakeholders

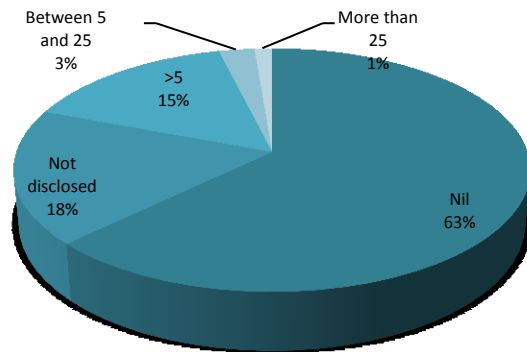
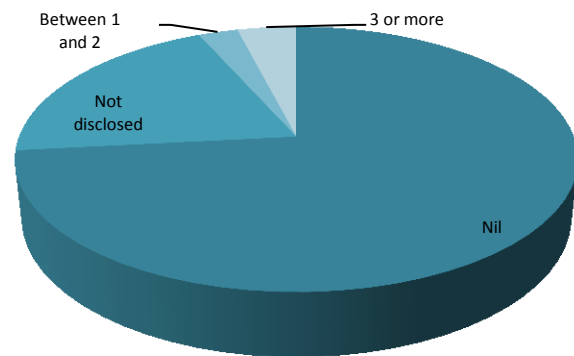


Fig. 4: Number of legal notices



Source: cKinetics' Research and Analysis

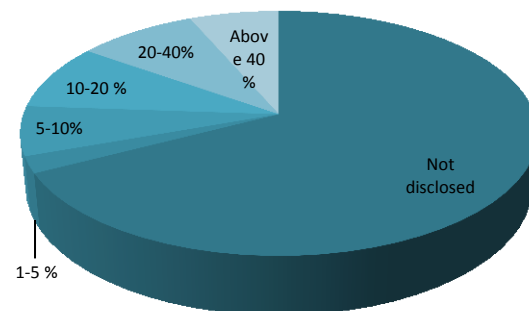
Measures impacting long term business continuity and performance will start getting benchmarked

Currently, although quantitative data is being reported, the reporting formats are not standardized. This data, although useful for investors, is therefore not comparable.

While for most environment related parameters, the data is disparate, businesses are consistently providing information on their energy consumption and use of renewable energy. One such metric, where quantitative and very useful data is being reported is "Use of renewable energy as percentage of total energy consumption" In the time of escalating diesel prices, the margin certainty of businesses is, in no small way, linked to energy security. Therefore, this metric is an important one to encourage standardized disclosure on.

Table 2 provides a detailed break-up of the disclosures made on this metric.

Fig. 5: Use of renewable energy as percentage of total energy consumption



Source: cKinetics' Research and Analysis

TABLE 2: Disclosure on Renewable Energy Consumption by Businesses in 2013-14

Companies	Renewable Energy Installed / Used
ACC	19 MW of renewable energy
Bharti Infratel	9 MW of renewable energy
Cairn India	276 GJ of renewable energy
Chambal Fertilisers	99.93 % of the total energy consumption
Coal India	2.25 Mw of renewable energy
DLF	11,43,11,461 units of renewable energy
Dr Reddys Laboratories	9% of the total energy consumption
GAIL	8,38,594 GJ of renewable energy
Godrej Consumer Products	9% of the total energy consumption
Hero Motocorp	1,56,000 units of renewable energy
Hindustan Unilever	21% of total energy consumption
Hindustan Petroleum Corporation	405.04 GJ
IndusInd Bank	21,679 kwh of renewable energy
Infosys	30% of total energy consumption
Indian Oil Corporation	68 MW of renewable energy
ITC	38.1% of the total energy consumption
Jubilant Life Sciences	6.85% of the total energy consumption
Kansai Nerolac Paints	74.36 GJ of renewable energy
Larsen & Toubro	11.09% of the total energy consumption
Mahindra and Mahindra	225 GJ of renewable energy
Maruti Suzuki	1MW of renewable energy
NTPC	110 MW of renewable energy , Commissioned: 75 MW , Under Execution: 35 MW
ONGC	51 MW generated 94.04 Million Unit.
Reliance Industries	481.71 ('000 GJ) of renewable energy
Shree Cements	0.56 % of total energy consumption
Tata Chemicals	6 TJ of renewable energy
Tata Motors	13.48% of total energy consumption
Tata Power	13 % of total energy consumption
Tata Consultancy Services	13% of total energy consumption
Titan	52.46% of total energy consumption
UltraTech Cement	4.85 million units
Wipro	22% of the total office energy consumption

Company Profiles

Sector: Infrastructure, Construction and Contracting

- Several companies are foraying into the domestic renewable energy sector - in addition to the solar plants being set up under the JNNSM, focus is also on wind energy. However, further development needed to drive scale and companies have come out in demand for higher solar tariffs
- The Green Energy Development Corporation Limited (Gedcol) has appointed Bharat Heavy Electricals Limited (BHEL) with establishment of a 20 mw solar plant at the industrial estate
- ABB has been eyeing the renewable energy sector in the country with its range of products and integrated solutions
- NHPC has announced plans to set up its first solar project in UP
- Public Private Partnerships: (PPP) remain fraught with governance related challenges, which is a potential disincentive for future investment in sector
- Government approval was granted to several controversial projects with projects with potentially detrimental environmental impacts receiving clearances
- Various regulating bodies including SEBI, National Green Tribunal, the High Court, State Government and the honourable Supreme Court have, have pulled up several companies on both governance issues as well as environmental damages, one of the major being DLF getting barred by SEBI.

ACC Limited (ACC) is an India-based company engaged in manufacture of cement such as ordinary Portland cement (OPC), portland pozzolana cement (PPC), Portland slag cement (PSC) and ready mixed concrete (RMX).

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 31th January 2014

OVERALL ESG
DISCLOSURE SCORE

79

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

45

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **3**

Metrics on which no disclosure is made: Policy against Child and forced labor, number of complaints relating to child labor and forced labor, mechanism to recycle products.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets 5 times a year. It consists of 6 Non Executive & Independent Directors including the Chairman, 5 Other Non-Executive Directors and 1 Executive Director (CEO & Managing Director).
- CEO & Managing Director is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets twice a year to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board

Ethical business operations and boundaries

- ACC has reported the existence of clear policies for ethics, bribery and corruption.
- The Company has a Code of Business Conduct and Ethics (along with an Anti-Bribery and Corruption Directive) and a Fraud Risk Management Policy that are applicable to all Board Members and employees of the Company and its subsidiaries.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Company has disclosed details regarding number of pollution notices, court cases and monetary value of significant fines for noncompliance

For further consideration: The company can provide the data over time

Labor relations and union practices

- The company has provided information on the health and safety topics covered in formal agreements with trade unions, the number of contract employee working on a temporary basis and the percentage of work force part of the union.

For further consideration: The company can provide the data over time with the number of contract employee and the percentage of workforce.

Key Environmental Issues

Environmental risk assessment and management systems

- The company has reported to have a mechanism to identify and assess potential environmental risks in its plants and projects. It also has three registered projects under Clean Development Mechanism (CDM)

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- The company has reported about its sustainability oriented products like Blended cements namely Portland Pozzolana Cement (PPC) and Portland Slag Cement (PSC). The Company offers waste management solutions whereby it uses industrial / municipal hazardous and non-hazardous waste as alternative fuel. The Company also uses biomass in its manufacturing process. The company has provided data on the same.

Resource consumption and efficiency

- For Energy, Waste, GHG emissions and Water, the company has outlined current consumption data and overtime with plans to achieve greater efficiency. Environmental Expenditure is also reported. It has also disclosed a roadmap to reduce is GHG emissions.

For further consideration: There is lack of data overtime on key parameters on resource consumption.

Key Social Issues

Community development activities

- The Company has spent an amount of INR 22.76 Crore in development projects in 2013 majorly under Literacy and Education for Community, Livelihood, Employability and Income Generation, Health and Sanitation Programs and Empowerment and Gender Equality.

Adani Enterprises Limited is an India-based global integrated infrastructure company engaged in coal trading, coal mining, oil and gas exploration, ports, multi-modal logistics, power generation and transmission and gas distribution. Its primary segments include trading, power, port, agro, real estate and others.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 17th May 2014

OVERALL ESG
DISCLOSURE SCORE

44

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

26

Number of metrics tracked **68**

Number of metrics on which disclosure is not made **22**

Metrics on which no disclosure is made: key stakeholder engagement topics, suppliers and contractors that have undergone screening on human rights, Rates of injury. Energy consumption, Use of renewable energy. Rests of the metrics are immaterial to the company.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets 4 times a year. The Board currently comprises 8 Directors out of which 5 Directors (63%) are Non-Executive Directors. The Company has an Executive Chairman and the four Independent Directors comprise half of the total strength of the Board.
- The MD & CEO is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the CEO reviews the business performance, the frequency of the review is not clear and to what extent they are monitored by the board is also not discussed.

Ethical business operations and boundaries

- Adani Enterprises has reported the existence of clear policies for ethics, bribery and corruption, which are issues plaguing the sector.
- The company has confirmed that the policies don't extend to the suppliers and stakeholders. The Company has adopted a Code of Conduct for its Directors and Senior Management personnel. Additionally, the Policy on Code of Conduct for Employees applies to all employees across Adani Group of companies. These do not extend to any other entities.

For further consideration: No details are provided on how the policies get implemented and reviewed. Percentage and total suppliers and contractors that have undergone screening on human rights are not discussed.

Regulatory challenge and compliance

- Data has been provided for pollution notices, court cases and monetary value of significant fines for noncompliance, but the company has not provided a comparison over time.

Labor relations and union practices

- The company has provided information on the number of contract employee working on a temporary basis

Key Environmental Issues

Environmental risk assessment and management systems

- Yes – the Company regularly identifies and assesses environmental risk during all stages of its existing and planned projects.

For further consideration: Detailed data on quantitative targets and progress against the same should be disclosed

Sustainable product design and risk assessment

- Yes, the company has provided details on Company's Solar PV Power Project at Bitta (Gujarat) in respect of resource use per unit of product.

For further consideration: The company should provide more data based information and details on the products and services.

Resource consumption and efficiency

- Company has not reported data for energy consumption, waste, GHG emissions and Water. Environmental Expenditure is also not reported
- Company has taken steps to optimize auxiliary power consumption through LED lights

For further consideration: There is lack or no data available on key parameters mentioned above.

Key Social Issues

Community development activities

- Rs 15.6 crores was spent in community development interventions such as facilitating immunizations of pregnant women and infants, Early Childhood Education/School preparedness Program, Primary and High school Education support, Skill Development of youth, Income Generation activities and so on.

Adani Ports and Special Economic Zone Limited (APSEZL) is engaged in the business of developing, operating and maintaining the Mundra Port and Port based related infrastructure facilities, including Multi product Special Economic Zone.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 15th May 2014

OVERALL ESG
DISCLOSURE SCORE

40

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

23

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **24**

Metrics on which no disclosure is made: number of incidents of discrimination, Health and safety topics, on stakeholder engagement topics, Environmental Expenditure, details in respect of resource use per unit of product, suppliers and contractors that have undergone screening on human rights

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets 4 times a year. There board comprises of ten Directors out of which seven Directors are Non-Executive Directors.
- Whole Time Director is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets every quarter to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board

Ethical business operations and boundaries

- Adani Ports has reported the existence of clear policies for ethics, bribery and corruption, which are issues plaguing the sector.
- The Company has adopted a Code of Conduct for its Directors and Senior Management personnel. Additionally, the Policy on Code of Conduct for Employees applies to all employees across Adani Group of companies. The company has confirmed that the policies don't extend to the suppliers and stakeholders.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided for pollution notices, court cases and monetary value of significant fines for noncompliance, but the company has not provided a comparison over time.

Labor relations and union practices

- The company has provided information on the number of contract employee working on a temporary basis
- The company doesn't have a recognized employee association.

Key Environmental Issues

Environmental risk assessment and management systems

- Company regularly identifies and assesses environmental risk during all stages of its existing and planned projects.
- Company has acquired International Standards ISO 9001:2008, ISO 14001:2004, OHSAS 18001:2007, ISO 28000:2007 certifications specifying the requirements for an Integrated Management System (IMS) as part of its objective to improve quality, health, safety and environment in the work place

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- The Company has converted all its diesel operated cranes into electric mode and saved huge amount of emissions. Additionally, the Company has also installed and operating regenerative crane system which reduces the demand for energy consumption and thus reduces related emission reduction.

Resource consumption and efficiency

- Company has also installed and operating regenerative crane system which reduces the demand for energy consumption and thus reduces related emission reduction
- For Energy, Waste, GHG emissions and Water, the company has not reported current consumption data. Environmental Expenditure is also not reported.

For further consideration: There is lack or no data based information on key parameters environment expenditure.

Key Social Issues

Community development activities

- The Company's monetary contribution to community development projects in FY 2013-14 was Rs 25.36 Crores.

Asian Paints Limited is a paint company. The Company operates in Decorative Coatings and Industrial Coatings segments across India and outside. In Decorative paints, the Company is in the four segments: Interior Wall Finishes, Exterior Wall Finishes, Enamels and Wood Finishes.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 2nd June 2014

OVERALL ESG
 DISCLOSURE SCORE

47

SECTOR ADJUSTED ESG
 DISCLOSURE SCORE

27

Number of metrics tracked	68
Number of metrics on which disclosure is made	20
Metrics on which no disclosure is made: key stakeholder engagement topics, number of incidents of discrimination Rates of injury, Monetary value of significant fines for noncompliance, suppliers and contractors that have undergone screening on human rights ,weight of waste by type and disposal method, environmental protection expenditures	

Key Governance Issues

Organizational Structure and Board Independence

- The company’s board has a combination of executive, non-executive and independent members, which met 7 times last year. The Board of Directors comprises of fifteen Directors of which six are Non-Executive Directors, eight (8) are Non-Executive/Independent Directors and one Managing Director & CEO of the Company.
- The MD & CEO is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration : While it is reported that the CEO reviews the business performance, the frequency of the review is not clear and to what extent they are monitored by the board is also not discussed.

Ethical business operations and boundaries

- Asian Paints has reported the existence of clear policies for ethics, prevention of Fraud, bribery and corruption, which are issues plaguing the sector.
- The Code as well as the Company’s Policy on Prevention of Fraud applies to any irregularity, involving employees as well as vendors, contractors, customers and/or any other entities having a business relationship with the Company.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided on CPCB notices and court cases, but the company has not provided a comparison over time.
- 26 consumers related legal cases are pending as on the end of the financial year.

For further consideration: No disclosure made on monetary value of fines for non-compliance.

Labor relations and union practices

- The company has provided information on the health and safety topics covered in formal agreements with trade unions, the number of contract employee working on a temporary basis and the percentage of work force part of the union.

For further consideration: The company can provide the data over time with the number of contract employee and the percentage of workforce.

Key Environmental Issues

Environmental risk assessment and management systems

- The paint manufacturing facilities have established ISO systems (ISO 9001 and ISO 14001). As part of the ISO 14001 Environment Management system, every factory monitors the state of Environment inside the factory. Further, as part of the ISO 14001 Environment Management system, every factory conducts Aspect Impact study of various activities and identifies Controllable/Uncontrollable and Normal/Abnormal/Emergency scenarios of operation

Sustainable product design and risk assessment

- The Company has range products under Royale and Ultima brands have been made eco-friendly by removing VOC (Volatile Organic Compound) , APEO (Alkyl Phenol Ethoxylates), CMR (Carcinogen, Mutagen and reproductive Toxin), formaldehyde and heavy metals as per the requirements of GS 11 standard. It has created an internal green logo called “Green Assure” which assures end users of having truly green products.

Resource consumption and efficiency

- For Energy, the company has outlined current consumption with plans to achieve greater efficiency. For waste, water and environmental expenditures, no disclosure is made.

For further consideration: There is lack or no data based information on key parameters like waste and water.

Key Social Issues

Community development activities

- Education, health and hygiene and water management are the thrust areas of Asian Paint’s CSR focus

Cummins India Limited is a manufacturer of diesel and natural gas engines. The Company operates in two segments: Engine Business Segment, which is engaged in manufacture and sale of internal combustion engines, gensets and parts thereof, and Others. The Company operates in four business sectors: Industrial, Automotive, Power Generation and Distribution.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 22nd May 2014

**OVERALL ESG
DISCLOSURE SCORE**

58

**SECTOR ADJUSTED ESG
DISCLOSURE SCORE**

33

Number of metrics tracked **68**

Number of metrics on which disclosure is made **15**

**Metrics on which no disclosure is made:
Rates of injury, Monetary value of significant fines for noncompliance, court cases, weight of waste by type and disposal method, child labor, significant suppliers and contractors that have undergone screening on human rights and renewable energy use.**

Key Governance Issues

Organizational Structure and Board Independence

- The Board of Directors of the Company comprises of 10 Directors, with 5 Promoter Directors and 5 Independent Directors and met 5 times
- The CEO is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets annually at least to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board

Ethical business operations and boundaries

- Cummins has reported the existence of clear policies for ethics, bribery and corruption.
 - The Cummins Code of Conduct applies to all its through alliances with partners and joint venture employees, customers and business associates
- For further consideration:** No details are provided on how the policies get implemented and reviewed. Also, Percentage and total suppliers and contractors that have undergone screening on human rights and actions taken are not disclosed.

Regulatory challenge and compliance

- Actual data is not provided on CPCB notices received by the company
- For further consideration:** No disclosure on monetary value of significant fines and court cases

Labor relations and union practices

- The company has provided information on the number of contract employee working on a temporary basis and the percentage of work force part of the union.
- Cummins Health and Wellness Program whose purpose is to create a sustainable culture of health and wellbeing with its employees, their families

Key Environmental Issues

Environmental risk assessment and management systems

- Yes – The Company identifies and assesses potential environmental risks. Since all of its operational facilities are EMS (IS 14001) and OHSAS (IS 18001) certified, as a part of system implementation.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- The company has reported Development of 40 kVA Bio-gas genset , 15 kVA genset working on Straight Vegetable Oil, Pongamia (SVO. Development of 25/ 40 kWe genset with rice husk (Biomass) gasification which has incorporated environmental concerns.

Resource consumption and efficiency

- For Energy, Waste, GHG emissions and Water, the company has outlined current consumption data and overtime with plans to achieve greater efficiency. Environmental Expenditure is also reported.

Key Social Issues

Community development activities

- Company spent Rs. 221 lakhs Educational Projects and Rs 37 lakhs on Infrastructure and Social Justice in the last financial year

Container Corporation of India Ltd is engaged in providing inland transport by rail for containers, Ports, air cargo complexes and cold-chain. The Company developed multimodal logistics support for India's Int'l and Domestic containerization and trade. It operates in two divisions: EXIM and Domestic. Both EXIM and Domestic divisions of the Company are engaged in handling, transportation & warehousing activities.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of Sustainability Report :** 2nd July 2014

OVERALL ESG
DISCLOSURE SCORE

42

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

24

Number of metrics tracked **68**

Number of metrics on which disclosure is made **26**

Metrics on which no disclosure is made: key stakeholder engagement topics, significant suppliers and contractors that have undergone screening on human rights Rates of injury, Monetary value of significant fines for noncompliance, details in respect of resource use per unit of product, court cases, energy management, Health and safety topics.

Key Governance Issues

Organizational Structure and Board Independence

- The Board of Directors of the Company consists of five Executive functional Directors, including a Chairman and Managing Director, One part-time Director (Government Nominee), and Seven part-time Non-official (Independent) Directors.
- The Director of Finance is responsible for overall sustainability performance,
For further consideration: While it is reported that the board meets annually and at CMD level regularly to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board

Ethical business operations and boundaries

- Cummins has reported the existence of clear policies for ethics, bribery and corruption.
- The company has confirmed that the company has policies for the ethics and prevention of bribery and corruption extend to Group/Joint Ventures. For the suppliers/contractors/JV's, it has strict terms and conditions for, pre and post engagement. These procedures are well documented in its internal policy documents such as purchase manual, model tender documents and others.
For further consideration: Even though details are provided on how the policies get implemented and reviewed, the percentage and total suppliers and contractors that have undergone screening on human rights and actions taken are not disclosed.

Regulatory challenge and compliance

- Absolute data is provided on CPCB notices, but the company has not provided a comparison over time.
For further consideration: No disclosure on monetary value of significant fines and court cases.

Labor relations and union practices

- The company has provided information on the number of contract employee working on a temporary basis and the percentage of work force part of the union.
For further consideration : No details provided on the health and safety topics covered in formal agreements with trade unions

Key Environmental Issues

Environmental risk assessment and management systems

- Yes. The technical department of CONCOR is monitoring the fuel consumption per completed move for RTG cranes provided at its various terminals and efforts have been made for its reduction. Efforts have also made for introducing efficiency in warehouse and equipment designs for reducing energy consumption
For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- The company has not reported on the same. However, company has reported Use of Fuel Efficient Power packs to feed power supplies to refrigerated containers while transport to ports, Use of energy efficient Rail Mounted Gantry cranes, Use of double stack containers which increase the utilization of container flat wagons and reduces the cost of logistics.

Resource consumption and efficiency

- For Energy, Waste, GHG emissions and Water, the company has not reported current consumption data. Environmental Expenditure is also not reported.

Key Social Issues

Community development activities

- In FY2013-14 an amount of Rs.10.38 crores was committed for disbursement on the infrastructure and community development activities. The company has adopted public procurement policy for goods produced and services rendered by Micro and Small Enterprises (MSEs).

DLF Limited (Delhi Land & Finance) is one of the largest commercial real estate developers in India. It was founded in 1946 and is based in New Delhi, India.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 31st July 2014

OVERALL ESG
DISCLOSURE SCORE

52

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

29

Number of metrics tracked **68**

Number of metrics on which disclosure is made **18**

Metrics on which no disclosure is made: key stakeholder engagement topics, significant suppliers and contractors that have undergone screening on human rights Rates of injury, Monetary value of significant fines for noncompliance, waste, water and environment expenditure , Health and safety topics.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets 6 times a year. The Board comprises 13 members - 6 Executive Directors and 7 Non-executive Directors including 6 Independent Directors

For further consideration: While it is reported that the board meets every quarter to review the business performance, it is not clear if the sustainability performance reviewed during these meetings ,frequency and to what extent are they monitored by the board. Also, No director has yet been nominated for the review of BR performance.

Ethical business operations and boundaries

- DLF has reported the existence of clear policies for ethics, bribery and corruption, which are issues plaguing the sector.
- The company has confirmed that the policies are applicable to suppliers. Apart from the Company, the Code of Conduct and Whistle Blower Policy cover other stakeholders as well. However few details are provided on the implementation mechanism.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data of exact number of pollution notices received by the firm is not provided

For further consideration: Monetary value of significant fines for noncompliance court cases are not disclosed.

Labor relations and union practices

- The company has provided information on the number of contract employee working on a temporary basis and the percentage of work force part of the union. There is no formal employee association in the company.

For further consideration : No details provided on the health and safety topics covered in formal agreements with trade unions

Key Environmental Issues

Environmental risk assessment and management systems

- The Company has reported that every single project of the Company and its subsidiaries undergoes Environment Impact Assessment (EIA). The company and its subsidiaries had setup Gas based Cogeneration power plants of aggregate capacity of about 121 MW. Due to their environmental friendliness, the UNFCCC had registered some of these projects under CDM / carbon credit scheme.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- Yes, The Company is now designing buildings/upgrading existing buildings to achieve LEED Certification. Building 5A in DLF Cyber City, Gurgaon has received GOLD LEED Certification. In addition, the Company is generally using Aerated Concrete blocks (ACC) instead of clay burnt bricks in "product" construction thus preventing the depletion of soil strata.

Resource consumption and efficiency

- For Energy, the company has outlined current consumption data and overtime with plans to achieve greater efficiency. It had set up 161MW of wind power generation. However, Waste, GHG emissions, Water and Environmental Expenditure are not reported.

For further consideration: There is lack or no data based information on key parameters like water, waste and environment expenditure.

Key Social Issues

Community development activities

- The Company's direct contribution to community development programmes was Rs. 13.42 crore in FY 2013-14. DLF Foundation works on areas of Skill Development, Talent Nurturing and Village Cluster Development

Grasim Industries Limited is an Indian building materials manufacturing company based in Mumbai, Maharashtra. It was started in 1948 as a textile manufacturer. Since then Grasim has diversified into Viscose Staple Fiber (VSF), cement, sponge iron and chemicals.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 7th August 2014

OVERALL ESG
DISCLOSURE SCORE

52

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

29

Number of metrics tracked **68**

Number of metrics on which disclosure is made **16**

Metrics on which no disclosure is made: key stakeholder engagement topics, Rates of injury, Monetary value of significant fines for noncompliance, court cases, weight of waste by type and disposal method, on discharge of water and effluents, , Health and safety topics ,environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets 4 times a year. The Company's Board comprises of 12 Directors, having considerable professional experience in their respective fields. Out of them, 6 are Independent Directors, 4 are Non-Executive Directors and 2 are Executive Directors.
- The Managing Director is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets periodically to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board. Also, the frequency is not reported.

Ethical business operations and boundaries

- Grasim has reported the existence of clear policies for ethics, bribery and corruption, which are issues plaguing the sector.
- The Company's governance structure guides the organization keeping in mind its core values of Integrity, Commitment, Passion, Seamlessness and Speed. The Corporate Principles and the Code of Conduct are applicable to all the employees of the Company.

For further consideration: No details are provided on how the policies get implemented and if they are applicable to external parties.

Regulatory challenge and compliance

- Absolute data is provided on CPCB notices, but the company has not provided a comparison over time.

For further consideration: No reporting done on monetary value of significant fines on non-compliance and court cases.

Labor relations and union practices

- The company has provided information on the number of contract employee working on a temporary basis and the percentage of work force part of the union.

For further consideration : No details provided on the health and safety topics covered in formal agreements with trade unions

Key Environmental Issues

Environmental risk assessment and management systems

- The Company regularly assesses the environmental risks emanating from its operations. The Company's plants are ISO 14001 EMS certified. The plants at Nagda are also OHSAS-18001 and SA- 8000 certified. The Plant at Harihar is also OHSAS-18001 certified.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- The products are Viscose Staple Fibre, Rayon Grade Pulp and Chemicals. The Company has worked towards cost optimization, optimization of logistics, and reduction in input consumption ratio in the processes and has reduced the consumption of major inputs including energy, water, etc., by adoption of new techniques and alternate methods.

Resource consumption and efficiency

- For Energy, the company has outlined both current consumption and data overtime with plans to achieve greater efficiency.

For further consideration: There is lack or no data based information on key parameters for waste, water and environmental expenditures

Key Social Issues

Community development activities

- The Company has spent an amount of Rs. 12.73 crore on CSR activities mainly on education, health care, sustainable livelihood, infrastructure development, and to bring about social change by advocating and supporting various social campaigns and program.

GVK is an Indian conglomerate spanning across diverse sectors including Energy, Resources, Airports, Transportation, Hospitality and Life Sciences.

- **Annual Business Responsibility Report filed:** No
- **Date of release of sustainability report:** 17th May 2014

OVERALL ESG
DISCLOSURE SCORE

65

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

38

Number of metrics tracked **68**

Number of metrics on which disclosure is made **11**

Metrics on which no disclosure is made: stakeholder complaints have been received, number of complaints relating to child labor, case filed by any stakeholder against the company regarding irresponsible advertising employees were given safety & skill up-gradation training significant, court cases, product life cycle, renewable energy use.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets 6 times a year. The total strength of the Board as on 31st March, 2014 is Eleven Directors comprising of four Promoter Directors, Six Independent Directors and one Non-Independent Director. Among the Directors, one is an Executive Director and ten are Non-executive Directors as on 31st March, 2014
- The Deputy Manager - Corporate Environment & Sustainability is responsible for overall sustainability performance, which indicates lower than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets every quarter to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board

Ethical business operations and boundaries

- GVK has reported the existence of clear policies for ethics, bribery and corruption.
- As part of the standard practice, all suppliers are required to follow specific rules and regulations as laid down in the contracts. Rules provide specific requirements related to business conduct including human rights clauses pertaining to payment of wages, child labor, forced and compulsory labor, corruption, sexual harassment and environmental impact.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided for monetary value of significant fines for noncompliance, but the company has not provided a comparison over time.

