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**Independent Limited Assurance Statement to Havells India Limited on select Non-financial  
Sustainability Disclosures in the Business Responsibility and Sustainability Report for the Financial  
Year 2022-23**

To  
The Management of Havells India Limited,  
QRG Towers, 2D,  
Sector 126, Noida- Greater Noida Expressway Noida,  
Uttar Pradesh- 201304.

### **Introduction**

We ('KPMG Assurance and Consulting Services LLP', or 'KPMG') have been engaged by Havells India Limited ('HIL' or 'the Company') for the purpose of providing an independent limited assurance on the select non-financial sustainability disclosures presented in the Business Responsibility and Sustainability Report (BRSR) ('the Report') of the Company for the period covering 1st April 2022 to 31st March 2023 ('the Year' or 'the Reporting Period'). Our responsibility was to provide a limited assurance on the select non-financial sustainability-related data presented in the Report as described in the 'scope, boundary, and limitations' below.

### **Reporting Criteria**

The Company has referred to the following reporting criteria for developing the report:

- Principles of National Guidelines on Responsible Business Conduct as part of Business Responsibility and Sustainability Report (BRSR).

### **Assurance standards used**

We conducted the assurance in accordance with

- Limited Assurance requirements of International Federation of Accountants' (IFAC) 'International Standard on Assurance Engagement (ISAE) 3000 (revised) – Assurance Engagements Other than Audits or Reviews of Historical Financial Information'.
  - Under this standard, we have reviewed the information presented in the Report against the characteristics of relevance, completeness, reliability, neutrality, and understandability.
  - Limited assurance consists primarily of enquiries and analytical procedures. The procedures performed in a limited assurance engagement vary in nature and timing and are less in extent than for a reasonable assurance engagement.

### **Scope, Boundary and Limitations**

- The scope of assurance covers the select non-financial sustainability disclosures related to the BRSR with reference to GRI standards 2021 for the period of 01 April 2022 to 31 March 2023, as per the table below.
- The boundary of the report includes the data and information from HIL sites as mentioned in the Business Responsibility and Sustainability Report section – Reporting Boundary.
- Data review and validation for the following sites was performed through physical site visits:
  - Haridwar (Uttarakhand)
  - Neemrana (Rajasthan)
  - Alwar (Rajasthan)
  - Baddi (Himachal Pradesh)
  - Ghiloth, (Rajasthan)
  - Corporate Office, Noida (Uttar Pradesh)



- Following select non-financial disclosures in ‘the Report’ were subjected to assurance:

BRSR	GRI 2021
<b>Section A: General Disclosures</b>	<b>General disclosures 2021</b> <b>GRI 401: Employment 2016</b>
Section A 18 (a)* <sup>a</sup> , Section A 18(b), Section A 19, Section A 20	2-7 Employees 401-1 New employee hires and employee turnover
<b>Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains</b>	<b>GRI 401: Employment 2016</b> <b>GRI 403: Occupational Health and Safety 2018</b>
P3 E5, P3 E9, P3 E10, P3 E11* <sup>b</sup> , P3 E15	401-3 Parental Leave 403-1 Occupational health and safety management system 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships 403-9 Work-related injuries 404-3 Percentage of employees receiving regular performance and career development reviews
<b>Principle 5: Businesses should respect and promote human rights</b>	<b>GRI 406: Non-discrimination 2016</b> <b>GRI 408: Child Labor 2016</b> <b>GRI 409: Forced or Compulsory Labor 2016</b>
P5 E1, P5 E6* <sup>c</sup> , P5 E9* <sup>c</sup> ,	406-1 Incidents of discrimination and corrective actions taken 408-1 Operations and suppliers at significant risk for incidents of child labor 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor
<b>Principle 6: Businesses should respect and make efforts to protect and restore the environment</b>	<b>GRI 302: Energy 2016</b> <b>GRI 305: Emissions 2016</b> <b>GRI 306: Waste 2020</b>
P6 E1, P6 E6* <sup>d</sup> , P6 E8, P6 L4	302-1 Energy consumption within the organization 302-3 Energy intensity 305-1 Direct (Scope 1) GHG emissions 305-2 Energy indirect (Scope 2) GHG emissions 305-3 Other indirect (Scope 3) GHG emissions 305-4 GHG emissions intensity 306-1 Waste generation and significant waste-related impacts 306-2 Management of significant waste-related impacts 306-4 Waste diverted from disposal 306-5 Waste directed to disposal

\*<sup>a</sup> Only Permanent Employees and permanent workers data for FY 2022-23 is covered under assurance.

