

Annexure 7

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

SECTION A: GENERAL DISCLOSURES

I. Details of listed Company

| | |
|---|--|
| 1. Corporate Identification Number (CIN) of the Company: | L72200DL1992PLC049074 |
| 2. Name of the Company: | Newgen Software Technologies Limited |
| 3. Year of Incorporation: | 05-06-1992 |
| 4. Registered Office Address: | E-44/13 Okhla Phase II, New Delhi South Delhi DL 110020 |
| 5. Corporate Address: | E-44/13 Okhla Phase II, New Delhi South Delhi DL 110020 |
| 6. E-mail id: | investors@newgensoft.com |
| 7. Telephone: | +91 11 46533200 |
| 8. Website: | https://newgensoft.com |
| 9. Financial Year for which reporting is being done: | 1st April 2022 to 31st March 2023 |
| 10. Name of the Stock Exchange(s) where shares are listed: | Bombay Stock Exchange (BSE) National Stock Exchange of India (NSE) |
| 11. Paid-up Capital (In ₹): | ₹ 69,95,57,010 |
| 12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report: | Arun Kumar Gupta investors@newgensoft.com +91 11 46533200 |
| 13. Reporting boundary | Disclosures made in this report are on a standalone basis and pertain only to Newgen Software Technologies Limited |

II. Products/Services

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

| S. No. | Description of Main Activity | Description of Business Activity | % of Turnover of the Company |
|--------|------------------------------|---|------------------------------|
| 1. | Software & IT services | Software application development Services and related activities | >90 % of the turnover |

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

| S. No. | Product/Service | NIC Code | % of total contributed Turnover |
|--------|-------------------------------|----------|---------------------------------|
| 1. | Sale of Software/SaaS/ATS/AMC | 9983 | 51% |
| 2. | Sale of Services/ Others | | 48% |

III. Operations

16. Number of locations where plants and/or operations/offices of the Company are situated:

| Location | Number of plants | Number of offices | Total |
|---------------|------------------|-------------------|-------|
| National | NA | 16 | 25 |
| International | NA | 9 | |

17. Market served by the Company:

a. Number of locations

| Locations | Number |
|----------------------------------|--------|
| National (No. of States) | 7 |
| International (No. of Countries) | 6 |

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

Contribution of exports during the financial year ended 31st March 2023: 69%

c. A brief on types of customers:

Newgen's customers are Business to Business Customers or Enterprise Customers in the Banking and Financial Services, Government, Shared Services, Healthcare, Insurance and other domains.

Employees

18. Details as at the end of the Financial Year:

a. Employees and workers*** (including differently abled):

| S. No. | Particulars | Total (A) | Male | | Female | |
|------------------|------------------------------|-------------|-------------|---------------|------------|---------------|
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) |
| EMPLOYEES | | | | | | |
| 1. | Permanent* (D) | 3190 | 2400 | 75.24% | 790 | 24.76% |
| 2. | Other than Permanent** (E) | 571 | 435 | 76.18% | 136 | 23.82% |
| 3. | Total Employees (D+E) | 3761 | 2835 | 75.38% | 926 | 24.62% |

*Permanent Employees include on-roll employees of Newgen including those who are on Probation.

**Other than Permanent Employees include Temporary, Casual, Contractual & Third-Party Employees, Trainees.

***The Company does not employ workers on any of its office premises.

b. Differently abled Employees and workers:

| S. No. | Particulars | Total (A) | Male/Others | | Female | |
|-------------------------------------|------------------------------|-----------|-------------|------------|----------|------------|
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) |
| DIFFERENTLY ABLED EMPLOYEES* | | | | | | |
| 1. | Permanent (D) | | | | | |
| 2. | Other than Permanent (E) | 31 | 28 | 90% | 3 | 10% |
| 3. | Total Employees (D+E) | 31 | 28 | 90% | 3 | 10% |

19. Participation/ Inclusion/Representation of women

| | Total (A) | No. and Percentage of Females | |
|---------------------------------|-----------|-------------------------------|---------|
| | | No. (B) | % (B/A) |
| Board of directors | 7 | 2 | 28 % |
| Key Management Personnel | 5 | 0 | 0 % |

20. Turnover rate for permanent employees and workers

| | FY 2022-23 | | | FY 2021-22 | | | FY 2020-21 | | |
|---------------------|------------|--------|-------|------------|--------|-------|------------|--------|-------|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent Employees | 30% | 30% | 30% | 48% | 56% | 50% | 24% | 28% | 25% |

V. Holding, Subsidiary and Associate Companies (Including Joint ventures)

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

| S. No. | Name of the holding/ subsidiary/ associate companies/ joint ventures (A) | Indicate whether holding/ subsidiary/ associate/ joint venture | % of shares held by listed Company | Does the Company indicated at column A, participate in Business Responsibility initiatives of the listed Company? (Yes/No) |
|--------|--|--|------------------------------------|--|
| 1 | Newgen Software Inc. USA | Wholly owned Subsidiary | 100 % | Yes |
| 2 | Newgen Software Technologies Pte. Ltd. | Wholly owned Subsidiary | 100 % | Yes |
| 3 | Newgen Software Technologies Canada Ltd. | Wholly owned Subsidiary | 100 % | Yes |
| 4 | Newgen Software Technologies (UK) Limited | Wholly owned Subsidiary | 100 % | Yes |
| 5 | Newgen Software Technologies Pty Ltd. | Wholly owned Subsidiary | 100 % | Yes |
| 6 | Newgen Computers Technologies Limited. | Wholly owned Subsidiary | 100 % | Yes |
| 7 | Number Theory Software Private Limited. | Wholly owned Subsidiary | 100 % | Yes |
| 8 | Newgen Software Technologies LLC | Wholly owned Subsidiary | 100 % | Yes |

VI. CSR Details

22. (i) Whether CSR is applicable as per section 135 of companies Act, 2013: (Yes/No)- Yes

(ii) Turnover (in ₹) -88780.06 lakhs (Standalone)

(iii) Net worth (in ₹) - 92047.85 lakhs (Standalone)

VII. Transparency and Disclosures Compliances

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

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy) | FY 2022-23 | | | FY 2021-22 | | |
|---|--|--|--|---------|--|--|---------|
| | | Number of the complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of the complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Communities | NA | NA | NA | - | NA | NA | - |
| Investors (Other than shareholder) | NA | NA | NA | - | NA | NA | - |
| Shareholders | Yes* | 16 | 0 | - | 10 | 0 | - |
| Employees and workers | Yes* | 1 | 0 | - | Nil | Nil | - |
| Customers | Yes* | 6 | 0 | - | - | 0 | - |
| Value Chain Partners | Yes* | Nil | Nil | - | Nil | Nil | - |
| Other (Please specify) | NA | NA | NA | - | NA | NA | - |

*The Grievance Redressal Policy is available on the Newgen intranet platform.

