

**BUSINESS RESPONSIBILITY (BR) REPORT:****SECTION A: GENERAL INFORMATION ABOUT THE COMPANY**

Sr No.	Particulars									
1.	Corporate Identity Number (CIN) of the Company	L17100MH1909PLC000294								
2.	Name of the Company	Swan Energy Limited								
3.	Registered address	6, FELTHAM HOUSE, 2ND FLOOR, J N HERDIA MARG, BALLARD ESTATE MUMBAI MH 400001								
4.	Website	<a href="http://www.swan.co.in">www.swan.co.in</a>								
5.	E-mail id	<a href="mailto:invgrv@swan.co.in">invgrv@swan.co.in</a>								
6.	Financial Year reported	2019-20								
7.	Sector(s) that the Company is engaged in (industrial activity code-wise):	Finishing of textiles: NIC Code - 1313 [as per 2008]								
8.	List three key products/services that the Company manufactures/provides (as in balance sheet):	(a) 13131 Finishing of cotton and blended cotton textiles. (b) 13136 Activity related to screen printing (c) 13139 Other activities relating to finishing of textile								
9.	Total number of locations where business activity is undertaken by the Company	(a) Number of International Locations: NIL (b) 1 manufacturing location, 2 offices, including registered office								
10.	Markets served by the Company	<table border="1"> <thead> <tr> <th>Local</th> <th>State</th> <th>National</th> <th>International</th> </tr> </thead> <tbody> <tr> <td>Yes</td> <td>Yes</td> <td>Yes</td> <td>Yes</td> </tr> </tbody> </table>	Local	State	National	International	Yes	Yes	Yes	Yes
Local	State	National	International							
Yes	Yes	Yes	Yes							

**SECTION B: FINANCIAL DETAILS OF THE COMPANY**

1. Paid up Capital (INR): Rs. 24,42,57,000
2. Total Turnover (INR in Lakhs): 30684.03
3. Total profit after taxes (INR in Lakhs): 413.20
4. Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%): Rs. 40,99,000/-
5. List of activities in which expenditure in 4 above has been incurred:-  
Please refer Annexure E (page no. 34) to Directors' Report for CSR Policy.

**SECTION C: OTHER DETAILS**

1. Does the Company have any Subsidiary Company/ Companies?  
*The Company has Six Subsidiaries.*

2. Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s)

No

3. Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]

No

#### SECTION D: BR INFORMATION

##### 1. Details of Director/Directors responsible for BR

(a) Details of the Director/Director responsible for implementation of the BR policy/policies

1. DIN Number: 00660027
2. Name: Mr. Paresh V. Merchant
3. Designation: Executive Director

(b) Details of the BR head

No.	Particulars	Details
1	DIN Number (if applicable)	00660027
2	Name	Mr. Paresh V. Merchant
3	Designation	Executive Director
4	Telephone number	022-4058300
5	e-mail id	<a href="mailto:paresh@swan.co.in">paresh@swan.co.in</a>

##### 2. Principle-wise, (as per NVGs) BR Policy/Policies:

The National Voluntary Guidelines (NVGs) on Social, Environmental and Economic responsibilities of Business released by the Ministry of Corporate Affairs has adopted 9 (nine) areas of Business Responsibility. These briefly are as follows.

- P1: Business should conduct and govern themselves with Ethics, Transparency and Accountability
- P2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle
- P3: Businesses should promote the wellbeing of all employees
- P4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized
- P5: Businesses should respect and promote human rights
- P6: Business should respect, protect and make efforts to restore the environment
- P7: Businesses, when engaged in influencing public and regulatory policy, should do so in a

- responsible manner
- P8: Businesses should support inclusive growth and equitable development
- P9: Businesses should engage with and provide value to their customers and consumers in a responsible manner

**(a) Details of compliance (Reply in Y/N)**

No	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	<i>Do you have a policy/ policies for....</i>					Y				
2	<i>Has the policy being formulated in consultation with the relevant stakeholders?</i>					Y				
3	<i>Does the policy conform to any national / international standards? If yes, specify? (50 words)</i>					Y				
4	<i>Has the policy being approved by the Board? Is yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director?</i>					Y				
5	<i>Does the company have a specified committee of the Board/ Director/ Official to oversee the implementation of the policy?</i>					Y				

