

BRR in process to become a fully loaded electronic form

- MCA recommends extended data and coverage
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Background

The concept of Business Responsibility Report (“BRR”) arose back in 2009. The Ministry of Corporate Affairs (“MCA”) in the year 2009 had issued the ‘*Voluntary Guidelines on Corporate Social Responsibility as a step towards mainstreaming the concept of business responsibility*’. However, after necessary consultation and extensive research, the said Guidelines were revised and the ‘*National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business, 2011*’. Currently, the provisions of BRR are applicable to top 1000 listed entities based on the market capitalization as on 31st March every year and does not include unlisted companies in its ambit.

MCA has recently come up with a Report of the Committee on the Business Responsibility Reporting¹ on 11th August, 2020. The Committee was formulated in November, 2018 and was headed by Mr. Gyaneshwar Kumar Singh, Joint Secretary, MCA. The Report is divided into 4 chapters and two versions of reporting formats with their guidance notes. Several recommendations have been made in the Report which includes the format of BRR (making it an electronic form, introducing additional contents and a *lite* version format), extending the applicability to certain unlisted companies in a phased manner, etc.

Further, the Committee has also recommended to modify the name of BRR to “Business Responsibility and Sustainability Reporting (BRSR)” to reflect the intent of wider responsibility of business houses towards economic and social sustainability.

While this Article covers the recommendations made by the Committee, there are several other articles written by our colleagues which includes detailed [FAQs](#) on BRR, an [article](#) covering the global study on BRR. Further, we also have a detailed presentation of various aspects under BRR can be accessed [here](#).

The Milestone of BRR

As mentioned the concept of BRR is not new. It had laid its stone in the year 2009 with ‘*Voluntary Guidelines on Corporate Social Responsibility as a step towards mainstreaming the concept of business responsibility*’. Two years after the extensive consultation, the ‘*National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business, 2011*’ (NVGs) were brought in in 2011. Thereafter in 2012, the SEBI has mandated the applicability of BRR to only top 100 listed entities. Gradually, the applicability of BRR was extended to top 500 listed entities in 2015-16 and then to top 1000 listed entities in 2019. Meanwhile in March 2019, the updated NVGs were released as ‘*Guidelines for Responsible Business Conduct*’ (NGRBCs).

A snapshot of the milestone is as below:

¹ http://www.mca.gov.in/Ministry/pdf/BRR_11082020.pdf

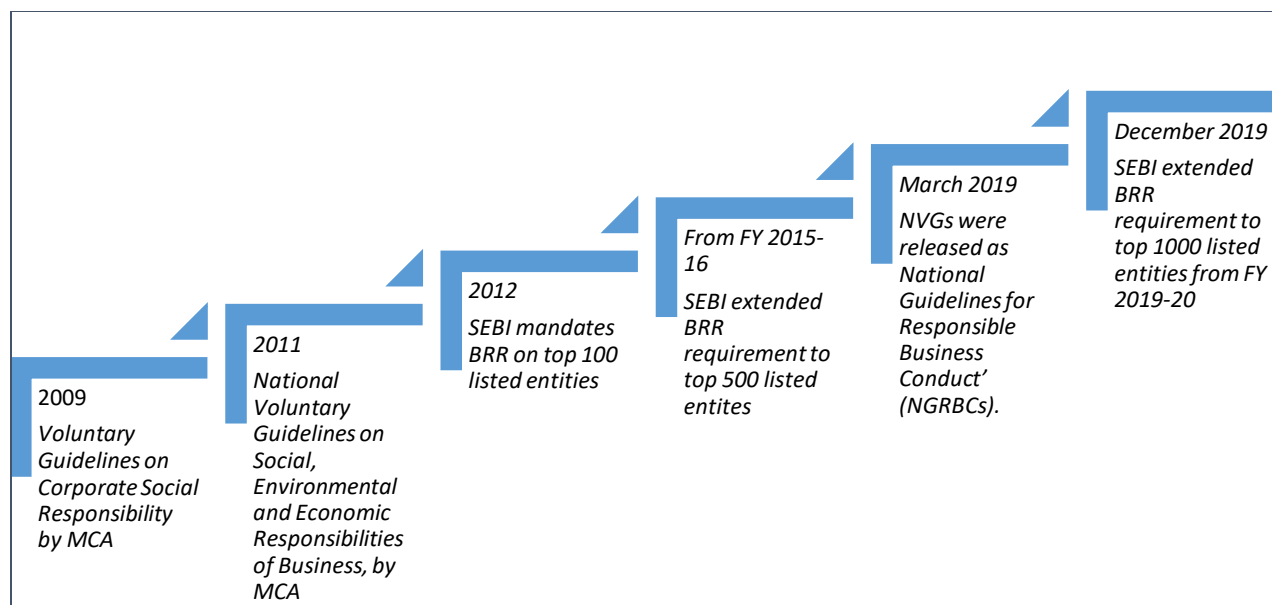


Figure: Snapshot of the milestone

BRR v/s BRSR

The extant provisions on BRR as mentioned is only for top business houses and is limited to reporting on certain no. of questions only. However, the wider scope of BRSR will gradually require all categories of business houses whether small or large, irrespective of its size or operations to report on their approach towards a business responsibility and sustainability. Further, while the extant provisions are pin-pointed and requires limited reporting only, the new format is much more comprehensive, descriptive and narrative and contains a whole lot of quantitative data. Since, the reporting in the new formats will contain numerous details, such report is expected to be handy for various agencies including banks, rating agencies and other financial institutions for data analytics and assessing the credibility of the business house. Also, it is expected to be used by Government and various other stakeholders in giving preference in procurement processes to such business houses that will demonstrate responsible business conduct.

Sl. No.	Basis	BRR	BRSR
1	Scope	Limited to Business Responsibility	Additional reporting on sustainability aspect
2	Applicability	Top 1000 listed entities based on market capitalization	Is expected to be applicable to all categories of company, even LLPs, irrespective of type, size etc. in 5-year

Sl. No.	Basis	BRR	BRSR
			phased timeline starting from 2021-22.
3	Format of reporting	One single format with 5 sections containing the general and principle-wise performance	Two separate formats-comprehensive and <i>Lite</i> version with 3 sections containing general and principle-wise performance
4	Type of data	Basic will lesser details	Several quantitative data based on turnover, operations also with plant/product-wise bifurcation.
5	Electronic or non-electronic based reporting	Non-electronic. Forms part of Annual Report	Electronic form linked to other filings made on MC21 Portal
6	Coverage	General non-financial disclosures and NGRBC principle-wise performance	General non-financial disclosures with NGRBC principle-wise performance bifurcated into two categories: Essential Indicators and Leadership Indicators
7	Utilisation of Report	Forms part of Annual Report of top 1000 listed entities	Several stakeholders (banks, rating houses, government, etc.) can use the data put in BRSR for the following: <ul style="list-style-type: none"> • assessing Business Responsibility-Sustainability Index and credibility of companies; • giving preference in procurement process to business houses showing responsible business conduct.

Key proposals or objective by/of the Committee

The Committee has suggested 2 Formats: one being comprehensive and the other as *Lite* version which majorly is formed with the following objective:

- To become a single source of non-financial/ sustainability information for companies reporting in India;
- Formats intended to serve all business stakeholders viz. investors, other businesses, consumers, governments, citizens, and other listed entities and individuals;
- Scope to extend to businesses, irrespective of size or ownership and not to be an obligation from the point of view of law only;
- Based on the level of preparedness of small-sized, informal or home-based companies, to perhaps begin the applicability on voluntary basis;
- Scope might cover Limited Liability Partnerships (LLPs) also;
- A set of quantitative variables for each NGRBC principle has been chosen and questions have been reframed and revised to make them self-explanatory without any scope of different interpretations;
- Introduction of a Guidance note in alignment with the terms of the Companies Act, 2013;
- To standardize and reduplicate reporting requirements, drafting of formats in an integrated manner with filings made on MCA21 Portal. Wherever possible, information to get auto/prefilled with the filings already made on MCA21 Portal.
- Listed entities meeting eligibility to continue reporting on both MCA21 Portal and Stock Exchanges whereas, for other companies, eligibility criteria to be based on a combination of paid-up capital and/or turnover for non-financial reporting requirements.
- Listed companies to start with reporting whereas unlisted companies to begin reporting in a phased manner. Smaller unlisted companies to begin reporting using BRSR *Lite* version for the time being.
- BRSR filing to be integrated with MCA21 filings preferably in XBRL formats.