24 Overview of the Company's material responsible business conduct issues. Please indicate material responsible business conduct and sustainability issues pertaining to environment and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach or mitigate the risk along-with its financial implications:

| S. No. | Material issues identified | Indicate whether risk or opportunity | Rational for identifying the risk/opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--------|--|--------------------------------------|--|--|---|
| 1. | Talent Management | Risk/ Opportunity | <p>Opportunity Increased demand for digital transformation projects from customers given the demand supply mismatch of talent</p> <p>Risk The company's business depends largely upon its highly skilled technology professionals and its ability to hire, attract, motivate, retain, and train these personnel.</p> | <p>As a company we have a strong focus on nurturing the existing workforce, attracting new talent through campus recruitment drives and lateral placements, and reskilling employees through different training programs.</p> <p>The company also has a broad based Employee Stock Option schemes and Restricted Stock Options scheme for incentivization of employees bringing in inclusive ownership.</p> | <p>Positive- Increased demand for digital transformation projects from customers given the demand supply mismatch of talent</p> <p>Negative- Higher cost given the current environment.</p> |
| 2 | Data Security/ cyber-Security and Data breach | Risk | <p>Risk- Increasing exposure to cyber threats and data breach</p> | <p>As an organization, we are constantly vigilant about the evolving cyber-security threat landscape in order to make our processes more robust and achieve higher compliance. We continue to be certified against the Information Security Management System (ISMS) Standard ISO 27001:2013 as well as ISO 27017. Additionally, we have also been assessed on SOC 1 and SOC 2 by an independent audit firm.</p> | <p>Negative- Financial loss and damage of reputation</p> |
| 3 | Environmental footprint: Climate Change | Risk/ Opportunity | <p>Opportunity- Certain Newgen solutions help in measuring the carbon footprint and digitizing content hence reducing the requirement for physical paper. Newgen provides technology-led solutions that help customers in the process of achieving certain sustainability goals.</p> <p>Risk- Climate Change and the resultant extreme weather events can lead to disruption to the company's operations, and the safety and wellbeing of its employees.</p> | <p>Successive efforts are being undertaken to reduce the overall emissions/ waste across the organization</p> <p>We also have a robust risk management system in place</p> | <p>Positive- Helping enterprises in their digital transformation journey to manage the uncertain environment.</p> <p>Negative-Business/ Operations risk</p> |

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

The National Guidelines for Responsible Business Conduct (NGRBC) as brought out by the Ministry of Corporate Affairs advocates nine principles as P1-P9 as given below:

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

| Disclosure Questions | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|---|--|-----|-----|-----|-----|-----|-----|-----|-----|
| Policy and management processes | | | | | | | | | |
| 1. a). Whether your Company's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| b). Has the policy been approved by the Board? (Yes/No) | Yes | No* | No* | No* | Yes | Yes | Yes | Yes | Yes |
| c). Web Link of the policies, if available | # | # | # | # | # | # | # | # | # |
| 2. Whether the Company has translated the policy into procedures. (Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| 3. Do the enlisted policies extend to your value chain partners? (Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | No | No | Yes |
| 4. Name of the national and international codes/certifications/labels/standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your Company and mapped to each principle. | ISO 9001:2015- Quality Management System ISO 27001:2013- Information Security Management ISO 27017- Information Security Controls in Cloud environment ISO 27018- Personal Data Security Controls SOC-1 and SOC-2 Compliance- System and Organization Controls | | | | | | | | |
| 5. Specific commitments, goals and targets set by the Company with defined timelines, if any | - | - | - | - | - | - | - | - | - |
| 6. Performance of the Company against the specific commitments, goals and targets along-with reasons in case the same are not met. | - | - | - | - | - | - | - | - | - |

Governance, leadership and oversight

7. Statement by the director responsible for the business responsibility report, highlighting ESG related challenges, targets, and achievements.

Newgen provides technology-led solutions that have been instrumental in driving digital transformation in the country by innovatively connecting systems, processes, people, and things.

Our products and services do not involve ESG risks. Our digital transformation platform, deployed on the cloud, helps enterprises in mapping and reducing their carbon footprint by driving end-to-end digitalization of processes across the enterprise. Our cloud-based technology significantly lowers energy use and carbon emissions.

As we scale up, we embark on another long-term goal to build a responsible and sustainable organisation. We are working on the long term goal of creating sustained value for our business, stakeholders and the community at large.

Under CSR, our mission is to actively contribute to the social and economic development of the communities in which we operate. The core philosophy is to empower lesser privileged sections of society through a holistic approach to help them realize their full potential and ensure a good quality of life. Our initiatives have contributed toward two Sustainable Development Goals of the United Nations:

- a. Goal 2 (Zero Hunger)
- b. Goal 4 (Quality Education)

We are constantly committed towards the environmental wellbeing by promoting sustainable practices across our organization. We are in the process of setting specific goals and targets which will be disclosed at a later stage.

| | |
|---|--|
| 8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies). | Arun Kumar Gupta Chief Financial Officer investors@newgensoft.com +91 11 46533200 |
| 9. Does the Company have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes/No). If yes, provide details. | Yes, Mr. Diwakar Nigam (Chairman and Managing Director) |

*Approved by the Senior Management

Weblink of the Policies:

