BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORTING FORMAT

ANNEXURE TO THE DIRECTORS' REPORT

SECTION A: GENERAL DISCLOSURE

I. Details of Listed Entity

1	Corporate Identity Number (CIN) of the Company	U67120MH1995PLC092283
2	Name of the Company	NSE CLEARING LIMITED
3	Year of Incorporation	31-08-1995
4	Registered Office address	Exchange Plaza, C-1, Block-G, Bandra Kurla Complex, Bandra (East), Mumbai – 400051
5	Corporate Address	9th Floor, Inspire BKC, Bandra Kurla Complex, Bandra (East), Mumbai – 400051
6	Email ID	rtank@nsccl.co.in
7	Telephone	+91 22 26598100
8	Website	https://www.nseclearing.in/
9	Financial year of which Reporting is being done	F.Y. 2025-2026
10	Name of the Stock Exchange(s) where shares are listed	Not Applicable
11	Paid Up Capital	₹ 1,445 crores
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:	Mr. Ravin Tank, Company Secretary Telephone - +91 22 26598446 Email - rtank@nsccl.co.in
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Standalone
14	Name of assurance provider	TUV India Private Limited
15	Type of assurance obtained	Reasonable

II. Products/Services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Processing & Clearing services of securities transactions	NSE Clearing Limited (NCL) carries out clearing and settlement functions as per the settlement cycles provided in the settlement schedule. The clearing function of the clearing corporation is designed to work out a) what members are due to deliver and b) what members are due to receive on the settlement date.	100

17. Products/Services sold by the entity (accounting for 90% of the entity's turnover):

S. No.	Product/Service	NIC Code	% of Total Turnover contributed
1	Processing & Clearing services of securities transactions	6619	100

III. Operations

18. Number of locations where plants and/or operations/offices of the entity are situated:

Location	Number of Plants	Number of Offices	Total
National	Not Applicable	15	15
International	Not Applicable	0	0

19. Markets served by the entity:

a. Number of locations

Location.	Number
National (No. of states)	28 states 8 union territories
International (No. of countries)	0

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

This question is not applicable to NCL as the entity is in the service industry and does not manufacture anything which needs to be exported to other nations.

c. A brief on types of customers

1. **Clearing Members** are members of the Clearing Corporation who clear and settle deals through the Clearing Corporation for a segment in a manner and mode and are subject to the terms, conditions, and procedures prescribed for them. Clearing Members include **Self-clearing members (SCM) and Custodians.**

1.1 **Self-clearing members (SCM)** execute, clear, and settle their own trades and those of their clients, while Clearing Members (CM) execute trades both for themselves and clients and clear and settle their own and other members' trades. The Professional Clearing Members (PCM) solely clear and settle trades for other members who opt for their services.

1.2 **Custodians** handle trade settlements on behalf of their clients. They must confirm the settlement of trades upon which the settlement obligation is assigned to them. If they do not confirm, the obligation reverts to the trading member. Custodians Clearing members are also required to request Clearing Corporation for allotment of Custodian Participant (CP) code for the clients for which they wish to clear and settle.

2. **Stock Exchanges** NSE Clearing Limited (NCL) is a recognized Qualified Central Counterparty (QCCP) and systemically important market infrastructure institution in the securities market regulated by SEBI. NCL provides clearing and settlement services for transactions executed on recognized stock exchanges. Currently, NSE Clearing Limited provides clearing and settlement for the Capital Market (CM) Segment, Futures and Options (FO) Segment, and Currency Derivatives (CD) Segment to the National Stock Exchange of India Limited (NSE), BSE Limited (BSE), and Metropolitan Stock Exchange of India Limited (MSEI). NSE Clearing Limited also provides clearing and settlement for the Debt Segment and Commodity Derivatives (CO) Segment of NSE.

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	452	326	72%	126	28%
2.	Other than Permanent (E)	1002	802	80%	200	20%
3.	Total Employees (D+E)	1454	1128	78%	326	22%

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
WORKERS*						
4.	Permanent (F)	Not Applicable				
5.	Other than Permanent (G)					
6.	Total workers (F + G)					

*NCL has not employed any 'worker'.

b. Differently abled Employees and workers:

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	0	0	0	0	0
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total differently-abled employees (D + E)	0	0	0	0	0
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	Not Applicable				
5.	Other than permanent (G)					
6.	Total differently-abled workers (F + G)					

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	8	1	12.5
Key Management Personnel	28	5	18

22. Turnover rate for permanent employees and workers

	FY 2025-26			FY 2024-25			FY 2023-24		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	11.76%	4.95%	8.51%	10.14%	11.22%	10.48%	5.71%	11.69%	7.68%
Permanent Workers	Not Applicable								

V. HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

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

S. No.	Name of the holding/ subsidiary/ associate companies/ joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	National Stock Exchange of India Limited*	Holding	100	Yes

*The National Stock Exchange of India Limited is herein referred to as 'NSE,' 'NSE group,' or 'group.'

Note: On June 10, 2025, the Company completed the transaction of sale of 100% stake of its wholly owned subsidiary, NSEICC to NSE IFSC Limited, wholly owned subsidiary of NSE. Accordingly, post June 09, 2025, the Company does not have any Subsidiary.

VI. CSR DETAILS

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

(ii) Turnover (in ₹): 972.18 crores

(iii) Net worth (in ₹): 4,335.96 crores

VII. TRANSPARENCY AND DISCLOSURES COMPLIANCES

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web link for grievance redress policy)	FY 2025-26			FY 2024-25		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints Filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes https://www.nseclearing.in/ Whistle Blower Mechanism https://www.nseclearing.in/sites/default/files/filefield_paths/Whistle%20Blower%20Policy.pdf	0	0	NA	0	0	NA
Investors (Other than shareholders)		0	0	Nil	0	0	Nil
Shareholders		0	0	NA	0	0	NA
Employees and workers		0	0	NA	0	0	NA
Customers		0	0	NA	0	0	NA
Value Chain Partners		0	0	NA	0	0	NA
Other (please specify)*		66*	2**	NA	201	0	NA

*The complaints are related to routine clearing related functions.

**2 Pending Complaints were closed within applicable SEBI SCORES TAT in the next FY

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Compliance	Risk & Opportunity	**Risk:** A Clearing House must adhere to multiple regulatory and operational compliances to safeguard investor interests and promote financial system stability. Failure to comply will lead to legal consequences and financial liabilities. **Opportunity:** Compliance with regulatory standards further strengthens trust and confidence in the organization. This results in heightened trading activity, greater liquidity, and enhanced market efficiency, ultimately bolstering the organization's market standing.	A robust compliance framework and regular audits are key tools to proactively mitigate operational and ethics-related risks. We have implemented several risk management measures, including real-time exposure monitoring through the Parallel Risk Management System (PRISM) and end-of-day monitoring of client-level exposures.	Positive & Negative

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
2.	Business Ethics	Opportunity	A Clearing House, as a guarantor of every trade, requires unwavering ethical conduct. This ensures the stability of the market and protects against financial risks, fostering trust with clients and safeguarding the entire financial ecosystem.	NA	Positive
3.	Data Privacy	Risk & Opportunity	**Risk:** A Clearing House safeguards a vast amount of critical client data. Inadequate data privacy measures can lead to breaches, causing reputational damage and legal consequences and heightening systemic risks. **Opportunity:** Addressing data privacy concerns presents an opportunity for us to demonstrate the organization's commitment to integrity, earn stakeholder trust, and gain a competitive advantage.	To effectively mitigate cybersecurity risks, the group has established a robust cybersecurity and cyber resilience policy; and detailed SOPs. The Standing Committee on Technology (SCOT) regularly reviews the implementation of these policies and adherence to SOPs, showcasing its commitment to maintaining robust infrastructure and safeguarding assets against evolving cyber threats.	Positive & Negative
4.	Human Capital Management	Opportunity	Employees serve as the driving force of an organization, and their skills, dedication, and passion significantly impact our overall success. Effective management of human capital not only maximizes talent potential but also promotes employee engagement and boosts organizational performance.	NA	Positive
5.	Human Rights	Risk & Opportunity	**Risk:** NCL is in the service sector, but we still consider human rights risks as highly relevant. By identifying potential issues like discrimination, harassment, unfair working conditions, and privacy violations within the organization, we can mitigate reputational damage, regulatory scrutiny, and loss of investor confidence. **Opportunity:** This commitment to responsible practices strengthens our position as a leader in the market.	Adhering to regulations and the NSE group's human rights standards enables us to proactively identify and address potential human rights issues within our organization. Every employee is required to complete mandatory e-learning modules on specific aspects of human rights, which undergo annual updates. This programme ensures that all employees are equipped to uphold human rights in their daily work.	Positive & Negative

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6.	Occupational Health and Safety	Opportunity	Investing in occupational health and safety measures is essential for creating a safe, productive, and sustainable work environment. Prioritizing wellness programs improves employee's physical and mental health. This leads to reduced absenteeism, decreased incident costs, and related legal liabilities. It also increases company effectiveness and boosts employee productivity.	NA	Positive
7.	Employee Retention and Satisfaction	Opportunity	Investing in talent is a strategic imperative for NCL. By prioritizing employee satisfaction, growth, and development, we cultivate a high-performing workforce, driving productivity, quality, and retention, all critical factors for securing a competitive edge.	NA	Positive
8.	Diversity and Inclusion	Opportunity	A diverse and inclusive workplace acknowledges individual skills, fostering broader perspectives and innovative ideas. The organization can attract a diverse pool of expertise, thereby achieving goals effectively and improving employee retention and performance.	NA	Positive
9.	Learning and Development	Opportunity	Enhancing workforce capabilities offers NCL a competitive edge in dynamic capital markets. Leveraging digital platforms and creating customized learning pathways for employees comprehensively enhances their behavioural, functional, and technical skills, thus contributing to our business growth and resilience.	NA	Positive
10.	GHG Emissions and Energy Management	Opportunity	Emphasizing energy management, improving efficiency, and transitioning to renewable energy sources offer cost-saving opportunities while also reducing GHG emissions.	NA	Positive
11.	Waste Management	Opportunity	Effective waste management practices reduce environmental footprint and help to align with sustainability goals. NCL, as a part of the group, has adopted responsible waste management practices to ensure compliance and environmental accountability.	NA	Positive

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes									
1. a. Whether your entity's policy /policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c. Web Link of the Policies, if available	https://www.nseclearing.in/disclosures/other-disclosures								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4. Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	NSE Group has the following certifications: ISO/IEC 27001:2022 - Information security management systems(ISMS). ISO 45001:2018 - Occupational health and safety Management systems ISO 14001:2015 - Environmental Management Systems USGBC Platinum Certification for Chennai Regional Office IGBC Gold Certificate for Kohinoor office building								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	NCL has established internal goals and targets related to economic, environmental, social, and governance aspects aligned with NSE's ESG allinged commitment & measurable targets.								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	At NCL, we regularly monitor the progress of the established goals and targets and take necessary corrective actions.								
Governance, leadership and oversight									
7. Statement by director responsible for the business responsibility and sustainability report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)									
NCL is dedicated to Environmental, Social, and Governance (ESG) principles and actively engages in sustainability initiatives to enhance its performance. We believe that collaboration with stakeholders and the advancement of sustainability initiatives are crucial to business success. Therefore, NCL partners with both internal stakeholders (including at the group level) and external stakeholders to promote sustainability. By integrating ESG consciousness into our strategic initiatives and operations, we aim to create a sustainable business model that benefits both our stakeholders and the environment.									
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Governing Board is responsible for the implementation and oversight of the Business Responsibility policies.								
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	NCL leverages NSE's group-wide sustainability initiatives to enhance its environmental performance and operational resilience. The Board of Directors is responsible for decision-making on sustainability-related topics.								