For further consideration: No disclosure on pollution notices and court cases.

Labor relations and union practices

- The company has provided information on the number of contract employee working on a temporary basis and the percentage of work force part of the union.
- Company has health and Safety Committee, designed to address, control and monitor safety concerns involving all users of the airport

Key Environmental Issues

Environmental risk assessment and management systems

- The company, as a part of our Greenhouse Gas Management program, has developed a Carbon Accounting and Management System (CAMS) to identify measure and manage GHG emissions. The accounting method followed is based on ISO 14064-1 using IPCC approved emission factors. The emissions patterns are identified and specific development programs are implemented to mitigate emission.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- No, the company has not reported on the same.

Resource consumption and efficiency

- For Energy, Waste, GHG emissions and Water, the company has outlined current consumption data and overtime with plans to achieve greater efficiency. Environmental Expenditure is also reported.

For further consideration: No targets disclosed for reduced resource usage

Key Social Issues

Community development activities

- Support a five day Interactive Workshop named 'SHILP' (Supplementary Holistic and Interactive Learning Program) was conducted in March 2014 at a community school located in the neighboring city, Pune. No disclosure of expenditure on CSR activities

Hindustan Construction Company (HCC) is headquartered in Mumbai, India. HCC's businesses span the sectors of Engineering & Construction, Real Estate, Infrastructure, Urban development & Management.

- **Annual Business Responsibility Report filed:** No
- **Date of release of sustainability report:** 26th July 2013

OVERALL ESG
DISCLOSURE SCORE

53

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

30

Number of metrics tracked **68**

Number of metrics on which disclosure is made **17**

Metrics on which no disclosure is made: stakeholder complaints have been received, number of complaints relating to child labor, case filed by any stakeholder against the company regarding irresponsible advertising employees were given safety & skill up-gradation training significant, court cases, product life cycle, renewable energy use.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets 6 times a year. There are 7 Independent Directors constituting one-half of the Board's membership. There is also segregation between the chairman of the board and the CEO, which allows for independent review.
- The CSR committee is responsible for overall sustainability performance, which indicates lower than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets every quarter to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board

Ethical business operations and boundaries

- HCC has reported the existence of clear policies for ethics, bribery and corruption.
- The company has reported that it continues to proactively reinforce anti-corruption behavior and competitive bidding practices, complying with all relevant legal requirements in this respect. Given the contractual nature of HCC's business, clients/customers are liable for resettlement and displacement issues.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Yes – absolute data is provided for pollution notices and monetary value of significant fines for noncompliance, but the company has not provided a comparison over time. However, no disclosure on court cases.

Labor relations and union practices

- The company has provided information on the number of contract employee working on a temporary basis
- For further consideration : No details provided on the health and safety topics covered in formal agreements with trade unions and the percentage of work force part of the union.

Key Environmental Issues

Environmental risk assessment and management systems

- Yes – The Company has aimed to reduce total water consumption and improve their water efficiency index. Company's commitment to water sustainability is further exemplified by Communication on Progress (COP) 2012 to meet the UN Global Compact CEO Water Mandate obligations.

For further consideration: The company should provide more data based information on quantitative targets, current practices and progress against the same.

Sustainable product design and risk assessment

- No, the company has not reported on the same.

Resource consumption and efficiency

- For Energy, Waste, GHG emissions and Water, the company has outlined current consumption data and overtime with plans to achieve greater efficiency. Environmental Expenditure is also reported.

Key Social Issues

Community development activities

- Akash Ganga Project, developed by HCC is holistic solution to alleviate the perennial or chronic shortage of drinking water with the help of science, technology, culture and tradition, and business models to maximize rainwater harvesting.

For further consideration: The community expenditure is not disclosed.

Kansai Nerolac Paints Ltd is largest in industrial paint and second largest decorative paint company based in Mumbai. It is engaged in the industrial, automotive and powder coating business. It develops and supplies paint systems used on the finishing lines of electrical components, cycle, and material handling equipment, bus bodies, containers and furniture industries.

- **Annual Business Responsibility Report filed:** No
- **Date of release of sustainability report:** NA

OVERALL ESG
DISCLOSURE SCORE

66

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

38

Number of metrics tracked **68**

Number of metrics on which disclosure is made **9**

Metrics on which no disclosure is made: percentage of under mentioned employees were given safety & skill up-gradation training ,CPCB notices, court cases, Environmental Expenditure

Key Governance Issues

Organizational Structure and Board Independence

- The company’s board has a combination of executive, non-executive and independent members, which meets once a quarter. The Managing Director and a Whole-time Director are the two Executive Directors. There are seven Non-Executive Directors, of which four Directors, including the Chairman, are Independent Directors.

For further consideration: While it is reported that the board meets every quarter, it is not clear if the sustainability performance is reviewed during these meetings and to what extent are they monitored by the board. Also, who is responsible for BR performance review is not reported

Ethical business operations and boundaries

- Kansai Nerolac has reported the existence of clear policies for ethics, bribery and corruption.
- Moreover, the company has confirmed that many of their policies also extend to suppliers and others

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Yes – absolute data is provided for monetary value of significant fines for noncompliance, but the company has not provided a comparison over time. However, no disclosure on court cases and pollution notices.

Labor relations and union practices

- The company has reported that the number of contract employee varies over the year and provides freedom of association to all their employees at all the manufacturing sites and employees are free to become members of one or the other association but no data or details are provided on the same.

For further consideration: The company should provide more data based information and details on the health and safety topics discussed with the trade unions.

Key Environmental Issues

Environmental risk assessment and management systems

- Yes – To address the environmental problems we conduct Environmental aspects and impact assessment for routine/ non routine/ emergency activities assessing the risks involved with the business activities.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- Yes, SOC (substances of concern) free automotive paints, VOC Reduction Initiative are sustainability oriented products. Introduction of lead free paint saved the major environmental pollution. Considering the adverse effects of VOC, KNPL has put all efforts and has reduced VOC amounting 50 to 150 gm/litre in its flagship products.

Resource consumption and efficiency

- For Energy, Waste, GHG emissions and Water, the company has outlined current consumption data and overtime with plans to achieve greater efficiency. However, Environmental Expenditure is not reported.

For further consideration: There is lack or no data based information on key parameters like energy usage.

Key Social Issues

Community development activities

- Kansai Nerolac Paints Limited extended financial support to Prem Jyoti Prangan School, Jamshedpur, with an objective to support education of those students who belong to economically challenged families in the area. However, the total expenditure is not disclosed.

Larsen & Toubro Limited, also known as L&T, is an Indian multinational conglomerate headquartered in Mumbai, India. L&T is India's largest engineering and construction company. The company has business interests in engineering, construction, manufacturing goods, information technology and financial services, and also has an office in the Middle East and other parts of Asia.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 30th May 2014

OVERALL ESG
DISCLOSURE SCORE

72

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

41

Number of metrics tracked **68**

Number of metrics on which disclosure is made **3**

Metrics on which no disclosure is made: environmental protection expenditure, value of financial and in-kind contributions to political parties and court cases being reported.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 10 times last year. As on date, the Board comprises Group Executive Chairman, Chief Executive Officer and Managing Director, 4 Executive Directors and 9 Non-Executive Directors.
- The Advisor to Chairman is responsible for overall sustainability performance annually, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets 10 times to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board.

Ethical business operations and boundaries

- **Larsen & Toubro Limited** has reported the existence of clear policies for ethics, bribery and corruption
- The company has confirmed that the policies extend to the suppliers and stakeholders.

For further consideration: **No details are provided on how the policies get implemented and reviewed.**

Regulatory challenge and compliance

- Absolute data is provided on CPCB notices, monetary value of significant fines, but the company has not provided a comparison over time.

For further consideration: No disclosure provided on court cases.

Labor relations and union practices

- The company has provided information on the health and safety topics covered in formal agreements with trade unions, the number of contract employee working on a temporary basis and the percentage of work force part of the union.

Key Environmental Issues

Environmental risk assessment and management systems

- Yes – The Company has a registered project by its Infrastructure Development arm (L&T IDPL) on Clean Development Mechanism (CDM) under United Nations Framework Convention on Climate Change (UNFCCC) related to Green Power Generation Project (8.7 MW wind farm). The hydrocarbon business of the Company executes energy conservation and fuel switch projects for fertilizer plants and refineries. - The heavy engineering business of the Company manufactures coal gasifiers for core industries.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- 'Green Buildings', solar EPC power plants, fuel switch projects, Dehydrogenation & Desulphurization (DHDS) projects, coal gasifiers, super critical thermal power plant & equipment, electricity transmission & distribution systems, and energy-saving electrical & automation equipment are some of the sustainability oriented products .

Resource consumption and efficiency

- For Energy, Waste, GHG emissions and Water, the company has outlined current consumption data and overtime with plans to achieve greater efficiency. Environmental Expenditure is also reported.

Key Social Issues

Community development activities

- Corporate Social Initiatives (CSI) of the Company oversees implementation of social programmes across the organisation in the following thrust areas: Mother & Child Health Care, Education and Skill Building.
- The community expenditure is reported to be Rs 0.68 Billion.

Shree Cement is a cement manufacturer in India. It was founded in the Beawar in district Ajmer of Rajasthan and now one of the biggest cement in Northern India.

- **Annual Business Responsibility Report filed:** No
- **Date of release of sustainability report:** 25th August 2014

OVERALL ESG
DISCLOSURE SCORE

68

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

39

Number of metrics tracked **68**

Number of metrics on which disclosure is made **10**

Metrics on which no disclosure is made: product life cycle, non-hazardous waste created, procedures in place for sustainable sourcing, total number of employees hired on contractual basis, court cases.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members. The Board comprises of six Independent Directors and three working / Whole Time Directors besides the Non-Executive Chairman.
- The Business Responsibility Reporting Committee is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets to review the business performance, the frequency of the meeting is not reported and it is not clear if the sustainability performance are reviewed during these meetings and to what extent are they monitored by the board.

Ethical business operations and boundaries

- Shree Cements has reported the existence of clear policies for ethics, bribery and corruption, which are issues plaguing the sector.
- The company has confirmed that the policies extend to the suppliers and stakeholders. It has in place a strict policy which discourages unfair dealings with all stakeholders and the authorities

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided on CPCB notices, monetary value of significant fines, but the company has not provided a comparison over time.

For further consideration: No disclosure provided on court cases.

Labor relations and union practices

- The company has provided information on the health and safety topics covered in formal agreements with trade unions and the percentage of work force part of the union.

For further consideration : No details provided on the number of contract employee working on a temporary basis

Key Environmental Issues

Environmental risk assessment and management systems

- Yes – the company identifies and assesses potential environmental risks. 56 MW Green Power Capacity has been installed on the same

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- No, the company has not reported on the same.

Resource consumption and efficiency

- For Energy, Waste, GHG emissions and Water, the company has outlined current consumption data and overtime with plans to achieve greater efficiency. Environmental Expenditure is also reported.
- 56MW of installed capacity of green power

Key Social Issues

Community development activities

- Primary Education, Agriculture Development Program, Natural Resource Management, Infrastructure Development Projects and Women Empowerment Program are the areas that the company is working on.
- Community Development Projects : The contribution for social cause has also been on a rising curve with community investment increasing from Rs 86 million in 2011-12 to Rs 92.76 million in 2012-13

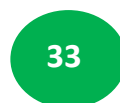
UltraTech Cement Limited is India's biggest cement company and India's largest exporter of cement clinker based in Mumbai, India. The company is part of the Aditya Birla Group and division of Grasim Industries. It has an annual capacity of 62 million tonnes.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 31st March 2014

OVERALL ESG
DISCLOSURE SCORE



SECTOR ADJUSTED ESG
DISCLOSURE SCORE



Number of metrics tracked **68**

Number of metrics on which disclosure is made **14**

Metrics on which no disclosure is made:
List of stakeholder groups, contractors that have undergone screening on human rights and Water sources, GHG emissions, weight of waste by type, Environmental Expenditure

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets 6 times a year. Your Company's Board comprises of 12 Directors, which include the Whole-time Director and 6 Independent Directors
- Whole - time Director is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets 6 times a year to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board. Also, the frequency to access the BR performance is not clear.

Ethical business operations and boundaries

- Ultra Tech has reported the existence of clear policies for ethics, bribery and corruption.
- Yes, The Company's governance structure guides the organization keeping in mind the core values of Integrity, Commitment, Passion, Seamlessness and Speed. The Corporate Principles and Code of Conduct cover the Company and its subsidiaries and is applicable to all the employees of the Company.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- The Competition Commission of India (CCI) upheld the complaint of alleged cartelisation against certain cement manufacturing companies including the Company and imposed a penalty of INR 1,175.49 crores on the Company. The Company has filed an appeal against the Order before the Competition Appellate Tribunal (COMPAT).

For further consideration : Environmentalists surprised at Uttarakhand nod to two cement plants

Labor relations and union practices

- The company has provided information on the health and safety topics covered in formal agreements with trade unions, the number of contract employee working on a temporary basis and the percentage of work force part of the union

Key Environmental Issues

Environmental risk assessment and management systems

- The Company has procedures in place for identifying environmental issues and the risks arising out of it. The Company is a member of CSI of WBCSD and the tools developed by CSI (eg: Global Water Tool) are being used by the Company to assess the potential risk arising out of its operations and take necessary action to mitigate the same.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- These include Ordinary Portland Cement, Portland Blast Furnace Slag Cement, Portland Pozzaland Cement, White Cement, Ready Mix Concrete including Specialty Concrete, Building Products like AAC bricks and jointing mortars and a host of others in retail formats.

Resource consumption and efficiency

- For Energy, the company has outlined current consumption with plans to achieve greater efficiency. For waste, water and environmental expenditures, no disclosure is made

For further consideration: There should be data based information on key parameters mentioned above

Key Social Issues

Community development activities

- The Company has spent an amount of INR 48.56 crores on its CSR activities during 2013-14 in education, health care, women empowerment, sustainable livelihood, infrastructure development etc.

Company Profiles

Sector: Metals and Mining

MACRO - ESG ISSUES : A SNAPSHOT

- Controversy surrounding illegal mining and unfair land acquisition / displacement continued to create challenges for the industry - governance reforms needed
- Many mining sector leaders are facing probes on unfair / anti-competitive practices including price hikes – the CCI ruled in the favour of the companies
- Ban on mining by the Goa and Odhisha government has adversely affected the companies in the sector
- Companies are badly hit by Goa mining ban – the share prices of TATA Steel, JSW Steel and Jindal Steel dropped due to the same
- The new BJP government is mulling the privatization of Coal India
- The Coal scam was the major news in the sector with the ED filing money laundering case against ex-MoS Rao, Naveen Jindal in the Coal scam
- Several fatal / environmentally damaging accidents were reported including leakage of Carbon Monoxide at a SAIL plant and ammonia leakage at an ESSAR plant
- The Indian commerce and industry chambers has warned the industry of an impending iron ore shortage
- Tata Steel was asked to control air pollution in Scunthorpe
- The Indian government beginning the process of rebuilding the coal industry after the Supreme Court's decision to cancel the allocation of 214 coal blocks to private companies and India's Cabinet had approved the sale of a further 10% stake in Coal India (CIL) for about US\$ 3.9 billion.
- The Union Government has decided to set up a research centre for the steel industry with Special Mining Zones', while Odisha issues notices to 18 miners over lease renewal.

Coal India Limited (CIL) is an Indian state-controlled coal mining company headquartered in Kolkata, West Bengal, India. It is the largest coal producer company in the world and contributes around 81% of the coal production in India. It produced 452 million tons of coal during FY 2012–13 and earned revenue of INR 882.81 billion from sale of coal in the same financial year.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 20th June 2014

OVERALL ESG DISCLOSURE SCORE



SECTOR ADJUSTED ESG DISCLOSURE SCORE



Number of metrics tracked **68**

Number of metrics on which no disclosure is made **11**

Metrics on which no disclosure is made: the number of court cases, CDM projects GHG emissions and sustainable sourcing

Key Governance Issues

Organizational Structure and Board Independence

- The company’s board has a combination of 15 Board of Members; 8 non-executive Directors, 4 functional directors, 2 permanent invitees and 1 chairman who meet 10 times in a year.
- The Chief General Manager (Environment) is responsible for overall sustainability performance, which indicates lower than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets 10 times to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board

Ethical business operations and boundaries

- Coal India has reported the existence of clear policies for ethics, bribery and corruption, which are issues plaguing the sector.
- The company has confirmed that the policies extend to the entire company and covers employees, suppliers & contractors, service providers, and their employees.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided on monetary fines and notices from CPCB

For further consideration: No disclosure made on court cases

Labor relations and union practices

- The company has provided information on the health and safety topics covered in formal agreements with trade unions, the number of contract employee working on a temporary basis and the percentage of work force part of the union.
- Five Central Trade Unions (INTUC, AITUC, HMS, BMS & CITU), apart from other regional unions functioning in CIL and its Subsidiary Companies are recognized by the Management of CIL and its Subsidiary Companies.

Key Environmental Issues

Environmental risk assessment and management systems

- The company’s impact on existing environment and forest due to coal mining projects are assessed by an Environment Impact Assessment (EIA) study for each project and based on the same, Environmental Management Plans (EMP) are prepared. However, no supporting data is being provided.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- The company reports that it produces sustainability oriented products such as CIL/LTC coke that are smokeless, environment friendly product

Resource consumption and efficiency

- For Energy, water detailed disclosures are provided including data comparable over time. The details of weight of waste being generated have direct disclosure but not over time.

For further consideration: No disclosure on GHG emissions except NOx and SOx quantity

Key Social Issues

Community development activities

- Financial grant to Sunebada Hill Area Development Plan by way of providing bye-cycles for 12000 nos. of households for ensuring better mobility in Nuapada Dist., Odisha, through Collector and District Magistrate, Nuapada.
- CSR Expenses for Coal India is Rs 409.37 million

Jindal Steel and Power Limited (JSPL) is an Indian steel and energy company based in New Delhi, India. With turnover of approx. US\$ 3.56 billion, JSPL is a part of about US\$ 17 billion diversified Jindal Group conglomerate. JSPL is a leading player in steel, power, mining, oil and gas and infrastructure in India. .

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 29th April 2014

OVERALL ESG DISCLOSURE SCORE

55

SECTOR ADJUSTED ESG DISCLOSURE SCORE

31

Number of metrics tracked **68**

Number of metrics on which disclosure is not made **11**

Metrics on which no disclosure is made:
Expenditure on key stakeholder engagement, rates of injury and lost days Monetary value of significant fines for noncompliance court cases, Health and safety topics weight of waste by type and disposal method, on discharge of water and effluents, GHG emissions, suppliers screening on human rights.

Key Governance Issues

Organizational Structure and Board Independence

- The company’s board has a combination of 15 Directors, of which 8 are Non-executive who meet 6 times a year.
- The Managing Director & Group CEO is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company. The Board Committees typically meet once every quarter to assess the BR performance of the Company

Ethical business operations and boundaries

- JSPL has reported the existence of clear policies for ethics, bribery and corruption, which are issues plaguing the sector.
- The company has confirmed that the policies are applicable to all internal stakeholders of JSPL, and its subsidiaries. All suppliers and contractors are subject to certain ethical standards through appropriate clauses in the contracts which the counterparty is obligated to follow.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- At the end of FY 2013-14, there are 3 pending cases with SPCB. A total of 141 consumer complaints were received during 2013-14; this includes 46 complaints that were treated as feedback and 23 that are under resolution

For further consideration: monetary value of significant fines for noncompliance and court cases are not disclosed.

Labor relations and union practices

- The company has provided information on the number of contract employee working on a temporary basis and the percentage of work force part of the union.

For further consideration: The company needs to provide details on the health and safety topics covered in formal agreements with trade unions with the data over time and the number of contract employee and the percentage of workforce.

Key Environmental Issues

Environmental risk assessment and management systems

- As part of ISO 14001, ISO 9001 and OHSAS 18001 certifications, JSPL undertakes continuous assessment of the potential environmental risks. The company has a 24 MW wind power project registered as a Clean Development Mechanism project .To promote a green environment, JSPL proactively implements the concept of Green Productivity and takes preventive measures in and around its various facilities.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- Yes, the company has reported to have sustainability oriented products such as Parallel Flange Beams and Columns which enables savings in steel consumption and provide ultimate design flexibility to the structural designers. Reduced energy consumption is also attributed to savings made during transportation and construction.

Resource consumption and efficiency

- For Energy, water the company has outlined both current consumption and plans to achieve greater efficiency. However, waste and GHG emissions are not being reported.

Key Social Issues

Community development activities

- Birohar Tribal Development Programme at Patratu, Jharkhand – Promoting traditional skill like rope making and reshaping it into an income generating activity for tribal people Redirecting focus on children education and well-being of women
- JSPL’s direct contribution towards community development projects during the reporting period (2013-14) is Rs 52.26 crore

JSW Steel Ltd is an Indian steel company owned by the JSW Group based in Mumbai, Maharashtra, India. JSW Steel, after merger of ISPAT steel, has become India's largest private sector steel company with an installed capacity of 14.3 MTPA.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 18th July 2013

OVERALL ESG
DISCLOSURE SCORE

65

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

37

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **12**

Metrics on which no disclosure is made
Are court cases ,contractors that have undergone screening on human rights
Health and safety topics covered Use of renewable energy as total energy consumption, number of incidents of discrimination, public policy positions.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of 13 Directors, of which 9 are non-executive who meet every 3 months
- The Chairman is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets every 3 months to review the business performance and The Board Committees typically meet once in 3-6 months to assess the BR performance of the Company, it is not clear to what extent are they monitored by the board.

Ethical business operations and boundaries

- JSW Steel Limited has reported the existence of clear policies for ethics, bribery and corruption, which are issues plaguing the sector.
- The company has confirmed that the policy not only covers the company but is extended to its entire value chain.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided, but the company has not provided a comparison over time.

Labor relations and union practices

- The company has provided information on the number of contract employee working on a temporary basis and the percentage of work force part of the union.

For further consideration: The company needs to provide details on the health and safety topics covered in formal agreements with trade unions with the data over time and the number of contract employee and the percentage of workforce.

Key Environmental Issues

Environmental risk assessment and management systems

- Yes – the company has a registered Clean Development Mechanism project in place

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- Yes, Low Thickness, Higher Strength CRCA product developed through technology tie-up with JFE to reduce vehicle weight thereby increasing fuel efficiency and reducing pollution

Resource consumption and efficiency

- For Energy, Waste and Water, the company has outlined both current with plans to achieve greater efficiency. However, no data over time is provided.

For further consideration: There is lack or no data based information on key parameters like energy usage.

Key Social Issues

Community development activities

- JSW Steels company's direct contribution to community development projects is 27.03 Cr
- JSW Steel works on the area of women empowerment, education, livelihood support as part of its community initiatives.

Sesa Sterlite, a Vedanta Group company is one of the world's largest global diversified natural resource majors, with operations across zinc-lead-silver, oil & gas, iron ore, copper, aluminum and commercial power.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 29th April 2014

OVERALL ESG
DISCLOSURE SCORE

68

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

39

Number of metrics tracked **68**

Number of metrics on which disclosure is made **10**

Metrics on which no disclosure is made: stakeholder engagement, show cause/ legal notices received from CPCB/SPCB, court cases and water sources waste reductions procedures in place for sustainable sourcing procure goods and services from local & small producers environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The Company's Board comprises eight Directors, a Executive Chairman and the Promoter Director, 1 Whole-time Director and Chief Executive Officer, 1 Whole-time Director and 1 Whole-time Director and Chief Financial Officer and there are four Non-Executive, 1 Independent Directors.
- The Vedanta Sustainability Committee is responsible for overall sustainability performance, which indicates lower than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets every quarter to review the sustainability performance, it is not clear to what extent are they monitored by the board

Ethical business operations and boundaries

- Sesa Sterlite has reported the existence of clear policies for ethics, bribery and corruption, which are applicable to employees, contract workforce and suppliers
- Company has adopted Vedanta Sustainability Framework which comprises of sustainability policies, technical standards, management standards and guidance notes all aligned to international guidelines

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute disclosure regarding monetary fines arising from non-compliance

For further consideration: No disclosure on the number of show cause/ legal notices received from CPCB/SPCB and court cases.

Labor relations and union practices

- The company has provided information on the health and safety topics covered in formal agreements with trade unions, the number of contract employee working on a temporary basis and the percentage of work force part of the union.

For further consideration: The company can provide the data over time with the number of contract employee and the percentage of workforce.

Key Environmental Issues

Environmental risk assessment and management systems

- The company has identified CDM projects with CER potential of 1.4 million units. Energy and Carbon policy commits operations to adopt and maintain global best practices in carbon and energy management and to minimize greenhouse gas (GHG) emissions.

For further consideration: The company should provide more data based information on processes for risk management and quantitative targets.

Sustainable product design and risk assessment

- No but the company has a process in place to use slag in road construction, land leveling and in the abrasive and cement industries rather than being deposited in landfill. Similarly Gypsum from SSL Copper-Tuticorin plant was utilized in cement, fertilizers and brick manufacturing.

Resource consumption and efficiency

- For Energy, Waste and Water, the company has outlined both current and data overtime consumption with plans to achieve greater efficiency.

For further consideration: The data being reported does not provide the extent of impact. In addition, no disclosure is made on environmental protection expenditures

Key Social Issues

Community development activities

- The company has seven discrete focus areas in our community programs: health, education, sustainable livelihoods, women empowerment, community asset creation, bio-investment and integrated village development.
- The company has invested around Rs 173 Crore in community program around the world.

Tata Steel Limited is an Indian multinational steel-making company headquartered in Mumbai India, and a subsidiary of the Tata Group. It was the 11th largest steel producing company in the world in 2013, with an annual crude steel capacity of 25.3 million tons, and the second largest private-sector steel company in India (measured by domestic production) with an annual capacity of 9.7 million tons .

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 22nd July 2014

OVERALL ESG
DISCLOSURE SCORE



SECTOR ADJUSTED ESG
DISCLOSURE SCORE



Number of metrics tracked **68**

Number of metrics on which disclosure is made **5**

Metrics on which no disclosure is made:
 renewable energy as total energy
 number of incidents of discrimination
 court cases key stakeholder topics

Key Governance Issues

Organizational Structure and Board Independence

- The Company’s Board comprises of 13 Directors, of which 7 Directors are independent, and 9 meetings were held.
- The Managing Director, India and South-East Asia is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.
- it is reported that the board meets 9 times with no gap of 4 months between meetings, to review the business performance and meets quarterly to review sustainability performance

Ethical business operations and boundaries

- The company follows the Tata Code of Conduct which serves as the ethical roadmap for all Tata companies. All suppliers, partners and joint ventures are expected to adopt Tata Code of Conduct (TCoC) or a joint code of conduct incorporating all elements of the TCoC
- For further consideration:** No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided regarding CPCB notices and monetary fines from non-compliance but the company has not provided a comparison over time.
- For further consideration:** no disclosure regarding court cases is made.

Labor relations and union practices

- The company has provided information on the health and safety topics covered in formal agreements with trade unions, the number of contract employee working on a temporary basis and the percentage of work force part of the union.

Key Environmental Issues

Environmental risk assessment and management systems

- “Top Gas Pressure Recovery based Power Generation from ‘G’ Blast Furnace” implemented in 2010 at Jamshedpur Steel Works is a registered CDM project. The company has risks, mitigation strategies and contingency measures that are reviewed and revised every year.
- For further consideration:** The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- Yes, The Company has reported Tata Steel make extensive use of life cycle assessment to advise its customers in the design of their products made from steel to help minimize energy usage. However, no data has been provided on the same.

Resource consumption and efficiency

- For Energy, Waste and Water, the company has outlined both current consumption and data overtime with plans to achieve greater efficiency. The data being reported also provides the extent of impact and data overtime.