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

- Anti-Bribery and Anti-corruption Policy*
- Whistleblower Policy- <https://newgensoft.com/wp-content/uploads/investor/Whistle%20Blower%20Policy.pdf>
- Code of Ethics and Business Conduct - <https://newgensoft.com/wp-content/uploads/investor/Code%20of%20Ethics%20&%20Business%20Conduct%20for%20Website.pdf>
- Disciplinary Action Policy*
- Code of Conduct for Directors and Senior Management Personnel - <https://newgensoft.com/wp-content/uploads/2018/03/Code-of-Conduct-for-Board-SMP.pdf>

Principle 2: Product Life Cycle Sustainability: Businesses should provide goods and services in a manner that is sustainable and safe:

- Information Security Policy*
- Policy on Disposal and Reuse of Equipment*
- Policy on Environment Sustainability*
- Policy on Incident Reporting*
- Supplier Code of Conduct*
- Purchase Policy*

Principle 3: Employee Well Being: Businesses should respect and promote the well-being of all employees, including those in their value chains:

- Code of Ethics and Business Conduct - <https://newgensoft.com/wp-content/uploads/investor/Code%20of%20Ethics%20&%20Business%20Conduct%20for%20Website.pdf>
- Prevention of Sexual Harassment of Women at workplace (POSH) - <https://newgensoft.com/wp-content/uploads/2021/06/POSH-compressed.pdf>
- Equal Opportunity Policy*
- Compensation philosophy and promotion guidelines*

Principle 4: Stakeholder Engagement: Businesses should respect the interests of and be responsive to all its stakeholders:

- CSR Policy - <https://newgensoft.com/wp-content/uploads/2020/05/Policy-on-Corporate-Social-Responsibility.pdf>
- Supplier Code of Conduct*

Principle 5: Businesses should respect and promote human rights:

- Code of Ethics and Business Conduct - <https://newgensoft.com/wp-content/uploads/investor/Code%20of%20Ethics%20&%20Business%20Conduct%20for%20Website.pdf>
- Supplier Code of Conduct*
- Nomination and Remuneration Policy - <https://newgensoft.com/wp-content/uploads/2018/03/Nomination-and-Remuneration-Policy.pdf>
- Prevention of Sexual Harassment of Women at workplace (POSH) - <https://newgensoft.com/wp-content/uploads/2021/06/POSH-compressed.pdf>
- Equal Opportunity Policy*
- Whistleblower Policy*

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

- Policy on Environmental Sustainability*
- Risk Management Policy - <https://newgensoft.com/wp-content/uploads/2021/06/Risk-Management-Policy.pdf>
- Policy on Disposal and Reuse of Equipment*

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

- Code of Ethics and Business Conduct - <https://newgensoft.com/wp-content/uploads/investor/Code%20of%20Ethics%20&%20Business%20Conduct%20for%20Website.pdf>

Principle 8: Inclusive Growth: Businesses should promote inclusive growth and equitable development:

- CSR Policy - <https://newgensoft.com/wp-content/uploads/2020/05/Policy-on-Corporate-Social-Responsibility.pdf>
- Purchase Policy*

Principle 9: Customer/Consumer Value: Businesses should engage with and provide value to their consumers in a responsible manner:

- Policy on Incident Reporting*
- Risk Management Policy - <https://newgensoft.com/wp-content/uploads/2021/06/Risk-Management-Policy.pdf>
- Information Security Policy*

*The Policies are available on Newgen's Intranet Platform.

10. Details of Review of NGRBCs by the Company:

| Subject for Review | Indicate whether Review was Undertaken by Director/ Committee of the Board/ Any other Committee | | | | | | | | | Frequency (Annually/ Half yearly/ Quarterly/ Any other- please specify) | | | | | | | | |
|---|---|----|----|----|-----|----|----|----|----|---|----|----|----|----------|----|----|----|----|
| | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
| Performance against above policies and follow up action | | | | | Yes | | | | | | | | | Annually | | | | |
| Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances | | | | | Yes | | | | | | | | | Annually | | | | |

| 11. Has the Company carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency. | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|--|----|----|----|----|----|----|----|----|----|
| | No | No | No | No | No | No | No | No | No |

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

| Questions | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|---|----|----|----|----|----|----|----|----|----------------|
| The Company does not consider the principles material to its business | | | | | | | | | |
| The Company is not at a stage where it is in a position to formulate and implement the policies on specified principles | | | | | | | | | |
| The Company does not have the financial or/human and technical resources available for the task | | | | | | | | | Not Applicable |
| It is planned to be done in the next financial year | | | | | | | | | |
| Any other reason | | | | | | | | | |

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE
PRINCIPLE 1

Ethics, Transparency and Accountability: Business should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

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

| Segment | Total number of training and Awareness Programmes held | Topics / principles covered under the training and its impact | % of persons in respective category covered by the awareness programmes |
|-----------------------------------|--|--|---|
| Board of Directors | 2 | Awareness sessions on Newgen's Code of Conduct under SEBI listing regulations and Familiarization program which include Governance Topics like Anti bribery and corruption disclosures, stakeholders' engagements, social topics like welfare benefits etc. | 100% |
| Key Managerial Personnel | 2 | | 100% |
| Employees other than BoD and KMPs | 12 | During induction, all new employees are trained on Newgen's Code of Conduct and various policies like Anti-Bribery, Anti-corruption Policy, Vigil Mechanism, Whistleblower Policy, Prevention of Sexual Harassment of Women at workplace (POSH) etc. Further, all existing employees at Newgen are required to undergo refresher training on annual basis. Additionally, we regularly conduct Health and Safety trainings such as Fire Safety, Information Security etc. | 100% |
| Workers | NA | NA | NA |

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the Company or by directors / KMPs) with regulators/ law enforcement agencies/judicial institutions, in the financial year.

(Note: The Company shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the Company’s website):

During the financial year 2022-23, no fines/penalties/punishment/award/compounding fees/settlement amount was paid in proceedings (by the Company or by directors/KMPs with regulators/law enforcement agencies/judicial institutions).

| Monetary | | | | | |
|------------------|-----------------|---|-----------------|-------------------|--|
| | NGRBC Principle | Name of regulatory/enforcement agencies/judicial institutions | Amount (In INR) | Brief of the Case | Has an appeal been preferred? (Yes/No) |
| Penalty/fine | | | | | |
| Settlement | | | No | | |
| Compounding fees | | | | | |

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

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

| Case Details | Name of regulatory/enforcement agencies/judicial institutions |
|----------------|---|
| Not applicable | |

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

Yes, we have an Anti-Bribery & Anti-Corruption (ABAC) policy which provide a detailed framework for preventing, detecting, and addressing bribery and corruption issues within the organization.