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	Y	Y	Y	Y	Y	Y	Y	Y	Y	Annually								
Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances	Y	Y	Y	Y	Y	Y	Y	Y	Y	Annually								

11. Has the entity carried out independent assessment / evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.

P 1	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 stated:

Questions	P1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the principles material to its business (Yes/No)	NA								
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

SECTION C: PRINCIPLE-WISE PERFORMANCE DISCLOSURE

PRINCIPLE 1: BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH INTEGRITY IN A MANNER THAT IS ETHICAL, TRANSPARENT AND ACCOUNTABLE

Essential Indicators

1. Percentage coverage by 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*	8	1. SLB Scheme 2. Regulatory Technologies (RegTech) and Supervisory Technologies (Suptech) 3. Delta Equivalent Open 4. CIS 5. Segregation, monitoring and allocation of Collateral at Client Level 6. DPDP Act 7. PaRRVA 8. Electronic Gold Receipts (EGR)	100
Key Managerial Personnel	3	1. POSH 2. Enterprise Risk Management 3. Code of Ethics and Conflict of Interest 4. Anti Money Laundering (AML) 5. CIS Awareness	89
Employees other than BoD and KMPs	5	1. POSH 2. Enterprise Risk Management 3. Code of Ethics and Conflict of Interest 4. Anti Money Laundering (AML) 5. CIS Awareness	94
Workers	Not Applicable		

*Additionally, the Public Interest Directors also attended external trainings organised by Indian Institute of Corporate Affairs (IICA) held during the F.Y. 2025-26.

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

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

Monetary					
	NGRBC Principle	Name of the Regulatory Enforcement Agencies/ Judicial Institutions	Amount (In INR)	Brief of the Case	Has an Appeal been preferred? (Yes/No)
Penalty/ Fine	Nil	Nil	Nil	Nil	Nil
Settlement	Nil	Nil	Nil	Nil	Nil
Compounding Fee	Nil	Nil	Nil	Nil	Nil

Non-Monetary				
	NGRBC Principle	Name of the Regulatory Enforcement Agencies/Judicial Institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	Nil	Nil	Nil	Nil
Punishment	Nil	Nil	Nil	Nil

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

Case details	Name of the regulatory/ enforcement agencies/ judicial institutions
Nil	Nil

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

   Yes, the anti-bribery and anti-corruption principles are embedded within NCL's Anti-Bribery and Anti-Corruption, Whistle Blower, HR policies, providing comprehensive coverage to address unethical practices, including bribery and corruption. Additionally, we have e-learning modules on anti-money laundering (AML) for our employees, which cover a range of policies, procedures, and technologies aimed at preventing money laundering.

   Please refer to the below link to access NCL's Whistle Blower policy:

   https://www.nseclearing.in/sites/default/files/2025-11/Whistle%20Blower%20Policy.pdf

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

	FY 2025-26	FY 2024-25
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	Not Applicable	Not Applicable

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

	FY 2025-26		FY 2024-25	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	Nil	0	Nil
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	Nil	0	Nil

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.**

   The question is not applicable to NCL, as there have been no instances where fines, penalties, or actions were taken by regulators, law enforcement agencies, or judicial institutions regarding cases of corruption and conflicts of interest.

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

	FY 2025-26	FY 2024-25
Number of days of accounts payables	34.14	41.80

9. **Open-ness of business**

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties, along-with loans and advances & investments with related parties, in the following format:

Parameter	Metrics	FY 2025-26	FY 2024-25
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	-	-
	b. Number of trading houses where purchases are made from	-	-
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	-	-
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	-	-
	b. Number of dealers / distributors to whom sales are made	-	-
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	-	-
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	-	-
	b. Sales (Sales to related parties / Total Sales)	-	-
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	-	-
	d. Investments (Investments in related parties / Total Investments made)	Nil	25%

Leadership Indicators

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

Total number of awareness programmes held	Topics / principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programmes
4	Member Conclave meetings are held in multiple regions to discuss key developments, providing members with insights into the company's progress and new initiatives.	Not Available

2. **Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If yes, provide details of the same.**

Yes, NCL's Code of Conduct for Directors and Senior Management Persons outlines professional and ethical standards, ensuring compliance with all pertinent statutory laws, regulations, and internal policies. It requires Directors and committee members to avoid participating in decisions where they have a direct or indirect interest. Public Interest Directors (PIDs) in the capacity of Independent Directors also affirm their compliance with the Code of Conduct.

The Board Evaluation Policy mandates an annual assessment, which is conducted under the supervision of the Board and the Nomination and Remuneration Committee. This evaluation is essential for assessing the performance of the Board both as an individual and collective governing body, as well as the performance of its various committees as stipulated by the Companies Act, 2013 ("Board Committees"). It examines adherence to the Code of Conduct and Ethics, transparency in the disclosure of personal interests, and the effective management of potential conflicts of interest.

Please refer to the below link to access the Code of Conduct for the Directors and Senior Management Personnel:
https://www.nseclearing.in/sites/default/files/disclosure-doc/2024-09/NCL%20Code%20of%20Conduct.pdf

Please refer to the below link to access NCL's Board Evaluation Policy:
https://www.nseclearing.in/sites/default/files/disclosure-doc/2026-01/Board%20Evaluation%20Policy.pdf

PRINCIPLE 2: BUSINESSES SHOULD PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE

Essential Indicators

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

	FY 2025-26	FY 2024-25	Details of improvements in environmental and social impacts
R&D	0	0	Not Applicable
Capex	0	0	Not Applicable

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

Yes. NSE has established a structured vendor empanelment and procurement framework that integrates sustainability and compliance considerations into supplier selection and evaluation processes. Vendors are encouraged to adhere to applicable environmental, social, and regulatory standards, ensuring alignment with responsible business practices.

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

Yes, 100% of vendors onboarded through NSE's empanelment process undergo compliance and due diligence checks under the defined procurement framework. While sustainability performance metrics are evolving, NSE continues to strengthen its approach towards responsible and sustainable sourcing practices across its value chain.

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.

As a service-oriented organization, NSE has limited exposure to product lifecycle impacts. However, the Exchange adopts responsible waste management practices across its operations, with a focus on environmental sustainability:

(a) **Plastics and General Waste:** Use of compostable materials and environmentally responsible waste segregation practices. Waste generated at key facilities is processed through authorized vendors for recycling or composting.

(b) **E-waste:** Electronic waste, including IT equipment and peripherals, is disposed of through authorized and certified e-waste recyclers, ensuring compliance with regulatory requirements.

(c) **Hazardous waste:** Electronic waste, including IT equipment and peripherals, is disposed of through authorized and certified e-waste recyclers, ensuring compliance with regulatory requirements.

(d) **Organic waste:** Food waste is managed through on-site composting and vermiculture systems, promoting circularity and reducing landfill dependence.

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

EPR is not applicable to NCL as the entity is in the service industry and does not produce any goods for customers.

Leadership Indicators

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

NIC Code	Name of Product /Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
Not Applicable					

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

Name of Product / Service	Description of the risk /concern	Action Taken
Not Applicable		

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

Indicate input material	Recycled or re-used input material to total material
FY 2025-26	FY 2024-25
Not Applicable	

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

	FY 2025-26			FY 2024-25		
	FY 2024-25	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics	Not Applicable					
E-waste						
Hazardous waste						
Other waste						

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
Not Applicable	

NSE Clearing

PRINCIPLE 3: BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS

Essential Indicators

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

Category	% Employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	326	326	100	326	100	0	0	326	100	326	100
Female	126	126	100	126	100	126	100	0	0	126	100
Total	**452**	**452**	**100**	**452**	**100**	**126**	**28**	**326**	**72**	**452**	**100**
Other than Permanent employees											
Male	802	0	0	0	0	0	0	0	0	0	0
Female	200	0	0	0	0	0	0	0	0	0	0
Total	**1002**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**

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

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

c. Spending on measure towards well-being of employees and workers (including permanent and other than permanent) in the following format –

	FY 2025-26	FY 2024-25
Cost incurred on well-being measures as a % of total revenue of the company	0.41	0.24

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

Benefits	FY 2025-26			FY 2024-25		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100	Not Applicable	Y	100	Not Applicable	Y
Gratuity	100		Y	100		Y
ESI	0		NA	0		NA
Others- Superannuation	1		NA	1.02		NA

3. Accessibility of workplaces

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

Yes, the premises/ offices of NCL are accessible to differently abled employees.

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

NCL is committed to providing equal opportunities for all employees through its equal opportunity policy and the group's ESG policy. These policies ensure that employment opportunities and all aspects of employment are equally accessible to all qualified individuals without discrimination. As an equal opportunity employer, NCL adheres to all applicable fair employment practices and equal opportunity laws in each state where it operates. NCL strictly prohibits any discrimination against employees or applicants based on language, race, colour, religion, gender, origin, ethnicity, age, disability, marital status, sexual orientation, gender identity, or any other protected category. NCL's commitment to equality spans the entire duration of an employee's career, from recruitment to separation.

https://www.nseclearing.in/diversity-equal-opportunity

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

	Permanent employees		Permanent workers	
Gender	**Return to work rate**	**Retention rate**	**Return to work rate**	**Retention rate**
Male	100	100	Not Applicable	
Female	100	100		
Total	**100**	**100**		

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

	Yes/No (If yes, then give details of the mechanism in brief)
Permanent Workers	Not Applicable
Other than Permanent Workers	Not Applicable
Permanent Employees	Yes, NCL has the policy "Employee Grievance Policy", following is the mechanism in brief:- This policy of NSE Clearing Ltd, as far as possible prevents the occurrence of grievance and deals promptly and fairly with those which occur. NCL's preferred approach is to resolve employee grievances informally wherever possible, through discussions between the employee and his/ her Manager/Supervisor (or the human resources (HR) department if required). Where an informal process has not been successful or where it has been decided that an informal process is not adequate for the given case, the grievance shall be addressed in accordance with the process laid down in these Procedures. Formal Grievances could be in writing to the Immediate Supervisor / Head of the Department, or the employee may also prefer to directly approach the Grievance Committee stating employee's name, the nature of the compliant, the time and date of incident and such other details as the employee may consider necessary. The employee should also mention the specific remedial action requested by him / her in the grievance redressal letter. The said letter may be sent through an email, the email ID is grievance@nsccl.co.in .
Other than Permanent Employees	Currently, we don't have a grievance mechanism for our vendor resources.

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

Category	FY 2025-26			FY 2024-25		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	NCL does not have any employee associations					
- Male						
- Female						
Total Permanent Workers						
- Male						
- Female						

8. Details of training given to employees and workers:

Category	FY 2025-26					FY 2024-25				
	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	326	203	62	326	100	278	165	59	237	85
Female	126	75	60	126	100	116	55	47	103	89
Total	**452**	**278**	**62**	**452**	**100**	**394**	**220**	**56**	**340**	**86**
Workers										
Male	Not Applicable									
Female										
Total										

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

Category	FY 2025-26			FY 2024-25		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	326	300	92	278	250	90
Female	126	119	94	116	106	91
Total	**452**	**419**	**93**	**394**	**356**	**90**
Workers						
Male	Not Applicable					
Female						
Total						

10. Health and safety management system:

a. **Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?**

Yes. NCL operations are located in NSE premises, which adhere to ISO 45001 standards for occupational health and safety. In these premises, comprehensive safety measures are implemented, which include the installation of fire detection and alarm systems, fire safety equipment, emergency escape route maps, and emergency signages.