Vision of the Committee

With several recommendations that the Committee has made, they have the following vision in their minds:

- Integration of BRSR Report with MCA21 Portal to be used in data analysis by leveraging of technology;
- Development of Business Responsibility-Sustainability Index to enable organisations including Central and State Governments to give preference in their procurement processes to business that demonstrate business conduct;
- Usage of non-financial/ sustainability disclosures by banks, credit rating agencies for assessing the credibility of companies;
- Giving time to companies for implementation and hence make this reporting effective from 2021-2022;

- Phased applicability in a 5 year time to include all companies;
- Translation of BRSR to local language to avoid being an esoteric activity only for certain specific departments within the organization;
- Going forward to develop sector specific BRSR Formats so that environmental and social performance can be accessed in depth.

Current Reporting on Business Responsibility

Currently, top 500 listed companies based on their market capitalization as on 31st March of the preceding financial year are required to include the reporting on BRR by virtue of clause (f) of Regulation 34(2) of the Listing Regulations. The format in this regard has already been specified by SEBI vide its circular dated 4th November, 2015.

Further, SEBI vide its notification dated 26th December, 2019 extended the applicability to top1000 listed companies which should ideally be taken into consideration for the FY 2020-2021 onwards.

Additional Contents in the format recommended by the Committee

Currently the format issued by SEBI had 5 sections containing detailed pointers for the corporates to fill in. These were the:

- Section A: General Information by the Company
- Section B: Financial Details of the Company
- Section C: Other Details
- Section D: BR Information
- Section E: Principle-Wise Performance

However, the new **comprehensive format** proposed by the Committee consist of major 3 sections which in addition to the existing disclosures contains several other disclosures as discussed below, namely:

- Section A- General Disclosures
 - *Aimed to capture basic information about the company such as size, location, products, no. of employees, CSR activities. Additionally, disclosures about company's operations in environmentally sensitive areas such as water-stressed zones etc.*
- Section B- Management and Process Disclosures
 - *Aimed to capture to disclose information on policies and processes relating to the NGRBC Principles concerning leadership, governance, and stakeholder engagement. Wherever relevant, companies have been asked to provide links to their websites where these policies are available.*
- Section C- Principle Wise Performance Disclosures

- *Aimed to seek disclosures under two heads: Essential and Leadership covering mandatory and voluntary actions and outcomes of companies towards each of the principles.*

The new format being recommended as an electronic format shall consist of areas where radio buttons will be provided for the company to either fill 'yes or no' or select from a drop down box or link with the annual return of the company.

Whereas the **BRSR Lite version** is designed in a way to make it easier for all companies to begin with sustainability reporting. This Format contains lesser details and fewer questions answers of which are expected to be available with all sorts of companies.

The table below consists of the additional contents of the format which are not required to be given currently.

Section	Additional Contents						Remarks																				
A	I Company details <ul style="list-style-type: none"> Certain additions under co details Year of incorporation Corporate address Telephone nos. Website Whether shares listed Authorized and paid up 						Has been split into 7 parts. Basically the contents of section A, B and C of the current format has been merged into Section A of the proposed format.																				
	II Product & Service details <ul style="list-style-type: none"> While it is mentioned that the same will be prefilled from e-form MGT-7, however ,it is not clear which specific fields will be pre-filled- all or any one of them <table border="1" data-bbox="413 794 1503 971"> <thead> <tr> <th>Sr.No</th> <th>Main Activity group code</th> <th>Description of Main Activity group</th> <th>Business Activity Code</th> <th>Description of Business Activity</th> <th>% of Turnover of the company</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>						Sr.No	Main Activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% of Turnover of the company															
	Sr.No	Main Activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% of Turnover of the company																					
<ul style="list-style-type: none"> Top 3 products/ services sold as per the turnover with the following details <table border="1" data-bbox="413 1109 1503 1352"> <thead> <tr> <th rowspan="2">Sr. No.</th> <th rowspan="2">Product / Service</th> <th rowspan="2">NIC Code</th> <th rowspan="2">% of total turnover contributed</th> <th colspan="4">Brand(s) associated with the product/service and % of total Turnover contributed by the Brand(s)</th> </tr> <tr> <th>Brand 1</th> <th>Contribution to % of total Turnover</th> <th>Brand 2</th> <th>Contribution to % of total Turnover</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>						Sr. No.	Product / Service	NIC Code	% of total turnover contributed	Brand(s) associated with the product/service and % of total Turnover contributed by the Brand(s)				Brand 1	Contribution to % of total Turnover	Brand 2	Contribution to % of total Turnover										
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<ul style="list-style-type: none"> Percentage of export contribution in total turnover 																											