Newgen is committed under the UN Global Compact’s principles for prevention, deterrence and detection of fraud, bribery and other corrupt practices. It is our objective to conduct all business activities with honesty, integrity and with the highest ethical standards.

The policy applies to all individuals working/associated worldwide with Newgen at all levels and grades.

The policy is available on Newgen’s intranet platform.

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

| Segment | FY 2022-23 | FY 2021-22 |
|-----------|------------|------------|
| Directors | | |
| KMPs | None | None |
| Employees | | |

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

| | FY 2022-23 | | FY 2021-22 | |
|--|------------|----------------|------------|----------------|
| | Number | Remarks | Number | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | 0 | Not applicable | 0 | Not Applicable |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs | 0 | Not applicable | 0 | Not Applicable |

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

Not Applicable

PRINCIPLE 2

Product Life Cycle Sustainability: Businesses should provide goods and services in a manner that is sustainable and safe.

Essential Indicators

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

| | FY 2022-23 | FY 2021-22 | Details of improvements in environmental and social impacts |
|-------|------------|------------|--|
| R&D | 100% | 100% | Our R&D efforts are solely focused on designing solutions that assist customers in digitizing their business processes, making them more effective and paperless and ultimately lowering their carbon footprint. |
| CAPEX | 39.5% | 77.2% | Most of our Capex in IT infrastructure is on upgrading our old Laptops, Desktops & Servers with more energy efficient and technologically advanced equipment. |

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

Yes. Newgen has procedures in place for sustainable sourcing. Our Supplier Code of Conduct and Procurement policy provides for the same.

We select our supplier/vendors based on clear and set communication with transparency about the requirements of Human rights, Health & safety, Business Ethics and Environment policy. Our procurement policy provides weightage to the sustainability practices of the suppliers during selection.

With the procurement policy and suppliers' code of conduct we ensure that the sustainability framework is adhered across our value chain.

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

With Newgen being an IT company that has intangible inputs and products, we have applied principles of sustainable sourcing to our supplies, wherever feasible.

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

Not applicable

4. Whether Extended Producer Responsibility (EPR) is applicable to the Company's activities. If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Not applicable

PRINCIPLE 3

Employee Wellbeing: Businesses should respect and promote the well-being of all employees, including those in their value chains.

Essential Indicators

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

Newgen continues to put a strong emphasis on employee well-being by hosting awareness seminars on mental health and various lifestyle diseases with eminent doctors besides providing medical and parental benefits to all our employees. We have also partnered with outside creche facilities at all of our office locations to cater to the needs of new parents.

| Category | Total (A) | % of Employees covered by | | | | | | | | | |
|---------------------------------------|--------------|---------------------------|-------------|--------------------|-------------|--------------------|------------|--------------------|------------|---------------------|-------------|
| | | Health insurance | | Accident insurance | | Maternity benefits | | Paternity benefits | | Day Care facilities | |
| | | Number (B) | % (B/A) | Number (C) | % (C/A) | Number (D) | % (D/A) | Number (E) | % (E/A) | Number (F) | % (F/A) |
| Permanent employees | | | | | | | | | | | |
| Male | 2400 | 2400 | 100% | 2400 | 100% | - | - | 2400 | 100% | 2400 | 100% |
| Female | 790 | 790 | 100% | 790 | 100% | 790 | 100% | - | - | 790 | 100% |
| Total | 3190 | 3190 | 100% | 3190 | 100% | | | | | 3190 | 100% |
| Other than Permanent employees | | | | | | | | | | | |
| Male | 435 | 33* | 7.6% | 33 | 7.6% | - | - | 435 | 100% | 435 | 100% |
| Female | 136 | 1 | 0.7% | 1 | 0.7% | 136 | 100% | - | - | 136 | 100% |
| Total | 571 | 0 | 0 | 0 | 0 | | | | | 571 | 100% |

*Casual and Temporary employees covered

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

Not Applicable

2. Details of retirement benefits, for FY 2022-23 and FY 2021-22:

| Benefits | FY 2022-23 | | | FY 2021-22 | | |
|------------------------|--|--|--|--|--|--|
| | No. of employees covered as a % of total employees | No. of workers covered as a % of total Workers | Deducted and deposited with the authority. | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority. |
| PF | 100% | NA | Yes | 100% | NA | Yes |
| Gratuity | 100% | NA | Yes | 100% | NA | Yes |
| ESI | 0.03% | NA | Yes | 0.03% | NA | Yes |
| Others- please specify | NA | NA | NA | NA | NA | NA |

*The data relates to permanent employees only.

3. Accessibility of workplaces

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

Yes, most of our premises/offices are accessible to differently abled employees and visitors with provision of ramps, handrails, accessible washrooms, availability of wheelchair, accessible parking etc.

Newgen is continuously working towards improving infrastructure for eliminating any existing barrier to accessibility to ensure that they remain compliant with any changes to accessibility requirements. We are constantly evaluating the accessibility of our offices and gathering feedback from employees to identify any gaps and addresses issues pointed out.

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

Yes, the Newgen has an equal opportunity policy and is available on our intranet. We don't discriminate based on their disability, race, gender, age, religion, sexual orientation, or other beliefs.

We continue to work towards ensuring equal opportunities for persons with disabilities in all aspects of employment, including recruitment, training, promotions and working conditions.

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

| Gender | Permanent employees | | Permanent workers | |
|--------------|---------------------|--|---------------------|----------------|
| | Return to work rate | Retention rate | Return to work rate | Retention rate |
| Male | 100% | NA, as the Company started Paternal Leave Policy from 1 st Jan 2023 | Not Applicable | |
| Female | 100% | 58% | | |
| Total | 100% | 58% | | |

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

Yes/No (If yes, then give details of the mechanism in brief)

Permanent Employees Yes, we have a mechanism available to receive and redress grievances to maintain a work culture that is healthy, fair, and inclusive. This ensures that employees feel heard and valued, and their concerns are addressed promptly and effectively.