No	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
6	Indicate the link for the policy to be viewed online?	Y*	Y*	Y**	Y***	Y**	Y***	Y****	Y*	Y****
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Y								
8	Does the company have in-house structure to implement the policy/ policies.	Y								
9	Does the Company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to the policy/ policies?	Y								
10	Has the company carried out independent audit/ evaluation of the working of this policy by an internal or external agency?	Y								

\* Code of conduct: <http://www.swan.co.in/pdf/swan%20-%20code%20of%20conduct.pdf>

\*\* Whistle Blower Policy: [http://www.swan.co.in/pdf/Whistle%20blower%20policy\\_SWAN.pdf](http://www.swan.co.in/pdf/Whistle%20blower%20policy_SWAN.pdf)

\*\*\* CSR Policy: <http://www.swan.co.in/pdf/Corporate%20Social%20Responsibility%20Policy.pdf>

\*\*\*\* Quality Policy: <http://www.swan.co.in/pdf/swan%20quality%20policy.pdf>

(b) If answer to the question at serial number 1 against any principle, is 'No', please explain why: (Tick up to 2 options)

No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	The company has not understood the Principles	NOT APPLICABLE								
2	The company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles									
3	The company does not have financial or manpower resources available for the task									
4	It is planned to be done within next 6 months									
5	It is planned to be done within the next 1 year									
6	Any other reason (please specify)									

3. Governance related to BR

- (a) Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year

*The assessment of BR performance is done annually by the MD, ED and senior management of the Company.*

- (b) Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?

*The Company had started publishing BR report from financial year 2017-18 on a yearly basis. The BR report is/shall be available on [www.swan.co.in](http://www.swan.co.in)*

## SECTION E: PRINCIPLE-WISE PERFORMANCE

**Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability**

1. Does the policy relating to ethics, bribery and corruption cover only the company?  
No.

Does it extend to the Group/Joint Ventures/ Suppliers/Contractors/NGOs/Others?  
Yes

2. How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.

*During the reporting year, Company has received 2 (two) complaints from the shareholder and 1 (one) complaint was pending as on 31st March, 2019. All the above complaints were duly resolved during the year.*

**Principle 2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle**

1. List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.

- (a) *Suiting*  
(b) *Shirting*  
(c) *Dress materials*

*Your company is committed to offer quality standards for all range of its textile products, which are safe and environment friendly. The company is having well equipped test lab at its Ahmedabad production location to verify the products on a regular basis to ensure no deviation.*

2. For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product (optional):

- (a) Reduction during sourcing/production/ distribution achieved since the previous year throughout the value chain?

*The company is having process house, where grey is purchased as a raw material. The raw materials are sourced locally on the best possible trade terms. The production costs are continuously monitored. Automation is extensively used through latest machines, which results in reduction of scrap percentage and also energy and water consumption.*

*The company is committed to transform energy conservation into a strategic business goal by way of monitoring energy related parameters on a regular basis and to reduce energy consumption in all its operations.*

- (b) Reduction during usage by consumers (energy, water) has been achieved since the previous year?

*As the products of the company are used by a diverse and large number of consumers, it is not feasible to identify the reduction of resource usage by the consumers. The Company's products do not have any broad-based impact on energy and water consumption by consumers. However, the Company continuously takes measures to reduce the consumption of energy and water.*

3. Does the company have procedures in place for sustainable sourcing (including transportation)? Yes.

- (a) If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.

*The Company endeavours to focus on protection of environment, stakeholders' interest and cost effectiveness while procuring any raw material or goods. The main raw materials are procured from manufacturers / producers who are well reputed keeping in mind the need for quality and consistency. Adequate steps are taken for safety during transportation and optimization of logistics, which, in turn, help to mitigate the impact on climate.*

4. Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work?

Yes

- Does the company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so.