Section	Additional Contents	Remarks																												
	<p>III Operations</p> <ul style="list-style-type: none"> • Details of number of plant/ office locations both nationally and internationally (now required to provide the details of all locations internationally) • Provide details of top 3 plants with certain specific details and affirmations <table border="1" data-bbox="415 440 1503 688"> <thead> <tr> <th>State</th> <th>State (1)</th> <th>State (2)</th> <th>State (3)</th> </tr> </thead> <tbody> <tr> <td>Turnover (%)</td> <td></td> <td></td> <td></td> </tr> <tr> <td>District</td> <td>Kolkata</td> <td>Kolkata</td> <td>Kolkata</td> </tr> <tr> <td>Category A</td> <td>Yes/ No</td> <td>Yes/ No</td> <td>Yes/ No</td> </tr> <tr> <td>Category B</td> <td>Yes/ No</td> <td>Yes/ No</td> <td>Yes/ No</td> </tr> <tr> <td>Category C</td> <td>Yes/ No</td> <td>Yes/ No</td> <td>Yes/ No</td> </tr> <tr> <td>Category D</td> <td>Yes/ No</td> <td>Yes/ No</td> <td>Yes/ No</td> </tr> </tbody> </table> <p>Categories denote whether the organization is in a high risk zone both nationally and internationally.</p> <ul style="list-style-type: none"> • Location of both top 3 national and international markets by way of contribution to turnover <p>IV Employee and workmen details</p> <ul style="list-style-type: none"> • Information required on the basis of classification by gender, time-basis, ability/ disability • Workmen details on the basis of gender, skill, time involvement, ability/disability • Female representation in the Board and management <p>V Holding/ Subsidiary/ Associate Details</p> <p>The report will now disclose in addition to subsidiaries, the details of holding, associate and joint venture entities as well. [details will get pre-filled from MGT-7]. Apart from the holding details, Company will also have to mention about participation of the said entities in taking BR initiatives.</p>	State	State (1)	State (2)	State (3)	Turnover (%)				District	Kolkata	Kolkata	Kolkata	Category A	Yes/ No	Yes/ No	Yes/ No	Category B	Yes/ No	Yes/ No	Yes/ No	Category C	Yes/ No	Yes/ No	Yes/ No	Category D	Yes/ No	Yes/ No	Yes/ No	
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Category C	Yes/ No	Yes/ No	Yes/ No																											
Category D	Yes/ No	Yes/ No	Yes/ No																											

Section	Additional Contents	Remarks
	<p>VI CSR Details (to be pre-filled from AOC-4, if applicable otherwise to be filled voluntarily)</p> <p>The details are similar to the CSR reporting made in the Board's report.</p> <p>VII Transparency and Disclosure compliance</p> <ul style="list-style-type: none"> • Category of stakeholder group from which the grievance is received and the complaint status • Top 3 company's high priority responsible business conduct issues and steps taken by the company to address them 	
B	<p>I Policy and management processes</p> <ul style="list-style-type: none"> • Translation of policies into procedure (to click on radio button) • Extension of enlisted policies to value chain partners (to click on radio button) <p>II Governance, leadership and oversight</p> <ul style="list-style-type: none"> • Details of the committee of Board for implementation of the policy such as: <ul style="list-style-type: none"> ○ No. of Directors ○ DIN No., Name, Designation ○ No. of Employees ○ Employee ID No., Name, Designation <p>(Some of these details will be auto-filled based on DIN Nos. and for the rest appropriate no. of fields have to be inserted)</p> <ul style="list-style-type: none"> • Bifurcated details of review of NGRBCs by the Company: <ul style="list-style-type: none"> ○ Performance against the policies and follow up action whether by board committee/ any other committee alongwith frequency 	<p>Comprises of information of Section D of existing Format mostly however, has this Section has become more prescriptive and detailed in comparison to a mere tick-box approach</p>