Key Social Issues

Community development activities

- Tata Steel’s direct contribution to community development is Rs 212 crores which is 3.31 per cent of the Company’s PAT
- The thrust areas for Tata Steel are sustainable livelihood - especially skill development and employability training, education and health care, all of which constitute the Human Development Index – a quality of life indicator.

Company Profiles

Sector: Banking and Financial Services

MACRO - ESG ISSUES : A SNAPSHOT

- Banks and Government of India are both, eager to build out infrastructure and financial products to reach under banked rural markets. The banking sector is uniformly targeting rural markets with both financial products (mobile banking platforms) and outreach programs focussing on promoting financial literacy.
- Public + Private banks are focussing on internal ESG management and offering products for financial inclusion and inclusive growth; this includes products for new sectors (Renewable Energy) and new markets (MSME credit, rural consumers)
- The National Housing Bank and KfW have joined hands for a second line of credit to support energy-efficiency
- The National Bank for Agriculture and Rural Development (NABARD) has initiated power conservation scheme to replace outdated irrigation pumps
- The interest from financiers in the renewable energy sector is increasing, particularly international investors; the Asian Development Bank provides \$500 million to build transmission infrastructure for renewable energy in India. The challenge remains that there are only a few investible companies currently
- Several issue of irregularities were reported in period, with institutions like ICICI and MCX under the spanner
- Regulators are expected to introduce norms governing foreign banks' anticipated mandates around local subsidiaries and poor/rural lending
- Asia Development Bank has estimated that there is under-investment of \$2.3 trillion needed (by 2035) in Indian energy sector
- Several strikes were reported, almost every month, in both PSU Banks, as well as Private Sector Banks
- Insider trading was a key risk seen in the period, as SEBI increased the pace of taking actions against large investors including Credit Suisse

Axis Bank is the third largest private sector bank in India, offering an entire spectrum of financial services covering Large and Mid-Corporates, MSME, Agriculture and Retail Businesses. The Bank has a footprint of 2402 domestic branches and 12,922 ATMs. The overseas operations are spread over 7 international offices with branches at Singapore, Hong Kong, Dubai, Colombo, Shanghai and Abu Dhabi.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** NA

OVERALL ESG
 DISCLOSURE SCORE



SECTOR ADJUSTED ESG
 DISCLOSURE SCORE



Number of metrics tracked **68**
 Number of metrics on which no disclosure is made **24**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Monetary value of significant fines for non-compliance, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company’s board consists of 14 directors, 50% of which are independent; the unique thing about the company’s board is that, in addition to the Chairman, it has a Lead Independent Director. It met 6 times last year.

- The CSR committee is responsible for the sustainability performance of the company, which is reviewed every 6 months

For further consideration: No details are provided on the composition of the CSR committee and its oversight.

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is applicable to all individuals working in the Company.
- The company has confirmed that the policies extend to the suppliers and stakeholders.
- In addition, Axis Bank is implementing the recommendations of RBI Working Group on Information Security, Electronic Banking, Technology Risk Management and Cyber Frauds

For further consideration: No details are provided on how the policies get implemented and reviewed

Regulatory challenge and compliance

- Company has not provided any details on court cases, fines and any other legal challenges, apart from notices from CPCB

For further consideration: Legal challenges and notices are crucial from a risk perspective and should be disclosed

Customer satisfaction and complaints

- The bank reported pending customer complaints at the end of the year but not how many were addressed successfully

For further consideration: Customer complaints can be a potential risk and should be disclosed

Key Environmental Issues

Environmental risk assessment and management systems

- The Bank has reported to have taken concerted efforts towards adopting green technologies that reduce the environmental impact to its own operations. It primarily focuses on energy efficiency (including Green Information Technology initiatives) and resource efficiency and has moved to solid-state storage of data in its Data Centre by which is 80% energy efficient compared to hard disk storage technology.
- Additionally, the bank has also started work on solar ATMs in Coimbatore and is also taking initiative to save water by installing sewage treatment plant and re-using waste water

For further consideration: company has not provided data on the overall plan for any initiative, targets and process against the same. Furthermore, no quantitative information is provided on the impact created by any of the initiatives reported.

Sustainable product design and risk assessment

- The company has reported to have initiatives like a “No frills” saving account, Remittance and payment service and micro loans and insurance product that incorporate social concerns and risks

For further consideration: The company has not provided data the targets set for itself on how these products are creating impact

Resource consumption and efficiency

- For Energy, waste, water, GHG emissions and environmental expenditures, no data based disclosure is made with but plans to achieve greater efficiency is discussed.

For further consideration: No impact data or information on targets set and met has been provided

Key Social Issues

Community development activities

- Rs 52.45 crores was spent on community development efforts and company has reported to have impacted 4.42 lac beneficiaries through the same

Bank of India (BoI) is commercial bank with headquarters in Mumbai, Maharashtra, India. Founded in 1906, it has been government-owned since nationalization in 1969.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 30th May 2014

OVERALL ESG
DISCLOSURE SCORE

39

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

22

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **27**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Monetary value of significant fines for noncompliance, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 12 times last year.
- The General Manager is responsible for the sustainability performance which indicates lower than average integration of sustainability issues in the company

For further consideration: While it is reported that the committee met more than once to assess BR performance, the exact frequency and level of board oversight is unclear.

Ethical business operations and boundaries

- The Bank has a Code of Conduct, which is applicable to all individuals working in the Company.
- All other policies of the bank, including those pertaining to ethics, bribery etc are applicable to Group/ Joint Ventures/ Suppliers/Contractors/NGOs and Others.

For further consideration: No details are provided on how the policies get implemented and reviewed and how suppliers are governed. Percentage of total number of significant suppliers and contractors that have undergone screening on human rights and actions taken has also not been disclosed.

Regulatory challenge and compliance

- Bank has disclosed that it didn't receive any show cause notice from the Pollution Control Board.

For further consideration: No details are provided on the show cause notices and monetary fines arising from non-compliance

Customer satisfaction and complaints

- The bank reported pending customer complaints at the end of the year but not the absolute number of complaints received

For further consideration: Details regarding customer surveys

Key Environmental Issues

Environmental risk assessment and management systems

- The bank has reported to it has no strategies/ initiatives to address global environmental issues such as climate change, global warming as it is a service industry.

Sustainable product design and risk assessment

- The bank has reported to have initiatives like Self-help groups, which helps in generating self-employment. BOI has launched Star Swaroggar Prashikshan Sansthan (SSPS)-RSETI: Rural Self Employment Training Institute and a Financial Literacy & Credit counseling center.

Resource consumption and efficiency

- No data based disclosure for key resource consumption metrics related to energy, waste, water, GHG emissions and environmental expenditures
- Disclosure regarding implementation of solar street lighting program and concept of energy efficiency.

For further consideration: Lack of disclosure on resource use and recycling

Sustainable Sourcing

- Almost all items of use are sourced locally by branches. Bulk Purchase for distribution among all service branches are sourced through transparent bidding process

For further consideration: The company has not provided absolute data on impact or the targets set for itself in terms of sustainable sourcing

Key Social Issues

Community development activities

- Rs 7.83 crores is spent on promoting financial inclusion and spreading financial literacy and other community development efforts

Bank of Baroda is an Indian state-owned banking and financial services company headquartered in Vadodara. It is the second-largest bank in India, after State Bank of India, and offers a range of banking products and financial services to corporate and retail customers through its branches and through its specialized subsidiaries and affiliates.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 13th May 2014

OVERALL ESG
DISCLOSURE SCORE

39

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

22

Number of metrics tracked	68
Number of metrics on which no disclosure is made	28

Metrics on which no disclosure is made: key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Monetary value of significant fines for noncompliance, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The bank reported that its board composition is governed by the provisions of the Banking Regulation Act, 1949, The Banking Companies (Acquisition & Transfer of Undertakings) Act, 1970, and The Nationalized Banks (Management & Miscellaneous Provisions) Scheme, 1970
- The board met 20 times in the last year
- The Executive Director is responsible for the sustainability performance which indicates higher than average integration of sustainability issues in the company

Ethical business operations and boundaries

- The bank has a Code of Conduct, which is applicable to all individuals working in the Company.
- The bank has confirmed that their policies do not extend to the suppliers
- In addition, the bank is compliant with Basel-II and the Data Centre and Disaster Recovery Centre are ISO 27001 certified.

For further consideration: No details are provided on how the policies get implemented and reviewed and what is the process of governing external agencies, that policies are not applicable to.

Regulatory challenge and compliance

- The bank has confirmed that no pollution notices are received notices.

For further consideration: Monetary value of significant fines for noncompliance and number of court cases are not disclosed. As regulatory risk is crucial for the sector, the bank should provide information on all legal challenges faced.

Customer satisfaction and complaints

- The bank reported that only 0.57% (132) of the customer complaints (23,350) received during the year, were pending at the end of the year

Key Environmental Issues

Environmental risk assessment and management systems

- In the TEV (Techno-Economic-Viability) appraisal of a project, the Bank gives due weightage to the mitigation of Environmental Risks. The sanction decisions are mainly dependent upon the viability of the projects.
- In SME rating module, the Bank gives 5 Bonus marks to environment friendly industries.
- In addition, as per the Domestic Loan Policy, the Bank is not extending any finance to the environmental hazardous industries viz. Industries using Ozone Depleting Substance and insists upon installation of water treatment projects for processing of pollutants

For further consideration: The company has not provided quantitative data on impact achieved.

Sustainable product design and risk assessment

- The bank has reported to have initiatives like Self Help Groups (SHGs), and Baroda Swarojgar Vikas Sansthan, which identifying the need for imparting skills to rural youth and financial Literacy & Credit Counseling centers
- The Bank has also reported to be giving priority to financing of environment friendly renewable energy projects.

For further consideration: The company has not provided data the targets set for itself

Resource consumption and efficiency

- No data based disclosure is made for Energy, waste, water, GHG emissions and environmental expenditures, with but plans to achieve greater efficiency have been discussed.

Key Social Issues

Community development activities

- The Bank has spent Rs. 15.3 crores on community development efforts but has not provided detailed information on its impact

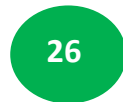
Canara Bank is an Indian state-owned bank headquartered in Bangalore, Karnataka. It was established in 1906, making it one of the oldest banks in the country; the bank was nationalized in 1969. As of July 2014, the bank had a network of 5111 branches and more than 6000 ATMs spread across India.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 4th June 2014

OVERALL ESG
DISCLOSURE SCORE



SECTOR ADJUSTED ESG
DISCLOSURE SCORE



Number of metrics tracked **68**

Number of metrics on which no disclosure is made **22**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Monetary value of significant fines for non-compliance, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, Health and safety topics.

Key Governance Issues

Organizational Structure and Board Independence

- The bank’s board has a combination of executive, non-executive and independent members, which met 16 times last year.
- The Executive Director is responsible for the sustainability performance of the company, which is reviewed every 3-6 months

Ethical business operations and boundaries

- The bank has a Code of Conduct, which is applicable to all individuals working in the Company.
- The Risk Management policy of the Bank covers Subsidiaries/ Joint Ventures and the Regional Rural Banks sponsored by the Bank.
- The Bank has implemented the recommendations of the RBI Working Group on Information Security, Electronic Banking, Technology Risk Management and Cyber Frauds and has obtained the ISO 27001: 2013 certification

For further consideration: No details are provided on how the policies get implemented and reviewed

Regulatory challenge and compliance

- The bank has provided for pollution notices, but the company has not provided a comparison over time

For further consideration: No details are provided on the show cause notices and monetary value of fines for non-compliance

Customer satisfaction and complaints

- The bank reported that only 1.40% (1265) of the 90286 customer complaints received were pending as at the end of the financial year. However, all the pending customer complaints of 2012-13 have since been redressed.

Key Environmental Issues

Environmental risk assessment and management systems

- The bank has reported to have various green banking initiatives undertaken by the Bank include core banking solution, internet banking, telebanking, mobile banking, ATMs, solar powered biometric ATMs for the use of rural folk, E-lounges in branches and e-governance for its staff and administrative areas to promote paperless banking

For further consideration: the company has not provided data on the targets being set under their SD plan and progress against the same

Sustainable product design and risk assessment

- The bank has reported to have initiatives like Financial Inclusion Campaign - covering varied rural activities , co-sponsored/ supported 64 self-employment training institutes and introduced several environment friendly measures, viz., core banking solution, internet banking, telebanking, mobile banking, ATMs, solar powered biometric ATMs
- For sourcing, Bank has a policy as per which the suppliers should meet the standards of energy generation, pollution free climate friendly technologies

For further consideration: the company has not provided data the targets set for itself

Resource consumption and efficiency

- No data based disclosure is made for resource consumption pertaining to energy, waste and water, as also GHG emissions and environmental expenditures
- The Bank is in the process of deploying solar powered UPS for its various locations and adopting renewable energy usage

For further consideration: while some information is provided on energy efficiency measures, the company has not provided data on targets set for itself

Sustainable Sourcing

- For sourcing, Bank has a set policy as per which the suppliers should meet the standards of energy generation, pollution free climate friendly technologies

For further consideration: the company has not provided data the targets set for itself in terms of sourcing sustainably

Key Social Issues

Community development activities

- Rs. 76.95 crores is spent community development efforts, and the bank has provided detailed information of its impact

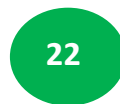
HDFC Bank is the fifth largest bank in India by assets, incorporated in 1994. It is the largest private sector bank in India by market capitalization as of 24 February 2014.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 22nd April 2014

OVERALL ESG
DISCLOSURE SCORE



SECTOR ADJUSTED ESG
DISCLOSURE SCORE



Number of metrics tracked **68**

Number of metrics on which no disclosure is made **26**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Monetary value of significant fines for noncompliance, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company’s board has a combination of executive, non-executive and independent members, which met 8 times last year.
- The Executive Director is responsible for the sustainability performance, which is reviewed every 6 months

For further consideration: [Extent of monitoring of sustainability performance by the board is unclear](#)

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is applicable to all individuals working in the Company.
- The bank has disclosed that its policies do not extend to the suppliers, subsidiaries, Joint ventures and other partners.
- HDFC bank reported that it has been measuring its carbon footprint and disclosing the same to the Carbon Disclosure Project (CDP). It was 1 of 16 companies in India to make it to the Carbon Disclosure Leadership Index (CDLI) in 2012

For further consideration: [No details are provided on how the policies get implemented and reviewed and governed.](#)

Regulatory challenge and compliance

- The bank has not provided any information on legal issues such as fines for non-compliance, pollution notices and court cases.

Key Environmental Issues

Environmental risk assessment and management systems

- The bank regards climate change mitigation and environmental improvement as essential elements of a sustainable business.
- HDFC has taken various steps to manage Phone, Net and Mobile Banking which have cut down customers' need to commute to our branches.
- The bank has ensured that many of its major locations have energy efficient lighting systems in place lighting options and have also started incorporating the use of unconventional energy sources to power our ATMs in areas with fluctuating power supply.

For further consideration: [The company has not provided data on the impact of the interventions undertaken, the plans for the future, targets set and achievement against the same.](#)

Sustainable product design and risk assessment

- The company has reported to have initiatives like Kisan Gold Card, Grameen Loans, Basic Savings Bank Deposit Account (BSBDA) whose design has incorporated social concerns.

For further consideration: [The company has not provided data regarding the targets set](#)

Resource consumption and efficiency

- No data based disclosure is made for resource consumption pertaining to energy, waste and water, as also GHG emissions and environmental expenditures
- Project of 20 Solar ATMs with the pilot ATM set up in Bihar

Sustainable Sourcing

- No disclosures made

Key Social Issues

Community development activities

- FY 2012-2013, bank spent 0.58% of their profit after tax towards community development initiatives and approximately 0.74% of their average profit after tax for the last three financial years

For further consideration: [The company has not provided detailed information on impact of its community development activities](#)

Housing Development Finance Corporation Limited or HDFC is an Indian financial conglomerate based in Mumbai, India. It is a major player for housing finance in India. It also has a presence in banking, life and general insurance, asset management, venture capital and education loans.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 6th May 2014

OVERALL ESG
DISCLOSURE SCORE

32

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

18

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **35**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 5 times last year.
- The Executive Director is responsible for the sustainability performance which indicates higher than average integration of sustainability within the functioning of the firm

For further consideration: The exact frequency of review of BR performance by the concerned personnel and extent of oversight by the board is not known

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is applicable to all individuals working in the Company.
- The company, as others in the sector, has confirmed that many of their policies extend to suppliers and others do not.

For further consideration: No details are provided on how the policies get implemented and reviewed

Regulatory challenge and compliance

- Absolute data is provided for monetary value of significant fines for noncompliance, but the company has not provided a comparison over time.

For further consideration: No details are provided on the show cause notices by Pollution Control Board and court cases

Key Environmental Issues

Environmental risk assessment and management systems

- The bank has reported to have conducted a pilot study to map the carbon emission at HDFC's corporate office in Mumbai with an aim to compare the emission with a pre-determined benchmark and also look into initiatives to cap the emission taking into account 3 vital parameters for its pilot study – electricity consumption, domestic and international travel and paper consumption.
- HDFC promotes ecological sustainability and green initiatives by adopting energy saving mechanisms, employees are sensitized towards making efforts to reduce HDFC's carbon foot print.

For further consideration: The company has not provided data on the targets being set (if any) for reducing carbon emissions

Sustainable product design and risk assessment

- No, the company has not reported on this.

Resource consumption and efficiency

- No, the company has not reported on this.

For further consideration: While some information is provided on water recycling initiatives, the company has not provided data on targets set for itself

Sustainable Sourcing

- No disclosures made

Key Social Issues

Community development activities

- Shelter Assistance Reserve : The SAR is capitalised on an annual basis by way of appropriation out of HDFC's annual profits and is primarily utilised for the provision of grants to non-government organisations (NGOs), community bodies and organisations. The use of the SAR covers the areas of education, child welfare programmes, causes of the disabled, health-care, vocational training and community development programmes.

For further consideration: Information on direct contribution made by the company towards community development initiatives has not been provided

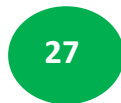
ICICI Bank is an Indian multinational banking and financial services company headquartered in Vadodara. As of 2014 it is the second largest bank in India in terms of assets and market capitalization.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 20th May 2014

OVERALL ESG
 DISCLOSURE SCORE



SECTOR ADJUSTED ESG
 DISCLOSURE SCORE



Number of metrics tracked **68**

Number of metrics on which no disclosure is made **25**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Monetary value of significant fines for non-compliance, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members totaling 12 in number, who met 6 times last year.
- Executive Director is responsible for the sustainability performance

Ethical business operations and boundaries

- The Company has a Code of Conduct which is applicable to directors and employees of the Bank as well as the directors and employees of the subsidiary companies. The company, as others in the sector, has confirmed that many of their policies extend to suppliers and others do not.
- The Bank, through the Group Code of Business Conduct & Ethics, has adopted a 'zero-tolerance' approach to bribery and corruption.

For further consideration: [No details are provided on how the policies get implemented and reviewed](#)

Regulatory challenge and compliance

- During the year ended March 31, 2014, RBI imposed a penalty of Rs 10.0 million, in exercise of powers vested with it under the provisions of section 47(A)(1)(c) read with section 46(4)(i) of the Banking Regulation Act, 1949 and subsection (3) of section 11 of Foreign Exchange Management Act, 1999 (FEMA) on operating matters pertaining to Know Your Customer (KYC)

For further consideration: [No details are provided on any reported court cases](#)

Key Environmental Issues

Environmental risk assessment and management systems

- The Bank complies with applicable environmental regulations in respect of its premises and operations. The Bank is aware of the potential environmental risks and participates in initiatives as mentioned above to address the environmental concerns. The Bank also requires the borrowers of project loans to comply with the various national environmental standards
- The bank has reported to have a mechanism under through its Technology Finance Group (TFG) to sanction soft loan / equity / grant assistance for development & distribution of fuel efficient cook stoves & solar lanterns, seed-stage sustainable energy and clean technology development and wildlife & forest conservation.

For further consideration: [the company has not provided data on the targets being set under their SD plan and progress against the same](#)

Sustainable product design and risk assessment

- The bank has reported of services like sustainable banking products to cater to different classes of customers through an expansive ATM network, mobile, phone, internet, doorstep banking. Customized products include personal loans, home loans, loans for asset purchases and a wide range of accounts and deposits.
- The Bank also offers a selection of cards for convenience to complement the distinct lifestyle needs of customers. In addition, the Bank's Rural & Inclusive Banking Group focuses on rural and below poverty line customers.

For further consideration: [The company has not provided information regarding the targets set for itself](#)

Resource consumption and efficiency

- No data based disclosure is made for resource consumption pertaining to energy, waste and water, as also GHG emissions and environmental expenditures but steps taken for energy conservation discussed.
- About 295 of bank's rural branches are powered through rooftop solar panels, and they are using solar power in one of their large office premises

For further consideration: [while some data is provided on water and waste reduction, the company has not provided data on targets set for itself](#)

Key Social Issues

Community development activities

- Company has focused on promoting financial inclusion but has not provided detailed information on its actual amount spent

Infrastructure Development Finance Company Ltd (IDFC) is India's leading integrated infrastructure finance player providing end to end infrastructure financing and project implementation services. The company's main business is to provide finance for infrastructure projects including through ownership of infrastructure assets.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 13th June 2014

OVERALL ESG
DISCLOSURE SCORE

47

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

26

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **21**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- IDFC's Board consisted of 11 Directors, comprising of two Whole-time Directors consisting of an Executive Chairman and Managing Director & CEO; seven Independent Directors; one Nominee Director of an institution which has invested in the Company and one Nominee Director of the Government of India, which met 6 times last year.
- The Executive Chairman is responsible for the sustainability performance of the firm which indicates very high level of integration with the board.

Ethical business operations and boundaries

- IDFC has developed its Code of Conduct and Whistle Blower Policy which pertain to ethics, bribery and corruption, which is applicable to all individuals in IDFC and group companies.
- Furthermore, all major suppliers are also required to agree to conform to the Code of Responsible Business Conduct (which covers ethical business practices) for the duration of their contract with IDFC.

For further consideration: No details are provided on how the policies get implemented and reviewed

Regulatory challenge and compliance

- During the year ended March 31, 2014 there was no penalty imposed by the RBI (Previous Year 0.05 crore). Previous year penalty was on account of one instance of SGL bounce and the penalty was paid to the RBI.

For further consideration: No details are provided on the pollution notices and court cases

Key Environmental Issues

Environmental risk assessment and management systems

- The bank has reported to have a mechanism under which each investment proposal received is categorized based on its environmental and social impact into environmental category A (high impact), B (medium to moderate impact) and C (low impact) depending upon degree of the impact.
- The bank has a detailed E&S risk management framework and process in place which provides guidelines for various stages of project appraisal process. As part of the project appraisal, a detailed Environmental and Social Due diligence is carried out that includes site visits, secondary information collection and analysis, review of applicable compliances and consents, E&S performance of the project on E&S mitigation and regulatory compliance.
- IDFC has aligned its E&S policy and framework to IFC performance standards, operational policies and EHS guidelines of World Bank and E&S safeguards guidelines of Asian Development Bank and also conform to the national regulatory framework on environmental management and social impact assessment.

Sustainable product design and risk assessment

- The bank has reported of services like Environmental and Social Due Diligence ("ESDD") which is undertaken for the project finance deals at the time of project appraisal. Annual Environmental and Social Monitoring and Review ("ESMR") a review is undertaken for portfolio projects as per EPs requirements to identify and mitigate E&S risks

For further consideration: The company has not provided data the targets set for itself

Resource consumption and efficiency

- No data based disclosure is made for resource consumption pertaining to energy, waste and water, as also GHG emissions and environmental expenditures but steps taken for increasing energy efficiency discussed.

For further consideration: while some data is provided on waste recycling and treatment, the company has not provided data on targets set for itself

Key Social Issues

Community development activities

- Company has not provided details on expenditure incurred by it on community development efforts

IndusInd Bank Limited is a Mumbai based Indian new generation bank, established in 1994. The bank offers commercial, transactional and electronic banking products and services.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 15th May 2014

OVERALL ESG
DISCLOSURE SCORE

50

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

28

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **21**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Monetary value of significant fines for noncompliance, number of incidents of discrimination, number of incidents of non-compliance with regulations, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of 9 directors and 8 non-executive members, which met 7 times last year.
- The Managing Director & CEO is responsible for the sustainability performance of the company which is reviewed annually

Ethical business operations and boundaries

- Policy relating to ethics, bribery and corruption covers the Bank, as also the Suppliers / Contractors / Others, and is embedded in the Bank's Human Resources Policy, Code of Conduct and Discipline, Employee Service Rules, Outsourcing Agreements with vendors / contractors etc.

For further consideration: No details are provided on how the policies get implemented and reviewed

Regulatory challenge and compliance

- No disclosures made regarding any legal challenges faced by the firm.

Key Environmental Issues

Environmental risk assessment and management systems

- The bank has reported that it addresses environmental risks by procuring eco-friendly A4 papers, generation of energy through installation of solar panels, saving of electricity through implementation of various Green IT initiatives, printing of Visiting Cards on recycled paper, etc.

For further consideration: the company has not provided data on the targets being set under their SD plan and progress against the same

Sustainable product design and risk assessment

- No, the company has not reported on this.

For further consideration: the company has not provided data the targets set for itself

Resource consumption and efficiency

- Current consumption data for Energy, Waste, GHG emission and water has not been reported
- Green IT: Power Management policies were implemented across the organisation on 10,739 desktops and laptops. The steps resulted in reduction of power consumption by about 27.87 KWh per machine per annum. This has translated in savings of approximately ` 25.15 lakhs and reduction in CO2 emission by about 273 tonnes in the year 2013-14.
- Bank installed of 100 Solar ATMs in areas of power shortage
- The Bank disposed 21,455.35 kgs of E-waste through authorised recycle vendors who follow environment norms laid down by the Government

For further consideration: while some data is provided on water and waste reduction, the company has not provided data on targets set for itself

Key Social Issues

Community development activities

- Rs 12.69 crores is spent community development efforts, and but has not provided detailed information on its impact

Kotak Mahindra Bank Limited offers transaction banking, operates lending verticals, manages initial public offerings (IPOs) and provides working capital loans. The Bank operates in four segments: Treasury and BMU, Corporate / Wholesale Banking, Retail Banking and Other Banking business.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 24th May 2014

OVERALL ESG
DISCLOSURE SCORE

49

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

28

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **20**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, number of incidents of discrimination, number of incidents of non-compliance with regulations, on discharge of water and effluents, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has 9 members comprising a combination of executive and non-executive Directors, which meets at least once a quarter.
- The Joint Managing Director is responsible for the sustainability performance.
- Business Responsibility Committee was formed on March 15, 2013. The Bank has been reporting its CSR initiatives to the Board every quarter.

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is applicable to all individuals working in the Company as well as to the Group/Joint Ventures/Suppliers/Contractors.
- Bank has been assigned high rating with a total score of 85 in the Banking Codes and Standard Board of India survey, ranking second among the 19 private sector banks and third among all banks on level of compliance.

For further consideration: No details are provided on how the policies get implemented and reviewed

Regulatory challenge and compliance

- As on March 31, 2014, KMBL does not have any Public Interest Litigation (PIL) or cases filed against it by any stakeholder or regulatory agency for unfair trade practices and anti-competitive behaviour

For further consideration: No details are provided on any monetary fines imposed on the bank by the regulator

Key Environmental Issues

Environmental risk assessment and management systems

- Being in the service sector, the Bank has limited material environmental impacts and hence focuses primarily on building energy efficiency, data centre efficiency and resource (paper) optimization as part of its internal green agenda. KMBL has taken significant strides in implementing various e-initiatives across the Group.

For further consideration: The company has not provided data on the targets being set under their SD plan and progress against the same

Sustainable product design and risk assessment

- Bank has reported to have products such as Basic Savings Bank Deposits Accounts, Agri business banking products, Tractor financing which takes into account social concerns.

Resource consumption and efficiency

- The bank has reported details regarding energy and water consumption, waste generation and GHG emissions. There is also disclosure regarding resource conservation and treatment. This is significantly higher disclosure compared to peers in this sector.