The building also has expansion joints, sump pits, blast-proof film on its façade glass, and a compound wall with concertina coils.

Security is enhanced with the presence of physical security guards, bollard systems, perimeter intruder devices, and sniffer dogs. Access control systems, CCTV systems, baggage and food scanners, door frame metal detectors, and handheld metal detectors. These security measures are implemented based on their applicability and necessity. Collectively, these measures contribute to ensuring the safety and security of all individuals within the premises of NCL.Top of Form

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

NCL, as part of the group protocols, ensures a safe working environment through various measures, such as fire safety measures, biannual fire safety audits, regular fire drills, floor familiarization training sessions, daily briefings for physical security staff on safety protocols, periodic audits to maintain ISO certificates, regular air quality analysis in workspaces, daily workspace cleaning routines, and the scheduled disposal of E-waste.

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

Not Applicable

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

Yes. At NCL, we consider employees to be our most valuable asset. Employees are offered a comprehensive suite of health and wellness benefits, including group medical insurance with a family floater option, group personal accident insurance, and term life insurance. Additionally, annual medical check-ups are provided to employees and their spouses. The Exchange Plaza office building has a gymnasium and yoga facility accessible to all employees. Health awareness sessions, specifically tailored for female employees, are conducted across all offices. The staff welfare committee organizes regular tournaments such as table tennis, badminton, cricket, and chess for all employees. These initiatives foster a culture of wellness, teamwork, and friendly competition among employees.

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

Safety Incident/Number	Category*	FY 2025-26	FY 2024-25
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	NA	
Total recordable work-related injuries	Employees	0	0
	Workers	NA	
No. of fatalities	Employees	0	0
	Workers	NA	
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	NA	

*Including in the contract workforce

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

NSE demonstrates its commitment to creating a safe, healthy, and supportive workplace for its employees, prioritising their well-being and security. We offer a wide range of programmes designed to promote a proactive approach to health and safety.

We conduct safety training for all employees, with a focus on fire safety. Every employee, as part of onboarding, receives 1.5 hours of hands-on training on fire safety. All the offices have RO based drinking water systems, and an FSSAI license is required for all the canteen vendors operating within the premises. At Exchange Plaza, we have on-site medical facilities, which include an on-site doctor, a medical emergency room, and a medical kit in case of any medical emergencies. Employee Assistance Programme (EAP) is a support system which enables employees to deal with a wide range of issues relating to stress, work-life balance, and any other challenges. Employees are offered periodic sessions on work-life balance, healthy habits, resilience building, and achieving a well-rounded lifestyle.

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

	FY 2025-26			FY 2024-25		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0	NA	0	0	NA
Health & Safety	0	0	NA	0	0	NA

14. Assessments for the year:

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

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

No risks or concerns have been identified in the assessments of health and safety practices and working conditions at NCL's offices.

Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).

All NCL employees are covered by a Group Term Life Policy that insures against death from any cause, natural or accidental. It also provides coverage for permanent or partial disability. We also have Ex-Gratia as part of Employee Health and Wellness, policy. We do not have workers; hence, it is not applicable.

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

At NCL, we prioritize transparent business practices across our value chain. The NCL supplier empanelment process requires the vendors to share copies of all necessary documents to ensure that all statutory dues are deducted and deposited correctly.

3. Provide the number of employees/workers having suffered high consequence work- related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2025-26	FY 2024-25	FY 2025-26	FY 2024-25
Employees	0	0	0	0
Workers	Not Applicable			

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment?

No, NCL does not have any transition assistance programs.

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	NA
Working Conditions	NA

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

Not Applicable

PRINCIPLE 4: BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL ITS STAKEHOLDERS

Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the entity.

At NCL, we recognize the vital role of stakeholders in shaping our business strategy and understanding evolving risks and opportunities. The first Stakeholder Engagement and Materiality Assessment (SEMA) was conducted in FY 2022-23 with our leadership team. This initiative enabled the Company to identify key material topics influencing and impacting our operations. The SEMA assessment enabled NCL to identify its key stakeholders by evaluating their influence and interest concerning the organization's sustainability initiatives.

The various stakeholder groups that are of importance to us are:

- Employees
- Regulatory Bodies
- Customers (including Clearing Members)
- Partner Service Providers
- Investors

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others – please specify)	Purpose and scope of engagement, including key topics and concerns raised during such engagement
Clearing Members	No	• Member Help Desk - Phone Calls, E-mails • Periodic Compliance Filings • Webinars	Quarterly / Regular	• Compliance and regulatory matters
Employees	No	• Induction Programs • Training and Development Programs • Employee Engagement Programs	Quarterly / Regular	• Collecting insightful feedback from employees on their welfare and career growth • Employee motivation, career development, and individual wellness
Regulators	No	• Periodic Meetings with SEBI Officials • E-mails • Phone Calls	Quarterly / Regular	• Periodic engagement with SEBI officials on key regulatory matters & important cases • Discussions on policy matters and data requirements
Customers	No	• Group Meetings • Member Help Desk - Phone Calls, E-mails	Quarterly / Regular	• Compliance and regulatory matters • Product and service-related matters

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others – please specify)	Purpose and scope of engagement, including key topics and concerns raised during such engagement
Key partner service providers	No	• Technology Conferences • Webinars and Training • Meetings and Regular Calls • E-mails	Quarterly / Regular	• Adherence to delivery standards and timelines
Investors	No	• NCL Website • Circulars	Quarterly / Regular	• Financial performance, corporate governance, strategic decisions, and feedback collection

Leadership Indicators

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

   At NCL, we have set up engagement channels customized to each stakeholder group to gather their perspectives on our business activities. These channels enable stakeholders to share their concerns and suggestions with NCL's management and play a crucial role in our risk management strategy. By integrating stakeholder feedback, we mitigate risks and seize opportunities that contribute to building a more sustainable and robust business.

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

   Yes, stakeholder consultation at NCL is instrumental in supporting the identification and management of ESG (Environment, Social, and Governance) topics. We have established diverse channels for engagement across these dimensions. In FY-2022-23, we conducted a Materiality Assessment with the participation of our leadership team. This initiative enabled us to identify key material topics influencing and impacting our operations and stakeholders.

   The NSE Foundation, the CSR arm of the NSE group, collaborates with various NSE group entities, NGOs, and communities to identify, select, and implement initiatives in social and environmental sustainability. Based on suggestions from local municipal corporations, NSE has switched to biodegradable bags. Renewable energy and rainwater harvesting initiatives have also been implemented after extensive deliberations among internal stakeholders.

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

   NSE Foundation was incorporated in March 2018 as a Section 8 company and a wholly owned subsidiary of NSE. NSE Foundation serves as the central platform for implementing the corporate social responsibility initiatives across the NSE Group. Its primary mandate is to align and converge CSR efforts across group companies, thereby enhancing synergy and amplifying social impact in line with the Group's CSR Policy.

   Through the Foundation, NCL drives inclusive and sustainable development across identified CSR focus areas including education, elder care, sanitation and safe drinking water, health and nutrition, sports, environmental sustainability, skill development and entrepreneurship. NSE recognises that the economic and social well-being of communities is intrinsically linked with environmental sustainability, and accordingly, our CSR approach adopts an integrated social, economic, and environmental perspective to create sustainable and inclusive impact. NSE Foundation partners on CSR initiatives with organisations that are committed towards our community development objectives. Recognising the shortage of quality healthcare facilities in underserved regions and the potential for long-term, scalable impact, priority has been set to capital-intensive healthcare infrastructure projects capable of serving large beneficiary populations. By adopting a unified and strategic approach, NSE Foundation ensures efficient resource utilisation, robust governance, and measurable impact, reinforcing the NSE Group's commitment to inclusive and equitable development.

PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

Essential Indicators

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

Category	FY 2025-26			FY 2024-25		
	Total (A)	No. of employees workers covered (B)	% (B / A)	Total (C)	No. of employees workers covered (D)	% (D / C)
			Employees			
Permanent	452	452	100	394	354	90
Other than permanent	0	0	0	0	0	0
Total Employees	**452**	**452**	**100**	**394**	**354**	**90**
			Workers			
Permanent	Not Applicable					
Other than permanent						
Total Workers						

2. Details of Minimum wages paid to Employees and workers in the following format

Category	FY 2025-26					FY 2024-25				
	Total (A)	Equal to minimum wages		More than Minimum Wages		Total (D)	Equal to minimum wages		More than Minimum Wages	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
					Employees					
Permanent	452	0	0	452	100	394	0	0	394	100
Male	326	0	0	326	100	278	0	0	278	100
Female	126	0	0	126	100	116	0	0	116	100
Other than Permanent	1002	0	0	1002	100	711	0	0	711	100
Male	802	0	0	802	100	555	0	0	555	100
Female	200	0	0	200	100	156	0	0	156	100
					Workers					
Permanent	Not Applicable									
Male										
Female										
Other than Permanent										
Male										
Female										

3. Details of remuneration/salary/wages.

a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	7*	49,12,500	1	33,75,000
Key Managerial Personnel	23	1,08,34,000	5	95,90,000
Employees other than BoD and KMP	303	13,86,000	121	10,00,000
Workers	Not applicable			

*Note: Mr. Vikram Kothari, Managing Director of NCL, is KMP.

As per the decision taken by the Board, NSE employees who become Directors on the Boards of its subsidiaries are not eligible for sitting fees from such companies. NCL is one of the subsidiaries of NSE. Mr. Ian Desouza and Mr. Piyush Chourasia, employees of NSE, are NSE's representative on the Board of NCL. Accordingly, they were not paid any sitting fee for the Board or committee meetings attended by them.

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

	FY 2025-26	FY 2024-25
Gross wages paid to females as % of total wages.	23.31	24.14

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

Yes, our Employee Grievance Policy serves as the focal point for addressing all human rights issues within the company. The Internal Committee (IC) acts as a focal point for POSH complaints. All employees have access to HR policies through a dedicated HR portal. Employees are provided a comprehensive overview of HR policies during their induction and onboarding process. Employees are encouraged to raise any grievances related to human rights violations, ensuring a proactive approach to addressing such concerns.

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

The Grievance Redressal procedure provides a structured platform for employees to formally raise grievances and discuss problems or concerns regarding discrimination, harassment, and unfair labour practices. Led by a senior member, the Grievance Redressal Committee conducts impartial investigations to ensure fairness and thoroughness in addressing filed grievances. Additionally, employees can report any instances of human rights violations through the whistle-blower mechanism. This mechanism safeguards the confidentiality of the complainant, and appropriate actions are taken based on the investigation.