Section	Additional Contents	Remarks
	<ul style="list-style-type: none"> ○ Compliance with statutory requirements of relevance to principles and rectification of non-compliances whether by board committee/ any other committee alongwith frequency ● Frequency for both points- Quarterly/ Half-yearly/ Annually (to select from drop down list) <p>III Stakeholder Engagement</p> <ul style="list-style-type: none"> ● Description of the process of identification of stakeholder groups ● Mentioning of channels used for communication to stakeholders and for access by the stakeholders regarding features of policies, procedures, decisions or performance that impact them and details of outcome of its stakeholder engagement ○ Channels like SMS, Email, Newspaper, Pamphlets, Advertisement, Community Meetings, Notices, Website (choose from drop down list) <p>IV If answer to any question under the question 1 is 'No', then reasoning has to be stated:</p> <ul style="list-style-type: none"> ● Whether the company considers the Principles non-material for its business (to select yes/no) 	
C	<p>Principle wise performance with two indicators-</p> <ul style="list-style-type: none"> ● Essential Indicators- Expected from every business that has adopted these Guidelines ● Leadership Indicators- Expected from businesses which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible. 	Section C now comes with two major bifurcations – (i) Essential Indicators (ii) Leadership Indicators
Principle 1- Businesses should conduct and govern themselves with integrity in a manner that is Ethical, Transparent and Accountable		
	Essential Indicators	

Section	Additional Contents	Remarks
	<ul style="list-style-type: none"> • Details of number of training and awareness programmes for all segments and persons covered by such programmes for all or any of the principles. • Meetings and dialogues organised on responsible business conduct and sustainability with shareholders. • Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings with regulators/ law enforcement agencies imposed on your company by regulatory/ judicial institutions in the financial year and details of appeals made against such orders. • Number of complaints / cases of bribery/corruption received/ registered in the financial year. • Details of disclosure of interest involving members of Board. 	
	<p>II. Leadership Indicators</p> <ul style="list-style-type: none"> • Details of number of training and awareness programmes for value chain partners and % of persons covered by such programmes for all or any of the principles. • Details of non-disputed fines/penalties imposed on your company by regulatory and judicial bodies in the financial year been made available in public domain. <ul style="list-style-type: none"> ○ Provide web links/ details of places where such reports are available. ○ Instances (up to 3) where corrective actions have been taken on the above punishment/fines/penalties imposed ○ Details of such instances (up to 3) where corrective measures were taken on the complaints / cases of corruption and conflicts of interest ○ Details of business continuity and disaster management plan, if any. 	
Principle 2- Businesses should provide goods and services in a manner that is sustainable and safe		

Section	Additional Contents	Remarks
	<p data-bbox="409 232 695 261">I Essential Indicators</p> <ul style="list-style-type: none"> <li data-bbox="457 302 1507 363">• Life Cycle Assessments (LCA) for any or all of its top 3 brands/ products manufactured <ul style="list-style-type: none"> <li data-bbox="554 407 1507 469">○ NIC Code, Product/ Service and % of contribution to turnover (prefilled from respective field in Sec A) <li data-bbox="554 513 1507 607">○ Whether LCA conducted during current financial year, whether conducted by external independent agency and results communicated in public domain. <li data-bbox="457 651 1507 777">• Details of actions taken to mitigate the adverse environmental and social impacts in production and disposal as identified in the LCA or any other means of for 3 products or services whose design has incorporated social or environmental concerns and/or risks. <li data-bbox="457 821 1507 948">• Details of % of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the company, respectively. <li data-bbox="457 992 1507 1200">• % of input material (by value of all inputs) to total inputs sourced from suppliers <ul style="list-style-type: none"> <li data-bbox="554 1032 1507 1094">○ Will required details of adhering to national and international codes/ certifications/ labels <li data-bbox="554 1097 1163 1127">○ Adherence to internal standards / guidelines <li data-bbox="554 1130 1108 1159">○ Sourcing from MSEMs/ small producers <li data-bbox="554 1162 1436 1192">○ Sourcing directly from within the district and neighboring districts <li data-bbox="457 1235 1507 1362">• Description of the processes in place to safely collect, reuse, recycle and dispose after sale and at the end of life of your products was there in the current format , however, the same is now proposed to be given separately for (a) Plastics (including packaging) (b) E-waste and (c) other waste. 	