For further consideration: Total environmental protection expenditures not disclosed

Sustainable Sourcing

- No disclosures made

Key Social Issues

Community development activities

- The Bank has spent Rs 363 lakh towards its CSR activities (including donations) for the period April 1, 2013 to March 31, 2014.

LIC Housing Finance Limited (LIC HFL) is an Indian housing finance company having its Registered and Corporate office at Mumbai. It provides housing loans to individuals, builders, development authorities, employers, organizations, etc.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 21st April 2104

OVERALL ESG
DISCLOSURE SCORE

34

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

19

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **33**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Monetary value of significant fines for noncompliance, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company’s Board of Directors as on 31st March, 2014 comprised of nine members — eight Non-Executive and one Executive Director and met 7 times last year.
- The Board of the Company is collectively responsible for the implementation of the BR policies of the Company and it reviews the sustainability performance annually.

Ethical business operations and boundaries

- The Company has a Code of Conduct and all companies in LIC HFL group are covered by the policy
- For further consideration:** No details are provided on how the policies get implemented and reviewed

Regulatory challenge and compliance

- No disclosure made on any legal challenges faced by the firm.

Key Environmental Issues

Environmental risk assessment and management systems

- The bank has reported to the direct and indirect environmental impacts of its operations and considers it as a major criterion in all its decisions.
- The bank being in the business of granting housing loans encourages housing projects which are environmentally safe and secure.

For further consideration: The company has not provided any information regarding processes set up for assessing environment risk and safety

Sustainable product design and risk assessment

- The bank has reported to have initiatives like Loan against property, LIC HFL advances housing loan to women applicants who are the sole owner of the property or the first owner in a jointly owned property and Energy Efficiency Housing Scheme LIC HFL has been financing individual loans in the projects approved under energy efficiency housing units in urban areas.

For further consideration: The company has not provided data on any targets set

Resource consumption and efficiency

- No disclosure made.

Key Social Issues

Community development activities

- The Company has not directly contributed in community development projects. However through its subsidiary LICHFL Care Homes Limited, the Company is engaged in Community Development Project

Mahindra & Mahindra Financial Services Limited (MMFSL) is one of India's leading Rural NBFC headquartered in Mumbai, India. It is amongst the top tractor financier in India and offers a wide range of financial products to address varied customer requirements.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 31st Dec, 2013

OVERALL ESG
DISCLOSURE SCORE

57

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

32

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **17**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Monetary value of significant fines for non-compliance, number of incidents of discrimination, number of incidents of non-compliance with regulations, renewable energy

Key Governance Issues

Organizational Structure and Board Independence

- As on 31st March, 2014, the Company's Board comprised eight members. The Chairman of the Board and two other members are Non-Executive Non-Independent Directors
- The CSR committee is responsible for the sustainability performance and reviews it twice a year

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is applicable to all individuals working in the Company.
- For further consideration:** No details are provided on how the policies get implemented and reviewed

Regulatory challenge and compliance

- Absolute data is provided for pollution notices and monetary value of significant fines for non-compliance.
- For further consideration:** No details are provided on the court cases

Key Environmental Issues

Environmental risk assessment and management systems

- The company has reported that it identifies and assess potential environmental risks. However, no details are provided for the same.

Sustainable product design and risk assessment

- The company has reported to have initiatives like Project MF Connect 3000, Enquiry Management Loan Application Processing, Mahindra Loan Suraksha (MLS) product that incorporated social concerns, risks.

For further consideration: The company has not provided any impact data or the targets set

Resource consumption and efficiency

- For Energy, GHG emissions, Waste and Water, the company has outlined current consumption data and over time with plans to achieve greater efficiency.

For further consideration: Environmental Expenditure and waste data are not reported

Sustainable Sourcing

- No disclosure made

Key Social Issues

Community development activities

- 1% of company's Profit after Tax was spent towards CSR initiatives

Oracle Financial Services Software Limited is a subsidiary of Oracle Corporation. It is an IT solution provider to the banking industry. It claims to have more than 900 customers in over 145 countries.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 24th July 2014

OVERALL ESG
DISCLOSURE SCORE

44

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

25

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **24**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 5 times last year.
- The Managing Director & CEO is responsible for the sustainability performance and reviews the performance annually

For further consideration: [Extent of board oversight on sustainability performance of the firm is unclear](#)

Ethical business operations and boundaries

- The Company's Code of Ethics and Business Conduct and Anti-Corruption Policy covers aspects of improper payments, insider trading, anti-corruption and financial integrity, amongst others. These are applicable to its employees and Directors and business partners.
- The Supplier Code of Ethics and Business Conduct are applicable to its suppliers.

For further consideration: [No details are provided on how the policies get implemented and reviewed and how suppliers are governed](#)

Regulatory challenge and compliance

- There were no complaints filed or pending against the Company regarding unfair trade practice, irresponsible advertising and/or anti-competitive behaviour in the last 5 years.

Key Environmental Issues

Environmental risk assessment and management systems

- The Company is committed to conducting its business in a manner that minimizes pollution and other adverse environmental impacts. It has adopted the Real Estate & Facilities Global Sustainability Program, which seeks to drive environmental stewardship by reduction of global energy and water consumption, reducing waste and diverting waste from landfill.
- The Company also supports Ministry of Corporate Affairs' Go Green initiative, which makes provision for electronic communication of the Annual Reports and other documents to shareholders.

For further consideration: [The company has not provided data on the targets being set under their SD plan and progress against the same](#)

Sustainable product design and risk assessment

- No disclosure made by the firm

Resource consumption and efficiency

- For Energy, waste, water, GHG emissions and environmental expenditures, no data based disclosure is made.
- Initiatives for energy conservation have been disclosed

For further consideration: [While some data is provided on waste reduction and treatment, the company has not provided data on targets set for itself](#)

Key Social Issues

Community development activities

- No direct contribution in the financial year 2013-14. The Company is however in the initial phase of developing a Corporate Social Responsibility (CSR) program as required by the newly introduced CSR clause in Section 135 of the Companies Act, 2013.

Punjab National Bank (PNB) is an Indian financial services company based in New Delhi, India. Founded in 1894, the bank has over 5,800 branches and over 6,000 ATMs across 764 cities. It serves over 80 million customers.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 22nd May 2014

OVERALL ESG
DISCLOSURE SCORE

53

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

30

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **25**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Monetary value of significant fines for noncompliance, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board comprises of 15 directors which met 13 times last year. This is significantly higher number of meetings compared to other firms, both within this sector and other sectors as well.
- The Executive Director is responsible for the sustainability performance

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is presently applicable to the Bank. However it will be gradually extended to cover subsidiaries.

For further consideration: No details are provided on how the policies get implemented and reviewed

Regulatory challenge and compliance

- Absolute data is provided for pollution notices.

For further consideration: No details are provided on the court cases and monetary fines imposed for non-compliance

Key Environmental Issues

Environmental risk assessment and management systems

- Presently this is not being done. However, the Bank has reported that it is committed to reducing its carbon footprint at its places of operation.

For further consideration: The company has not provided any timeline for development of environmental risk assessment practices

Sustainable product design and risk assessment

- The company has reported to have initiatives like Biometric ATM Card that makes it possible for illiterate or barely literate customers to use banking services. The application supports transaction authorization using fingerprint scans of the cardholder and thus enables them to withdraw money without using PIN. Kiosk Banking Solution (KBS) that has been made live across the Bank through internet and intranet that incorporated social concerns, risks

For further consideration: The company has not provided information on the targets set for itself

Resource consumption and efficiency

- No data based disclosure is made for Energy, waste, water, GHG emissions and environmental expenditures,.
- The Bank has an e-waste policy. The Bank purchases recycled office materials to the maximum extent possible. With the help of e-waste dealers old and obsolete computers, servers, monitors, printers, fax machines, ATMs, UPSs, etc are disposed off.

Key Social Issues

Community development activities

- No disclosure on direct expenditure incurred on community development efforts

State Bank of India (SBI) is a multinational banking and financial services company based in India. It is a government-owned corporation with its headquarters in Mumbai, Maharashtra. As of December 2013, it had assets of US\$388 billion and 17,000 branches, including 190 foreign offices, making it the largest banking and financial services company in India by assets.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 19th May 2014

OVERALL ESG
DISCLOSURE SCORE

34

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

19

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **29**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, waste, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of whole time directors, nominees of the Central Government, official from Government of India and official from Reserve Bank of India. During the year 2013-14, twelve Central Board Meetings were held.
- The Managing Director & Group Executive (National Banking) is responsible for the sustainability performance. The BR performance is assessed annually.

Ethical business operations and boundaries

- The Bank's Business Responsibility Policy also covers aspects related to ethics, bribery and corruption.

Regulatory challenge and compliance

- As on 31.03.2014, 1,024 cases of officers were taken up for examination under the vigilance category
- The Bank didn't receive any show cause/legal notice by Pollution Control Board during the FY 13-14.

For further consideration: No details are provided on the court cases by the bank

Key Environmental Issues

Environmental risk assessment and management systems

- The Bank has initiated a pilot project to determine its Carbon footprint levels, which will help in determining the Bank's resource consumption pattern and enable the Bank to take effective steps to implement various measures for sustainable usage in a cost effective way.

For further consideration: the company has not provided data on the targets being set under their SD plan and progress against the same

Sustainable product design and risk assessment

- The Bank has reported to have services like State Bank Virtual Card for retail customers. State Bank MobiCash Easy, a mobile wallet, was introduced during the year. E -challan cum return for collection of Employees Provident Fund through Branches and Corporate Internet Banking Channel (CINB). State Bank Virtual Card enables secured e-commerce on-line transactions, through Internet Banking facility. Green Channel Counter, Self Service Kiosk, Green Remit Card, prepaid cards like Smart Payout card, Ez Pay Card, VishwaYatra Card are some of the initiatives of the Bank's green initiatives and have social benefits also.
- The bank gives project loans at concessionary rate of interest to encourage reduction of greenhouse gases by adopting efficient manufacturing practices.

For further consideration: the company has not provided data the targets set for itself

Resource consumption and efficiency

- No data based disclosure is made for Energy, waste, water, GHG emissions and environmental expenditures
- The Bank has put in place SMART i.e. Specific, Measurable, Achievable, Realistic and Time bound Green Banking Goals, some of which are obtaining star rating at all Local Head Offices premises from Bureau of Energy Efficiency, construction of 'Green' buildings, waste water treatment, programs to sensitize staff on energy savings.
- SBI is the largest deployed of solar ATMs. Bank has installed windmills in three states for its own energy needs.
- Paperless Banking is promoted and implemented across the country

Key Social Issues

Community development activities

- The Bank has spent a total amount of INR 148.93 crores on CSR activities in FY 13-14

SHRIRAM TRANSPORT FINANCE is India's largest in commercial vehicle finance, was established in the year 1979. The company has a network of 620 branches and 515 rural centers. SRTF are one of the largest asset financing NBFCs in India with a niche presence in financing pre-owned trucks and Small Truck Owners (STOs).

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 9th June 2014

OVERALL ESG
DISCLOSURE SCORE

33

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

19

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **28**

Metrics on which no disclosure is made: Key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Monetary value of significant fines for noncompliance, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- As of March 31, 2014, the Company's Board comprised of nine members. The Chairman of the Board is non-executive Director. The Managing Director is an Executive of the Company.
- The Managing Director is responsible for the sustainability performance
- The BR performance was reviewed two times by the Business Responsibility Committee.

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is applicable to all individuals working in the Company.
- The compliance with the code of conduct is regularly reported and monitored.

Regulatory challenge and compliance

- Absolute data is provided only for pollution notices.

For further consideration: No details are provided on the court cases and monetary fines applicable for non-compliance

Key Environmental Issues

Environmental risk assessment and management systems

- The company has reported to have Environment policy in place. As a part of Green initiative for paperless office, company uses electronic methods of communication within and outside its offices and avoids use of paper as far as possible.
- For payment of Interest, dividend, maturity amount of debentures and fixed deposits etc. as far as possible methods of electronic remittances such as NECS, NEFT, RTGS which also ensures faster credit of money to the bank accounts of the investors are used, avoids use of paper for dividend warrants, interest warrants, cheques.

For further consideration: The company has not provided data on the targets being set under their SD plan and progress against the same

Sustainable product design and risk assessment

- The company has not reported on this.

For further consideration: the company has not provided data the targets set for itself

Resource consumption and efficiency

- No data based disclosure is made.

Sustainable Sourcing

- No data based disclosure is made.

Key Social Issues

Community development activities

- 0.48% of Rs 126,420.77 lakhs was spent community development efforts

Union Bank of India (UBI) is one of the largest government-owned banks of India (the government owns 60.13% of its share capital). It is listed on the Forbes 2000, and has assets of USD 13.45 billion.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 20th May 2014

OVERALL ESG
DISCLOSURE SCORE

40

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

23

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **38**

Metrics on which no disclosure is made: Key stakeholder engagement topics, policy relating to ethics, bribery and corruption voluntary codes related to marketing promotion, and sponsorship, Monetary value of significant fines for noncompliance, number of incidents of discrimination, number of incidents of non-compliance with regulations, energy and water consumption, on discharge of water and effluents, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's Board comprised of four whole-time Directors viz. Chairman & Managing Director and three Executive Directors appointed by the Government of India besides eleven part-time Non- Executive Directors who are eminent personalities from various walks of life.
- The Executive Director is responsible for the sustainability performance

For further consideration: No details are provided on how frequently the sustainability performance of the bank is assessed and the extent of review by the board.

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is applicable to all individuals working in the Company.

For further consideration: No details are provided on whether the company's policy relating to ethics, bribery and corruption covers only the company or extends to the Group/Joint Ventures/ Suppliers/Contractors/NGOs etc

Regulatory challenge and compliance

- No details disclosed regarding any legal challenges faced by the firm

Key Environmental Issues

Environmental risk assessment and management systems

- The Bank has proactively taken several initiatives to reduce its carbon footprint. Constant steps are evolved in reducing the carbon foot prints by utilizing LED lighting fixtures, eco-friendly refrigerant gas in air conditioners, utilizing energy efficient air conditioners and utilizing non-conventional sources of power like solar energy, wherever new projects are initiated.

Sustainable product design and risk assessment

- The company has reported to have initiatives like Bio-Metric ATMs for the rural population in Punjab, ATMs for Visually Challenged, and Loans to farmers are services that incorporated social concerns, risks.

For further consideration: The company has not provided data the targets set for itself

Resource consumption and efficiency

- No data based disclosure is made for Energy, waste, water, GHG emissions and environmental expenditures
- Employed Bus bar Trunking System to ensure safe and cost efficient flow of power in all kinds of applications. The Bank has also carried out re-engineering of the External Electrical Distribution system of Central Office Building wherein the power supply distribution of floors was done through same Trunking System.

Key Social Issues

Community development activities

- No disclosure made on the actual amount spent by the bank on community development efforts
- The Bank has a tie-up with Sri Kshetra Dharmasthala Rural Development Project (SKDRDP) a NGO for financing of Self Help Group (SHGs).

YES BANK is a private bank in India with headquarters in Mumbai. As on 31 March 2014, the bank had 560 branches and 1139 ATMs. It had a balance sheet size of INR 1090.2 billion and Gross NPA of 0.31%

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 23rd April 2014

OVERALL ESG
 DISCLOSURE SCORE

63

SECTOR ADJUSTED ESG
 DISCLOSURE SCORE

36

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **7**

Metrics on which no disclosure is made: Environmental expenditure, Statement on use of energy saving processes, Use of renewable energy

Key Governance Issues

Organizational Structure and Board Independence

- The company's board 8 Board of Directors: 5 independent directors, and 2 Non executive and 1 whole time director
- The Managing Director & CEO is responsible for the sustainability performance and he reviews the Bank's BR performance with the Chief Sustainability Officer every three months.

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is applicable to all individuals working in the Company.
- The Bank has a separate Vendor Management Policy that covers the pertinent issues related to ethics, bribery and corruption.

For further consideration: No details are provided on how the policies get implemented and reviewed

Regulatory challenge and compliance

- Absolute data is provided on CPCB notices, but the company has not provided a comparison over time.

For further consideration: No details are provided on the monetary value of significant fines and court cases

Key Environmental Issues

Environmental risk assessment and management systems

- The Bank's environmental and social policy sets the guidelines through which the Bank accesses the social and environmental risks associated with its lending
- The Bank was a signatory to international protocols and initiatives such as the CDP (formerly, the Carbon Disclosure Project), the Natural Capital Declaration and the UN Global Compact, where the Bank actively participated and contributed to global discussions on pertinent issues.
- The Bank became the first commercial bank in India to achieve the ISO 14001 certification for its Environment Management System, demonstrating its commitment in mitigating its own climate change impact

For further consideration: the company has not provided data on the targets being set under their SD plan and progress against the same

Sustainable product design and risk assessment

- Bank has disclosed that it has segments such as inclusive & Social Banking – YES MONEY/YES SAHAJ/YES LEAP/YES Kisan Dairy Plus, Sustainable Investment Banking and advisory, Microfinance institutions and Affordable Housing Group which are designed to address certain social and environmental concerns
- The Bank focused on reducing consumption of paper through printing and managing its paper procurement practices. Through its focus on paperless banking, the Bank witnessed a steady increase in mobile and internet banking, with more customers moving towards electronic statements. .

For further consideration: the company has not provided data the targets set for itself

Resource consumption and efficiency

- Bank has reported data on GHG emissions, waste recycling and electricity consumption

For further consideration: The company has not provided data on targets (if any) set for decreased resource use

Key Social Issues

Community development activities

- No disclosure made regarding expenditure on community development efforts

Company Profiles

Sector: Oil and Gas

MACRO - ESG ISSUES : A SNAPSHOT

- Resource pressures in India are expected to continue to push technology innovation – many companies are foraying into renewable energy technologies including established ones like Solar and R&D like fuel research. These include conventional fuel refiners.
- Investment by companies in the sector on renewable energy sources has been on an upswing. The major announcements during this period included
 - Tata Power Solar completing a 10 MW solar power plant in Karnataka,
 - ONGC and IOC are also exploring establishing ventures for renewable power projects
- The industry is increasingly interested in alternative fuels and is investing in research and development ; market leaders are foraying into algae-based fuels and fuel cell development Many oil and gas companies are focusing their CSR initiatives and investments on rural markets; several major firms have made concerted efforts to enhance their presence in rural markets through education initiatives and new distribution services
- There is increased focus on intensifying presence in rural areas and extending the distribution network – BPCL has announced plans to open 2000 outlets
- Indian Government has launched a petroleum conservation initiative under the guidance of Ministry for Petroleum & Natural Gas, the Petroleum Conservation Research Association (PCRA) has developed benchmarking standards for diesel pumps and LPG stoves -- work has been conducted closely with the Bureau of Energy Efficiency (BEE)
- The Delhi High Court has stayed proceedings (CCI) investigating alleged anti-competitive practices of IOCL, HPCL and BPCL
- With measures taken by the government, like deregulating diesel prices and raising the cost of natural gas also aided the companies where Stocks of state-owned oil marketing companies BPCL, HPCL and Indian Oil hogged the limelight and surged up to 7.38 % along with the decision to impart worker in the decision making process.
- Due to the high Environmental and Social impact that the sector holds, companies in the sector continued to be under the scanner of various regulatory bodies such as the Competition Council of India (CCI), the judiciary and the Ministry of Environment and Forests. Some of the key highlights of this scrutiny included
 - The CCI was probing petroleum companies such as IOCL, HPCL and BPCL on anti-competitive practices in pricing of petrol. The companies were given respite by the Delhi HC, which stayed the proceedings
 - Cairn India faced IT probe under the controversial retrospective tax law. The assets of the company were attached and the company moved to the high court to contest the same
 - Police filed criminal cases against IOC and HPCL for frequent accidents
 - While Cairn India received clearance for its Rajasthan Block, ONGC reported that it has been unable to explore gas Tripura for 14 years, due to environmental non-clearances.
 - The National Green tribunal has, named the units of BPCL Ltd, HPCL Ltd, Tata Power Ltd, Natural Oil Blending Ltd (NOBL), Chemical Terminal Trombay Ltd. (CTIL) and RCF Ltd. in Mahul area as respondents in the case for “generating particulate material and having stacked or process emission”.
- Focus on Sustainable Development
 - ONGC India and Cleen Ltd Finland join in long-term collaboration in the fields of sustainable development and carbon management
 - IBM and Tata Power Delhi Distribution are collaborating to accelerate Smart Grid Deployment in India

Cairn India is one of India’s largest oil and gas exploration and production company. It is a subsidiary of Vedanta Resources and operates ~ 30 percent of India’s domestic crude oil production. Through its affiliates, Cairn India has been operating for close to 20 years.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 18th June 2014

OVERALL ESG DISCLOSURE SCORE



SECTOR ADJUSTED ESG DISCLOSURE SCORE



Number of metrics tracked **68**

Number of metrics on which no disclosure is made **1**

Metrics on which no disclosure is made: the number of court cases pending

Key Governance Issues

Organizational Structure and Board Independence

- The company’s board has a combination of executive, non-executive and independent members, which meet at-least once every quarter. There is also segregation between the chairman of the board and the CEO, which allows for independent review.
 - The CEO is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the firm
- For further consideration:** While it is reported that the board meets every quarter to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board

Ethical business operations and boundaries

- Cairn India has reported the existence of clear policies for ethics, bribery and corruption, which are issues plaguing the sector.
 - Moreover, the company has confirmed that many of their policies also extend to suppliers and others
- For further consideration:** No details are provided on how the policies get implemented and reviewed. Particularly, there is limited information on how suppliers are governed, given that the no suppliers / vendors were made to undergo screening. This information is necessary to evaluate the efficacy of the policies

Regulatory challenge and compliance

- Although company has confirmed that it received no non-compliance notices and paid no fines, no information has been provided on the number and status of outstanding court cases and other litigation which is a key factor in the sector.
- For further consideration:** The lack of information on outstanding court cases is particularly interesting as the company has been embroiled in an IT probe for its assessments for the year March 31, 2007 – although the company has claimed full compliance, the IT department had halted its \$300 million share buy-back. The company filed and then withdrew a complaint in the Delhi High-Court.

Labor relations and union practices

- Unlike most the companies in the sector, Cairn has no recognized employee association / union and therefore has no health and safety issues agreed as well. The company has reported a certain number of injuries, which are seemingly minor, but it should be ascertained how they are dealt with
- For further consideration:** More information is needed on how employee demands (particularly non-executive employees) are addressed.

Key Environmental Issues

Environmental risk assessment and management systems

- Cairn has voluntarily undertaken SD goals, such as reduction in GHG emissions, investment in renewable energy, and conservation of water
 - The company has a structured process to identify and address environmental risks, which comprises of conducting Environment Impact Assessment- during FY13-14; Cairn undertook 3 EIA studies and public hearings activities.
- For further consideration:** The company should provide more information on quantitative targets and progress against the same, especially since the consumption of both water and energy have gone up

Sustainable product design and risk assessment

- The company transports processed crude oil to the buyers through heated, insulated and buried pipeline, minimizing environmental impact.

Resource consumption and efficiency

- For Energy, Waste and Water, the company has outlined both current consumption and last year consumption data.
- For further consideration:** Non-hazardous waste for Cairn India has increased by 228% in the reporting year

Key Social Issues

Community development activities

- Cairn India and IL&FS Education have joined hands to work towards for improving quality education in Barmer

Adani Power Limited is the power business subsidiary of Indian conglomerate Adani Group with head office at Ahmedabad, Gujarat. The company is India's largest private power producer with capacity of 8620 MW and also it is the largest solar power producer of India with capacity 40 MW.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 15th July 2014

OVERALL ESG
DISCLOSURE SCORE

41

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

23

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **24**

Metrics on which no disclosure is made: Expenditure on environmental protection GHG Gas Emission, Waste management, Regulatory challenges, Supply chain standards and selection and Employee health, safety and wellness / Training and Development

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meet at-least once every quarter. There is also segregation between the chairman of the board and the CEO, which allows for independent review.
- The sustainability performance is reviewed by the CEO (which is unlike most other companies, where the performance is reviewed by the board or committees of the board).

For further consideration: While it is reported that the CEO reviews the business responsibility performance periodically, it is not clear if the board is overseeing the same and the periodicity with which it is reviewed – which is important to gauge how integral it is to company

Ethical business operations and boundaries

- The company has a code of conduct and a policy on human rights. However they are not applicable to suppliers and vendor. Moreover, there are limited details on the mechanisms for the implementation of these policies – which is needed to assess their efficacy.
- Adani has reported that many of their policies extend do not extend to entities beyond the organizational boundaries

For further consideration: The standards employed for supplier / vendor selection and how they cover and go beyond compliance are needed

Regulatory challenge and compliance

- Although company has confirmed that there are no **pending** court cases and other show cause notices, no information is provided on the number of cases and legal notices dealt with in the year.

For further consideration: In this sector particularly, where the legal and reputational risk run high for both businesses and investors, information is needed the complete legal challenges faced by the company

Labor relations and union practices

- Adani does not have a recognized employee association / union.
 - The company has provided details on the health and safety training received by the employees and the adherence to OHSAS: 18001-2007
- For further consideration:** More information is needed on how employee demands (particularly non-executive employees) are addressed. The company has limited disclosure on health & safety training for employees and rates of injuries. Considering that there is neither a recognized employee association nor disclosure of how these issues are covered with employees, these issues should be paid attention to

Key Environmental Issues

Environmental risk assessment and management systems

- Adani has a ISO 14001 certified Environment Management System and also has 1 project registered under the CDM of the UNFCC.
- For further consideration:** No data is provided on key environmental parameters (such as emissions and water discharge). It is also not clear how much impact is being created from the Mundra Thermal Power Project (Which is registered under CDM)

Sustainable product design and risk assessment

- The company has implemented the reuse of entire treated effluent, which is now reused in the Flue Gas Desulphurization process. The outlet effluent is again treated and let out through the sea water outfall

Resource consumption and efficiency

- The company has adopted technologies for energy efficiency and water treatment and confirmed that the waste generated is within permissible limits
- For further consideration:** There is limited data being reported on resource consumption or the impact of any of the systems put in the place

Key Social Issues

Community development activities

- Adani spent Rs.74 crores on community development activities and outlined the initiatives undertakes
- For further consideration:** No information is provided on the spent on political lobbying and contribution.

Bharat Petroleum Corporation Limited (BPCL) is an Indian state-controlled oil and gas company headquartered in Mumbai, Maharashtra. BPCL has been ranked 229th in the Fortune Global 500 rankings of the world's biggest corporations for the year 2013.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 12th August 2014

OVERALL ESG
DISCLOSURE SCORE

75

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

43

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **6**

**Metrics on which no disclosure is made: Expenditure on environmental protection
Regulatory challenges and fines, political contribution, incidents of discrimination**

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 7 times last year.
- The sustainability performance is the responsibility of a sustainability and CSR committee which provides information to the board.

For further consideration: More information is needed on the constitution of the sustainability committee, their the overall accountability, and how their work is integrated into the other divisions of the company

Ethical business operations and boundaries

- The company has a code of conduct and a policy on human rights. In addition, it is also a signatory to the UNGC.
- The policy relating to ethics, bribery and corruption also extends to suppliers and contractors through the Integrity Pact, which is a legal commitment.

For further consideration: No details are provided on how the policies get implemented and reviewed and how suppliers are governed, given that the no suppliers / vendors were not made to undergo screening.

Regulatory challenge and compliance

- **BPCL has not disclosed the court cases and regulatory challenges in its entirety**

For further consideration: Relative non-disclosure on this issue is crucial as BPCL had received two show-cause notices from Rajasthan Pollution Control Board at our Kota operations and 3 court cases on anti-competitive behavior.

Labor relations and union practices

- BPCL has a recognized employee association / union, which covers most of its work force

For further consideration: More information is needed on rates of injuries and injuries to evaluate the impact of training.

Key Environmental Issues

Environmental risk assessment and management systems

- To address the environmental /climate change risk the company is reporting to have explored opportunities in the field of alternate energy and strive towards increasing our renewable energy mix. The company made significant investment in various renewable energy projects in 2012-13 and generated about 26891.87 MWH of energy through these projects.