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

	FY 2025-26			FY 2024-25		
	Filed during the year	Pending resolution at the End of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	Nil	0	0	Nil
Discrimination at workplace	0	0	Nil	0	0	Nil
Child Labour	0	0	Nil	0	0	Nil
Forced Labour /Involuntary Labour	0	0	Nil	0	0	Nil
Wages	0	0	Nil	0	0	Nil
Other human rights related issues	0	0	Nil	0	0	Nil

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

	FY 2025-26	FY 2024-25
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act,2013(POSH)	0	0
Complaints on POSH as a % of female employees/workers	0	0
Complaints on POSH upheld	0	0

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

At NCL, we prioritize creating a workplace where everyone feels valued, respected and safe. To achieve this, we have implemented a robust Prevention of Sexual Harassment (POSH) policy. This policy outlines clear guidelines and procedures for preventing, prohibiting, and addressing any instances of sexual harassment, ensuring a work environment free from such misconduct. Our Internal Committee (IC) plays a vital role in upholding this commitment. The IC is responsible for conducting thorough investigations and ensuring fair and prompt resolutions. Furthermore, the IC safeguards complainants by guaranteeing a safe space to report their experiences and prohibiting any retaliation for coming forward. By implementing these practices, NCL demonstrates its unwavering commitment to fostering a work environment where all employees feel secure, respected, and empowered to reach their full potential.

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

Yes, Procurement process of NCL involves vendors aligning with the Supplier Code of Conduct, which prioritises human rights. The Code encourages vendors to comply with ESG clauses, including those related to human rights. This process helps establish a foundation for ethical business practices within the supply chain and cultivates a culture of respect for human rights across the NCL operations.

10. Assessments for the year:

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

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

No risks/concerns had arisen from the assessments at Question 10 above.

Leadership Indicators

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

No complaints regarding human rights violations have been reported across the organization, so no modifications to business processes were necessary.

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

We have not conducted any human rights due diligence.

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes, NCL has provisions in place, such as wheelchairs, lifts, and security/housekeeping personnel assisting differently abled visitors, that make the entity's premises/office accessible to them, as per the requirements of the Rights of Persons with Disabilities Act, 2016.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	0
Discrimination at workplace	0
Child labour	0
Forced Labour/Inventory Labour	0
Wages	0
Others – please specify	NA

5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments in Question 4 above.

Not Applicable

PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

Essential Indicators

1. Details of total energy consumption (Giga Joules) and energy intensity in the following format:

Parameter*	FY 2025-26	FY 2024-25
From renewable sources		
Total electricity consumption (A)	2,036	4,290
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total energy consumption from renewable sources (A+B+C)	**2,036**	**4,290**
From non-renewable sources		
Total electricity consumption (D)	16,741	7,957
Total fuel consumption (E)	68	54
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewable sources (D+E+F)	**16,809**	**8,011**
Total energy consumed (A+B+C+D+E+F)	**18,845**	**12,301**
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations) **GJ/Crores**	9.23	4
X-Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP) **GJ/ Crores**	187	92
Energy intensity in terms of physical output	NCL does not generate any physical output in terms of product.	NCL does not generate any physical output in terms of product.
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-
Source of emission factor	https://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/2_Volume2/V2_2_Ch2_Stationary_Combustion.pdf	
PPP Conversion Factor used	20.34	20.6
Source of the PPP Conversion Factor	www.imf.org	

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

Yes. TUV India Private Limited

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

The question is not applicable as NCL is not an obligated entity and does not fall under the PA scheme of the Government of India.

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

Parameter	FY 2025-26	FY 2024-25
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Groundwater	355	-
(iii) Third party water	2,579	6,872
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	**2,934**	**6,872**
Total volume of water consumption (in kilolitres)	**2,934**	**6,872**
Water intensity per rupee of turnover (Total Water consumption / Revenue from operations) KL/Crores	1.44	0.98
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP) KL/Crores	29.22	20.22
Water intensity in terms of physical output	-	-
Water intensity (optional) – the relevant metric may be selected by the entity	-	-
PPP Conversion Factor used	20.34	20.6
Source of the PPP Conversion Fcator	www.imf.org	

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

Yes. TUV India Private Limited

4. Provide the following details related to water discharged:

Parameter	FY 2025-26	FY 2024-25
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment	-	-
- With Treatment – please Specify level of treatment - (Tertiary level of treatment)	-	-
(ii) To Groundwater		
- No treatment	-	-
- With treatment – please specify level of treatment.	-	-
(iii) To Seawater		
- No treatment	-	-
- With treatment – please specify level of treatment.	-	-
(iv) Sent to third-parties		
- No treatment	-	-
- With treatment – please specify level of treatment.	-	-
(v) Others		
- No treatment (municipal sewage)	-	-
- With treatment – Please specify level of treatment.	-	-
Total water discharged (in kilolitres)	-	-*

*In previous year, outflowing water was reported as discharge. However, this has now been reclassified as internal recycling and hence total discharge is reported as nil for current year.

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

Yes. TUV India Private Limited

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

NCL adopts NSE's sustainable water management practices. The offices at the Mumbai, Exchange Plaza building and Chennai are equipped with Sewage Treatment Plant (STP), enabling the recycling of water from domestic use. Post-treatment, the water is repurposed for the cooling towers in the air conditioning system and for gardening purposes. This significantly reduces freshwater consumption and supports water conservation efforts. This initiative enabled NSE to conserve around 6.14 Million gallons of water in FY 2025-26.

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

Parameter	Please specify unit	FY 2025-26	FY 2024-25
NOx	NCL is a Clearing Corporation and its operations do not have any continuous sources of air emissions. The DG sets are used solely during power outage's, so, the air emission (excluding GHGs) are not material.		
SOx			
Particulate matter (PM)			
Persistent organic pollutants (POP)			
Volatile organic compounds (VOC)			
Hazardous air pollutants (HAP)			
Others – please specify			

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

Not Applicable

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

Parameter	Unit	FY 2025-26	FY 2024-25
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	56	4
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	2,900	1,607
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	MtCO2e/crores	1.45	1
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	MtCO2e/crores	29.49	12
Total Scope 1 and Scope 2 emission intensity in terms of physical output	-	-	-
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-
Source of emission factor	• CERC CDM– CO2 Baseline Database • IPCC – Chapter 2 (Stationary Combustion)		
PPP Conversion Factor used	-	20.34	20.6
Source of the PPP Conversion Factor	-	www.imf.org	

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

Yes. Bureau Veritas India Private Limited

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

NCL, as a part of the NSE, supports group-level initiatives to reduce GHG emission footprint. We have installed a 20 KW solar power plant at our Mumbai and Chennai locations. This plant helps power part of the lighting load at Exchange Plaza in Mumbai and our BCP premises in Chennai. Additionally, our wind plant in Satara, Maharashtra, commissioned in 2014, has a capacity of 5 MW (four units of 1.25 MW each). According to Maharashtra's renewable energy policy, the electricity generated by this plant is supplied to the grid, offsetting our power consumption.

NSE has also implemented several energy efficiency initiatives to cut down on power usage and improve operational efficiency. These include installing lighting transformers and LED lights across our offices to regulate power supply and extend the life of our lighting systems. We have integrated a thermal energy storage system into our air-conditioning system to manage peak load by using chilled water stored overnight. Occupancy sensors have been installed throughout our offices to control lighting based on actual usage. Our Building Management System (BMS) ensures that air-conditioning units operate only when needed, and automatic power factor control units improve the overall power factor of the building, earning cost-saving incentives from our power supplier. These measures collectively enhance our building's energy efficiency and reduce its environmental impact. Additionally, we use environment-friendly gases in our firefighting equipment and air conditioning systems (i.e., R134a, R407a, and R410a). These efforts demonstrate our commitment to reducing our environmental footprint.

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

Parameter	FY 2025-26	FY 2024-25
Total Waste generated (in metric tonnes)		
Plastic waste **(A)**	-	0.02
E-waste **(B)**	0.042	1.38
Bio-medical waste **(c)**	-	-
Construction and demolition waste **(D)**	-	40.28
Battery waste **(E)**	-	2.93
Radioactive waste **(F)**	-	-
Other Hazardous waste. Please specify, if any. **(G)**	-	0.17
Other Non-hazardous waste generated **(H)**. Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	-	0.38
Total (A+B+C+D+E+F+G+H)	0.042	45.16
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations) Tons/Crore	0	0.02
Waste intensity per rupee of turnover adjusted Purchasing for Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) Tons/ Crore	0	0.34
Waste intensity in terms of physical output	-	-
Waste intensity (optional) – the relevant metric may be selected by the entity	-	-

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)

Parameter	FY 2025-26	FY 2024-25
Category of waste		
(i) Recycled (Authorized vendor)	-	4.31
(ii) Re-used	-	-
(iii) Other recovery operations (Vermicompost)	-	0.18
Total	-	4.49
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	-	-
(ii) Landfilling	-	-
(iii) Other disposal operations	-	40.28
Total	-	40.28
Source of emission factor	-	-
PPP Conversion Factor used	20.34	20.6
Source of the PPP Conversion Factor	www.imf.org	

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

Yes. TUV India Private Limited

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

At NCL, we are committed to the NSE group's three "R"s of waste management: Reduce, Reuse and Recycle. We have set up systems to carefully track the quantity and types of waste generated, enabling us to identify opportunities for waste reduction and improved operational efficiency.

Because of our business, we mostly produce electronic waste. Our E-waste policy makes sure that electronic waste is recycled responsibly by vendors approved by the Central Pollution Control Board (CPCB) and the Maharashtra Pollution Control Board (MPCB). We also use a Document Management System (DMS) to store and manage all approval notes digitally. This reduces the need for paper, cutting down on paper waste in our offices. Further, biodegradable waste such as food waste from the Canteen, horticultural waste and paper is processed through an in-house vermicomposting system.

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

SI No.	Location of operations/ offices	Type of operations	Whether the conditions of environmental approval/ clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
NCL doesnot have offices in/around ecologically sensitive areas.			

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
NCL did not conduct environmental impact assessments during the financial year because no projects require such assessments.					

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

S. No.	Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
No such non-compliances have been noticed.				

Leadership Indicators

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

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

(i) Name of the area

(ii) Nature of operations

(iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2025-26	FY 2024-25
Water withdrawal by source (in Kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	0	0
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres)	0	0
Total volume of water consumption (in kilolitres)	0	0
Water intensity per rupee of turnover (Water consumed / turnover)	0	0
Water intensity (optional) – the relevant metric may be selected by the entity	0	0
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) Into Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) Into Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(v) Others		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
Total water discharged (in kilolitres)	0	0

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

Not Applicable

2. Provide the details of total Scope 3 emissions & its intensity in the following format:

Parameter	Unit	FY 2025-26	FY 2024-25
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	-	-
Total Scope 3 emissions per rupee of turnover		-	-
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity		-	-

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

No

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

The question can only be answered if NCL has responded to the question (P6-E-11).