*Wastage management is highly focused and monitored through various initiatives with a view to ensure reduction in waste generation. Recycling of the wastage is not feasible and hence, sold as a scrap.*

**Principle 3: Businesses should promote the wellbeing of all employees**

- Please indicate the Total number of employees: 117
- Please indicate the Total number of employees hired on temporary/contractual/casual basis: 236
- Please indicate the Number of permanent women employees: 0
- Please indicate the Number of permanent employees with disabilities: NIL
- Do you have an employee association that is recognized by management: No
- What percentage of your permanent employees is members of this recognized employee association? N.A.
- Please indicate the 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.

No.	Category	No of complaints filed during the financial year	No of complaints pending as on end of the financial year
1	Child labour/forced labour/involuntary labour	Nil	Nil
2	Sexual harassment	Nil	Nil
3	Discriminatory employment	Nil	Nil

- What percentage of your under mentioned employees were given safety & skill up-gradation training in the last year?
  - Permanent Employees
  - Permanent Women Employees
  - Casual/Temporary/Contractual Employees
  - Employees with Disabilities

*All the employees undergo the company's safety and skill upgradation programmes and are conscious about its utility and benefits.*

**Principle 4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.**

1. Has the company mapped its internal and external stakeholders? Yes/No  
Yes.
2. Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders.  
Yes.
3. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so.

*The company extends its social responsibilities through its CSR projects. The company identifies the stakeholders through multiple channels so as to incorporate their feedback for continuous improvement and innovation to meet customer expectation, need and demand in fair manner.*

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

1. Does the policy of the company on human rights cover only the company or extend to the Group/Joint Ventures/Suppliers/Contractors/NGOs/Others?

*The Company has in place 'Whistle blower Policy', which covers its Human Rights Policy. It also extends to the group companies.*

2. How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?

*Nil.*

**Principle 6: Business should respect, protect, and make efforts to restore the environment**

1. Does the policy related to Principle 6 cover only the company or extends to the Group/Joint Ventures/Suppliers/Contractors/NGOs/others?

*The policy, covered under CSR, extends to the company and its group companies.*

2. Does the company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc? Y/N. If yes, please give

hyperlink for webpage etc.

No

3. Does the company identify and assess potential environmental risks?

*The company has taken certification under ISO 9001: 2015.*

4. Does the company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed?

No

5. 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.

No

6. Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported?

Yes

7. 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.

Nil

**Principle 7: Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner**

1. Is your company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with:

Yes

*(a) Narol Textile Infrastructure & Enviro Management*

*(b) Gujarat Chamber of Commerce & Industry*

2. Have you advocated/lobbied through above associations for the advancement or improvement of public good? Yes/No; if yes specify the broad areas (drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)

*The Company continuously advocates the use of eco-friendly practices, use of alternatives fuels and energy conservation.*

**Principle 8: Businesses should support inclusive growth and equitable development**

1. Does the company have specified programmes/ initiatives/ projects in pursuit of the policy related to Principle 8? If yes details thereof.

*The Company has a well-defined CSR policy, under which, it has taken various initiatives for support and development of society. The report on the CSR projects carried by the Company is annexed with the Director's Report*

2. Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/any other organization?

*The programmes /projects undertaken are through various external NGOs, supporting various CSR initiatives.*

3. Have you done any impact assessment of your initiative?

*The Company undertakes an impact assessment of the CSR interventions to ensure that the resources are gainfully utilized for the welfare of the intended communities.*

4. What is your company's direct contribution to community development projects- Amount in INR and the details of the projects undertaken.

*The Company has spent Rs. 40.99 lacs on the CSR activities during the financial year 2019-20. The amount was spent on areas as mentioned in Annexure 'E' to the Director's Report.*

5. Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so.

*Yes. The company is in contact with NGOs to ensure that all development/health care initiatives of the Company are successfully adopted by the concerned communities.*

**Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner**

1. What percentage of customer complaints/consumer cases are pending as on the end of financial year.

*There are three customer complaints/ cases pending as on the end of F.Y. 2019-20.*

2. 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)  
*Not applicable*

3. 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. If so, provide details thereof, in about 50 words or so.

*No*

4. Did your company carry out any consumer survey/ consumer satisfaction trends?

Yes.

For and on behalf of the Board of Directors

Mumbai, 27<sup>th</sup> July, 2020

**Navinbhai C. Dave**

Chairman

DIN: 01787259