For further consideration: the company should outline the targets it has set for reduction in environmental impact

Sustainable product design and risk assessment

- BPCL's R&D Centre is developing products and processes to minimize any social or environmental concerns. They include Euro III & IV Motor Spirit, Euro III & IV HSD and Horticulture Mineral Oil (HMO)

For further consideration: No data is provided on key impact of these products on resource consumption and environmental impact.

Resource consumption and efficiency

- The company has outlined its director energy consumption, water consumption and impact of efficiency measures on both –which were achieved despite increase in production
- 10% of the energy is reported to come from renewable sources – which is amongst the highest in the sector

For further consideration: There company is prepared to set and disclose on performance benchmarks for resource consumption benchmark able data as outlined above

Key Social Issues

Community development activities

- Although the company did not disclosure the spend on community development efforts, it is continuing with project Boond toward water positivity of villages

For further consideration: No information is provided on the spent on political lobbying and contribution.

GAIL (India) Limited is the largest state-owned natural gas processing and distribution company in India. It is headquartered in New Delhi. It has following business segments: Natural Gas, Liquid Hydrocarbon, Liquefied petroleum gas Transmission, Petrochemical, City Gas Distribution, Exploration and Production, GAILTEL and Electricity Generation.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 4th August 2014

OVERALL ESG
DISCLOSURE SCORE

96

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

56

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **6**

Metrics on which no disclosure is made: Marketing

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 11 times last year.
- The sustainability performance is the responsibility of a sustainability committee which provides information to the board, which meets every 3 months (amongst the highest in the industry)

For further consideration: More information is needed on the constitution of the committee, their the overall accountability, and how their work is integrated into the other divisions of the company

Ethical business operations and boundaries

- The company has a code of conduct and a policy on human rights, which is not applicable to supplies, vendors etc.
- The ' Integrity Pact' and "Fraud Prevention Policy" of the company extends to Suppliers, contractors etc.
- However, the company is in only in the process of setting up systems to screen Human Rights performance of our suppliers and contractors.

For further consideration: No details are provided on how the policies get implemented and reviewed and how suppliers are governed.

Regulatory challenge and compliance

- The company has provided detailed information on the show cause notices received over time

Labor relations and union practices

- GAIL has a recognized employee association / union, which covers most of its work force

For further consideration: A few fatalities and injuries were reported – it is important to assess if the company is making plans to up the safety standard (adopt internationally accepted standards) to address this

Key Environmental Issues

Environmental risk assessment and management systems

- The company is measuring environmental risks and has systems and policies in place

For further consideration: the company should outline the targets it has set for reduction in environmental impact

Sustainable product design and risk assessment

- The company has reported 3 products which are sustainably designed – i) the Transmission of Natural Gas & LPG ii) Liquid Hydrocarbon and iii. Petrochemicals (HDPE & LLDPE) –for each of these products, the company has proved details of resource savings achieved

For further consideration: The company can and should identify performance benchmarks

Resource consumption and efficiency

- The company has outlined its director energy consumption, water consumption and impact of efficiency measures on both –which were achieved despite increase in production

For further consideration: The company has reported that no water sources were affected. Considering only 45% of the water is recycled, it is important to know where the water is coming from. The company however has reported detailed EWW data over time and can measure performance benchmarks to allow stakeholders to evaluate performance against targets

Key Social Issues

Community development activities

- GAIL has spent 30 Crores on community development efforts, it is working on energy access

For further consideration: The company should provide impact data of the CSR spend.

Hindustan Petroleum Corporation Limited (HPCL) is an Indian state-owned oil and natural gas company with its headquarters at Mumbai, Maharashtra. HPCL has been ranked 260th in the Fortune Global 500 rankings of the world's biggest corporations (2013) and 4th among India's Companies for the year 2012.

- **Annual Business Responsibility Report filed:** No
- **Date of release of sustainability report:** 3rd September 2013

OVERALL ESG
 DISCLOSURE SCORE

64

SECTOR ADJUSTED ESG
 DISCLOSURE SCORE

37

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **4**

Metrics on which no disclosure is made: CPCB notices, sustainable sourcing and product life cycle

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 10 times last year.
- For further consideration:** The company has not provided details on who is responsible for the review of the sustainability performance and how it is getting reviewed

Ethical business operations and boundaries

- The company has a code of conduct and a policy on human rights, but it is not reported if they are applicable beyond the organizational boundary.
 - The contractors are required to give an undertaking that they abide by human rights and regulations before bidding. The organization screens the documentation accordingly and only those who conform to the requirement are retained.
- For further consideration:** No details are provided on how the suppliers are audited on their undertaking and what supporting documents / stand certification are needed

Regulatory challenge and compliance

- The company has provided details of 3 cases with the CCI but have not reported on the show cause notices received from Ministries

Labor relations and union practices

- Although HPCL does have an employee association, only 53% pf the employees are covered under the same.
- For further consideration:** A injuries were reported but it is not clear what the policy to deal with them was. It is also important to ensure the union rights of the non-executive workforce.

Key Environmental Issues

Environmental risk assessment and management systems

- The company is measuring environmental risks and has systems and policies in place - HPCL is ISO 9001 and ISO14001 certified. We have SOPs developed to monitor any significant impact of our operations on the Environment. The water bodies were not affected by any of our current operations.
- For further consideration:** the company should outline the targets it has set for reduction in environmental impact

Sustainable product design and risk assessment

- Although the company has not reported any products which were design sustainably, the company has confirmed interest in RE Power generation
- For further consideration:** The company should provide more data on targets for RE generation

Resource consumption and efficiency

- Despite significant energy efficiency measures being reported, the plant energy consumption is reported to have remained the same – the company has said this is due to increased complexity
 - HPCL has reduced 10% of water consumption and provided detailed information ion waste.
- For further consideration:** In absence of no visible reduction in consumption, the company should provide benchmarks for impact measurement – eg: Energy consumption per unit of production

Key Social Issues

Community development activities

- HPCL has spent 21.76 Crores on community development efforts, it is working on Child-Care, Education, Health Care, Skill Development and Community Development
- For further consideration:** The company should provide impact data of the CSR spend.

Indian Oil Corporation Limited, or Indian Oil, is an Indian state owned oil and gas corporation with its headquarters in New Delhi, India. It is the world's 88th largest corporation, according to the Fortune Global 500 list, and the largest public corporation in India when ranked by revenue

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 4th August 2014

OVERALL ESG
 DISCLOSURE SCORE

80

SECTOR ADJUSTED ESG
 DISCLOSURE SCORE

46

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **1**

Metrics on which no disclosure is made: Marketing

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 13 times last year. The company, however, has fallen out of compliance with the requirement for the number of independent directors.
- The sustainability performance is reviewed by the board, and is the ultimate responsibility of the Chairman

For further consideration: More information is needed on the executive level accountability of the sustainability performance

Ethical business operations and boundaries

- The company has a code of conduct and a policy on human rights, which is applicable to supplies, vendors etc
- IOC is also a founder member of United Nations Global Compact (UNGC) and the company also follows the Bureau of Indian Standards (BIS) guidelines for product information and labeling

For further consideration: No details are provided on how the policies get implemented and reviewed and how suppliers are governed. (Considering no data is disclosed on any supplier screening parameter)

Regulatory challenge and compliance

- The company reported that 2 cases have been filed against regarding anti-competitive behavior.
- The company has also provided detailed information on the show cause notices received over time – 2 notices served to the Haldia refinery and 1 by the Rewari station

Labor relations and union practices

- IOC has a recognized employee association / union, which covers most of its work force

For further consideration: IOC has reported almost the highest fatalities and it is important to assess if the company is making plans to up the safety standard (adopt internationally accepted standards) to address this

Key Environmental Issues

Environmental risk assessment and management systems

- The company is measuring environmental risks and has systems and policies in place and has planned to reduce carbon and water footprints by 18% the year 2020, with reference to 2013-14.
- The company has 6 projects registered as CDM (Clean Development Mechanism) projects – amongst the highest in the sector

For further consideration: the company has made no disclosures on if and how they manage their biodiversity impact.

Sustainable product design and risk assessment

- The company has produced 3 products which have reduced environmental impact - an "Ethanol Blended Petrol (EBP), BS-IV products and Auto Gas - a clean, high octane and eco-friendly fuel (lower emissions with respect to Petrol and Diesel).

For further consideration: the company has not provided data on the impact of these products viz-a-via its alternatives

Resource consumption and efficiency

- The company has implemented 126 Energy Conservation projects resulting in saving of 1,02,800 Standard Refinery Fuel Tons (SRFT) (Rs. 420 crore).
- The company has also disclosed on reduction in energy consumption and waste as a result of various initiatives

For further consideration: The company has not provided data on water impact

Key Social Issues

Community development activities

- IOC has spent 81.9 crores on community development efforts, and has provided detailed information on its impact

NTPC Limited (formerly known as National Thermal Power Corporation Limited) is a Central Public Sector Undertaking (CPSU) under the Ministry of Power, Government of India, engaged in the business of generation of electricity and allied activities. NTPC's core business is generation and sale of electricity to state-owned power distribution companies and State Electricity Boards in India.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 15th May 2014

OVERALL ESG
DISCLOSURE SCORE

99

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

57

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **5**

Metrics on which no disclosure is made: Expenditure on water sources, suppliers undergone human rights screening and marketing.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 11 times last year.
- The sustainability performance is reviewed by the board, and is the ultimate responsibility of the Chairman and Managing Director

For further consideration: More information is needed on the executive level accountability of the sustainability performance

Ethical business operations and boundaries

- The company has a code of conduct and a policy on human rights
- The Fraud Prevention Policy applies to vendors, suppliers, contractors, consultants, service providers or any outside agency (ies) doing any type of business with NTPC.
- The stations have been certified ISO 14001 & OHSAS 18001

For further consideration: No details are provided on how the policies get implemented and reviewed and how suppliers are governed. (Considering no data is disclosed on any supplier screening parameter)

Regulatory challenge and compliance

- The company reported details of cases filed against the company
- Aberrations were observed in 17 instances and remarks were received from regulators. Cases with Appellate Tribunal For Electricity (APTEL) : 34 nos., Cases in Supreme Court : 82 nos. and 22 cases are in Consumer forums

For further consideration: No details are provided on the monetary value of fines

Labor relations and union practices

- About 50-55% of the permanent employees are in the recognized union of workmen and no employees are hired on a contractual basis

For further consideration: The company has provided detailed information on the fatalities which are relatively high – more information is needed on how they are being addressed

Key Environmental Issues

Environmental risk assessment and management systems

- NTPC assesses potential environmental risks through "Enterprise Risk Management framework, which comprises of an ED level committee, which meets every quarter to review and mitigate risks. The risk portfolio includes "Compliance of emission, ash utilization and regulatory norms" risk.
- The company has 2 CDM projects and 8 in the pipeline – amongst the highest in the sector

For further consideration: the should provide more information on the specific targets they have set

Sustainable product design and risk assessment

- The company does not have any specific products with lower environmental impact – however, the company is making efforts to lower the energy and water consumption in generation of electricity as well.

For further consideration: the company has provided detailed benchmarks for energy, coal and water consumption and can begin to provide improvements over time

Resource consumption and efficiency

- The company has also disclosed on reduction in energy consumption and waste as a result of various initiatives

For further consideration: Although the company has a dedicated initiative to lower the GHG emissions, no data has been provided for the same

Key Social Issues

Community development activities

- NTPC has spent 128.35 crores on community development efforts, and has provided limited information on its impact

Oil and Natural Gas Corporation Limited, or **ONGC**, is an Indian state owned oil and gas corporation with its headquarters in Dehradun, Uttarakhand. ONGC is ranked as the Top Energy Company in India and 21st among global Oil and Gas Operations industry in Forbes Global 2000 list of the World's biggest companies for 2014.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 8th August 2014

OVERALL ESG
DISCLOSURE SCORE

44

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

25

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **1**

Metrics on which no disclosure is made: Marketing

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 12 times last year.
- The Chairman and Managing Director is responsible for the sustainability performance

Ethical business operations and boundaries

- ONGC has a policy for every activity such as - procurement, payment, tendering, contracting, HR etc.
- ONGC is also a founder member of United Nations Global Compact (UNGC) and the company also follows the Bureau of Indian Standards (BIS) guidelines for product information and labeling, OISD and other statutory standards
- The company is also one of the few ones to have reported that their policy is audited by the auditors
- The company has included a clause asking commitment from suppliers, contractors and vendors to uphold human rights as per Indian laws and regulations and ensure compliance with all applicable labour laws such as minimum and equal wages, prohibition of child labour and forced labour.

For further consideration: No details are provided on how the policies get implemented and reviewed and how suppliers are governed. (Considering no data is disclosed on any supplier screening parameter).

Regulatory challenge and compliance

- In FY13, there were 4 reported cases of corruption – 3 cases have been registered under vigilance and one case has been registered under CBI
- There are few other accidental instances of environmental pollution as per regulations. All issues have been resolved with CPCB / SPCB, except the Uran case.

Labor relations and union practices

- 10 unions have been conferred recognition on the basis of verification through secret ballot. They recognize all the unionized categories of employees in their respective work-centres, though some may hold membership with rival unions

For further consideration: The company has reported relative data on fatality – which is not enough to ascertain the number of deaths and how they are dealt with.

Key Environmental Issues

Environmental risk assessment and management systems

- ONGC has implemented environmental management system like ISO 9001, OHSAS 18001 and ISO 14001 at all its operational work centres
- The company has 11 projects registered as CDM (Clean Development Mechanism) projects –the highest in the sector

For further consideration: the has not provided data on the targets being set under their SD plan and progress against the same

Sustainable product design and risk assessment

- Although ONGC has not introduced any new sustainability oriented products but is making investments in renewable energy

For further consideration: the company has not provided data the targets set for itself

Resource consumption and efficiency

- The company is one of the few in the sector which is looking at water efficiency – it has a 20 MLD desalination plant and has started Water foot-printing which is likely to be completed by 2015 and dedveloping a waste reporting systems
- The company is also pursuing aggressive RE targets

Key Social Issues

Community development activities

- ONGC has spent 34 crores on community development efforts, and has provided detailed information on its impact

Reliance Industries Limited (RIL) is an Indian conglomerate holding company headquartered in Mumbai, Maharashtra, India. RIL is the second-largest publicly traded company in India by market capitalization and is the second largest company in India by revenue after the state-run Indian Oil Corporation.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 18th April 2014

OVERALL ESG
DISCLOSURE SCORE

78

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

45

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **2**

Metrics on which no disclosure is made: Marketing

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets at least 5 times a year
- A board committee is responsible for the sustainability performance

For further consideration: More information is needed on the executive level accountability of the sustainability performance

Ethical business operations and boundaries

- The company has a code of ethics and a policy against corruption which is applicable to all partners
- In addition to its own policy the company also is following the UNGC, Industry standards, such as those promoted by the American Petroleum Institute (API) / International Petroleum Industry Environmental Conservation Association (IPIECA), World Business Council for Sustainable Development (WBCSD)

For further consideration: No details are provided on how the policies get implemented and reviewed and how suppliers are governed. (apart from truckers) (Considering no data is disclosed on any supplier screening parameter).

Regulatory challenge and compliance

- The company has reported that there are no legal notices pending at the end of the year

For further consideration: There should be increased regulatory disclosure considering a controversy regarding an Ashton Martin accident was not a part of the disclosure

Labor relations and union practices

- The company has confirmed that all employees belong to a union

For further consideration: The company has not provided the details on the topics that are covered with the union

Key Environmental Issues

Environmental risk assessment and management systems

- From an environmental risk perspective, the company is focusing on energy security – therefore the company is investing in alternate energy
- The company has a separate Clean Development Mechanism (CDM) cell to focus on climate change mitigation projects. In addition, all these sites have also been covered under the British Safety Council UK's environment five star audit.
- All the manufacturing Divisions are certified by ISO-14001 environment management system and integrated with quality and safety management systems (ISO 9001 and OHSAS 18001).

For further consideration: the has not provided data on the targets being set and progress against the same

Sustainable product design and risk assessment

- Reliance Industries to invest in Algae.Tec and fund its first India Plant. It has also introduced a Double Wall Corrugated Polyethylene Pipes, PVC-based food grain packaging, PP non-woven fabric.

For further consideration: the company has not provided any impact data on the 3 products

Resource consumption and efficiency

- Although the company is working toward waste reduction, it has increased by over 9%.

For further consideration: while resource consumption data is provided, the company has not provided any comparison over the previous reporting periods to measure the impact of efficiency measures

Key Social Issues

Community development activities

- RIL has spent 711 crores on community development efforts, and has provided detailed information on its impact. CSR expenditure incurred by RIL is on various projects pertaining to education, healthcare, livelihood support, rural

Tata Power is an Indian electric utility company based in Mumbai, Maharashtra, India and is part of the Tata Group. The core business of the company is to generate, transmit and distribute electricity. With an installed electricity generation capacity of about 8560 MW, it is India's second largest private power producer.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 29th May 2014

OVERALL ESG
DISCLOSURE SCORE

85

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

48

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **1**

Metrics on which no disclosure is made: Are number of court cases and fines on non compliance.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 10 times last year.
- Anil Sardana Designation CEO & Managing Director is responsible for the sustainability performance and Tata Power also has a Sustainability Advisory Council (SAC) comprising an independent Director which meets at least 4 times a year. CEO & Managing Director also reviews sustainability issues at least 6 times a year, and National & International experts from Civil Society, Environment, Biodiversity and Community Relations – all this indicates high integration of the sustainability issues in the company

Ethical business operations and boundaries

- Tata Power has a written code of ethics and also adheres to the United Nations Global Compact (UNGC) and the company also follows the Bureau of Indian Standards (BIS) guidelines for product information and labeling, OISD and other statutory standards
- The company has confirmed that the policies are applicable to suppliers. Tata Power has major operations in India and the engaging child labour in any form in the company or in supply chain is strictly prohibited. A check is administered while supplier selection process as they are requested to abide by the Tata Code of Conduct clauses. Tata Power's Human Rights policy helps keep a check on all the parameters pertaining to Child labour, forced labour, freedom of association & collective bargaining and discrimination

For further consideration: No details are provided on how the policies get implemented and reviewed and how suppliers are governed. (Considering no data is disclosed on any supplier screening parameter)

Regulatory challenge and compliance

- Yes regulatory and pollution board notices have been reported

For further consideration: No details are provided on the monetary value of fines and court cases.

Labor relations and union practices

- Only 33% of the employees are reported to be in the union

For further consideration: The rights and the agreements of the rest of the employees should be ascertained

Key Environmental Issues

Environmental risk assessment and management systems

- Yes –the Company has Clean Development Mechanism (CDM) projects registered with United Nations Framework Convention on Climate Change (UNFCCC) and intends to generate power through Non-Carbon Emitting Sources (NCES) like hydro, solar, wind, waste heat recovery etc

For further consideration: the has not provided data on the targets being set under their SD plan and progress against the same

Sustainable product design and risk assessment

- Tata Power Solar has completed 10 MW solar power plant in Karnataka and is developing 160 MW wind and eyeing more purchases in wind and solar
- Based on market survey and scientific load research several initiatives are implemented in Demand Side management schemes. The company has collaborated with IBM to accelerate Smart Grid Deployment in India
- Tata Power launched solar power inverter

For further consideration: the company has not provided data the targets set for itself

Resource consumption and efficiency

- For each of its plants, the company has provided breakup of energy consumption and has also reported on GHG emissions and water consumption
- The company is also pursuing aggressive RE targets

Key Social Issues

Community development activities

- Tata Power has spent 7 crores on community development efforts, and but has not provided detailed information on its impact

Company Profiles

Sector: Information and Communication Technology

MACRO - ESG ISSUES : A SNAPSHOT

- The Telecom industry is actively looking at “greening” the tower infrastructure and focusing on reducing the carbon footprints. Companies are undertaking ‘green projects’ such as use of renewable sources of electricity for rural base stations/telecom towers by telecom service providers such as IDEA Cellular, Vodafone, etc.
- Indus Towers recently announced an initiative to green 35,000 telecom sites across 15 telecom circles
- PricewaterhouseCoopers was invited by telecom industry to recommend initiatives for operators to reduce carbon emissions
- The sector has one of the levels of voluntary non-financial / ESG disclosure. However, there is weak disclosure on sustainable products and initiatives as a majority of disclosures pertain to inclusive growth, HR and corporate policies are weak.
- Wipro has topped India’s 200 Climate Disclosure Leadership Index (CDLI)
- A report by Toxic Link found that 16 out of 50 leading companies are “wanting in their role on e-waste management” - these include Akai, BPL Group, Blackberry and HCL. Given the e-waste guidelines released by the Indian government, this is a big setback
- Mobile service providers are actively pursuing rural market, betting on mobile banking and SMS-based applications coupled with enhanced distribution/service networks.
- The industry has been in highlight over the spectrum crunch for the auction of 2015 and delay in providing spectrums by DoT.

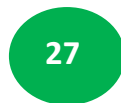
Bharti Airtel Limited is an Indian multinational telecommunications services company headquartered in New Delhi, India. It operates in 20 countries across South Asia, Africa, and the Channel Islands. Airtel has a GSM network in all countries in which it operates, providing 2G, 3G and 4G services depending upon the country of operation. Airtel is the world's third largest mobile telecommunications company by subscribers, with over 275 million subscribers across 20 countries as of July 2013.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 29th April 2014

OVERALL ESG
 DISCLOSURE SCORE



SECTOR ADJUSTED ESG
 DISCLOSURE SCORE



Number of metrics tracked **68**

Number of metrics on which no disclosure is made **24**

Metrics on which no disclosure is made: number of court cases, waste by weight, use of renewable energy, and suppliers screening on human rights.

Key Governance Issues

Organizational Structure and Board Independence

- The Board comprises of thirteen members with a Chairman, Managing Director & CEO (International) and Joint Managing Director & CEO (India) beside three Non-Executive and seven Non-Executive Independent Directors. Two of the Board members including Chairman are founder members
- The Board is responsible for overall sustainability, primarily CSR performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: No disclosure regarding who is primarily responsible for the BR performance of the firm

Ethical business operations and boundaries

- Bharti Airtel has reported the existence of clear policies for ethics, bribery and corruption.
- The company has confirmed that the policies extend to the entire Bharti Group and covers employees, suppliers & contractors, service providers, channel partners and their employees.
 For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Yes – absolute data is provided on compliance related fines and CPCB notices, but the company has not provided a comparison over time.

For further consideration: No disclosure regarding court cases

Customer satisfaction

- The company has provided percentage of pending customer complaints which need resolution. They also conduct customer satisfaction surveys.

For further consideration: More information can be provided on, how many complaints were made and results of the surveys.

Key Environmental Issues

Environmental risk assessment and management systems

- The company has reported to have identified climate change and waste management as material issues from a sustainability perspective and has reported to have aligned its sustainability strategy around the same. However, no supporting data is being provided.

For further consideration: The company should provide more supporting data based information on the above. Considering that the company has come up with a sustainability report, the disclosure content is fairly low compared to its peers in the sector.

Sustainable product design and risk assessment

- The services provided by the company have a social impact and as they leverage on the existing platforms provided by the Company, they have no impact on sourcing/ production or distribution. They have confirmed that no broad-based impact on energy and water due to these services.

Resource consumption and efficiency

- For Energy, the company has outlined current consumption. For GHG emissions, data being provided are over time, and is also benchmark able.

For further consideration: However, there is lack or no data on targets for improvement of on the energy and emission parameters. Lack of disclosure on water and weight of waste being generated except direct disclosure of e-waste.

Key Social Issues

Community development activities

- Bharti Foundation provides quality education, free of cost to underprivileged children in rural India, with a special focus on the girl child and the weaker sections of society [SC/ST/OBC]
- Bharti Foundation contributed Rs. 105.82 mn towards CSR and community development

Bharti Infratel is a provider of tower and related infrastructure and on a consolidated basis is one of the largest tower infrastructure providers in India, based on the number of towers that Bharti Infratel owns and operates. In India, Bharti Infratel owns 33,446 towers across 11 circles.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 24th April 2014

OVERALL ESG
DISCLOSURE SCORE

44

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

25

Number of metrics tracked **68**

Number of metrics on which disclosure is not made **21**

Metrics on which no disclosure is made:
Expenditure on key stakeholder engagement, Monetary value of significant fines for noncompliance court cases, weight of waste by type and disposal method, on discharge of water and effluents, GHG emissions, energy consumption, suppliers screening on human rights.

Key Governance Issues

Organizational Structure and Board Independence

- The Board of Directors comprises 10 Directors including 2 Executive Directors, 3 Non-Executive, Non-Independent Directors and 5 Non-Executive Independent Directors.
- The Managing Director & CEO assesses the BR performance of the Company on annual basis, which indicates higher than average integration of sustainability issues in the company but lower than average frequency of assessment of BR performance

For further consideration: While it is reported that the board meets annually to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board.

Ethical business operations and boundaries

- Bharti Infratel has reported the existence of clear policies for ethics, bribery and corruption.
- The company has confirmed that the policy extends to the entire Bharti Group and covers employees, suppliers & contractors, service providers and their employees. In addition to this, the Company’s Consequence Management Policy prescribes the action to be initiated in all confirmed cases of violation.

For further consideration: However, the company hasn’t disclosed its key stakeholder engagement mechanism and with suppliers.

Regulatory challenge and compliance

- Absolute data is provided for pollution notices, but the company has not provided a comparison over time.

For further consideration: No disclosure regarding monetary value of significant fines for noncompliance and court cases

Customer satisfaction

- The company has provided with the number of customer complaints. They also conduct customer satisfaction surveys.

For further consideration: **More information can be provided on, how many complaints were received and results of the surveys.**

Key Environmental Issues

Environmental risk assessment and management systems

- Company has ‘Green Towers P7’ program as a step to create positive impact on the environment.

For further consideration: The company should provide more supporting data based information on the above. Lowest amount of disclosure on environment within the sector.

Sustainable product design and risk assessment

- Yes, the company has reported to have reduced energy and transportation cost with significant CO2 emissions. However, no data has been provided to support the claims.

Resource consumption and efficiency

- Company has 2,000 solar powered towers with installed capacity of ~9 MW as on March 2014 which helps them save over 28,000 metric tonnes of CO2 emissions

For further consideration: There is lack or no data based information on key parameters related to waste, water and GHG emissions

Key Social Issues

Community development activities

- Rural education initiatives at schools – a matching contribution plan wherein the Company matches the contribution made by the Employees.
- During the year 2013-2014, Bharti Infratel Ltd. Has contributed Rs 57 Mn (approx.) towards various philanthropic activities

TATA Consultancy Services Limited (TCSL) is a multinational information technology (IT) service, consulting and business solutions company headquartered in India. TCS operates in 46 countries. TCS is the largest Indian company by market capitalization and is the largest India-based IT services company by 2013 revenues.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 21st May 2014

OVERALL ESG
DISCLOSURE SCORE

82

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

46

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **6**

Metrics on which no disclosure is made: court cases

Key Governance Issues

Organizational Structure and Board Independence

- The Company has eleven Directors with a Non-Executive Chairman and a Non-Executive Vice Chairman. Of the eleven Directors, ten (i.e. 90.91%) are Non-Executive Directors and six (i.e. 54.55%) are Independent Directors.
- The CEO is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets every quarter to review the business performance, it is not clear if the sustainability performance are reviewed during these meetings and to what extent are they monitored by the board

Ethical business operations and boundaries

- TCS has reported the existence of clear policies for ethics, bribery and corruption.
- The company has the Tata Code of Conduct which serves as the ethical roadmap for all Tata companies. All suppliers, partners and joint ventures are expected to adopt Tata Code of Conduct (TCoC) or a joint code of conduct incorporating all elements of the TCoC.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided, but the company has not provided a comparison over time.

For further consideration: No disclosure made regarding court cases

Key Environmental Issues

Environmental risk assessment and management systems

- The company has The 'Tata Group Climate Change Policy' and TCS' 'Environment Policy' which guides the organization to continually mitigate the impact on climate change and global warming as a result of its operations. ISO 14001:2004 has been adopted as the environment management system standard.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- There are services in place as sustainability oriented products with addressed area as social concern (TCS Financial Inclusion platform, DigiGov™, EC View).