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

Sr. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Wind Power Plant	The NSE group has a 5 MW wind power plant in Satara, Maharashtra that contributes electricity to the local grid. This offsets their power consumption at any location within the grid.	The wind power plant has generated 5,64,999.37 KWh electricity units in the FY 2025-26.
2	Solar Power Plant	20 kW solar power plants have been installed at Exchange Plaza and BCP Premises in Chennai. These plants harness solar power to meet part of the buildings' lighting needs.	NSE group has diverted 622.94 KWh from the grid to solar energy in the FY 2025-26.
3	Lighting Transformer and LED Lights	Lighting transformers have been installed in the lighting feeders to regulate the incoming power supply. This reduces excess power consumption and extends the life of the luminaries. Additionally, LED lights have been installed throughout the entire office area.	NSE Group has saved around 37,936 KWh units in the FY 2025-26.
4	Thermal Energy Storage System	NSE group implemented a thermal storage system at Exchange Plaza. AC chillers now operate at night, generating chilled water stored in tanks. During the day, this chilled water is used for air conditioning, shifting energy consumption away from peak hours. This allowed NSE to surrender excess contracted power.	NSE group has saved around 16,691 Demand KVA in the FY 2025-26.
5	Occupancy Sensors	Motion/Occupancy Sensors have been installed throughout the office to operate the lights automatically based on occupancy in the respective areas.	The value of this initiative in terms of the outcome cannot be precisely measured.
6	Building Management System	A Building Management System (BMS) was installed from the start to optimize building operations. The BMS automatically controls air conditioning units based on pre-set schedules, maintaining comfortable temperatures while conserving electricity.	The value of this initiative in terms of the outcome cannot be precisely measured.
7	Automatic Power Factor Control Units	Automatic power factor correction units improve building efficiency by balancing electrical loads, resulting in electricity bill discounts from the power supplier.	The value of this initiative in terms of the outcome cannot be precisely measured.
8	Water Recycling - Sewerage Treatment Plant	STP plants of 150KL and 12KL capacity are installed at the BKC & Chennai office, respectively. We reuse treated water for cooling towers, gardens, and flushing.	NSE group has saved around 15,497 Kiloliters of Water in FY 2025-26.
9	Rain Water Harvesting System	Anticipating future water needs, Exchange Plaza installed a rainwater harvesting system to collect rainwater and replenish the building's groundwater.	
10	Vermiculture Plant	Food scraps, garden waste, paper, and cardboard are composted in a vermiculture system, resulting in nutrient-rich compost that is used for gardening.	

5. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.

At NCL, business continuity and market stability are paramount as we recognize the criticality of maintaining uninterrupted operations and safeguarding the stability of the market in which we operate. We achieve this through a carefully crafted Business Continuity Management (BCM) policy, reinforced by a robust governance structure, detailed procedures, and thorough testing and training programs. Our commitment to business continuity is further enhanced by our infrastructural measures, which allow us to navigate and recover from disruptions effectively. Our organization has developed a comprehensive business continuity plan that effectively addresses various emergencies. Our BCM policy aligns with SEBI's 'Business Continuity Management and Disaster Recovery' guidelines. To ensure the effectiveness of our business continuity efforts, we have established a robust governance structure. This includes our Board and management-level committees, which oversee the implementation of the BCM framework. We also have dedicated teams, such as the Crisis Management Team (CMT), responsible for managing the execution of the plan during emergencies.

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

At present no significant impact has been reported by value chain partners of NCL. Accordingly, no specific mitigation or adaptation measures were required.

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

NCL has not undertaken environmental impact assessments of its value chain partners.

8. How many Green Credits have been generated or procured:

8.a. By the listed entity - Zero

8.b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners - Zero

PRINCIPLE 7: BUSINESSES, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT.

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations.

We are affiliated with the Global Association of Central Counterparties.

b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	CCP Global	International

2. Provide details of corrective action taken or underway on any issues related to anti - competitive conduct by the entity, based on adverse orders from regulatory authorities.

Name of authority	Brief of the case	Corrective action taken
Nil	Nil	Nil

Leadership Indicator

1. Details of public policy positions advocated by the entity.

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
NCL engages with regulators and other MIIs in implementing products/services for market safety.					

PRINCIPLE 8: BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

Essential Indicators

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

S. No	Name and brief details of project (Executed by NSE Foundation)	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
1	Supply, installation, testing, commissioning, implementation and delivery of the turnkey project	SIA was mandated via Rule 8(3) of the Companies (CSR Policy) Rules, 2014. General Circular No. 14 /2021	25th August 2021	Yes	Yes	https://www.nseclearing.in/disclosures/other-disclosures
2	Drinking water kiosks with fluoride and desalinity remediation	SIA was mandated via Rule 8(3) of the Companies (CSR Policy) Rules, 2014. General Circular No. 14 /2021	25th August 2021	Yes	Yes	https://www.nseclearing.in/disclosures/other-disclosures
3	Pilot Initiative on Comprehensive Elderly Care Programme in Nandurbar district by operationalising the National Programme for Health Care of Elderly (NPHCE) scheme of the Government	SIA was mandated via Rule 8(3) of the Companies (CSR Policy) Rules, 2014. General Circular No. 14 /2021	25th August 2021	Yes	Yes	https://www.nseclearing.in/disclosures/other-disclosures
4	"Gram Samrudhi'- Community Led Climate Smart Initiatives, to Safeguard Local Livelihood and Environment at Dhadgaon and Akkalkuva, tribal blocks in Nandurbar district of Maharashtra	SIA was mandated via Rule 8(3) of the Companies (CSR Policy) Rules, 2014. General Circular No. 14 /2021	25th August 2021	Yes	Yes	

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

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
Not Applicable						

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

NCL's community engagement is aligned to group-level initiatives and currently, NCL does not have a mechanism to receive and redress the community's grievances.

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

	FY 2025-26	FY 2024-25
Directly sourced from MSMEs/ small producers	12.17%	5.79%
Directly from within India	99.25%	99.06%

5. Job creation in smaller towns - Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/ on contract basis) in the following locations as % of total wage cost.

Location	FY 2025-26	FY 2024-25
Rural	0	0
Semi-Urban	0	0
Urban	0	0
Metropolitan	100	100

*The nature of business necessitates NCL to have its offices predominantly in metropolitan cities. (Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)

Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Socia Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
No negative social impact identified	Not Applicable

2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

S. No.	State	Aspirational District	Amount spent (In INR)
Though currently none of the projects are specifically in aspirational districts, CSR projects in focus areas of Primary Education, Safe Drinking water and Sanitation, Environmental Sustainability, Skill Development and Health were undertaken in the aspirational districts of Ramanathapuram (Tamil Nadu), Nandurbar (Maharashtra), Karauli (Rajasthan), Kiphire (Nagaland) and aspirational district designate- Birbhum (West Bengal) from 2018 to 2023. Since then, post covid, the focus has been on augmenting critical health infrastructure. Further, recently some projects have been selected which would cover some aspirational districts in the States of Odisha, Maharashtra, Chhattisgarh and J&K.			

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups?

No, NCL does not have any preferential procurement policy.

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

Not Applicable

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

Not Applicable

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

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/ No)	Benefit shared (Yes / No)	Basis of calculating benefit share
Not Applicable				

5. Details of beneficiaries of CSR Projects:

S. No.	CSR Project*	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	NSE Multispecialty Block and Bone Marrow Transplant Centres	On-going health infrastructure project	Not applicable as the project is underway
2	High-Altitude High-Performance Training Centres	Recently commenced project	Not applicable
3	Empowering Persons with Disability through mobility and assistive devices	Recently commenced project	Not applicable

PRINCIPLE 9: BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER

Essential Indicators

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

SEBI, vide its circulars dated October 04, 2021, and November 23, 2021, mandated that Clearing Corporations shall disclose on their website the data on complaints received against them and redressal thereof, latest by the 7th of the succeeding month. In view of the same, NCL seeks details from internal teams (Clearing, Settlement, Risk & Collaterals, and Secretarial) every month and displays data on its website.

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

	As a percentage of total turnover
Environmental and Social parameters relevant to the product	Not Measured
Safe and responsible usage	Not Measured
Recycling and/or safe disposal	Not Applicable

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

	FY 2025-26		Remarks	FY 2024-25		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	0	Nil	0	0	Nil
Advertising	0	0	Nil	0	0	Nil
Cyber-security	0	0	Nil	0	0	Nil
Delivery of essential services	0	0	Nil	0	0	Nil
Restrictive Trade Practices	0	0	Nil	0	0	Nil
Unfair Trade Practices	0	0	Nil	0	0	Nil
Other	0	0	Nil	0	0	Nil

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

	Number	Reasons for recall
Voluntary recalls	Not Applicable	
Forced recalls		

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

Yes, NCL has a board-approved Cyber Security and Cyber Resilience policy in place. Additionally, NCL aligns its practices with ISO 27001:2022 Information Security Management Systems.

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.

Given that no such incidents have happened, the corrective actions are not applicable.

7. Provide the following information relating to data breaches:

a. Number of instances of data breaches.

No such Incidents were reported by NCL

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

NIL

c. Impact, if any, of the data breaches.

NIL

Leadership Indicators

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

NCL uses its official website to communicate information on products and services of the entity. Customers can see all information about products and services at: https://www.nseclearing.in/

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

NCL regularly participates in quarterly Member Conclave meetings organised by NSE in multiple regions to discuss key developments. These meetings provide members with insights into the company's progress and new initiatives. Q&A sessions allow members to raise any queries or concerns they may have directly with NCL representatives.

Further, NCL also participates in sessions and webinars on topics relevant to the company. This year, we have jointly along with ANMI organised webinars focusing on NCL functions. Prior to these sessions, members are invited to submit their questions, enabling NCL to effectively address their concerns and provide valuable insights during the sessions. NCL continues with member engagements focused around new releases/implementation handholding. These initiatives reflect NCL's commitment to transparent communication and engagement with its members, fostering a collaborative environment where feedback is valued and addressed promptly.

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

NCL's customers are informed of disruption or breakdown in service, through SMS, e-mail, website notice, press releases, etc.

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

NCL has not carried out any customer satisfaction survey.

TÜVINDIA

INDEPENDENT ASSURANCE STATEMENT

To,
To the Board of Directors,
NSE Clearing Limited.
Exchange Plaza, C-1, Block-G, Bandra Kurla Complex Bandra, East, Mumbai, Maharashtra – 400051

Engagement Overview. NSE Clearing Limited (hereinafter referred to as "NCL" or the "Reporting Organization") engaged TUV India Private Limited ("TUVI") to perform an independent external assurance of its Business Responsibility and Sustainability Report ("BRSR") Core disclosures for the period 1 April 2025 to 31 March 2026. The Annual Report includes disclosures relating to the BRSR Core (the "nine attributes") as per Annexure I – Format of BRSR Core (collectively referred to as the "BRSR Core Information").

Reporting Boundary. The assurance engagement, including onsite verification at NCL's Corporate Office, Exchange Plaza, C-1, Block-G, Bandra Kurla Complex Bandra, East, Mumbai, on 13th and 14th July 2026 was complemented by desk reviews and remote verification procedures across the remaining locations within the reporting boundary. The reporting boundary covers NSE Clearing Limited, including its Corporate Office and 15 other offices; verification was conducted using a risk-based sampling methodology in accordance with ISAE 3000 (Revised).

Sampling Approach. Sample selection considered office size, geographical distribution, operational significance, contribution to consolidated BRSR Core KPIs, and risk of material misstatement. Two offices were selected for detailed verification. As ESG data is centrally managed and consolidated, assurance procedures primarily focused on centralized controls, data aggregation processes, and analytical review of consolidated datasets. The sampling methodology and Office selection rationale are maintained in the assurance working papers.

For the BRSR Core assurance, TUVI confirms that, prior to acceptance of the engagement, the preconditions for the assurance engagement were formally assessed in accordance with ISAE 3000 (Revised), specifically Para 24. As part of this formal criteria assessment, TUVI evaluated and documented that the subject matter is supported by suitable criteria (SEBI BRSR Core framework and GHG Protocol), which were determined to be available, relevant, and appropriate for the purpose of this engagement. NCL's management has acknowledged its responsibility for the preparation and presentation of the BRSR Core sustainability information and for providing access to relevant records, and that sufficient appropriate evidence was expected to be available to support the assurance conclusion. Accordingly, having satisfied all preconditions through this formal assessment, the BRSR Core assurance engagement was accepted and performed in accordance with ISAE 3000 (Revised).