\*<sup>b</sup> Reported fatality case is not covered under assurance opinion.

\*<sup>c</sup> Only child labour, forced labour and discrimination at workplace are covered under assurance.

\*<sup>d</sup> Only tonne CO<sub>2</sub> emission values are reported and assured.

## Limitations

The assurance scope excludes following:

- Data related to Company’s financial performance.
- Data and information outside the defined Reporting Period
- Data outside the operations mentioned in the Assurance Boundary above unless and otherwise specifically mentioned in this statement.
- The Company’s statements that describe expression of opinion, belief, aspiration, expectation, aim to future intention provided by the Company and assertions related to Intellectual Property Rights and other competitive issues.



- Strategy and other related linkages expressed in the Report.
- Mapping of the Report with reporting frameworks other than those mentioned in reporting criteria above.
- Aspects of the Report other than those mentioned under the scope and boundary above.
- Review of legal compliances.

### Assurance Procedures

Our assurance process involves performing procedures to obtain evidence about the reliability of specified disclosures. The nature, timing and extent of procedures selected depend on our judgment, including the assessment of the risks of material misstatement of the selected sustainability disclosures whether due to fraud or error. In making those risk assessments, we have considered internal controls relevant to the preparation of the Report to design assurance procedures that are appropriate in the circumstances.

Our assurance procedures also included:

- Assessment of Havells India Limited's reporting procedures regarding their consistency and relevance with the application of the reference criteria.
- Evaluating the reliability and appropriateness of the quantification methods used to arrive at the select non-financial sustainability related data presented in the Report.
- Review of systems and procedures, from the perspective of completeness, used for quantification, collation, and analysis of select non-financial sustainability data included in the Report.
- Understanding the appropriateness of various assumptions, estimations and materiality thresholds used by the Company for data analysis.
- Discussions with the personnel at the corporate and business unit level responsible for the select non-financial sustainability data presented in the Report.
- Assessment of reliability and accuracy.

Appropriate documentary evidence were obtained from the relevant authority at respective sites and at corporate office to support our conclusions on the information and data reviewed.

### Conclusions

We have reviewed the select non-financial sustainability data in the Business Responsibility and Sustainability Report of Havells India Limited as mentioned in the scope above, for the reporting period from 01<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023.

**Limited Assurance:** Based on limited review and procedures performed, nothing has come to our attention that causes us not to believe that the sustainability data, as per the scope of assurance mentioned above, presented in the Report is appropriately stated in material aspects. The assurance engagement considered an uncertainty of  $\pm 5\%$  based on materiality threshold for estimation/measurement errors and omissions. We did not engage with any external stakeholders as part of this assurance engagement.

We have provided our observations to the Company in a separate management letter. These, do not, however, affect our conclusions regarding the Report. These do not however affect our conclusions regarding the Report.

### Independence

The assurance was conducted by a multidisciplinary team including professionals with suitable skills and experience in auditing environmental, social, and economic information in as per requirements of ISAE 3000 (Revised).

Our work was performed in compliance with the requirements of the IFAC Code of Ethics for Professional Accountants, which requires, among other requirements, that the members of the assurance team (practitioners) be independent of the assurance client, in relation to the scope of this assurance engagement, including not being involved in writing the Report. The Code also includes detailed requirements for practitioners regarding integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour. KPMG has systems and processes in place to monitor compliance with the Code and to prevent conflicts regarding independence. The firm applies ISQC-1, and the practitioner complies with the applicable independence and other ethical requirements of the IESBA code.



## **Responsibilities**

Havells India Limited is responsible for developing the Report contents. The Company is also responsible for identification of material sustainability topics, establishing and maintaining appropriate performance management and internal control systems and derivation of performance data reported. This statement is made solely to the Management of Havells India Limited in accordance with the terms of our engagement and as per scope of assurance. Our work has been undertaken so that we might state to the Company those matters for which we have been engaged to state in this statement and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company for our work, for this report, or for the conclusions expressed in this independent assurance statement. The assurance engagement assumes that the data and information provided to us is complete and true. We expressly disclaim any liability or co-responsibility for any decision a person or entity would make based on this assurance statement. Our report is released to Havells India Limited on the basis that it shall not be copied, referred to or disclosed, in whole or in part, without our prior written consent. By reading this assurance statement, stakeholders acknowledge and agree to the limitations and disclaimers mentioned above.

A handwritten signature in blue ink, appearing to read 'Apurba Mitra', with a horizontal line underneath.

### **Apurba Mitra**

Associate Partner

KPMG Assurance and Consulting Services LLP

Date: 27-06-2023