Some of the common mechanism available to receive and redress grievances include-

- Open door Policy
- Grievance redressal committee
- Whistleblower policy

Other than Permanent Employees When needed, a resolution committee is formed with in the company to resolve the grievance. The committee may consist of members of management, HR, Legal, or other relevant departments depending upon the nature of the grievance.

Further, Newgen has appointed an Independent External Ombudsman under this Whistleblower mechanism. The designated Ombudsman administers the entire process – from reviewing and investigating concerns raised and undertaking all necessary actions to resolve the issue.

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

There are no Unions / Associations in Newgen that Employees are affiliated to.

8. Details of training given to employees and workers:

Employee Health, Wellbeing and Safety has always remained a priority area at Newgen. In addition to ensuring a safe workplace, we conduct awareness programs on various health topics with eminent doctors, conduct training and awareness on fire and safety protocols at the office buildings. In addition, we also conduct regular mock drills for fire evacuation as well as medical emergencies involving all our employees across our offices.

Technology is always evolving and to keep pace with this evolution, our workforce must constantly upgrade its knowledge and skills. We at Newgen believe in employee development as one of our prime responsibilities, and towards this our Managers and HR team constantly work with all our employees in identifying their training and development needs. Different training courses are designed and conducted in-house besides

certification programs conducted in collaboration with external agencies. We also have our internal online learning portal through which employees can participate in multitude of self-paced online trainings.

| Category | FY 2022-23 | | | | | FY 2022-21 | | | | |
|-------------------|-------------|-------------------------------|-------------|----------------------|---------------|-------------|-------------------------------|-------------|----------------------|---------------|
| | Total (A) | On health and safety measures | | On Skill upgradation | | Total (D) | On health and safety measures | | On Skill upgradation | |
| | | No.(B) | %(B/A) | NO.(C) | % (C/A) | | No.(E) | %(E/D) | NO. (F) | %(F/D) |
| Employees* | | | | | | | | | | |
| Male | 2835 | 2835 | 100% | 2053 | 72.42% | 2360 | 2360 | 100% | 1102 | 46.69% |
| Female | 926 | 926 | 100% | 656 | 70.84% | 839 | 839 | 100% | 384 | 45.77% |
| Total | 3761 | 3761 | 100% | 2709 | 72.03% | 3199 | 3199 | 100% | 1486 | 46.45% |

* Includes Permanent and Other than Permanent Employees

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

| Category | FY 2022-23 | | | FY 2022-21 | | |
|-------------------|-------------|-------------|-------------|-------------|-------------|-------------|
| | Total (A) | No.(B) | % (B/A) | Total © | No. (D) | % (D/C) |
| Employees* | | | | | | |
| Male | 2400 | 2400 | 100% | 2041 | 2041 | 100% |
| Female | 790 | 790 | 100% | 684 | 684 | 100% |
| Total | 3190 | 3190 | 100% | 2725 | 2725 | 100% |

* Includes Permanent Employees only

10. Health and safety management system:

a. Whether an occupational health and safety management system has been implemented by the Company? If yes, the coverage of such a system?

Yes, we work diligently to maintain high standard of occupational health and safety across our offices. These include Fire and Safety apparatus and drills, provision of defibrators, provision of safe transport practices in company provided transport facilities with special focus on safe commute of female employees, etc.

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

Being a software company, nature of our work doesn't involve any significant hazards. Our offices are designed with ergonomic workstations and furniture, provision of breakout, recreational and collaboration space as we strive to provide a stress-free work environment for our employees.

In our office location, we have provision and maintenance of fire detection, alarm, and suppression systems. We also conduct regular mock drills for fire evacuation as well as medical emergencies.

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

Yes, we have safety incident reporting and management processes to ensure that all work-related incidents are reported and closed after taking necessary corrective actions.

d. Do the employees/ worker of the Company have access to non-occupational medical and healthcare services?

Yes, for the healthcare of our employees, an Annual Health Check-up is undertaken. We also have tied up with eminent doctors to conduct awareness sessions on mental health and various lifestyle diseases for our employees.

11. Details of safety related incidents:

No work-related injuries during the reporting period.

| Safety Incident/Number | Category | FY 2022-23 | FY 2021-22 |
|---|-----------|------------|------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | Nil | Nil |
| Total recordable work-related injuries | Employees | Nil | Nil |
| No. of fatalities | Employees | Nil | Nil |
| High consequence work-related injury or ill-health (excluding fatalities) | Employees | Nil | Nil |

12. Describe the measures taken by the Company to ensure a safe and healthy workplace.

Our offices are designed with ergonomic workstations and furniture, provision of breakout, recreational and collaboration space as we strive to provide a stress-free work environment to our employees. In our office location, we have provision and maintenance of fire detection, alarm, and suppression systems. We also conduct regular mock drills for fire evacuation as well as medical emergencies. Further, we have robust management of Covid protocols in our organization.

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

| | FY 2022-23 | | | FY 2021-22 | | |
|--------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Working Conditions | | Nil | | | Nil | |
| Health & Safety | | Nil | | | Nil | |

14. Assessments for the year:

| | % of your plants and offices that were Assessed (by Company or Statutory Authorities or Third Parties) |
|-----------------------------|---|
| Health and safety practices | We assess most of our offices internally on a regularly basis on Health and Safety practices and working conditions. In addition, we regularly conduct mock drills & testing of our Fire & Safety equipment for proper functioning across all our offices. Most of the Health and Safety and Working Conditions aspects are covered under ISO 9001, ISO 27001 and CMMI |
| Working Conditions | |

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

No such incidents were reported during the year.

PRINCIPLE 4

Stakeholder Engagement: Businesses should respect the interests of and be responsive to all its stakeholders.

Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the Company:

As part of the business activities, CSR and ESG activities and other engagements, Newgen identifies and engages with a broad spectrum of stakeholders in consultation with the Company's management including the customers, employees, investors/ shareholders, vendors, government and statutory bodies and the community at large. These stakeholders are individuals, groups of individuals or organizations that affect and/or could be affected by the Company's activities, platforms or services. The company is in constant engagement with the different stakeholder groups and committed towards them to understand their needs and requirements and their impact on the business, future outlook and risks in order to enhance the strategic and operational decisions.

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

| Stakeholders Group | Whether identified as Vulnerable & Marginalised Group | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, website, Others) | Frequency of engagement (Annually/ Half yearly/ quarterly/ others- please specify) | Purpose and scope of engagement including Key topics and concerns raised during such engagement |
|----------------------------------|---|--|---|---|
| Customers | No | <ul style="list-style-type: none"> - Customer meetings/ visits/ reviews - Industry Events - Customer Satisfaction Surveys - Customer Meets - Brochures/ Case Studies/ Website/ Social Media/ Mailers | <ul style="list-style-type: none"> • Continuous: Website/ Social Media/ Meetings/ Mailers/ Industry Events • Annual: Customer Satisfaction Surveys/ Customer Meet | <p>Updates on New products, Resolving Queries, Seeking Customer Feedback & Satisfaction</p> |
| Employees | No | <ul style="list-style-type: none"> - NEWS Committee/ Events - Townhall - HR Surveys - Mailers/ Internal Communications - Intranet | <ul style="list-style-type: none"> • Continuous: NEWS Committee/ Events/ Mailers/ Internal Communications/ Intranet • Annual: Townhall/ HR Surveys | <p>Learning & Development, Employee recognition and Engagement activities, Employee performance review and career development, Employee Safety and Well Being</p> |
| Investors | No | <ul style="list-style-type: none"> - Quarterly Results/ Earnings Call - Roadshows - Annual General Meeting - Financial Reports - Press Releases and Presentations - Mails - Annual Report | <ul style="list-style-type: none"> • Continuous: Website/ Social Media/ Meetings • Quarterly: Quarterly Results/ Earnings Call/ Roadshows/ Financial Reports/ Presentations • Event basis: Press Releases Annual: Annual General Meeting, Annual Report | <p>Dividend Updates, Financial Performance, Resolving Queries etc.</p> |
| Government and Regulatory Bodies | No | <ul style="list-style-type: none"> - Engagement in global forums - Interacting with statutory/ regulatory bodies | As and when required | <p>Discussions with regards to various regulations and amendments, inspections, approvals.</p> |
| Suppliers and Business Partners | No | <ul style="list-style-type: none"> Meetings/ Mails/ visits/ Events | As and when required | <p>Resolving queries and operational challenges</p> |
| Communities | No | <ul style="list-style-type: none"> - School/ Site visits - Press Releases - Social Media - Website | As and when required | <p>Implementation of CSR projects.</p> |

PRINCIPLE 5
Human Rights: Businesses should respect and promote human rights.
Essential Indicators
1. Employees and workers who have been provided training on human rights issues and policy(ies) of the Company:

| Category | FY 2022-23 | | | FY 2021-22 | | |
|------------------------|-------------|--------------------------------------|---------------|-------------|--------------------------------------|---------------|
| | Total(A) | No. of employees/ workers covered(B) | % (B/A) | Total(C) | No. of employees/ workers covered(D) | % (D/C) |
| Employees | | | | | | |
| Permanent | 3190 | 3011 | 94.39% | 2725 | 1997 | 73.28% |
| Other than permanent | 571 | 490 | 85.81% | 474 | 375 | 79.11% |
| Total Employees | 3761 | 3501 | 93.08% | 3199 | 2372 | 74.15% |

2. Details of minimum wages paid to employees and workers:

| Category | FY 2022-23 | | | | | FY 2021-22 | | | | |
|-----------------------------|-----------------------|--------|--------|------------------------|--------|-----------------------|--------|--------|------------------------|--------|
| | Equal to minimum wage | | | More than minimum wage | | Equal to minimum wage | | | More than minimum wage | |
| | Total(A) | No.(B) | %(B/A) | No.(C) | %(C/A) | Total(D) | No.(E) | %(E/D) | No.(F) | %(F/D) |
| Employees | | | | | | | | | | |
| Permanent | | | | | | | | | | |
| Male | 2400 | - | - | 2400 | 100% | 2041 | - | - | 2041 | 100% |
| Female | 790 | - | - | 790 | 100% | 684 | - | - | 684 | 100% |
| Other than permanent | | | | | | | | | | |
| Male | 351 | - | - | 351 | 100% | 227 | - | - | 227 | 100% |
| Female | 125 | - | - | 125 | 100% | 119 | - | - | 119 | 100% |

3. Details of remuneration/salary/wages:

| In ₹ | Male | | Female | |
|----------------------------------|--------|--|--------|--|
| | Number | Median remuneration/ salary/wages of respective category | Number | Median remuneration/ salary/wages of respective category |
| Board of Directors (BoD) | 5 | 69,50,000 | 2 | 91,16,978 |
| Key managerial Personnel | 5 | 2,74,25,818 | 0 | - |
| Employees other than BOD and KMP | 2400 | 9,00,022 | 790 | 8,50,050 |
| Workers | NA | NA | NA | NA |

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business?

Yes

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

We have a robust internal mechanism system in place to receive and redress grievances to maintain a work culture that is healthy, fair and inclusive.

It ensures that employees feel heard and valued, and their concerns are addressed promptly and effectively.

Some of the common mechanism available to receive and redress grievances include-

- Open door Policy
- Grievance redressal committee
- Whistleblower policy

When needed, a resolution committee is formed within the company to resolve the grievance on case-to-case basis. Committees established are in line with the company's policies on Code of Ethics and Business Conduct, POSH, Whistle-Blower, and Disciplinary Action Protocol (DAP).

The committee may consist of members of management, HR, Legal, or other relevant department depending upon the nature of the grievance.