For further consideration: No data has been provided on the how these products incorporate sustainability

Resource consumption and efficiency

- For Energy, Waste and Water, the company has outlined both current and over time consumption with plans to achieve greater efficiency.

Key Social Issues

Community development activities

- Adult Literacy Program is among the first instances of use of IT Core Competence for social causes.
- TCS invested INR 71.60 crores on CSR initiatives during the financial year. Associates volunteered 90,828 hours in CSR programmes. TCS currently partners with 322 organizations globally.

Infosys (formerly Infosys Technologies) is an Indian multinational corporation that provides business consulting, information technology, software engineering and outsourcing services. On 31 March 2014, its market capitalization was INR 188,510 Cr (\$31.11 billion), making it India's fifth largest publicly traded company.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 15th April 2014

OVERALL ESG
DISCLOSURE SCORE

67

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

38

Number of metrics tracked **68**

Number of metrics on which disclosure is made **22**

Metrics on which no disclosure is made: stakeholder engagement, show cause/ legal notices received from CPCB/SPCB, court cases and environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which the majority of Board members – seven out of 13 – are independent members.
- Executive Vice Chairman is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the executive chairman reviews the business performance, the frequency of review is not disclosed and to what extent they are monitored by the board are also not discussed.

Ethical business operations and boundaries

- Infosys has reported the existence of clear policies for ethics, bribery and corruption. Every employee compulsorily attends a session on values during his or her induction, and acknowledges the Code of Conduct
- The company has confirmed that the policies are applicable to suppliers. Also, details are provided on the implementation mechanism

Regulatory challenge and compliance

- Absolute data is provided on monetary fines arising from non-compliance and court cases, but the company has not provided a comparison over time.
- No disclosure on the number of show cause/ legal notices received from CPCB/SPCB.

Key Environmental Issues

Environmental risk assessment and management systems

- The company has periodic assessment of environmental risks and has also achieved targets identified in 2008-09. It is continuing the adoption of the latest technology concepts such as virtualization, consolidation, and cloud in order to reduce the physical footprint of its servers, and has further expanded its internal private cloud capacity, with MyCloud.

For further consideration: The company should provide more over time data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- There are services like Optimized asset management, E-waste management, Server and storage virtualization as part of sustainability oriented services reducing the carbon footprint and the energy consumption. The company has made a data based disclosure on the same.

Resource consumption and efficiency

- For Energy, Waste and Water, the company has outlined both current and data overtime consumption with plans to achieve greater efficiency.
- Goal of the firm is to source 100% electricity from renewable sources by fiscal year 2018.

For further consideration: No disclosure is made on environmental protection expenditures

Key Social Issues

Community development activities

- The Sabbatical Policy for Community Service enables employees to participate in and lead community development projects while receiving monetary support from the Company.
- Community investments (contribution to Infosys Foundation) USD 1 million

Wipro Limited (Western India Products Limited) is a multinational IT Consulting and System Integration services company headquartered in Bangalore, Karnataka, India. On 31 March 2014, its market capitalization was approximately INR1.27 trillion (\$20.8 billion), making it one of India's largest publicly traded company and seventh largest IT services firm globally.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 30th June 2014

OVERALL ESG
DISCLOSURE SCORE

65

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

37

Number of metrics tracked **68**

Number of metrics on which disclosure is made **11**

Metrics on which no disclosure is made: incidents of non-compliance with the laws, court cases and frequency to assess the BR performance of the Company

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets 4 times a year. The company has 10 non-executive directors and three executive directors, of which one executive director is Chairman of the Board.
- The Chief Sustainability Officer (CSO) is responsible for overall sustainability performance and reports to the Chairman, which indicates an average integration of sustainability issues in the company.

For further consideration: While it is reported that the CSO reviews the business performance, the frequency of review is not disclosed and to what extent they are monitored by the board are also not discussed.

Ethical business operations and boundaries

- Wipro has reported the existence of clear policies for ethics, bribery and corruption. Moreover, the company has confirmed that many of their policies also extend to suppliers and others

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided for CPCB notices received by the firm

For further consideration: The company has not provided information on monetary fines arising from non-compliance and the number of court cases.

Key Environmental Issues

Environmental risk assessment and management systems

- The company has five year GHG mitigation strategy in place that consists of three key elements – Energy Efficiency, Renewable Energy (RE) Purchase and Captive RE; of this, RE procurement will contribute the maximum, 80% share to GHG emission mitigation strategy.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- The Company has reported incorporation of environmental concerns, risks through Emissions during product use and end of life treatment of sold products. The company has made a data based disclosure on the same.

Resource consumption and efficiency

- For Energy, Waste and Water, the company has outlined both current consumption and data overtime with plans to achieve greater efficiency. The data being reported also provides the extent of impact and data overtime.

Key Social Issues

Community development activities

- Wipro's primary work with communities is in Primary health care, Education for the underprivileged and Long term disaster rehabilitation.
- Company's core CSR initiatives during 2013-14 was of the order of Rs 160 mn

Company Profiles

Sector: Food, Beverages and Personal Care

MACRO - ESG ISSUES : A SNAPSHOT

- Coca –cola has been in the news for both good and bad reasons as several beverages companies faced actions on their bottling plant from the pollution control board
- Coca Cola’s bottling plant in Varanasi faced shut down due to depletion of water tables
- Jain Irrigation and Coca – cola have also decided to continue their collaborative project Unnati to cover end-to-end fruit supply chain and further optimize delivery
- HUL, faced with thinning volume growth, is aggressively targeting rural markets in 2013- 14 – this includes both building a distribution infrastructure for their products, but also support programs to improve the health and hygiene of children, through school contact and neighborhood programs
- The Associated Chambers of Commerce and Industry of India (ASSOCHAM) has recommended short- and long-term measures to give the agriculture sector a boost to the central government - Among the recommendations are the need to implement the Agricultural Produce Market Committee (APMC) Act in all states to enhance supply chain efficiencies, replace input-based subsidies to farmers with low-cost credit, and linking the Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA) to agriculture for asset creation
- Companies in the sector are actively looking to manage supply chain sustainability and waste management ☐ significant interest in tracking product life cycle sustainability; companies such as Coke, Pepsi are looking to manage water, whereas ITC, Tetrapak etc. are looking toward sustainable raw materials and sourcing
- Tetra Pak® India’s facility in Chakan has received Platinum certification for environment initiatives
- Coca Cola India foundation is focusing on different sustainability issues; the company has inked an MOU with Indian Institute of Corporate Affairs to work on education and healthcare, with TERI to launch a program on water conservation, and expanded its Water Partnership with UN-HABITAT to 12 countries
- Industry working towards supply chain sustainability - although businesses are faced with difficulties faced in scaling best practices among dispersed contract farming supplier base, which makes going deep into the supply chain a challenge
- Ministry of Food Processing Industries continues to play important role in encouraging investment into sector - fast growth, employment generation and export earnings attributed to policies encouraging R&D, technology investment, skill upgradation, and improving quality standards
- UN Sustainable Agricultural Business Principles (SABPs) have been finalized by UN Global Compact India ☐ its focus is on aligning business on sustainable agriculture goals
- Minister of State for Agriculture (Tariq Anwar) has cited need for generating awareness around benefits of GM crops among farmers and has sought constructing a regulatory mechanism for evaluating GM crops
- Agri supply chain challenges persist- lack of adequate infrastructure which extends from roads, to cold chain, food processing and access to skill development programs rank among the major concerns which continue to hold back development in the sector

The Colgate-Palmolive Company is an American multinational consumer products company focused on the production, distribution and provision of household, health care and personal products, such as soaps, detergents, and oral hygiene products (including toothpaste and toothbrushes).

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 23rd May 2014

OVERALL ESG
 DISCLOSURE SCORE



SECTOR ADJUSTED ESG
 DISCLOSURE SCORE



Number of metrics tracked **68**

Number of metrics on which no disclosure is made **21**

Metrics on which no disclosure is made: Is on the key stakeholder engagement topics, Rates of injury, waste by weight, energy and water consumption use of renewable energy, contractors that have undergone screening on human rights, Health and safety topics covered, number of incidents of discrimination, Total energy consumed and suppliers screening on human rights

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 6 times last year.
 - The Managing Director is responsible for the sustainability performance - this indicates high integration of the sustainability issues in the company
- For further consideration:** While it is reported that the committee meets to review the business performance, periodicity of these meetings is not mentioned and it is not clear to what extent are they monitored by the board

Ethical business operations and boundaries

- The company has confirmed that the policies extend to the suppliers. Colgate-Palmolive Company (U.S.A), the parent Company of Colgate-Palmolive (India) Limited has a Code of Conduct ('Colgate Code of Conduct') which applies to all Colgate people, including Directors, Officers and all Employees of the Company and its subsidiaries globally. 'Colgate Code of Conduct' also applies to the Vendors and Suppliers.
- The Company displays the product information on the product label, over and above what is mandated as per local laws. Few examples are efficacy of the product, technology used in the product and claims attributed to the product.
- The company has an enhanced supplier management which consists of audits, recommendations and an inspection process

Regulatory challenge and compliance

- Absolute data is provided for pollution notices
 - 8 consumer cases pending in different consumer courts/forums and the same are sub-judice
- For further consideration:** Company has not provided a comparison over time. No disclosure made on the monetary value of significant fines for noncompliance

Key Environmental Issues

Environmental risk assessment and management systems

- The company is addressing the environmental risks
- For further consideration:** No details regarding risks and no disclosure on how any environmental risk is assessed and addressed.

Sustainable product design

- The company is re-designing the packaging material that would result in lower impact on the environment. Cartons have lower thickness contribute to improve biodegradability and recyclability. Most of the cartons are made up of recycled paper.

Resource consumption and efficiency

- Colgate-Palmolive has committed to No Deforestation
- 78 % of the waste is recycled / reused - Solid waste/sludge from Waste Water Treatment Plants and process waste is sent to cement manufacturing companies to be co-processed for conversion into cement. A small portion of the waste is not environment friendly and is therefore disposed in a controlled manner to government approved Common Hazardous Waste Treatment Storage and Disposal Facility

For further consideration: the company has not provided data on energy consumption, GHG emissions, water consumption, waste generation

Sustainable Sourcing

The company reports to source material from suppliers of raw material and packaging located close to the manufacturing facilities. In most of the cases, the packaging material is sourced locally. The containers of primary packaging material have potential of being reused and recycled.

Key Social Issues

Community development activities

- Colgate has spent 10.80 crores on community development efforts, and but has not provided detailed information on its impact

Dabur (Dabur India Ltd.) is India's largest Ayurvedic medicine manufacturer

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 29th April 2014

OVERALL ESG
 DISCLOSURE SCORE



SECTOR ADJUSTED ESG
 DISCLOSURE SCORE



Number of metrics tracked **68**

Number of metrics on which no disclosure is made **21**

Metrics on which no disclosure is made: key stakeholder engagement topics, Monetary value of significant fines for noncompliance, weight of waste by type and disposal method, on discharge of water and effluents, GHG emissions, Health and safety topics, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets at least 4 times a year
- Corporate Social Responsibility Committee of the Board is responsible for the sustainability performance

For further consideration: It's not clear who has the executive responsibilities of the sustainability related issues.

Ethical business operations and boundaries

- The company has a written code of ethics and other policies that applicable to all employees
- However, the policies don't extend to the joint ventures, suppliers and contractors.
- The company provides additional information on the product label relating to various active ingredients contained in the product, their proven clinical benefits.

For further consideration: No details are provided on how the policies get implemented and reviewed and how suppliers are governed, considering that the supply chain in this sector consists of unorganized at-risk labor.

Regulatory challenge and compliance

- Cases of Unfair trade practices - 3 (2 have been resolved) and cases of Irresponsible advertising – 24 (all resolved)
- A total of 5 number of consumer cases were received during 2013-14 (4 are pending). No notices received from CPCB or SPCB in the reporting period

For further consideration: No disclosure made on the monetary value of significant fines for noncompliance

Key Environmental Issues

Environmental risk assessment and management systems

- With the aim to certify all manufacturing units with the Integrated Management system OHSAS 18001 and ISO 14001, Dabur has got external accreditation for all 12 manufacturing location by TUV NORD.
- The company has set concrete targets to be fulfilled by 2015: - reduce GHG emissions by 35%, achieve carbon-neutrality in the life cycle of Chyawanprash, Honey & Real Juice, increase renewable energy portfolio by 25%, improve energy efficiency by 20%, distribute 10% of products through rail and increase bio friendly material in packaging by 25% as compared to 2011-12

For further consideration: the company should start to report on progress as per planned targets

Sustainable product design and risk assessment

- Company has reported to have started Life Cycle Analysis (LCA) of three of the key products viz. Chyawanprash, Honey & Real in order to obtain clear and comprehensive information about each of these product's ecological footprint. Cradle-to-Cradle LCA has been undertaken for these products and going forward are targeting achieving carbon-neutrality for these products.

For further consideration: No time bound target has been reported

Resource consumption and efficiency

- Dabur has attained zero waste water discharge at 9 of 12 domestic production units. Effluent treatment plants and rain water harvesting project are also installed at all the units.
- All used tetra packs are recycled and the percentage of Tetra Pak packaging material recycled is more than 10% of the material
- Energy, the company has outlined both current consumption and plans to achieve greater efficiency. However, for waste, water and GHG emissions are not being reported.

Key Social Issues

Community development activities

- Dabur contributed INR 20.65 crore towards community development projects during 2013-14. This includes the goods distributed through NGO amongst society (INR. 8.47 crore); and INR 12.18 crore used in various activities done by the company

Godrej Consumer Products Limited (GCPL) is an Indian consumer goods company based in Mumbai; India. GCPL operates in the domestic and international markets in the 'Personal and Household Care' segment. Some of the categories are soaps, hair colorants, toiletries and liquid detergents.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 20th June 2014

OVERALL ESG DISCLOSURE SCORE

65

SECTOR ADJUSTED ESG DISCLOSURE SCORE

37

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **18**

Metrics on which no disclosure is made: Contractors that have undergone screening on human rights, incidents of discrimination, court cases, Monetary value of significant fines for noncompliance, programs related to marketing promotion, and sponsorship, waste reductions, incidents of non-compliance with regulations and voluntary codes, environment expenditures

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets at least one every quarter.
- The Managing Director is responsible for the sustainability performance

For further consideration: No details are provided on the periodicity of review of the company's sustainability performance by the board.

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is applicable to all individuals working in the Company. For the Subsidiaries and Joint Ventures, the Code is applicable in line with the local requirements prevailing in the country of operation. The company also abides by CII-ASSOCHAM Code of Conduct for Affirmative Action.
- The company, as others in the sector, has confirmed that many of their policies extend to suppliers and others do not.

For further consideration: No details are provided on how the policies get implemented and reviewed and how suppliers are governed, which is key for the sector

Regulatory challenge and compliance

- Absolute data is provided on CPCB notices, but the company has not provided a comparison over time.

For further consideration: No disclosure regarding monetary value of fines and court cases

Key Environmental Issues

Environmental risk assessment and management systems

- All the major manufacturing units have policies on environment, health and safety measures. Potential aspects related to environment are identified and evaluated for their impact on the basis of severity, scale and probability. All the significant aspects have operational control procedure in place.

For further consideration: the company has not provided details on risk measurement processes/procedures

Sustainable product design and risk assessment

The company has outlined 3 products as being sustainable – however, how they are environmentally sustainable is not outlined

For further consideration: the company has not provided data on the targets it has set for itself

Resource consumption and efficiency

- Company has reduced the consumption of major inputs including energy, water, etc., by adoption of new techniques and alternate methods.
- Energy conservation in all units have resulted in reduction of specific energy and reduction in specific water consumption and Green House Gas emissions. Specific energy consumption of GCPL has reduced from 904 kWh/t in 2012-13 to 854 kWh/t in 2013-1
- The company recycles its own waste but does not have programs to reduce waste at the consumer level –there has been a 78% reduction in waste to landfill per ton production.

Sustainable Sourcing

- Godrej has an automated sourcing system that covers all consumer products globally and utilizes practices such as the Theory of Constraints, Demand Driven Supply Chain, Total Productive Maintenance and Six Sigma. GCPL lays emphasis on procuring raw materials in a responsible manner- the company has been focusing on sustainably sourced palm oil which is used in place of crude oil derived products.
- All agri based bulk materials, shippers and plastic components are produced locally, closer to the plants.

For further consideration: the company has not provided data the targets set for itself

Key Social Issues

Community development activities

- 0.8% of Profit After Tax is spent community development efforts, and but has not provided detailed information on its impact

GlaxoSmithKline Consumer Healthcare Limited is engaged in nutritional business. The Company's products include malt-based food and biscuits. The Company has manufacturing facilities at Nabha, Rajahmundry and Sonapat. Horlicks Limited holds 43.16% of equity shares of the Company

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 9th May 2014

OVERALL ESG
DISCLOSURE SCORE



SECTOR ADJUSTED ESG
DISCLOSURE SCORE



Number of metrics tracked	68
Number of metrics on which no disclosure is made	1
Metrics on which no disclosure is made: the number of court cases.	

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 7 times last year.
- Director Operations is responsible for the sustainability performance. Cross functional team set up to review and monitor sustainability performance which met 4 times last year and presented their report to the board of directors

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is applicable to all individuals working in the Company.
 - Company has an Anti-Bribery and Corruption Policy which covers the Company and all its Third Party Vendors. It does extend to the Suppliers/Contractors and everyone the Company does business with.
 - The Company displays product information on the products label and also has a website which provides information about products and its usage.
- For further consideration:** No details are provided on how the policies get implemented and reviewed and how suppliers are governed, which is key for the sector

Regulatory challenge and compliance

- No show cause notices pending from the CPCB.
- For further consideration:** No details are provided on the court cases and monetary fines

Key Environmental Issues

Environmental risk assessment and management systems

- Proactive approach is followed in identification of the potential environmental risk, 5x5 matrix is used for the identification of the potential environmental risks. Proper SOP's/controls are in place for the key environmental risks.
- For further consideration:** the company has not provided details on the procedures for risk management and impact data

Sustainable product design and risk assessment

- Company has incorporated sustainability design in two of its products (including their variants) and provided absolute data for the same
- For further consideration:** the company has not provided impact data over time and hasn't disclosed any targets set for

Resource consumption and efficiency

- The company has taken several initiatives on energy conservation, waste recycling, renewable energy, etc. These include use of agri-waste bio-mass fuel (briquettes/pellets) for steam generation, installation of energy efficient Double-Effect Vapor Absorption system to reduce steam consumption, use of energy efficient LED lights, installation of Variable Frequency Drives on Multiple-Effect Evaporator and cooling tower pumps etc.
- For further consideration:** data not provided on water management and effluent treatment

Sustainable Sourcing

- Some initiatives have been undertaken in the area of dairy development
- For further consideration:** the company has not provided detailed data and any targets set for itself in terms of sourcing sustainably

Key Social Issues

Community development activities

- Rs 1.48 crores has been spent on community development efforts
- For further consideration:** Company has not provided detailed information on its impact

Hindustan Unilever Limited (HUL) is an Indian consumer goods company based in Mumbai, Maharashtra. It is owned by Anglo-Dutch company Unilever which owns a 67% controlling share in HULHUL's products include foods, beverages, cleaning agents and personal care products.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 28th April 2014

OVERALL ESG
 DISCLOSURE SCORE

66

SECTOR ADJUSTED ESG
 DISCLOSURE SCORE

37

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **1**

Metrics on which no disclosure is made: the number of court cases.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which 7 times last year.
- A Corporate Social Responsibility (CSR) Committee comprising Mr. O. P. Bhatt as the Chairman is responsible for the sustainability performance

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is applicable to all individuals working in the Company.
- Company's policy related to environment and on human rights extends to all stakeholders
- The company is one of the founder members of the Advertising Standards Council of India (ASCI). It has developed self-regulatory codes for all its marketing and advertising activities and applies these codes across the businesses.

For further consideration: No details are provided on how the policies get implemented and how suppliers are governed

Regulatory challenge and compliance

- At the end of the year, there were 77 consumer cases pending. Matters sub judice related to allegations of breach of environmental operating guidelines at the thermometer factory at Kodaikanal. The Company has also been impleaded in certain legal cases related to disputes over title to shares arising in the ordinary course of share transfer operations. However, none of these cases are material in nature.

For further consideration: No details are provided on the show cause notices– this should be disclosed

Key Environmental Issues

Environmental risk assessment and management systems

- The company is compliant with ISO-14001 and OHSAS-18001, which are externally verified
- The company is seeking creation of an equitable and a judicious policy on usage of biodiversity resources.

For further consideration: the company has not provided details on processes for environment risk management

Sustainable product design and risk assessment

- The company has reported incorporation of social concerns, risks in the products like making safe drinking water accessible and to eradicate open defecation through education about sanitation and supply of toilets. The company has made a data based disclosure on the same.

For further consideration: Although the company is incorporating social elements into product design and targeting BOP, the company has not provided information on how they are reducing the environmental impact

Resource consumption and efficiency

- Various initiatives like recycling treated effluent water for gardening, installing reverse osmosis technology at various utilities, collecting and recycling of rain water, arresting major leakage and loss of water at the manufacturing sites led to this reduction.
- In 2013, of 38 sites, 33 sites became zero-discharge sites, (+ 3 sites from last year). 6 sites implemented rainwater harvesting taking total to 28 sites.
- Total waste per tonne from manufacturing sites has reduced by 84% vis-a-vis 2008 baseline.
- Share of renewable energy consumption in company's manufacturing plan is 21%.

For further consideration: while some data is provided on water and waste reduction, the company has not provided data on targets set for itself

Sustainable Sourcing

- Under the USLP, the Company has committed to source 100% of its agricultural raw materials sustainably. All of the palm oil was from sustainable sources as 100% of palm oil volumes of India were covered by 'Green Palm' certificates in 2013. During the year, 80% of tomatoes used in Kissan Ketchup in India were from sustainable sources. The Company aims to source 100% of tomatoes from sustainable sources by 2015.

Key Social Issues

Community development activities

- 2.0% of Average net profit of three immediately preceding financial years spent in CSR (including env protection), and but has not provided detailed information on its impact

ITC Limited or ITC is an Indian conglomerate headquartered in Kolkata, West Bengal. Its diversified business includes five segments: Fast Moving Consumer Goods (FMCG), Hotels, Paperboards & Packaging, Agri Business & Information Technology. The company as of 2012-13, had an annual turnover of US\$ 8.31 billion and a market capitalization of US\$ 45 billion.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 23rd May 2014

OVERALL ESG
DISCLOSURE SCORE

73

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

41

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **1**

Metrics on which no disclosure is made: the number of court cases, monetary value of fines.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which 6 times last year.
- Chairman of the company heads the sustainability and CSR committee which reports to the board.

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is applicable to all individuals working in the Company.
- ITC's responsible sourcing policy addresses the issues of labor practices, human rights, bribery, corruption, occupational health, safety and the environment policy is meant for Third Party Manufacturers, service providers including transporters, suppliers of agricultural & non-agricultural materials and capital goods, franchisees, dealers and distributors collectively.
- ITC encourages its supply chain to comply with certifications, such as ISO 9001, ISO 14001 and OHSAS 18001, to strengthen their quality, environmental and occupational health & safety systems

For further consideration: No details are provided on how the policies get implemented and reviewed and how suppliers are governed, which is key for the sector

Regulatory challenge and compliance

- There were no incidents of non-compliance reported during 2013-14

Key Environmental Issues

Environmental risk assessment and management systems

- A business wise identification of sustainability risks has been carried out across various sectors in which ITC operates

For further consideration: the company has not provided details on the risk management systems in place and data on the targets if any

Sustainable product design and risk assessment

- ITC has reported that green features are being incorporated in all existing hotels, manufacturing Units, warehouses and office complexes apart from all new construction. The LEED® Platinum rating has been accorded to all of ITC's luxury hotels, with a significant reduction in specific energy and water consumption with respect to conventionally designed hotels.

For further consideration: the company has not provided data the targets set for itself

Resource consumption and efficiency

- As a result of implementation of energy conservation measures, a saving of 81.03 TJ in direct energy consumption and of 45.99 TJ in indirect energy consumption has been achieved in 2013-14
- ITC is committed to achieving zero effluent discharge through treating and recycling of all wastewater and harvesting of rainwater on its properties
- 38% of its energy consumption is from renewable sources

For further consideration: while some data is provided on water and waste reduction, the company has not provided data on targets set for itself

Sustainable Sourcing

- Board approved Policies on Life Cycle Sustainability and Responsible Sourcing now provide the necessary focus on sustainable sourcing of raw materials to ensure their long-term availability. In 2013-14, ITC consumed over 29,00,000 tonnes of materials, out of which close to 98% were from agricultural farms and plantations which are renewable.

For further consideration: the company has not provided data the targets set for itself in terms of sourcing sustainably

Key Social Issues

Community development activities

- ITC's e-Choupals serve 40,000 villages and 4 million farmers, making it the world's largest rural digital infrastructure

ITC Limited or ITC is an Indian conglomerate headquartered in Kolkata, West Bengal. Its diversified business includes five segments: Fast Moving Consumer Goods (FMCG), Hotels, Paperboards & Packaging, Agri Business & Information Technology. The company as of 2012-13, had an annual turnover of US\$ 8.31 billion and a market capitalization of US\$ 45 billion.

- **Annual Business Responsibility Report filed:** NA
- **Date of release of sustainability report:** NA

OVERALL ESG
 DISCLOSURE SCORE

37

SECTOR ADJUSTED ESG
 DISCLOSURE SCORE

21

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **32**

Metrics on which no disclosure is made: the number of court cases, monetary value of fines. Key stakeholder issues, stakeholder constraints, marketing, training hours, consumer complaints, emissions, waste, water, contribution to community development

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which 6 times last year.
- For further consideration:** No details are provided on who is responsible for the sustainability performance of the board

Ethical business operations and boundaries

- The Company has a Code of Conduct, which is applicable to all individuals working in the Company and group entities.
- For further consideration:** No details are provided on how the policies get implemented and reviewed and how suppliers are governed, which is key for the sector

Regulatory challenge and compliance

- No disclosure on legal challenges faced by the firm

Key Environmental Issues

Environmental risk assessment and management systems

- A Marico's Environment policy has been deployed at all manufacturing locations of Marico and constant efforts are taken to spread awareness about the policy
- For further consideration:** the company has not provided details on the risk management systems in place and data on the targets if any

Sustainable product design and risk assessment

- Company has disclosed that products like Saffola, Nihar and Parachute incorporate sustainable product design.
- For further consideration:** the company has not provided details on product design and any targets set for itself

Resource consumption and efficiency

- The company has deployed ISO 50000 energy management standards in its unit in Himachal Pradesh and is certified on these standards for adopting best practices in energy conservation and performance monitoring processes.
 - Company has used 94% of its fuel requirement through renewable fuels such as bio-mass briquettes, rice husk and bagasse in FY14 as against 59% in FY13
 - Company has been able to achieve zero water discharge status for most of its manufacturing facilities
- For further consideration:** Detailed disclosure not provided on energy consumption, emissions, waste an water

Sustainable Sourcing

- No relevant disclosure made

Key Social Issues

Community development activities

- No disclosure on direct expenditure of the firm towards community development activities

United Breweries Ltd. is a manufacturer of alcoholic beverages. It is deemed to be the market leader in the beer business in the country. This Indian conglomerate company is headquartered in Bangalore, Karnataka.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 27th May 2014

OVERALL ESG
DISCLOSURE SCORE

53

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

30

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **22**

Metrics on which no disclosure is made: key concerns raised through stakeholder consultations, the number of court cases, monetary value of fines. Suppliers undergone human rights screening, sustainable products, biodiversity, energy consumed, renewable energy used, waste disposal, emissions, water, environmental protection expenditure, contribution made to political parties

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 4 times last year.
- Managing Director is responsible for sustainability performance of the firm
- The Business Responsibility performance of the Company is periodically assessed internally by the Managing Director, Joint President and Executive Vice President – Human Resources. A Committee of the Board on Corporate Social Responsibility (CSR), has been formed, as mandated, which will review the Business Responsibility performance at periodic intervals.