The assurance process was conducted with reference to the following applicable frameworks and guidelines:

i. Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, requiring disclosure of the Business Responsibility and Sustainability Report (BRSR);
ii. The Industry Standards on Reporting of BRSR Core, as per SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177, dated 20 December 2024;
iii. SEBI circular SEBI/HO/CFD/CMD-2/P/CIR/2021/562, dated 10 May 2021;
iv. The SEBI notification SEBI/LAD-NRO/GN/2023/131, dated 14 June 2023, related to Annual Report / BRSR requirements;
v. The BRSR Core – Framework for Assurance and ESG Disclosures for the Value Chain, as stipulated by SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated 12 July 2023;
vi. The Master Circular for compliance with the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, by listed entities, HO/49/14/14(7)2025-CFD-POD2/I/3762/2026, dated 30/01/2026, which consolidates the operative BRSR and other LODR reporting requirements.
vii. World Resources Institute (WRI) / World Business Council for Sustainable Development (WBCSD) Greenhouse Gas (GHG) Protocol (A Corporate Accounting and Reporting Standard).
viii. International Standard on Assurance Engagements ISAE 3000 (Revised).

The assurance engagement comprised a reasonable assurance engagement over the quantitative BRSR Core KPIs within the nine attributes specified under Annexure I, performed in accordance with ISAE 3000 (Revised). Qualitative disclosures relating to stakeholder engagement, materiality determination, and the management approach for each indicator are reported as represented by management and were not subject to independent substantive verification under this engagement. However, Board-level governance oversight of ESG performance and BRSR Core KPIs was corroborated, on a documentary review basis, through examination of Board meeting minutes and agenda records; accordingly, TUVI's conclusion on governance oversight is based on this documentary evidence, while other representation-based elements

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are reported as represented by management and were not independently verified, and are identified as such in the relevant sections of this statement.

Management's Responsibility

NCL developed its BRSR Core information, forming part of the Annual Report (based on the BRSR Core framework) and holds full responsibility for the collection, analysis, preparation, and disclosure of the information presented in the Annual Report, including its availability in both web-based and printed formats. This responsibility also extends to the maintenance and integrity of the website where the Annual Report is published. Management is responsible for ensuring the disclosed data is accurate, reliable, and free from material misstatements for BRSR Core requirements. Additionally, NCL is responsible for the archiving and reproduction of the disclosed information and for ensuring that such data is made available to relevant stakeholders and regulatory authorities upon request. The Reporting Organization is responsible for complying with applicable laws. Any partial reproduction of this assurance statement could lead to misinterpretation of the assurance scope, procedures, and conclusions. The assurance conclusion is intended to be read in its entirety, together with the defined scope, methodology, limitations, and criteria described in this assurance statement. The primary intended user of this assurance statement is the Board of Directors, shareholders, regulators, and other stakeholders of NCL; however, NCL may use it at its own discretion in accordance with its specific requirements.

Scope and Boundary

The scope of work includes the assurance of the following *nine attributes as per Annexure I - Format of BRSR Core* disclosed in the Annual Report / BRSR. The BRSR core requirements encompass essential disclosures pertaining to organization's Environmental, Social and Governance (ESG) performance. In particular, the assurance engagement included the following:

1. Review of General Disclosures, Management and Process Disclosures, and NCL's BRSR Core information;
2. Review and evaluation of the nine attributes specified under Annexure I – Format of BRSR Core, as disclosed in the BRSR;
3. Assessment of the quality, clarity, and completeness of the reported information; and
4. Verification of supporting evidence on a sample basis, involving reasonable assurance for the nine attributes as per the BRSR Core framework.
5. The assurance does not include assurance of value chain disclosures. Value chain disclosures are presently voluntary and deferred under SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/38 dated 28 March 2025 and are therefore excluded from the scope of this assurance engagement. No value-chain KPIs were assured under this engagement. (Reference: Measures to facilitate ease of doing business with respect to framework for assurance or assessment, ESG disclosures for value chain, and introduction of voluntary disclosure on green credits)

This approach ensured an assessment aligned with the principles of ISAE 3000 (Revised) for the BRSR Core disclosures, providing an independent and objective evaluation of the reliability and accuracy of NCL's ESG information.

TUVI has verified the below *nine attributes as per Annexure I - Format of BRSR Core* disclosed in the BRSR with reference to the Industry Standards on Reporting of BRSR Core (SEBI circular dated 20 December 2024) as part of the applicable assurance criteria.

Attributes	KPI
Greenhouse gas (GHG) footprint	Total Scope 1 emissions (with breakup by type) - GHG (CO_2e) Emission in MT - Direct emissions from organization's owned- or controlled sources (Calculated)
	Total Scope 2 emissions in MT - Indirect emissions from the generation of energy that is purchased from a utility provider (Calculated)
	GHG Emission Intensity (Scope 1+2), Total Scope 1 and Scope 2 emissions (MT) / Total Revenue from Operations adjusted for PPP (Calculated)
Water footprint	Total water consumption (in kL) (Calculated)
	Water consumption intensity - kL / Total Revenue from Operations adjusted for PPP (Calculated)
	Water Discharge by destination and levels of Treatment (kL) (Calculated)
Energy footprint	Total energy consumed in GJ (Measured and Calculated)
	% of energy consumed from renewable sources - In % terms (Calculated)
	Energy intensity -GJ/ Rupee adjusted for PPP (Calculated)
Embracing circularity - details related to waste management by the entity	Plastic waste (A) (MT) (Measured)
	E-waste (B) (MT) (Measured)
	Construction & Demolition Waste(C) (MT) (Measured)
	Battery waste (D) (MT) (Measured)
	Used Oil (E) (MT) (Measured)
	Bio-medical Waste (F) (MT) (Reported NIL)
	Total waste generated (A + B + C + D + E+F) (MT) (Calculated)
	Waste intensity • MT / Rupee adjusted for PPP (Calculated)
	Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (MT) (Calculated)
	Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (Intensity) ✓ kg of Waste Recycled Recovered /Total Waste generated

Attributes	KPI	
	For each category of waste generated, the total waste disposed by the nature of the disposal method (MT)	
	For each category of waste generated, the total waste disposed of by the nature of the disposal method (Intensity) ✓ kg of Waste Disposed / Total Waste Generated	
Enhancing Employee Wellbeing and Safety	Spending on measures towards the well-being of employees and workers – cost incurred as a % of total revenue of the company - In % terms- (Calculated)	
	Details of safety-related incidents for employees and workers (including contract-workforce, e.g. workers in the company's construction sites) 1) Number of Permanent Disabilities Reported (Reported NIL) 2) Lost Time Injury Frequency Rate (LTIFR) (per one million-person-hours worked) (Reported NIL) 3) No. of fatalities (Reported NIL)	
Enabling Gender Diversity in Business	Gross wages paid to females as % of wages paid - In % terms - (Calculated)	
	Complaints on POSH	1) Total Complaints on Sexual Harassment (POSH) reported - (Reported NIL)
		2) Complaints on POSH as a % of female employees/workers) (Reported NIL)
		3) Complaints on POSH upheld (Reported NIL)
Enabling Inclusive Development	Input material sourced from the following sources as % of total purchases – Directly sourced from MSMEs/ small producers and from within India - In % terms – As % of total purchases by value- (Calculated)	
	Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non-permanent /on contract) as % of total wage cost - In % terms – As % of total wage cost • Rural (Reported NIL) • Semi-urban (Reported NIL) • Urban (Reported NIL) • Metropolitan (Calculated)	
Fairness in Engaging with Customers and Suppliers	Instances involving loss/breach of data of customers as a percentage of total data breaches or cybersecurity events - In % terms- (Reported NIL)	
	Number of days of accounts payable - (Accounts payable *365) / Cost of goods/services procured (Calculated)	
Openness of Business	Concentration of purchases & sales done with trading houses, dealers, and related parties. Loans and advances & investments with related parties	1) Purchases from trading houses as % of total purchases (Reported NIL)
		2) Number of trading houses where purchases are made from (Reported NIL)
		3) Purchases from top 10 trading houses as % of total purchases from trading houses (Reported NIL)
		1) Sales to dealers/distributors as % of total sales- (Reported NIL)
		2) Number of dealers/distributors to whom sales are made (Reported NIL)
		3) Sales to top 10 dealers/distributors as % of total sales to dealers/distributors (Reported NIL)
		Share of RPTs (as respective %age) in
		• Purchases (Reported NIL)
		• Sales (Reported NIL)
		• Loans & advances(Reported NIL)
		• Investments (Reported NIL)

The reporting boundaries cover NCL, including its Corporate Office and 15 other offices as the reporting boundary for BRSR Core disclosures.

Note on KPI classification: In the table above, 'Measured' denotes KPIs verified directly against source records (e.g., meters, registers, manifests); 'Calculated' denotes KPIs derived through computation from underlying measured or reported data points, in each case independently recalculated and verified by TUVI.

Waste intensity formula: consistent with BRSR Core guidance, waste intensity (for each waste category, and for total waste generated / recovered / disposed) is calculated as the waste quantity (in MT or kg) divided by Total Revenue from Operations, adjusted for Purchasing Power Parity (PPP) — i.e., expressed as MT (or kg) per Rupee of PPP-adjusted Revenue from Operations — consistent with the corresponding energy, water, and GHG intensity ratios described elsewhere in this statement.

ISF Compliance Declaration: TUVI confirms that this assurance engagement has been conducted in compliance with the Industry Standards on Reporting of BRSR Core as specified in SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177 dated 20 December 2024 and the SEBI Master Circular for compliance with the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 by listed entities (Ref. No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026) dated 30 January 2026. The nine BRSR Core attributes (Annexure I KPIs) and the nine BRSR principles covering Essential and Leadership Indicators, scope of reasonable assurance, assurance methodology, and reporting format adopted in this engagement are fully aligned with the requirements of the said ISF circular and the Master Circular.

Boundary Reconciliation: The ESG reporting boundary is aligned with the operational control approach adopted by NCL and encompasses all entities and locations over which the Company exercises operational control. As part of the assurance

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procedures, a reconciliation of the ESG/BRSR reporting boundary against the financial reporting boundary, as reflected in the audited financial statements for FY 2025-26, was performed. The review confirmed that the BRSR reporting boundary is consistent with the operational control approach and aligns with the entities and locations included in the audited financial statements, with no material differences identified. Where facilities are shared with other NSE group entities, the reporting boundary reflects NCL's operational control and cost/consolidation allocation basis for those facilities, consistent with the treatment applied in NCL's audited financial statements.

Onsite Verification

An on-site verification was conducted at the Corporate Office on 13th and 14th July 2026.

The assurance activities were carried out together with a desk review as per the reporting boundary.