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

| | FY 2022-23 | | | FY 2021-22 | | |
|-----------------------------------|-----------------------|---|---------|-----------------------|---|---------|
| | Filed during the year | Pending resolution at the end of the year | Remarks | Filed during the year | Pending resolution at the end of the year | Remarks |
| Sexual Harassment | Nil | Nil | - | Nil | Nil | - |
| Discrimination at Workplace | Nil | Nil | - | Nil | Nil | - |
| Child Labour | Nil | Nil | - | Nil | Nil | - |
| Forced Labour/ Involuntary Labour | Nil | Nil | - | Nil | Nil | - |
| Wages | Nil | Nil | - | Nil | Nil | - |
| Other human rights related issues | 1 | Nil | - | Nil | Nil | - |

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

As part of our Equal Opportunity Policy, we ensure equal opportunities at all levels of employment without any discrimination based on disability, race, gender, age, religion, sexual orientation or other beliefs. We conduct trainings and awareness sessions of employees to educate them about their Rights and responsibilities.

In case of receipt of complaint, we conduct Investigation keeping the identity and proceedings confidential.

Members are asked to sign a Non-Disclosure Agreement.

The company's policies on Code of Ethics and Business Conduct, Prevention of Sexual Harassment of Women at workplace (POSH), Whistle-Blower, and Disciplinary Action Protocol (DAP) further provide detailed mechanism on the same. We also have an external Ombudsman for the Whistle Blower Mechanism.

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

Yes, as per applicable Labour Laws.

9. Assessments for the year:

| | % of your plants and offices that were assessed (by Company or Statutory Authorities or Third parties) |
|--|--|
| Child Labour | |
| Forced Labour/ Involuntary Labour | |
| Sexual Harassment | |
| Discrimination at Workplace | 100%* |
| Wages | |
| Others-Please specify | |

*Internal Assessment

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

No concerns or risks were identified during these assessments.

PRINCIPLE 6:
Environment: Businesses should respect and make efforts to protect and restore the environment.
Essential Indicators
1. Details of total energy consumption (in Joules or multiples) and energy intensity:

| Parameter (in GJ) | FY 2022-23 | FY 2021-22 |
|--|--------------------------|--------------------------|
| Total Energy Consumption(A) | 13,089.09 | 9,645.34 |
| Total Fuel Consumption(B) | 501.35 | 473.35 |
| Energy Consumption through Other Sources (C) | - | - |
| Total Energy Consumption(A+B+C) | 13,590.43 | 10,118.69 |
| Energy intensity per lakh rupees of turnover (Total energy consumption/Turnover in Lakh rupees) | 0.153 GJ/ Lakh rupees | 0.142 GJ/ Lakh rupees |

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

No

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

Not Applicable

3. Provide details of the following disclosures related to water:

| Parameter | FY 2022-23 | FY 2021-22 |
|--|----------------------------------|----------------------------------|
| Water withdrawal by source (in kilolitres) | | |
| (i) Surface water | - | - |
| (ii) Groundwater | - | - |
| (iii) Third party water | 36,028.94 | 19,497.23 |
| (iv) Seawater/desalinated water | - | - |
| (v) Others- Packaged Drinking Water | 238.79 | 104.73 |
| Total volume of water withdrawal (in kilolitres) (i+ii+iii+iv+v) | 36,267.72 | 19,601.96 |
| Total volume of water consumption (in kilolitres) | 36,267.72 | 19,601.96 |
| Water intensity per lakh rupees of turnover (Kilolitres of water consumed/turnover in Lakh rupees) | 0.409 Kilolitre / Lakh rupees | 0.276 Kilolitre / Lakh rupees |

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

No

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

Yes, we have Zero Liquid Discharge mechanism in our Chennai office. We have our own water treatment plant here of 12 KLD based on Batch process STP. This technology combines age old anaerobic digestion with modern disinfection systems. The water free of bio pollutants is disinfected by Ozonation and Filtered. Currently the treated water is reused for gardening purposes.

Further, most of our other offices are in multi-tenanted building where the responsibility of water treatment and recycling lies with the building management.

5. Please provide details of air emissions (other than GHG emissions) by the Company:

| Parameter | Please specify unit | FY 2022-23 | FY 2021-22 |
|-------------------------------------|---------------------|------------|---------------------|
| NOx | Kg | 108.09 | Not Measured |
| Sox | Kg | 2.08 | |
| Particulate Matter (PM) | Kg | 11.59 | |
| Persistent organic pollutants (POP) | NA | NA | |
| Volatile organic compounds (VOC) | NA | NA | |
| Hazardous air pollutants (HAP) | NA | NA | |
| Others- Please specify | NA | NA | |

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

No

6. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity:

| Parameter | Unit | FY 2022-23 | FY 2021-22 |
|---|---|------------|------------|
| Total scope 1 emissions (Break-up of GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | Metric tonnes of CO ₂ equivalent | 290.53 | 110.77 |
| Total scope 2 emissions (Break-up of GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | Metric tonnes of CO ₂ equivalent | 2,490.45 | 1,819.05 |
| Total scope 1 and scope 2 emissions per lakh rupee of turnover | tCO ₂ e/lakh rupees | 0.03 | 0.03 |

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

No

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

Yes, we have adopted following measure to reduce our energy consumption:

- One of our office premises in Noida is housed inside a Gold rated LEED certified building.
- Switched to LED lights and occupancy sensor lights in majority of our offices.
- Installation of 19 KW- 3 phase solar power plant in our Delhi Okhla Phase-II office and planning to install 40KW solar power plant in our Chennai Office.
- Installation of Auto controls in A.C equipment in areas like Hub Rooms, UPS Rooms etc.

Additionally, we have implemented the following measures to reduce plastic waste:

- Increasing the usage of reusable cups, plates and glasses for snacks, beverages, and water.
- Serving water in glasses in meeting rooms during meetings/trainings etc in some of our office premises.
- Splitting up garbage into separate bins and using recyclable garbage bags as bin liners.
- Reduced usage of packaged drinking bottles etc.