Ethical business operations and boundaries

- The Company has a policy on the Code of Business Conduct and Ethics approved by the Board of Directors which is applicable to all individuals working in the Company.
- The policy does not extend to other Stakeholders. However, company reports that their engagement checkpoints with our supplier consider adherence to ethical practices.

For further consideration: No details are provided on how the policies get implemented and reviewed and how suppliers are governed, which is key for the sector

Regulatory challenge and compliance

- There were no pending or unresolved show cause / legal notices received from CPCB / SPCB at the end of 2013-14

For further consideration: No details are provided on monetary fines for non-compliance and court cases

Key Environmental Issues

Environmental risk assessment and management systems

- Company has a mechanism to identify environmental risks
- The Company has commissioned a Green Power Project at its Brewery located at Nelamangala, Bangalore for generation of electricity through spent grain. This is under Clean Development Mechanism (CDM) and the Company is looking forward to environmental benefits in the form of carbon credits through the implementation of this Green Power Project.

For further consideration: The company has not provided details on the risk management systems in place and data on the targets if any

Sustainable product design and risk assessment

- No disclosures made by the firm

Resource consumption and efficiency

- Most of the Units of the Company operate on 'Zero Discharge' mechanism
- Recycling of effluent treated water with programmable logic control operated reverse osmosis plant installed at Mallepally and Aurangabad Units to ensure water conservation
- The Company has undertaken several initiatives on energy efficiency, renewable energy under the 'Project Chamak'. All breweries use agri-waste as fuel in boilers which is a renewable energy source.

For further consideration: Company has not provided data for energy and water consumption, emission and waste generation

Sustainable Sourcing

- The Company has appropriate procedures for long term sourcing of raw materials, packaging materials and transportation. The Company has procedures and policy in place for selecting vendors for sustainable supply.

For further consideration: the company has not provided data the targets set for itself in terms of sourcing sustainably

Key Social Issues

Community development activities

- The Company's contribution towards community development projects during Financial Year 2013-14 was about Rs.13.5 million

Company Profiles

Sector: Pharmaceuticals and Chemicals

MACRO - ESG ISSUES : A SNAPSHOT

- Crackdowns by the US Food and Drug Administration (US FDA) on Indian companies were the major challenge faced by the Industry; many Indian pharmaceutical units are struggling to achieve quality standards and have faced punitive action
- The USFDA certification is highly sought after by pharmaceutical units as the Administration has stepped up its enforcement presence in India and the unit-level assessments are increasingly used to evaluate compliance with export quality standards
- Most companies faced significant market losses on news of violations in USFDA certification process
- Intellectual Property enforcement remains a point of major contention in trade disputes
- Pharmaceutical companies are increasingly focussing on Inclusive Growth by targeting burgeoning rural consumer market with launch of affordable medicines and healthcare services / packages
- The topic of “Green Chemistry” received some focus by companies in the chemical sector as they increasingly recognize the need for same in industrial application
- There has been an increased focus on supply chains sustainability issues, with companies looking to find alternative, sustainable raw materials-this is due to mounting pressure for global brands / buyer
- IP Law disputes contribute to trade strife - trade bodies and courts heard several high profile cases involving intellectual property disputes – companies in the dispute include Glaxo SmithKline, Dr. Reddy’s Laboratories and Novartis
- The industry also saw a major player, Sun pharma buying out another major player Ranbaxy

Ayurvet Limited is one of India's leading animal care companies specializing in 100% natural & safe herbal products. The company's portfolio includes herbal healthcare and nutritional products catering to a wide range of animal species.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** Not disclosed

OVERALL ESG
DISCLOSURE SCORE

40

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

23

Number of metrics tracked **68**

Number of metrics on which disclosure is made **31**

Metrics on which no disclosure is made: the frequency in which board meet, Rates of injury, stakeholder complaints, Child and forced labor , waste by weight, use of renewable energy, Employee health, safety and wellness / Training and Development , contractors that have undergone screening on human rights, Health and safety topics covered, number of incidents of discrimination, environmental protection expenditures

Key Governance Issues

Organizational Structure and Board Independence

- The Board comprises of 2 Executive Directors and 3 Non- Executive Directors

For further consideration: The company has not reported on the frequency of meeting of board members, who is responsible for the sustainability performance and the frequency of review of these performance.

Ethical business operations and boundaries

- Ayurvet has reported of existence of clear policies for ethics, bribery and corruption. but hasn't disclosed if it extends to suppliers and others

For further consideration: The company should provide details on these policies and how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Yes – absolute data is provided for pollution notices and monetary value of significant fines for noncompliance, but the company has not provided a comparison over time.

For further consideration: Disclosure on court cases not made.

Customer satisfaction

- The company has provided with the number of customer complaints and consumer complaints. They also conduct customer satisfaction surveys.

For further consideration: More information is needed on results of the surveys.

Key Environmental Issues

Environmental risk assessment and management systems

- The company endeavors to maximize natural resource usage efficiencies across its operations and attempts to create positive environmental externalities. This is achieved by appropriate mechanisms such as framing requisite policies, systems that verify compliance and a work environment that fosters innovation.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- The company reports to source material from herbal ingredients for products like Methiorep which may come from natural sources without sacrificing productivity.

Resource consumption and efficiency

- For Energy, the company has outlined both current consumption and data overtime with plans to achieve greater efficiency. For waste, water and environmental expenditures, no disclosure is made.

For further consideration: The company should provide detailed data based and overtime information on the key parameters that are mentioned above.

Key Social Issues

Community development activities

- ARF's training institute, (Institute for Animal Husbandry and Entrepreneurship Development), has been committed to popularize scientific dairy farming in rural areas and to promote rural employment.

For further consideration: Direct expenditure by the company for community development is not disclosed.

Cadila Healthcare is an Indian pharmaceutical company headquartered at Ahmedabad in Gujarat state of western India. The company is the fifth largest pharmaceutical company in India.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 15th June 2014

OVERALL ESG DISCLOSURE SCORE

53

SECTOR ADJUSTED ESG DISCLOSURE SCORE

30

Number of metrics tracked **68**

Number of metrics on which disclosure is made **19**

Metrics on which no disclosure is made: key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Rates of injury, Monetary value of significant fines for noncompliance, weight of waste by type and disposal method, on discharge of water and effluents, , Health and safety topics , environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company’s board has a combination of executive, non-executive and independent members, which meets 6 times a year. Company’s Board comprises of six Directors; which include two Executive Directors and four Non-Executive and Independent Directors
- The Chairman and Managing Director is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets every quarter to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board

Ethical business operations and boundaries

- Cadila has reported the existence of clear policies for ethics, bribery and corruption.
- The company has confirmed that the policies extend to the suppliers and stakeholders.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Disclosure provided on CPCB notices and court cases,

For further consideration: No disclosure on monetary value of significant fines on non-compliance.

Customer satisfaction

- A full-fledged Pharmacovigilance cell has been set to track, review and act on any adverse event complaints. They also conduct customer satisfaction surveys.

For further consideration: The company has not provided actual number of consumer complaints received. More information is needed on the results of the surveys.

Key Environmental Issues

Environmental risk assessment and management systems

- The company has reported to have a mechanism to identify and assess potential environmental risks in its plants or projects. The Company carries out regular environment audits and files reports with the relevant authorities. Environment Statements, Consolidated Consents and Authorizations and Environment Control Compliance reports, as applicable are being filed regularly.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- Yes, the company has reported to have products conform to stringent quality standards and bio-stability of products is also submitted during the periodic audits. All these manufacturing plants also have received environment audit certifications from ISO and OHSAS.

Resource consumption and efficiency

- For Energy, the company has outlined both current consumption and data overtime with plans to achieve greater efficiency.

For further consideration: No disclosure is made related to waste, water and environmental expenditures

Key Social Issues

Community development activities

- The company carries out initiatives in the field of education, health and research. The focus through these programs is to develop communities which we are a part of, inclusive education and creating knowledge platforms for the research community.
- Approximately 1.65% of profits after tax of the year is spent in CSR

Chambal Fertilizers and Chemicals Limited (Chambal) is one of the largest private sector fertilizer producers in India. It was promoted by Zuari Industries Limited in the year 1985.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** NA

OVERALL ESG
DISCLOSURE SCORE

64

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

36

Number of metrics tracked **68**

Number of metrics on which disclosure is made **16**

Metrics on which no disclosure is made: number of incidents of discrimination, procedures in place for sustainable sourcing, Health and safety topics, members of formal employee association, on monetary value of significant fines and court cases stakeholder engagement topics

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members. The Board consisted of nine Directors, including the Managing Director and eight Non- Executive Directors, of which five are Independent Directors

For further consideration: The company has not reported on the frequency of meeting of board members, who is responsible for the sustainability performance and the frequency of review of these performance.

Ethical business operations and boundaries

- Chambal Fertilizer has reported the existence of clear policies for ethics, bribery and corruption.
- The company has confirmed that the policies extend to the suppliers and stakeholders.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided on disclosure on monetary value of significant fines
- As on March 31, 2013, company had 15 reinstatement claim cases pending for adjudication before the Labour Court, Kota. Of these, 14 cases are related to contract workers and 1 case pertains to an ex-employee.

For further consideration: No disclosure on CPCB notices

Customer satisfaction

- The company has provided with the number of customer complaints. In 2012-13, it initiated a farmer feedback programme via the 'Hello Uttam Helpline'.

For further consideration: More information is needed on results of the consumer surveys.

Key Environmental Issues

Environmental risk assessment and management systems

- The Company has its own natural gas based captive power plants; hence we buy only small amounts of electricity from the grid. The major sources of emissions in fertilizer production are use of fossil fuel (natural gas, naphtha, etc) as feedstock and fuel. Therefore, the company primarily use natural gas – the cleanest of fossil fuel, as feedstock and fuel.

For further consideration: The company should provide more data based information on how it assess environmental risk.

Sustainable product design and risk assessment

- Yes, The Company has reported to have products like Urea coated with neem extract especially triterpene have nitrification inhibiting properties, thereby ensuring availability of Nitrogen for prolonged period.

Resource consumption and efficiency

- For Energy, Waste, GHG emissions and Water, the company has outlined current consumption data and overtime with plans to achieve greater efficiency. Environmental Expenditure is also reported.

Key Social Issues

Community development activities

- Chambal is committed to educating the farmers about the latest developments in the field of agriculture and animal husbandry.
- For further consideration: Direct expenditure for community development is not disclosed.

Cipla Global Limited is an Indian multinational pharmaceutical and Biotechnology company, headquartered in Mumbai, India. As of 17 September 2014, its market capitalization was INR517 billion (US\$8.4 billion), making it India's 42nd largest publicly traded company by market value.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 23rd July 2014

OVERALL ESG
DISCLOSURE SCORE

50

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

28

Number of metrics tracked **68**

Number of metrics on which disclosure is made **18**

Metrics on which no disclosure is made: key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Rates of injury, Monetary value of significant fines for noncompliance, weight of waste by type and disposal method, on discharge of water and effluents, , Health and safety topics , environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 7 times last year. The details of the board structure are as : Executive Directors - 3 ,Non-Executive/Non-Independent Director - 2, Non-Executive/Independent Directors - 9
- The Vice-Chairman is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company. The CEO discusses and reviews the progress of business responsibility performance with the BR Head on an ongoing basis.

For further consideration: While it is reported that the board meets 7 times to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board

Ethical business operations and boundaries

- Cipla has reported the existence of clear policies for ethics, bribery and corruption. It has a business code of conduct.
- The company has confirmed that the policy currently doesn't extend to the suppliers and stakeholders. However, steps are being taken to extend it to the major contractors and sub-contractors.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided on CPCB notices and court cases, but the company has not provided a comparison over time.
- Cipla has some pending legal cases related to alleged overcharging in respect of certain drugs under the Drugs (Prices Control) Order, 1995. The aggregate amount of the demand notices received is about INR 1,768.51 crore (inclusive of interest).

Customer satisfaction

- The company has provided with the number of customer complaints and consumer complaints pending as end of the financial year. They also conduct customer satisfaction surveys.

For further consideration: However, company needs to provide more information on results of the surveys.

Key Environmental Issues

Environmental risk assessment and management systems

- The Company undertakes a wide range of initiatives such as plantation, use of energy efficient technologies, setting up the state-of-art effluent treatment plants for minimization and recycling of waste, and reduction in the use of energy & water, etc., all of which put together ultimately address the challenges of global warming/climate change locally.

For further consideration: The company should provide more data based information on actual processes for environmental risk assessment and quantitative targets for the same.

Sustainable product design and risk assessment

- Sustainable sourcing, production and distribution practices are followed ensuring quality and safety of raw materials and packaging materials procured from suppliers as well as of products manufactured, stored and distributed throughout the value chain.

Resource consumption and efficiency

- For Energy, the company has outlined both current consumption and data overtime with plans to achieve greater efficiency

For further consideration: No disclosure is made for waste, water and environmental expenditures

Key Social Issues

Community development activities

- The company has been implementing social and community development projects for underprivileged communities around its eight manufacturing sites located in six States of India – Maharashtra, Sikkim, Himachal Pradesh, Madhya Pradesh, Goa and Karnataka.
- The Company, either by itself or through its foundations/trusts, has invested a total of Rs 9.98 crores on CSR

Dr. Reddy's Laboratories Ltd is a pharmaceutical company based in Hyderabad, Telangana, India.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 21st June 2014

OVERALL ESG
DISCLOSURE SCORE

47

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

27

Number of metrics tracked **68**

Number of metrics on which disclosure is made **24**

Metrics on which no disclosure is made: key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Rates of injury, Monetary value of significant fines for noncompliance, CPCB notices, court cases, weight of waste by type and disposal method, on discharge of water and effluents, , Health and safety topics.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets 5 times a year. the Board of Dr. Reddy's had 10 Directors, comprising (i) two Executive Directors, including the Chairman, and (ii) eight Independent Directors
- The Vice-Chairman & Managing Director is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that The Board of Directors/Committee of Directors also periodically review certain elements of BR performance, it is not clear if the sustainability performance are reviewed during these meetings and to what extent are they monitored by the board.

Ethical business operations and boundaries

- Dr. Reddy's Laboratories has reported the existence of code of ethics.
- Code of Business Conduct and Ethics sets forth high standards of human rights. This applies to all Directors, employees, subsidiaries and affiliates. A separate Supplier Code of Conduct has been drafted for suppliers, vendors and service providers

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- No disclosure on monetary value of significant fines, CPCB notices and court cases.

For further consideration: Novartis sues Dr Reddy's Laboratories over patent infringement on cancer drug.

Customer satisfaction

- The company has not provided with the number of customer complaints and consumer complaints. They have reported to conduct customer satisfaction surveys, but details of it are not reported.

For further consideration: More information is needed on, how many complaints were made and what percentage is pending and results of the surveys.

Key Environmental Issues

Environmental risk assessment and management systems

- The Company assesses each unit's progress on key environmental performance targets and strategizes appropriate actions. The company also participated in the Carbon Disclosure Project (CDP) initiative, scoring a 76 in the Carbon Disclosure Leadership Index

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- The Company has reported incorporation of social concerns, risks in the products like Global Generics, Pharmaceutical Services and Active Ingredients (PSAI) and Proprietary Products focusing on four core aspects. Training, Sustainable Logistics, Conservation of Resources also included

Resource consumption and efficiency

- For Energy, the company has outlined both current consumption and data overtime with plans to achieve greater efficiency.. During the year under review, 9% of total energy consumed was from renewable sources.

For further consideration: No disclosure is made for waste, water and environmental expenditures.

Key Social Issues

Community development activities

- Rs 198.6 million is the total spending on Corporate Social Responsibility (CSR)

GlaxoSmithKline Pharmaceuticals Ltd is an Indian subsidiary of GlaxoSmithKline plc, one of the world's leading research based pharmaceutical and healthcare companies. It is one of the oldest pharmaceuticals companies in India.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 18th February 2014

OVERALL ESG
DISCLOSURE SCORE

37

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

21

Number of metrics tracked **68**

Number of metrics on which disclosure is made **28**

Metrics on which no disclosure is made: key stakeholder engagement topics, Rates of injury, Monetary value of significant fines for noncompliance, weight of waste by type and disposal method, on discharge of water and effluents, , Labor relations and union practices, child labor, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets 6 times a year. The Non-Executive Directors bring independent judgment in the Board's deliberations and decisions. Four Directors, including the Managing Director, are Executive Directors. There are Ten Non-Executive Directors, of which, seven are Independent Directors.
- Executive Director is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: The frequency of the review of BR performance is not reported.

Ethical business operations and boundaries

- GSK Pharma has reported the existence of clear policies for ethics, bribery and corruption
- The company has confirmed that the policies extend to the suppliers and stakeholders.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided on CPCB notices, but the company has not provided a comparison over time

For further consideration: Regulatory pain for GSK's Crocin Advance (NPPA rejects plea for exemption from price control, set to penalize for overcharging)

Customer satisfaction

- The company has provided data on the percentage of customer complaints resolved and consumer complaints pending. They have not reported if they conduct customer satisfaction surveys.

For further consideration: More information is needed on, how many complaints were made

Key Environmental Issues

Environmental risk assessment and management systems

- Yes – GSK implements an environmental sustainability strategy across our entire value chain – from raw materials to product disposal. Various initiatives for energy efficiency and renewable energy were undertaken at our Nashik site

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- Yes, The company has reported products wherein they have incorporated social or environmental concerns are: Seretide Evohaler – product was changed to include CFC free propellant which is more environment friendly. The company follows the GMP guidelines with respect to our product packaging.

Resource consumption and efficiency

- For Energy, the company has outlined both current consumption and data overtime with plans to achieve greater efficiency.,

For further consideration: The company should provide detailed data based and overtime information on the key parameters such as water and environmental expenditures.

Key Social Issues

Community development activities

- The community development projects focus in the areas of healthcare, education and sustainable livelihoods to the underserved and underprivileged targeting women, children and the elderly as appropriate.
- The community investment was INRs. 2.89 crores in 2013

Jubilant Life Sciences Limited is an integrated global pharmaceutical and life sciences company engaged in manufacture and supply of APIs, Solid Dosage Formulations, Radiopharmaceuticals, Allergy Therapy Products and Life Science Ingredients.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 26th May 2014

OVERALL ESG
DISCLOSURE SCORE

75

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

44

Number of metrics tracked **68**

Number of metrics on which disclosure is made **10**

Metrics on which no disclosure is made: policy related environment cover only the company and percentage of the permanent employees are members of formal employee association.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which meets 6 times a year. The Board of Jubilant, as of date, comprises of nine members of which five are Non-Executive Independent Directors, one Non-Executive Nominee Director, two Managing Directors and one Executive Director
- Sustainability and CSR committee is responsible for overall sustainability performance, which indicates lower than average integration of sustainability issues in the company.

For further consideration: Though Sustainability committee once in 6 months, it is not clear to what extent they are monitored by the board

Ethical business operations and boundaries

- Jubilant Life has reported the existence of clear policies for ethics, bribery and corruption.
- The company has confirmed that the policies are applicable to suppliers.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided on CPCB notices, monetary value of significant fines and court cases, but the company has not provided a comparison over time.

Customer Satisfaction

- The company has provided with the number of customer complaints and consumer complaints. They also conduct customer feedback surveys.

Key Environmental Issues

Environmental risk assessment and management systems

- The Company has identification & implementation of energy efficiency measures and cleaner technology to fulfil its commitment delineated in its Climate Change Mitigation Policy. The Company is also monitoring and reporting its GHG emission regularly.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- Yes, The Company Jubilant manufactures Pyridine with agricultural feedstock (molasses). As per the latest Life Cycle based carbon footprint study pyridine manufactured by Jubilant through ethanol (biogenic source) route has a much lesser carbon footprint than similar products which are manufactured through conventional petro route.

Resource consumption and efficiency

- For Energy, Waste, GHG emissions and Water, the company has outlined current consumption data and overtime with plans to achieve greater efficiency. Environmental Expenditure is also reported. Bio-mass, biogas and bio-diesel are the key renewable energy sources in the overall energy mix of the company. Company has invested significantly to generate energy from its distillery effluent in the form of Bio-gas and slop, fired in the boiler.

For further consideration: The company should provide overtime information on the key parameters that are mentioned above.

Key Social Issues

Community development activities

- A MoU was signed between Jubilant Bhartia Foundation and Family Health International (FHI360) / Improving Healthy Behaviour Program (IHBP) to work on improving health behaviour of women in Gajraula including children through mass campaigns, counselling and trainings.
- The community investment was Rs 72.33 million

Lupin Limited is a transnational pharmaceutical company based in Mumbai. It is the 2nd largest Indian pharma company by market capitalization, the 14th largest generic pharmaceutical company globally.

- **Annual Business Responsibility Report filed: Yes**
- **Date of release of sustainability report: 24th June 2014**

OVERALL ESG DISCLOSURE SCORE

49

SECTOR ADJUSTED ESG DISCLOSURE SCORE

28

Number of metrics tracked **68**

Number of metrics on which disclosure is made **20**

Metrics on which no disclosure is made: key stakeholder engagement topics, voluntary codes related to marketing promotion, and sponsorship, Rates of injury, Monetary value of significant fines for noncompliance, court cases, weight of waste by type and disposal method, on discharge of water and effluents, , Health and safety topics , environmental protection expenditures

Key Governance Issues

Organizational Structure and Board Independence

- The company’s board has a combination of executive, non-executive and independent members, which meets 4 times a year. The board comprises of 10 Directors, 5 Independent Non-Executive Director 4 Promoter & Executive Director and 1 Executive Director.
- The Managing Director is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: It’s unclear to what extent sustainability performance of the company is monitored by the board

Ethical business operations and boundaries

- The Company has instituted an initiative encompassing three important policies namely, Code of Conduct, Whistle Blower Policy and Prevention of Workplace Harassment.
- The company has confirmed the policy covers the Company, its subsidiaries as well as all contractors working within the premises of the Company. However, the details on mechanism for implementation are not reported.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided on CPCB notices, but the company has not provided a comparison over time.

For further consideration: no disclosure on monetary value of significant fines and court cases.

Customer Satisfaction

- The company has provided with the **percentage** of customer complaints pending. They also conduct customer satisfaction surveys.

For further consideration: More information is needed on, how many complaints were made and the results and frequency of the surveys.

Key Environmental Issues

Environmental risk assessment and management systems

- Company received the International Sustainability Rating System (ISRS) certification after audit by external independent parties. The Company is the first in the pharmaceutical industry in India to have received the certification for three of its units. The Company has initiated the process of shifting from high Ozone depleting substances (R 11) being used as refrigerants to less/zero potential refrigerants like R 22/R 134A.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- Resource Consumption per unit depends on the product mix, thus there are no specific standards to ascertain reduction achieved at product level.

Resource consumption and efficiency

- For Energy and waste, the company has outlined both current consumption and data overtime with plans to achieve greater efficiency.

For further consideration: The company should provide detailed data based and overtime information especially on water and environmental expenditure.

Key Social Issues

Community development activities

- An amount of Rs 145.2 million was spent on various community development projects namely economic upliftment through Agricultural development, Promotion of rural industries, Women empowerment, Animal husbandry, Community health management, Education and training, Natural resource management, Infrastructure development and Learn and earn activities.

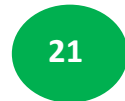
Ranbaxy Laboratories Limited is an Indian multinational pharmaceutical company that was incorporated in India in 1961. In 2014, Sun Pharma acquired the entire 63.4% share of Ranbaxy making the conglomerate world's fifth largest specialty generic pharma company.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 14th July 2014

OVERALL ESG DISCLOSURE SCORE



SECTOR ADJUSTED ESG DISCLOSURE SCORE



Number of metrics tracked **68**

Number of metrics on which disclosure is made **28**

Metrics on which no disclosure is made: key stakeholder engagement topics, number of incidents of non-compliance with regulations, Rates of injury, Monetary value of significant fines for noncompliance, court cases, weight of waste by type and disposal method, on discharge of water and effluents, , Labor relations and union practices, environmental protection expenditures.

Key Governance Issues

Organizational Structure and Board Independence

- The company's board has a combination of executive, non-executive and independent members, which met 8 times in fifteen months. There are 8 Directors, 7 non-executives.
- CEO & Managing Director is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board met 8 times in fifteen months, it is not clear how many times the meeting was held annually, it is also not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board.

Ethical business operations and boundaries

- Ranbaxy's Code of Conduct (CoC) is a shared commitment by the Company and its employees for ethical conduct and business integrity
- The company has confirmed that the policies extend to the suppliers and stakeholders.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided on CPCB notices. However, no disclosure on monetary value of significant fines and court cases.

For further consideration : Ranbaxy has denied sabotage at its Toansa (Punjab) factory, by workers offered voluntary retirement had led to a ban by the US Food and Drug Administration (FDA) and US FDA refuses to allow Ranbaxy to export from banned units

Customer Satisfaction

- The company has reported that there is insignificant number of customer and consumer complaint. Also, they have not reported if they conduct the customer survey.

For further consideration: The company needs to provide more information on, how many complaints were made and what percentage is pending and details of the surveys.

Key Environmental Issues

Environmental risk assessment and management systems

- All the major manufacturing sites in India are certified to ISO 14001:2004 and BS OHSAS 18001:2007 through implementation of an Integrated EHS Management System.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- The company manufactures products like SynriamTM, India's first new drug, and a new age antimalarial is emerging as an effective, well-tolerated, convenient and affordable treatment available today also to the under-privileged sections of the society.

Resource consumption and efficiency

- For Energy, the company has outlined both current consumption and data overtime with plans to achieve greater efficiency.

For further consideration: The company should provide detailed data based and overtime information on the key parameters for For waste, water, GHG emissions and environmental expenditures

Key Social Issues

Community development activities

- RCHS provides a blend of preventive, promote and curative services covering areas of maternal neonatal child health, family planning, reproductive health, adolescent health, prevention & control of HIV/AIDS, malaria, tuberculosis etc.
- Ranbaxy spent an amount of Rs.70.58 million on community development and CSR activities during the reporting period

Tata Chemicals Limited (TCL) is an Indian global company with interests in chemicals, crop nutrition and consumer products headquartered in Mumbai, India. The company is one of the largest chemical companies in India with significant operations in India and Africa. Tata Chemicals is a subsidiary of Tata Group conglomerate

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 30th May 2014

OVERALL ESG
DISCLOSURE SCORE

69

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

39

Number of metrics tracked **68**

Number of metrics on which disclosure is made **6**

Metrics on which no disclosure is made: members of formal employee association, Rates of injury, List of stakeholder groups, contractors that have undergone screening on human rights and Water sources

Key Governance Issues

Organizational Structure and Board Independence

- The company’s board has a combination of executive, non-executive and independent members, which meets 6 times a year The Managing Director and the Executive Director & Chief Financial Officer are the Whole-time Directors of the Company. The remaining are Non-Executive Directors comprising five Independent Directors and three Non-Independent Directors
- Managing Director is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.
- The sustainability performance is reviewed within every 3 months.

Ethical business operations and boundaries

- Tata Code of conduct defines the commitment on ethical behavior by the Company. Tata Chemicals has an elaborate system and processes on the ‘management of business ethics’ and all employees sign the Tata Code of Conduct.
- The Tata Code of Conduct is sent to all suppliers with the contract, for their perusal in respect of relevant clauses.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided on CPCB notices, monetary value of significant fines

Customer Satisfaction

- The company has provided with the percentage of customer complaints and consumer complaints pending with departmental breakup. They also conduct customer satisfaction surveys.

For further consideration: However, more information is needed on, how many complaints were made and results of the surveys.