Limitations

TUVI did not perform any assurance procedures on the prospective information disclosed in the Annual Report / BRSR, including targets, expectations, and ambitions. Consequently, TUVI draws no conclusion on the prospective information. During the assurance process, TUVI did not come across any limitation to the agreed scope of the assurance engagement. TUVI verified nine attributes and corresponding KPIs independently, without reference to any ESG targets or goals set by NCL. TUVI verified data on a sample basis; the responsibility for the authenticity of data entirely lies with NCL. TUVI referenced the financial figures from the audited financial statements of NSE Clearing Limited (NCL) for FY 2025-26. The denominator values used in BRSR Core intensity ratio calculations — specifically, Total Revenue from Operations adjusted for Purchasing Power Parity (PPP) were extracted from the audited financial statements and reconciled against the figures disclosed in NCL's Annual Report prior to use in intensity ratio verification. The Purchasing Power Parity (PPP) conversion factor applied for intensity calculations was sourced from the World Bank International Comparison Program (ICP) database using the latest available PPP conversion factor for India (GDP, LCU per international dollar). The source reference, conversion factor applied, calculation methodology, and resulting PPP-adjusted denominator values were independently verified and retained in NCL's calculation sheet and the assurance evidence files and working papers. Financial figures were not independently assured under this engagement; NCL remains responsible for the appropriate application and disclosure of financial data. The application of this assurance statement is limited with respect to *SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated* 12 July 2023 *and Industry Standards on Reporting of BRSR Core, circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177, dated* 20 December 2024. This assurance statement does not endorse any environmental and social claims (related to the product, manufacturing process, packaging, disposal of product, etc.) as well as advertisements by the Reporting Organization and shall not be used to support misleading environmental or social claims, including greenwashing-related representations. The Reporting Organization is responsible for ensuring adherence to relevant laws. The assurance procedures are subject to inherent limitations, including the use of estimates, assumptions, sampling, and reliance on internal controls and data systems maintained by NCL. Accordingly, there is an unavoidable risk that material misstatements or omissions may not be detected, particularly where information is subject to estimation uncertainty or dependent on management judgment.

Materiality for this engagement was established and documented prior to the commencement of assurance activities, in accordance with ISAE 3000 (Revised). For the purposes of this engagement, a material misstatement is defined as a misstatement, individually or in aggregate, that could reasonably be expected to influence the economic decisions of users made on the basis of the BRSR Core information. TUVI applied a KPI-specific materiality approach comprising two tiers: (i) a 5% quantitative materiality threshold relative to the applicable KPI base value (e.g., total emissions, total energy, total water consumption) was applied to volume-based and aggregated KPIs, supplemented by qualitative considerations including the nature and context of the disclosure and the risk of error; and (ii) a qualitative zero-tolerance materiality threshold was applied to sensitive ESG disclosures including fatalities, permanent disabilities, customer data breaches, POSH complaints upheld, and regulatory non-compliance, whereby any single occurrence is treated as material irrespective of magnitude. The materiality assessment methodology and approval records are maintained in the engagement documentation. For brevity, the KPI-category-wise table below indicates only the applicable quantitative and/or qualitative zero-tolerance classification for each attribute and does not restate the full materiality definitions set out above. The responsibility for the authenticity of the data is confirmed by NCL. Any reliance placed by any person or third party on disclosed KPIs is entirely at their own risk. The following table provides the KPI-category-wise materiality thresholds applied in this engagement, elaborating

the qualitative sensitivity considerations for each BRSR Core attribute:

I. Greenhouse Gas (GHG) footprint: 5% quantitative threshold applied to absolute Scope 1, Scope 2, and GHG intensity KPIs. A qualitative review was applied to confirm the completeness of emission source coverage within the defined boundary and the appropriateness of emission factors used.
II. Water footprint: The applicability assessment for water discharge was independently reviewed during the assurance engagement. NCL operates office-based financial service facilities and does not undertake any manufacturing or industrial processes generating reportable wastewater streams. Water consumption is limited to domestic and sanitary purposes and discharged through municipal sewerage systems. Accordingly, water discharge by destination and treatment level is not applicable under the BRSR Core reporting framework. Supporting evidence and management declarations were reviewed and retained in the assurance records
III. Energy footprint: 5% quantitative threshold applied to total energy consumed, percentage of renewable energy, and energy intensity ratio. A qualitative review was applied to the completeness of energy sources included and the consistency of measurement methodology.

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IV. Embracing circularity (waste management): A quantitative materiality threshold of 5% was applied to each waste category (A through F) as well as to total waste generated, recovered, and disposed of. A qualitative zero-tolerance threshold was applied to compliance with hazardous waste regulations and the completeness of submissions to the Pollution Control Board. The applicability of this waste stream and the related disclosures were assessed as part of the assurance engagement. In addition, battery waste generated from IT assets, security systems, and power-backup equipment is managed through authorized buy-back and take-back arrangements upon replacement, and the corresponding management practices were reviewed during the assurance process.
V. Enhancing employee wellbeing and safety: Qualitative zero-tolerance threshold applied to fatalities, permanent disabilities, and LTIFR accuracy. 5% quantitative threshold applied to wellbeing spend as a percentage of total revenue.
VI. Enabling gender diversity in business: 5% quantitative threshold applied to gross wages paid to females and POSH percentage calculations. Qualitative zero-tolerance applied to POSH complaints upheld.
VII. Enabling inclusive development: 5% quantitative threshold applied to MSME sourcing percentage and wages paid to persons in smaller towns as a percentage of total wage cost. Rural, Semi-urban, Urban, and Metropolitan classifications used for the job-creation-in-smaller-towns disclosure were determined with reference to the Census of India 2011 town classification framework, as applied consistently by NCL and verified by TUVI on a sample basis.
VIII. Fairness in engaging with customers and suppliers: Qualitative zero-tolerance applied to customer data breach disclosures. 5% quantitative threshold applied to accounts payable days calculation. Customer data breach disclosures were verified through review of NCL's Information Security Management System (ISMS) incident registers and internal security incident reports for the reporting period.

Our Responsibility

TUVI's responsibility in relation to this engagement is to perform a reasonable level of assurance for *nine attributes as per Annexure I - Format of BRSR Core* and to express a conclusion based on the work performed. Our engagement did not include an assessment of the adequacy or the effectiveness of NCL's strategy, management of ESG-related issues or the sufficiency of the Report against Annual Report/BRSR principles, other than those mentioned in the scope of the assurance. TUVI's responsibility regarding this verification is in reference to the agreed scope of work, which includes assurance of non-financial quantitative and qualitative information disclosed by NCL. The Reporting Organization is responsible for archiving the related data for a reasonable time period.

TUVI is responsible

i. For planning to obtain the reasonable assurance for BRSR attributes so that it is free from material misstatement,
ii. Forming an independent opinion, based on the sampled evidence,
iii. Reporting the opinion to the Directors of 'NCL'.

This assurance statement is prepared by considering that the data and information presented by 'NCL' are free from material misstatement. The data was verified on a sample basis; the responsibility for the authenticity of the data lies with the Reporting Organization.

Verification Methodology

During the assurance engagement, TUVI adopted a risk-based approach, focusing verification efforts on disclosures and issues of high material relevance to NCL and its stakeholders. The objective was to assess the reliability and accuracy of the non-financial information disclosed, with emphasis on the robustness of data management systems, internal controls, and information flows.

TUVI's assurance activities included:

1. **Document and Data Review**:
   i. Examination of documents, datasets, and supporting evidence provided by NCL for the nine attributes listed in Annexure I – Format of BRSR Core (non-financial disclosures).
   ii. Evaluation of disclosures related to Management Approach and performance indicators.
2. **Stakeholder Interviews**:
   i. Conducted interviews with key representatives, including data owners, process managers, and decision-makers across various departments. Board-level oversight of sustainability and ESG-related matters was corroborated, on a documentary review basis, through examination of Board and Committee meeting minutes, agenda papers, governance records, and management presentations. Based on the evidence reviewed, TUVI confirmed the existence of governance oversight mechanisms relevant to BRSR Core disclosures; this review provides corroborative evidence but does not constitute independent substantive testing of the underlying ESG data. Supporting records and verification notes are maintained within the assurance working papers.
   ii. Reviewed management representations regarding NCL's approach to stakeholder engagement and materiality determination; qualitative statements in the Annual Report are based on management representations and were not independently validated.
   iii. Interviews were conducted through both onsite visits and remote assessments, as applicable.
3. **Process and System Assessment**:

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i. Review of systems and processes for implementing ESG and sustainability-related policies as described in the BRSR and for collecting, managing, and reporting both quantitative data and qualitative information for the reporting period.
ii. Assessment of internal controls supporting data accuracy, traceability, and consistency.

4. **Substantive and Control Testing:** TUVI performed walkthrough procedures to evaluate the design and implementation of internal controls over ESG data processes and substantive testing, including document verification, recalculation, analytical review, and data traceability checks for selected KPIs and disclosures. For intensity ratio KPIs — including GHG emission intensity (Scope 1+2 / Revenue from Operations adjusted for PPP), water consumption intensity (kL / Revenue from Operations adjusted for PPP), energy intensity (GJ / Revenue from Operations adjusted for PPP), and waste intensity (MT / Revenue from Operations adjusted for PPP) — TUVI independently recalculated each ratio using verified numerator values (absolute environmental data) and denominator values (financial figures sourced from audited financial statements), and cross-checked the results against NCL's reported figures to confirm arithmetical accuracy and consistency of methodology. The combination of control testing and substantive procedures provided sufficient appropriate evidence in accordance with ISAE 3000 (Revised). For GHG emission calculations, Scope 2 emissions were computed using the location-based method, applying the CEA (Central Electricity Authority) grid emission factor for India (CEA CO_2 Baseline Database Version 21 (latest available version)) applicable to the reporting period, in accordance with the WRI/WBCSD GHG Protocol Corporate Standard. Scope 1 emissions were calculated based on standard fuel conversion factors consistent with IPCC guidelines. The emission factor sources and calculation methodology were reviewed and found appropriate for the engagement. Additional KPI-category procedures applied included: (a) Energy — cross-verification of meter readings against utility bills for offices/facilities and validation of renewable energy consumption mix; (b) Water — review of water intake records at office level and traceability to municipal supply invoices and groundwater extraction permits, as applicable; (c) Safety — verification of Lost Time Injury Frequency Rate (LTIFR) calculations against office incident registers and HR records; and (d) Waste — reconciliation of hazardous and non-hazardous waste disposal records against Pollution Control Board returns and third-party disposal manifests, and review of applicable statutory authorisations and hazardous waste handling licences where applicable. The invoices, sale records and disposal records were assessed for the non-hazardous waste. LTIFR is calculated as: (Number of Lost Time Injuries x 1,000,000) / Total person-hours worked during the reporting period, consistent with the BRSR Core KPI definition of LTIFR per one million person-hours worked.
5. **Sampling Methodology**: TUVI applied a risk-based sampling methodology to select representative samples of ESG disclosures, considering materiality thresholds, risk of misstatement, data complexity, estimation uncertainty, nature and scale of operations, and geographical spread of facilities. Sample selection prioritized locations with significant operational impact and KPIs with higher inherent risk, including those relevant to BRSR Core indicators. A materiality threshold of 5%, determined for this engagement with reference to the inherent estimation risk in environmental KPIs, the materiality of BRSR Core indicators to stakeholder decision-making, and the reasonable assurance level required under ISAE 3000, was applied to the selected samples for the verification of sustainability disclosures as applicable. The determination and approval of this materiality threshold, together with the supporting rationale, the qualitative zero-tolerance criteria described below, and the engagement's sampling approach, were reviewed by TUVI's independent technical reviewer and are documented in the assurance technical review (TR) records maintained for this engagement. Sites were selected based on proportionate contribution to total reported values, with NCL Ltd, a comprehensive desk review of BRSR Core data using risk-based sampling procedures was performed, comprising review of source records and supporting documents (including utility bills, meter readings, HR registers, hazardous and non-hazardous waste manifests, and internal MIS reports), recalculation of reported quantitative figures, year-on-year analytical review against prior-period data, reconciliation against the consolidated BRSR Core reporting templates, and remote interactions with site-level data owners and process managers to resolve queries. The same materiality threshold (5%), risk-based sampling criteria, and substantive procedures applied to the onsite locations were applied to the desk-review sites, providing comparable evidence to support the reasonable assurance conclusion across all sites within the reporting boundary. In addition to the onsite-verified locations (Corporate Office – Exchange Plaza), the desk-based sample for office-level KPI verification comprised 2 other Offices selected on a risk basis from NCL's operating network and the supporting selection rationale are maintained in the assurance working papers. This limited physical sample size was considered appropriate because the substantial majority of BRSR Core KPIs — including energy, GHG, water, waste, and workforce data — are aggregated and reported through NCL's centralized data management systems and internal reports rather than maintained independently at each Office; accordingly, TUVI's substantive procedures focused on testing the design and operation of these centralized controls and on analytical review and recalculation of the aggregated Office-level data, supplemented by the two Office visits to corroborate source-level evidence.