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

| Parameter | FY 2022-23 | FY 2021-22 |
|--|-------------|-------------|
| Total Waste generated (In metric tonnes) | | |
| Plastic waste(A) | 0.13 | 0.14 |
| E-waste(B) | 3.32 | - |
| Bio-medical waste(C) | - | - |
| Construction and demolishment waste(D) | - | - |
| Battery waste(E) | 4.04 | 1.17 |
| Radioactive waste(F) | - | - |
| Other Hazardous waste (G) | - | - |
| Other non-Hazardous waste generated(H) | - | - |
| Total(A+B+C+D+E+F+G+H) | 7.49 | 1.31 |
| For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes) | | |
| Category of waste | | |
| (i) Recycled | 6.91* | 1.31 |
| (ii) Reused | 0.58** | - |
| (iii) Other recovery operations | - | - |
| Total | 7.49 | 1.31 |
| For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes) | | |
| Category of waste | | |
| (i) Incineration | NA | NA |
| (ii) Landfilling | NA | NA |
| (iii) Other disposal operations | NA | NA |
| Total | NA | NA |

* We sell our Plastic waste, E-waste & Battery waste in a responsible manner to authorized dealers for recycling.

** We donate some of our old but functional desktops and laptops to the NGOs/ Schools for reuse.

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

No

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

The company aims to minimize all types of waste by adopting Reduce-Reuse-Recycle philosophy. The company ensures that all the waste collected like Plastic Waste, Battery Waste, E-waste etc. are disposed through authorized dealers for recycle. Further, Electronic waste management is being done as per the guidelines established in E-waste Management Rules, 2016.

Further, Newgen being an IT Software company, we have no such usage of hazardous and toxic chemicals in our products and processes.

Following are the waste management practices adopted by the company:

- Adopted practice to reuse wastewater from RO plants in our facilities. This water is used in mopping, cleaning, etc.
- To minimize the usage of paper products, the company has implemented use of reusable cups & glasses for employees to consume tea & coffee. This step has reduced waste by doing away with the need of paper products for tea/ coffee leading to less wastage.
- Encourage employees to switch to reusable water bottles to reduce plastic waste.
- We have removed dustbins from individual workstations to reduce the usage of Garbage bags.
- We donate some of our old but functional Laptops & Desktops to the NGOs / School so that they can be reused thus reducing waste generation.

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

| S No. | Location of operations/offices | Types of operations | Whether the conditions of environmental approval/clearance are being complied with? |
|----------------|--------------------------------|---------------------|---|
| Not Applicable | | | |

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

| Name and brief details of projects | EIA Notification No. | Date | Whether conducted by independent external agency | Results communicated in public domain | Relevant Web link |
|------------------------------------|----------------------|------|--|---------------------------------------|-------------------|
| Not Applicable | | | | | |

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

Compliance to all applicable laws and regulations is at the core of Newgen's philosophy and thus we are compliant.

PRINCIPLE 7:

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

Essential Indicators

1. a. **Number of affiliations with trade and industry chambers/ associations.**
The company has affiliations with three trade and industry chambers/ associations.
- b. **List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the Company is a member of/ affiliated to.**

| S. No. | Name of the trade and industry chambers/ associations | Reach of trade and industry chambers/ associations (State/National) |
|--------|---|---|
| 1. | NASSCOM | National |
| 2. | PHD Chamber of Commerce | National |
| 3. | TiE Delhi-NCR | NCR Region |

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

Not Applicable

PRINCIPLE 8:

Inclusive Growth: Businesses should promote inclusive growth and equitable development.

Essential Indicators

1. **Details of Social Impact Assessments (SIA) of projects undertaken by the Company based on applicable laws, in the current financial year.**
The company has not undertaken any SIAs in the current financial year.
2. **Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your Company.**
Not Applicable
3. **Describe the mechanisms to receive and redress grievances of the community.**
Not Applicable
4. **Percentage of input material (inputs to total inputs by value) sourced from suppliers:**
The company supports local and small suppliers (MSMEs) by procuring goods and services in proximity to its offices/ locations. First Preference is given to local vendors to the extent possible.

| | FY 2022-23 | FY 2021-22 |
|---|------------|------------|
| Directly sourced from MSMEs/ small producers | 10.42% | 9.26% |
| Sourced directly from within the district and neighboring districts | 98.50% | 99.09% |

PRINCIPLE 9:

Customer / Consumer Value: Businesses should engage with and provide value to their consumers in a responsible manner.

Essential Indicators

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

Newgen has a helpdesk portal in which various tickets on consumer queries / complaints/ feedback can be submitted by customers / department concerned. These issues are taken up and resolved by concerned departments within the internally defined SLA period.

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

| | As a percentage to total turnover |
|---|-----------------------------------|
| Environmental and social parameters relevant to the product | Not Applicable |
| Safe and responsible usage | |
| Recycling and/or safe disposal | |

Newgen, being a software product company, does not have any products that carry any label and hence this is not applicable

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

| | FY 2022-23 | | Remarks | FY 2021-22 | | Remarks |
|--------------------------------|--------------------------|-----------------------------------|---------|--------------------------|-----------------------------------|---------|
| | Received during the year | Pending resolution at end of year | | Received during the year | Pending resolution at end of year | |
| Data privacy | Nil | Nil | - | Nil | Nil | - |
| Advertising | Nil | Nil | - | Nil | Nil | - |
| Cyber-security | Nil | Nil | - | Nil | Nil | - |
| Delivery of essential services | NA | NA | - | NA | NA | - |
| Restrictive Trade Practices | NA | NA | - | NA | NA | - |
| Unfair Trade Practices | NA | NA | - | NA | NA | - |
| Other | 6 | 0 | - | - | 0 | - |

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

| | Number | Reason for recall |
|-------------------|--------|-------------------|
| Voluntary Recalls | | |
| Forced Recalls | | Not Applicable |

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

Yes, Newgen has a cyber security framework in place. Newgen is an ISO-27001:2013 Certified world-class Information Security Management System that helps in identifying, monitoring, managing and mitigating risks and controls in cyber space against cyber-attacks, threats, and vulnerabilities.

The company's Information Security Policy ensures privacy, confidentiality, integrity, and availability of information assets required or provided by any Stakeholders, Customers, and for delivery of software products, software solutions, and services to the customers. We also establish and maintain Information Security objectives derived from risk assessment, at relevant levels within the organization, which are reviewed and approved periodically by Senior Management.

The policy is available at Newgen's Intranet platform.

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

No issues related to such matters were reported during the year.