Key Environmental Issues

Environmental risk assessment and management systems

- Tata Chemicals has adopted Tata Group’s Climate Change Policy which is an integral part of the Company’s strategy to help the organization’s growth in a Carbon conscious manner. The Company has strategy, which includes: identifying opportunities for carbon abatement, investing in low carbon growth and tapping into opportunities presented by the emerging low carbon technologies. The company is exploring the opportunities of CDM in a CSR Project - Carbon Neutral Village Project.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- No, the company has reported products like Customized Fertilizer – “Paras Farmoola” and Tata Swach whose design has incorporated social and environmental concerns, risks which enhances crop productivity, promotes balanced application of nutrients and improves soil health and reduce the incidence of water borne diseases by making safe drinking water accessible

Resource consumption and efficiency

- For Energy, Waste, GHG emissions and Water, the company has outlined current consumption data and overtime with plans to achieve greater efficiency. Environmental Expenditure is also reported.

Key Social Issues

Community development activities

- Agri-Solutions Services – Tata Kisan Sansar & Tata Kisan Parivar: Tata Kisan Sansar (TKS) is one-stop agri input shop to a ‘one-stop farmer’s solution shop’ offering a range of agro products and services and played important role in empowering farmer community.
- For the financial year 2013-14 amount spent for community development projects: Rs. 12.76 Crores.

Company Profiles

Sector: Auto and Auto Ancillary

MACRO - ESG ISSUES : A SNAPSHOT

- Businesses in the Auto Sector were mostly focussed on sustainability oriented product innovation to make them more sustainable (fuel efficient). This was driven by progressive voluntary and mandatory norms“. Resultantly, “product lifecycle sustainability” is constituting a majority of ESG reporting / disclosure including in the sector, with companies announcing focus on introducing new products
- The industry came out in unison in asking for more concrete incentives to foster the domestic market for Electric Vehicles. Currently, Indian companies are focussed on only the international markets, currently and are looking at the government toward greater subsidies
- Businesses in the sector have emerged as early adopters for CII’s Sustainable Plus Label
- After having implemented Bharat Stage IV norms, the government is in the process of planning for Bharat Stage V norms; transition will likely happen in a phased manner to allow companies to adapt.
- These tighter norms on Emissions norms are estimated to cost manufacturers approx. Rs. 80,000 crore
- The companies are developing more and more contemporary and fuel efficient cars with Maruti Suzuki launching higher fuel efficient next generation cars and Tata registering EV type Jaguar.
- The launch of Star Ratings on passenger vehicles (similar to electrical appliances) has been delayed
- The Indian government is mulling a Rs 14,000-crore scheme to push green vehicles, to bridge the difference between the price of a car running on fossil fuel and that of a green vehicle, the heavy industry ministry has recommended a maximum subsidy of 35% for pure electric vehicles, and a 25% subsidy for plug-in vehicles that can drive for at least 15km at one go.
- At the same time, the Delhi government has decided to directly subsidize buyers of Electric Vehicles, both - electric scooters and cars, announcing a direct of 15% subsidy on the MRP, which will be transferred to the customer's bank account within two month from the date of purchase of the EV. Customers will also benefit from from zero VAT and 50 percent reduced road tax

Bajaj Auto Limited is a manufacturer of scooters, motorcycles and three-wheeler vehicles and spare parts thereof. The Company operates in two segments: Automotive and Investments. The Company's brands include Pulsar, Avenger, Discover, Platina and Ninja. The Company's subsidiaries include Bajaj Auto International Holdings BV and PT. Bajaj Auto Indonesia

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 15th May 2014

OVERALL ESG
 DISCLOSURE SCORE

39

SECTOR ADJUSTED ESG
 DISCLOSURE SCORE

22

Number of metrics tracked **68**

Number of metrics on which disclosure is made **4**

Metrics on which no disclosure is made: policy against Child and forced labor and number of complaints relating to child labor, forced labor.

Key Governance Issues

Organizational Structure and Board Independence

- The Board of Bajaj Auto consisted of sixteen directors, of whom three directors were executive. Nine out of thirteen non-executive directors were independent and one of them was a woman director.
- The Vice Chairman is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets 6 times to review the business performance, it is not clear if the sustainability performance are reviewed during these meetings and to what extent are they monitored by the board. In addition, the frequency of review of BR performance is also not reported.

Ethical business operations and boundaries

- Bajaj Auto has reported the existence of clear policies for ethics, bribery and corruption.
- The Company is a signatory to the "Commitment to anti-corruption" and is supporting the "Partnering Against Corruption Principles for Countering Bribery" derived from Transparency International's Business Principles. This call for a commitment to two fundamental actions viz. a zero-tolerance policy towards bribery and development of practical and effective implementation program

Regulatory challenge and compliance

- Although, absolute data is provided for pollution notices, the company has not provided a comparison over time.

For further consideration: Monetary value of significant fines for noncompliance and court cases are not disclosed.

Customer satisfaction

- The company has provided information on how many complaints were made and what percentage is pending. They also conduct customer satisfaction surveys with the mechanism of implementation.

For further consideration: **The company can provide more information on results of the surveys.**

Key Environmental Issues

Environmental risk assessment and management systems

The company has not disclosed details on this.

Sustainable product design and risk assessment

- The company has reported that all products designed by the Company comply with the Indian Central Motor Vehicle Rules (CMVR) for specific environmental concerns. This includes regulating tail-pipe emissions of air pollutants such as Carbon Monoxide (CO), Hydro-carbons (HC), Nitrogen oxides (NOx) gases as well as particulate matter. In addition, several of its product lines, including Pulsar 200 NS, Discover 125 ST, Boxer BM 150 and Quadricycle RE 60 meet the stricter European regulations regarding emissions, noise and safety.

Resource consumption and efficiency

Though the company has talked about steps to reduce the energy and water consumption, for waste, water, GHG emissions and environmental expenditures, no data based disclosure is made. However, the company has provided data overtime with details the energy consumption.

For further consideration: Compared to the disclosure made by the peers in this sector; Bajaj's disclosure on resource consumption is very less.

Key Social Issues

Community development activities

- The CSR Committee, in its functioning, will take into account the provisions of Companies Act, 2013 and Companies (CSR Policy) Rules, 2014, which have come into force from 1 April 2014. Since the mandatory CSR expenditure and other relevant provisions become effective only from the year 2014–15, the Report for the year 2013–14 is made as per practice followed in the previous years.

For further consideration: Disclosure on direct expenditure by the firm on CSR activities not made.

Exide Industries Limited manufacturers lead acid storage batteries. It is engaged in manufacturing storage batteries and allied products. The Company is engaged in manufacturing storage batteries ranging from 2.5 ampere-hour to 20,400 ampere-hour. The products manufactured by the Company include automotive batteries, industrial batteries and submarine batteries. The Company sells its products under EXIDE, SF, SONIC and Standard Furukawa Brands.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 9th May 2014

OVERALL ESG
 DISCLOSURE SCORE

47

SECTOR ADJUSTED ESG
 DISCLOSURE SCORE

27

Number of metrics tracked **68**

Number of metrics on which disclosure is made **21**

Metrics on which no disclosure is made: policy against Child and forced labor and number of complaints relating to child labor, forced labor.

Key Governance Issues

Organizational Structure and Board Independence

- The company’s board meets 5 times a year. There are 13 total Directors, 5 Executive Directors, 7 non-executive directors, and 1 alternate director.
- The Managing Director & Chief Executive is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that The Executive Committee, comprising of the Key Management Personnel oversees the implementation of and monitors the BR performance on a regular basis, it is not clear to what extent are they monitored by the board

Ethical business operations and boundaries

- Exide has reported the existence of clear policies for ethics, bribery and corruption.
- Vendors, suppliers and contractors as well as their employees are covered by the written Code of Business Conduct that all vendors have to accept before supplying anything for the company

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Although, the company has provided court cases details and absolute data is provided for pollution notices, the company has not provided a comparison over time.

For further consideration: Monetary value of significant fines for noncompliance is not reported.

Customer satisfaction

- The company has provided information on how many complaints were made and what percentage is pending. During 2013-14 the Company carried out a customer satisfaction survey in some of its key markets for automotive batteries.

For further consideration: More information is needed on, details and results of the surveys.

Key Environmental Issues

Environmental risk assessment and management systems

The company actively tries to identify, assess and address potential environmental risks and take preemptive action to minimize such risks in a structured manner. The Company also recognizes it can play a meaningful role in trying to mitigate the problem by adopting certain strategies and initiatives in its day to day operations.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- The company has reported to have products like Batteries for Electric Bikes/Electric Vehicles, ISS Batteries and Batteries for storage of Solar Energy that incorporated environmental concerns, risks..

Resource consumption and efficiency

Although the company has talked about steps to reduce the energy and water consumption, for Energy, waste, water, GHG emissions and environmental expenditures, no data based disclosure is made with but plans to achieve greater efficiency is discussed.

For further consideration: There is lack or no data based information on key parameters mentioned above.

Key Social Issues

Community development activities

- The company has spent Rs 1.02 crore in CSR projects during 2013-14. Apart from this, the Company has made donations to various charitable organizations and other institutions engaged in the fields of healthcare, environmental protection etc.

Hero MotoCorp Ltd. is the world's largest manufacturer of two - wheelers, based in India. The company was established as a Honda Motor Company of Japan and the Hero Group entered a joint venture to setup Hero Honda Motors Limited in 1984. The joint venture between India's Hero Group and Honda Motor Company, Japan has not only created the world's single largest two wheeler company but also one of the most successful joint ventures worldwide.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 18th July 2014

OVERALL ESG
DISCLOSURE SCORE

52

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

30

Number of metrics tracked **68**

Number of metrics on which disclosure is made **17**

Metrics on which no disclosure is made:
 Expenditure on environmental protection
 GHG Gas Emission
 Regulatory challenges and court cases
 Screening suppliers on human rights records

Key Governance Issues

Organizational Structure and Board Independence

- The Company's Board comprised of 11 (eleven) Directors. 3 (three) Directors, including the Chairman, are Executive Directors, 2 (two) are Non-Executive Directors and 6 (six) are Non-Executive and Independent Directors.
- The Managing Director & CEO is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that The BR performance of the Company is assessed annually at the end of financial year, it is not clear to what extent are they monitored by the board

Ethical business operations and boundaries

- Hero has reported the existence of clear policies for ethics, bribery and corruption, which are issues plaguing the sector.
- Currently, the Code of Conduct is applicable to only to the employees. The Insider Trading Code is applicable to designated employees and the Board of Directors of the Company.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Although, absolute data is provided for pollution notices, the company has not provided a comparison over time.

For further consideration: Monetary value of significant fines for noncompliance and court cases are not disclosed.

Customer satisfaction

- The company has provided with the number of customer complaints and the percentage pending. They also conduct customer satisfaction surveys through dealership programs and the company has reported details.

Key Environmental Issues

Environmental risk assessment and management systems

- The company has a periodic systematic mechanism for environmental impact assessment through its Aspect/ Impact assessment (AIA) activity and Hazard Identification and Risk Assessment (HIRA) technique as a part of the Environmental management System certifications of ISO 14001, and Occupational Health and safety management system certification of OHSAS 18001..

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- The company has disclosed that I3S (Idle Start Stop Switch) -Side Stand Indicator -Integrated Braking System (IBS) incorporate sustainability but hasn't reported details on the same.

Resource consumption and efficiency

- For Energy, Waste, the company has outlined both current consumption and plans to achieve greater efficiency.

For further consideration: The data being reported does not provide the extent of impact and data overtime. Also, no details and data are provide for GHG emissions, water usage and environmental expenditures.

Key Social Issues

Community development activities

- The company works with the objective of providing village children with additional support to improve their educational standard and to achieve their overall development. Healthcare outreach is an important cog in the social matrix and the company organizes several community health camps across the year.

Mahindra & Mahindra Limited is an Indian multinational automobile manufacturing corporation headquartered in Mumbai. It is one of the largest vehicle manufacturers by production in India and the largest seller of tractors across the world.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 30th May 2014

**OVERALL ESG
DISCLOSURE SCORE**

87

**SECTOR ADJUSTED ESG
DISCLOSURE SCORE**

51

Number of metrics tracked **68**

Number of metrics on which no disclosure is made **0**

**Metrics on which no disclosure is made
NIL**

Key Governance Issues

Organizational Structure and Board Independence

- The company’s board has a combination of executive, non-executive and independent members, which meets 6 times a year. There are Non-Executive Directors, comprising of nine Independent Directors and one Non-Independent Non-Executive Director as on 31st March, 2014.
- The Executive Director is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets 6 time to review the business performance, it is not clear if the sustainability performance reviewed during these meetings. In addition, it is reported that BR performance are reviewed 2 times a year but to what extent are they monitored by the board is not cleared.

Ethical business operations and boundaries

- Mahindra has reported the existence of clear policies for ethics, bribery and corruption.
- The company has confirmed that the policies are applicable to suppliers. However few details are provided on the implementation mechanism

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided on show cause notices from Pollution Control Board and court cases, but the company has not provided a comparison over time.

Customer satisfaction

- The company has provided division wise information on what percentage of customer complaints are is pending. They also conduct customer satisfaction surveys with the mechanism of implementation.

For further consideration: The company can provide more information on results of the surveys.

Key Environmental Issues

Environmental risk assessment and management systems

- Yes – the company has periodic assessment of environmental risks

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- Yes, there are plans increase fuel efficiency of vehicles as well as restrict the waste generated from end – of – life vehicles. However, the data being reported on the impact of the same is limited

Resource consumption and efficiency

- For Energy, Waste and Water, the company has outlined both current consumption and plans to achieve greater efficiency.

For further consideration: the data being reported does not provide the extent of impact and data overtime

Key Social Issues

Community development activities

- The company has disclosed amount donated to political causes and parties but details of the same are not provided.
- The Company’s contribution to community development projects amounts to Rs. 32.91 crores during the Financial Year 2013-14.
- Project Nanhi Kali – Provision of educational support to underprivileged girls from poor urban, remote rural and conflict afflicted urban communities across India.

Maruti Suzuki India Limited is engaged in the business of manufacture, purchase and sale of motor vehicles, automobile components and spare parts (automobiles). The other activities of the Company consist of facilitation of pre-owned car sales, fleet management and car financing.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 4th July 2014

OVERALL ESG DISCLOSURE SCORE

81

SECTOR ADJUSTED ESG DISCLOSURE SCORE

47

Number of metrics tracked **68**

Number of metrics on which disclosure is made **4**

Metrics on which no disclosure is made: Expenditure on environmental protection GHG Gas Emission, Regulatory challenges and court cases, Screening suppliers on human rights records

Key Governance Issues

Organizational Structure and Board Independence

- The Company has an optimum combination of Executive and Non-Executive Directors in accordance with the provisions of clause 49 of the listing agreement. The Board has four Executive Directors and eight Non-Executive Directors, of whom four are Independent Directors.
- The Managing Director & CEO is responsible for overall sustainability performance, which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that The Managing Director and top management periodically review the BR performance which is done through the weekly Business Review Meetings, it is not clear to what extent are they monitored by the board if done on a weekly basis.

Ethical business operations and boundaries

- Maruti Suzuki has reported the existence of clear policies for ethics, bribery and corruption.
- Company's Code of Business Conduct and Ethics ensures compliance to the Company's standards of business conduct and ethics and also with regulatory requirements. All employees sign a Code of Conduct on joining the Company and are expected to comply with it in letter and spirit. The Company also has in place a Whistle Blower Policy. As all joint ventures, suppliers and contractors working with the Company are independent entities, the Company's Code of Conduct and Whistle Blower Policy don't apply to them.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Although, absolute data is provided for pollution notices and monetary value of significant fines for noncompliance, the company has not provided a comparison over time.

For further consideration: Court cases are not disclosed.

Customer satisfaction

- The company has not provided actual data on how many complaints were made and what percentage is pending

Key Environmental Issues

Environmental risk assessment and management systems

- The potential environmental risks are identified as a part of the Company's Risk Management activity. The Company regularly reviews its environmental risks and undertakes initiatives to mitigate such risks. Potential environmental risks feature in the Company's risk library. Maruti Suzuki is the first automobile company in India to register a Clean Development Mechanism (CDM) project with the United Nations Framework Convention on Climate Change (UNFCCC).

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- All the Company's models (except M800, Omni and Gypsy) are End-of- Life compliant, which means they are free from hazardous substances and over 85 per cent material can be extracted and reused without impacting the environment

Resource consumption and efficiency

- 1MW solar power plant in Manesar plant was commissioned

For further consideration: There is lack or no data based information on key parameters like energy consumed by business operations, environmental expenditure, emissions, water and waste.

Key Social Issues

Community development activities

- Details on the Company's CSR programs on community development have been shared earlier in response to question 3 of Principal 4. In 2013-14, the Company spent INR 232.8 million on CSR initiatives.

Tata Motors Limited is India's largest automobile company. It is the leader in commercial vehicles in each segment, and among the top in passenger vehicles with winning products in the compact, midsize car and utility vehicle segments. It is also the world's fifth largest truck manufacturer and fourth largest bus manufacturer. Tata Motors, also listed in the New York Stock Exchange (September 2004), has emerged as an international automobile company.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 8th November 2014

OVERALL ESG
DISCLOSURE SCORE

85

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

48

Number of metrics tracked **68**

Number of metrics on which disclosure is made **2**

Metrics on which no disclosure is made:
Expenditure on environmental protection
Regulatory challenges and fines

Key Governance Issues

Organizational Structure and Board Independence

- The Board currently comprises of eleven Directors out of which nine Directors (82%) are Non-Executive Directors. The Company has a Non-Executive Chairman and the six Independent Directors comprise more than one half of the total strength of the Board.
- The Executive Director (Commercial Vehicles) is responsible for overall sustainability performance, which indicates lower than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets 8 times in a year to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board.

Ethical business operations and boundaries

- Tata Motors has reported the existence of clear policies for ethics, bribery and corruption, which are issues plaguing the sector.
- Tata Motors has adopted TCoC as a way of life which mandates, for every member of the organization to conduct the self in a completely ethical manner. The Code is applicable to all Tata Motors permanent, temporary and contractual workforce, suppliers, vendors, dealers, channel partners, subsidiaries, business associates and any other entity / stakeholder associated with the Company. Training and awareness on TCoC is provided to all employees and relevant stakeholders are also made aware of the same from time to time.

Regulatory challenge and compliance

- Absolute data is provided for pollution notices and court cases, the company has not provided a comparison over time.
- For further consideration:** Monetary value of significant fines for noncompliance are not disclosed.

Customer satisfaction

- The company has provided with the percentage of customer complaints pending. They have also reported on the details and results of the customer satisfaction surveys

Key Environmental Issues

Environmental risk assessment and management systems

- Tata Motors has a robust Enterprise Risk Management (ERM) framework to identify key organizational risks and devise mitigation plans. This year, the Company has also integrated 'Environment' aspect into the ERM. The Environmental Policy of Tata Motors guides the Company's efforts to manage its environmental impacts and continually improve its environmental performance.

For further consideration: The company should provide more data based information on quantitative targets and progress against the same.

Sustainable product design and risk assessment

- The company has reported to have products like Small Commercial Vehicles (SCV) and Pickup range, Passenger cars, Buses for Public Transport. There is a continual effort to reduce the life cycle impacts of the vehicles across the value chain. The Company focuses on researching, developing and producing new technologies, such as hybrid engines and electric cars.

Resource consumption and efficiency

- For Energy, GHG emissions, Waste and Water, the company has outlined both current consumption and data overtime and plans to achieve greater efficiency.

Key Social Issues

Community development activities

- Total expenditure reported is 17.33 Crores which is 5.17% of TML's PAT
- The initiatives primarily focus on Arogya (Health), Vidyadhanam (Education), Kaushalya (Employability) and Vasundhara (Environment).

Company Profiles

Sector: Miscellaneous

Titan Company Limited, formerly Titan Industries Limited, is engaged in manufacturing of watches/accessories, jewelry, precision engineering and eyewear. The Company has four divisions: watches/accessories, jewelry, precision engineering and eyewear

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 27th June 2014

OVERALL ESG
DISCLOSURE SCORE

66

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

37

Number of metrics tracked **68**

Number of metrics on which disclosure is not made **11**

Metrics on which no disclosure is made: court cases, suppliers and contractors that have undergone screening on human rights, Rates of injury, weight by type emission of ODS, and environment expenditure.

Key Governance Issues

Organizational Structure and Board Independence

- The Company had 12 Directors, comprising 11 Non-Executive Directors and 1 Executive Director.
- The Head of Corporate Sustainability is responsible for overall sustainability, primarily CSR performance, which indicates lower than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets five times a year to review the business performance, it is not clear if the sustainability performance is reviewed during these meetings and to what extent are they monitored by the board. Also, the frequency for review of BR performance is not disclosed.

Ethical business operations and boundaries

- Titan has reported the existence of clear policies for ethics, bribery and corruption.
- The company has confirmed that the policies extend to the suppliers and stakeholders. The Tata Code of Conduct serves as the ethical roadmap for all Tata companies. All suppliers, partners and joint ventures are expected to adopt Tata Code of Conduct (TCoC) or a joint code of conduct incorporating all elements of the TCoC.

For further consideration: No details are provided on how the policies get implemented and reviewed.

Regulatory challenge and compliance

- Absolute data is provided for pollution notices and monetary value of significant fines for noncompliance,

For further consideration: No disclosure regarding court cases

Customer satisfaction

- The company has provided with the number of customer complaints with the departmental breakup. In addition to this, they also conduct franchisee satisfaction surveys.

For further consideration: More information can be provided on details and results of the surveys.

Key Environmental Issues

Environmental risk assessment and management systems

- While all of the divisions have strategies to address global environmental issues, two of the divisions have a long-term strategy on climate control initiatives that are in line with the TATA Group Climate Change Control Policy. The Environmental Management Systems at factory level helps mitigate and prevent environmental risks across the company. The lens manufacturing facility is currently in the early stages of implementing ISO14001.

For further consideration: The company should provide more supporting data based information on the above.

Sustainable product design and risk assessment

- Titan Company has pioneered in environmentally sustainable processes in terms of raw material acquisition, vendor management, manufacturing, and recycling. However, no data has been provided to specify the processes/systems in place.

Resource consumption and efficiency

- For Energy, Waste, GHG emissions and Water, the company has reported current consumption data with details to increase the efficiency,

For further consideration: Lack of disclosure regarding Environmental protection Expenditure incurred by the firm

Key Social Issues

Community development activities

- Company spent Rs. 4 Crores on CSR activities in the areas of Education, Health & Disability and Employability & Skill Building Programs

Zee Entertainment Enterprises Limited (Zee) is an integrated media and entertainment company engaged primarily in broadcasting and content development, production and its delivery via satellite. The Group also derives revenue from space-selling and distribution for other satellite television channels and sale of television content, film distribution.

- **Annual Business Responsibility Report filed:** Yes
- **Date of release of sustainability report:** 21st May 2014

OVERALL ESG
DISCLOSURE SCORE

35

SECTOR ADJUSTED ESG
DISCLOSURE SCORE

20

Number of metrics tracked 68

Number of metrics on
which no disclosure is made 30

Metrics on which no disclosure is made:
Energy management, number of incidents of discrimination, Marketing and ethical advertising, Key topics and concerns that have been raised through stakeholder engagement

Key Governance Issues

Organizational Structure and Board Independence

- The Board of Director comprises of 8 members in total, Executive Director(s) 2 Non-Executive Independent Directors 4 Other Non-Executive Directors 2
- The Managing Director & CEO assesses the BR performance of the Company which indicates higher than average integration of sustainability issues in the company.

For further consideration: While it is reported that the board meets 7 times to review the business performance, it is not clear if the sustainability performance reviewed during these meetings and to what extent are they monitored by the board. Also, it is mentioned that the assessment of BR performance is done on an ongoing basis by the Managing Director and Senior Management of the Company, but the frequency is not clear.

Ethical business operations and boundaries

- ZEE has reported the existence of clear policies for ethics, bribery and corruption.
- The company has confirmed that the policies don't extend to the suppliers and stakeholders. Though the Company's policies currently do not apply to external stakeholders including supplier's, contractors, NGO's etc, the Company follows Zero tolerance on such agencies acts of bribery, corruption etc during their dealings with the Company..

For further consideration: However, the company hasn't disclosed its key stakeholder engagement mechanism and with suppliers.

Regulatory challenge and compliance

- No disclosure on CPCB or monetary value of significant fines for noncompliance for use of product or services.

Customer satisfaction

- The company has provided with the number of customer complaints pending. Company carries out surveys (either web-based or otherwise) for identifying consumers viewing behavior and emerging trends on consumer preference on a regular basis.

For further consideration: The company needs to provide more details on how many complaints were made and results of the surveys.

Key Environmental Issues

Environmental risk assessment and management systems

- The company hasn't disclosed details on the same.

Sustainable product design and risk assessment

- The company hasn't disclosed details on the same..

Resource consumption and efficiency

- For Energy, Waste, GHG emissions and Water, the company has not reported current consumption data. Environmental Expenditure is also not reported

Key Social Issues

Community development activities

- ZEE enhanced literacy levels across Rajasthan and Uttarakhand by setting up libraries through this partnership, elevating lives of over 2,400 children
- Excluding expenses incurred by the Company as part of CSR initiatives in the Business operations, which include the money spent by way of Donation and/or other financial support, an amount of Rs 47.48 Million to various NGO's engaged in development projects

METHODOLOGY

Considering that ESG Disclosure is a proxy for the **business responsibility practices** of businesses and **Management quality and commitment** to sustainability. The objective of the Annual Benchmarking Framework and the resultant scorecard is to **answer** the following questions:

- How complete and comprehensive is the ESG Disclosure of listed businesses in India?
- Where does a particular company rank vis-à-vis its peers on environment, social and governance disclosure separately in providing satisfactory amount of material ESG information which is consistent over time?
- What key material indicators are not being addressed by the companies?
- What are the disclosure highlights over the reporting year on ESG related issues?
- What are the outstanding metrics in which the company has been able to benchmark the level of material disclosure?

The following is the outline of the methodology used by cKinetics for scoring the ESG disclosure of business. The advisors of India Responsible Investment Working Group provided inputs into the same. The Scoring metric ranges from 0 (no data provided) to 1.75 (disclosure of benchmark able data that allows for comparison over earlier period reports) and the breakdown is included below:

Quality of Disclosure score (breakdown)		
0.25	Disclosure: no data	Some disclosure on the indicator
0.5	Disclosure: absolute data	Disclosure on the indicator with data related to it (e.g. total energy saved)
0.75	Disclosure: relative data	Disclosure of data that helps assess materiality or relevance of the parameter (e.g. percentage of energy saved)
1	Disclosure: absolute data over time	Disclosure on the indicator with data related to it (e.g., total water consumption: years 2007-2010)
1.25	Disclosure: relative data that is benchmark able	Disclosure of data that helps compare vis a vis benchmarks (e.g. per employee or unit of production -- energy intensity of production)
1.5	Disclosure: relative data over time	Disclosure of relative data that allows for comparison over earlier period reports
1.75	Disclosure: relative data over time that is benchmark able	Disclosure of benchmark able data that allows for comparison over earlier period reports

Note: The metrics outlined in table "ESG Disclosure by India Inc: Metric-wise Analysis" are used for this assessment.

For access to the data and company wise ESG Scorecard for 2014, please contact Sustainable Business Leadership Forum (Info@SustainabilityOutlook.in) with the subject ES Working Group)

This report is a Collaborative Content Partnership by India Responsible Investing Working Group
<http://SBLF.SustainabilityOutlook.in/about-the-forum/sustainability-disclosure-and-reporting>

About Sustainable Business Leadership Forum

Sustainable Business Leadership Forum (SBLF) is an invitation-only Indian industry focused market development platform which equips organizations, managers and industry stakeholders on the 'how' of sustainability through a unique programmatic approach comprising of round the year programs and 'on-ground industry oriented' work.

Instituted by Sustainability Outlook, SBLF enables a unique exchange of thought leadership, business know-how and catalytic tools for enabling corporate transition towards sustainable business practices.

Based on membership inputs and requests for focused research, the Forum facilitates creation of Industry Task Forces guided by industry catalysts and corporates to help enable:

About Sustainability Outlook

Sustainability Outlook is a market access, insight and collaboration platform tracking actions related towards enhanced resource management in the Indian economy. Sustainability Outlook provides market analysis and data tracking services, news and intelligence updates, and creates momentum towards specialised sustainability interventions by facilitating a structured process for multi-party collaboration.

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