   i. **Site Verification Coverage:** TUVI conducted onsite verification at the Corporate Office, complemented by a comprehensive desk review of BRSR Core data using risk-based sampling procedures across other locations within the boundary. The Corporate Office onsite verification covered all head-office-managed financial, HR, and governance KPIs for the full reporting entity.
6. **Reporting Framework Adherence:** Verified NCL's adherence to SEBI's BRSR guidelines, the BRSR Core – Framework for Assurance and ESG Disclosures for Value Chain (SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122), Industry Standards on Reporting of BRSR Core (SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177), and the SEBI Master Circular for compliance with the provisions of the SEBI (Listing Obligations and Disclosure Requirements)

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Regulations, 2015 by listed entities (Ref. No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 dated 30 January 2026). TUVI evaluated BRSR disclosures against the following reporting quality principles: Stakeholder Inclusiveness, Materiality, Responsiveness, Completeness, Neutrality, Relevance, Sustainability Context, Accuracy, Reliability, Comparability, Clarity, and Timeliness. MSME sourcing percentage was verified based on vendor UDYAM registration certificates provided by NCL; for vendors without a valid UDYAM registration, the corresponding purchase value was treated as non-MSME sourcing for calculation purposes. TUVI also reviewed NCL's Internal Committee (POSH) records, including the complaint register and case resolution documentation, to verify the reported POSH complaint figures.

This methodology enabled TUVI to provide a balanced and evidence-based assurance on the information disclosed, while maintaining alignment with ISAE 3000 (Revised) standards for non-financial assurance.

Evidence Reviewed: Evidence reviewed by TUVI in support of the nine BRSR Core attributes included, as applicable: utility bills and meter readings (energy and GHG); water intake records, municipal supply invoices and extraction permits (water); incident registers and HR records (LTIFR and safety); Internal Committee (POSH) case records; hazardous and non-hazardous waste manifests, authorised vendor take-back records, and Pollution Control Board returns (waste); vendor UDYAM registration certificates (MSME sourcing); ISMS incident registers (cybersecurity and customer data breaches); and reconciliation with NCL's audited financial statements for FY 2025-26 (PPP-adjusted denominators and Related Party Transactions). A detailed KPI-to-evidence mapping is maintained in the assurance working papers.

Opportunities for Improvement

The following are the opportunities for improvement reported to NCL. However, they are generally consistent with NCL management's objectives and programs. NCL has already identified the following topics, and the Assurance team endorses the same to achieve the sustainable goals of the organization.

i. **Strengthening Automated Environmental Data Management**

NSE Clearing Limited (NCL) may further enhance the reporting of its environmental performance by establishing an automated emissions accounting system to enable real-time tracking, monitoring, and consolidation of key environmental parameters across its operations.

Conflict of Interest

TUVI confirms its independence and the absence of any conflict of interest in relation to this assurance engagement, in accordance with ISAE 3000 (Revised), SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated 12 July 2023, and the Industry Standards on Reporting of BRSR Core (SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177 dated 20 December 2024).

TUVI's independence framework is grounded in the IESBA Code of Ethics, adopting a threats-and-safeguards approach to identify and manage risks, including self-interest, self-review, advocacy, familiarity, and intimidation. Organizational safeguards include segregation of responsibilities, independent technical review, documented conflict-of-interest controls, and a quality management system consistent with ISQM 1 and ISO 17029:2019.
During the reporting period, TUVI confirms that:

- No consulting, advisory, system design, data preparation, or implementation services related to ESG or BRSR were provided to NCL;
- TUVI was not involved in the preparation or drafting of BRSR Core disclosures, development of ESG strategy or targets, design or implementation of ESG data management systems, calculation of GHG emissions inventories, internal audit of ESG data, or consulting on materiality assessment; and
- No relationships, affiliations, or financial interests exist that could compromise the objectivity, independence, or impartiality of TUVI's findings, conclusions, or recommendations.

In the context of this engagement, TUVI solely provided verification and assurance services to NCL and did not provide any non-audit or non-assurance services and maintained professional impartiality towards all personnel interviewed throughout this engagement.

Rotation and Tenure Policy: In line with best practice and the Industry Standards on Reporting of BRSR Core for independence, TUVI maintains a documented engagement partner rotation policy. The lead assurance practitioner for this engagement has not exceeded the maximum tenure threshold prescribed under TUVI's internal quality and independence framework. TUVI confirms compliance with its engagement partner rotation policy. TUVI's independence and quality management procedures are reviewed periodically by the internal technical review function.

Our Conclusion

In our opinion, based on the scope of this assurance engagement, the disclosures on BRSR Core KPIs described in the Annual Report / BRSR, along with the referenced information, have been prepared, in all material respects, in accordance with the applicable BRSR Core criteria for the nine BRSR Core attributes and meet the applicable content and quality requirements of the SEBI BRSR Core framework.

The assurance conclusion wording set out below follows the standard unmodified reasonable assurance conclusion format prescribed under ISAE 3000 (Revised), paragraph 69, as adopted in TUVI's approved assurance reporting template.

Disclosures: TUVI is of the opinion that the reported disclosures meet, in all material respects, the BRSR requirements. NCL refers to general disclosures to report contextual information about NCL, while the Management & Process disclosures refer

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to the management approach for each indicator *(nine attributes as per Annexure I - Format of BRSR Core)*.

Reasonable Assurance: This engagement was performed as a reasonable assurance engagement in accordance with ISAE 3000 (Revised) and SEBI's reasonable assurance requirements. The scope, methodology, materiality, sampling approach, evidence documentation, and conflict-of-interest controls applied are described in the preceding sections of this statement.

BRSR complies with the below requirements

a) **Governance, leadership and oversight:** The governance disclosures in the Annual Report / BRSR were reviewed using a combination of independently verified evidence and management representations. Board meeting minutes and agenda records were made available and reviewed; based on this, sufficient appropriate evidence, an independent conclusion is expressed on Board-level governance oversight of ESG performance, BRSR Core KPIs, and sustainability objectives during FY 2025-26. Messages from top management, business model disclosures, risk management approach, and environmental priorities were reviewed for consistency against available internal governance frameworks and management representations provided to TUVI. The disclosures relating to inclusive growth, equitable development, and environmental protection are reported as represented by management and were not independently verified.

b) **Connectivity of information:** NCL discloses *nine attributes as per Annexure I - Format of BRSR Core* and their inter-relatedness and dependencies with factors that affect the organization's ability to create value over time.

c) **Stakeholder engagement:** Based on management representations, the Report covers mechanisms of communication with key stakeholders to identify major concerns and to derive and prioritize short, medium and long-term strategies. The disclosures on stakeholder relationships and the organization's responsiveness to stakeholder interests are reported as represented by management; independent validation of the stakeholder engagement process was not within the scope of this engagement.

d) **Materiality:** The material issues within the nine BRSR Core attributes and corresponding KPIs as per BRSR requirement are reported, based on management's materiality determination process and the representations provided to TUVI.

e) **Conciseness:** The Report reproduces the requisite information and communicates clear information in as few words as possible. The disclosures are expressed briefly and to-the-point sentences, graphs, pictorial, and tabular representations are applied. At the same time, due care is taken to maintain continuity of information flow in the BRSR.

f) **Reliability and completeness:** NCL has established internal data aggregation and evaluation systems to derive the performance. NCL confirms that all data provided to TUVI has been passed through Internal checks. Risk-based assurance procedures, including walkthroughs, document and data review, recalculation, and substantive testing on a sample basis as described in the Verification Methodology section, were performed over the BRSR Core data, providing sufficient appropriate evidence to support the reasonable assurance conclusion. All data is reported transparently and in a neutral tone and is, in all material respects, free from material misstatement.

g) **Consistency and comparability:** The information presented in the BRSR is on an annual basis and was found to be presented in a reliable and complete manner. Thus, the principle of consistency and comparability is established. **Year-on-Year Comparability:** TUVI reviewed the reported FY 2025-26 data in the context of prior-year (FY 2024-25) disclosures for the key BRSR Core KPIs (GHG emissions, energy consumption, water consumption, and safety indicators). No material inconsistencies in methodology, boundary, or reporting approach were identified that would impair comparability between the two reporting periods.

h) **Impact:** NCL communicates its ESG performance through regular, transparent internal and external reporting throughout the year, aligned with BRSR, as part of its policy framework that includes POSH, ESG, Code of Conduct Policy, and Whistleblower Policy. NCL reports on ESG performance to the Safety, Health and Environment (SHE) Committee and the Board of Directors, who oversee and monitors the implementation and performance of objectives, as well as progress against goals and targets for addressing ESG-related issues, and reports periodically to stakeholders on ESG progress. NCL has completed the process of establishing contemporary goals and targets against which performance will be monitored and disclosed periodically.

Quality control: The assurance team complies with quality management standards, ensuring that the engagement partner possesses requisite expertise and the assigned team collectively has the necessary competence to perform engagements in reference to standards and regulations. The assurance team follows the fundamental principles of integrity, objectivity, professional competence, due care, confidentiality and professional behavior. In accordance with the International Standard on Quality Management (ISQM 1), TUVI maintains a comprehensive system of quality management, including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. For this engagement, a mandatory independent technical and editorial quality review checklist was applied prior to the release of this assurance statement, covering technical accuracy of KPI verification, regulatory compliance with SEBI BRSR Core requirements, editorial consistency, and structural alignment with the approved reporting template.

Our Assurance Team and Independence

TUVI is an independent, neutral third-party providing sustainability assurance services with qualified environmental and social specialists. The assurance team comprises lead verifiers holding Sustainability auditor qualifications, ISO 14064 verification competencies, as well as confirmed competence in conducting ISAE 3000 (Revised) assurance engagements. Lead verifier(s) possess ISO 14064 verification qualifications, ESG assurance experience, and sector expertise. The team's

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collective credentials encompass environmental data verification, social performance assessment, and sustainability reporting assurance aligned with GRI Standards and IIRC Integrated Reporting frameworks. TUVI's independence, impartiality, and conflict-of-interest position with respect to this engagement are confirmed in the Conflict-of-Interest section of this statement.

For and on the behalf of TUV India Private Limited

Manojkumar Borekar
Product Head – Sustainability Assurance Service
TUV India Private Limited

Date: 04/08/2026
Place: Mumbai, India
Project Reference No: 8125164583