Section	Additional Contents	Remarks
	<p data-bbox="411 233 737 261">II Leadership Indicators</p> <ul data-bbox="459 302 1507 850" style="list-style-type: none"> <li data-bbox="459 302 1507 367">• Description of the improvements in environmental and social impacts of product and processes due to R&D and Capex Investments in specific technologies. <li data-bbox="459 407 1507 505">• Preferential procurement policy for giving preference to purchase from suppliers comprising marginal/vulnerable groups (details of such groups and % of total procurement). <li data-bbox="459 545 1507 610">• Impact of the products on various stakeholder groups and communications made in this behalf. <li data-bbox="459 651 1507 716">• Instances on how the feedback of the stakeholders have been used to improve the policies and practices. <li data-bbox="459 756 1507 850">• Details of quantities collected for reuse, recycling, safe disposal after sale, and at end of life of your products was already a part of the current format, however, the same is now separately required for plastic, e-waste and others. 	
<p data-bbox="226 927 1871 992">Principle 3 - Businesses should respect and promote the well-being of all employees, including those in their value chains</p>		
	<p data-bbox="411 1008 695 1036">I Essential Indicators</p> <ul data-bbox="459 1076 1507 1409" style="list-style-type: none"> <li data-bbox="459 1076 1507 1239">• Measures for the well-being of employees and workmen (including differently abled) <ul data-bbox="554 1146 1507 1239" style="list-style-type: none"> <li data-bbox="554 1146 1507 1239">○ Category of employees, % of employees covered, various benefits and plans like health insurance, accident insurance, maternity benefit, paternity benefits, day-care facilities. <li data-bbox="459 1247 1507 1312">• Statutory dues (PF, Gratuity, ESI) deducted and deposited with the authorities approved by government, for Current FY and Previous Financial Year. <li data-bbox="459 1352 1507 1409">• Mechanism available to receive and redress grievances for the following categories of employees and workmen. 	

Section	Additional Contents	Remarks
	<ul style="list-style-type: none"> • Type of complaints made by employees and workmen and % of plants/ offices that were assessed • Membership of employees and workmen in association(s) or Unions recognised by the Board • Details of employees and workmen in terms of minimum wages paid (incl differently abled) • Details of safety related incidents during the current Financial Year • Details of training to employees and workmen (incl differently abled) • (% to total no. of employees/workmen in different categories on health and safety and skill up gradation) • Measures taken by the company to ensure a safe and healthy work place. 	
	<p>II Leadership Indicators</p> <ul style="list-style-type: none"> • Measures undertaken by the company to ensure that statutory dues have been deducted and deposited by the value chain partners. • Corrective actions taken for children/adolescents identified as employed in your establishments and value chain. • Corrective actions taken for forced/involuntary labour identified in your establishments and value chain. • Actions taken to prevent adverse consequences to the complainant in discrimination and harassment cases. 	

Section	Additional Contents	Remarks
	<ul style="list-style-type: none"> • Corrective actions taken on the outcomes of health and safety audits of your establishments, including value chain partners • Accident-affected employees/workmen rehabilitated and placed in suitable employment. • Assessment of value chain partners for Sexual Harassment, Working Conditions, Health and Safety, Discrimination at workplace, Child labour, Forced/Involuntary labour, Wages and Others, enter the % of value chain partners by value of business done with such partners. 	
Principle 4 - Businesses should respect the interests of and be responsive to all its stakeholders		
	<p>I Essential Indicators</p> <ul style="list-style-type: none"> • List stakeholder groups identified as key for your company as described in Section B, and the frequency of engagement with each stakeholder group. 	
	<p>II Leadership Indicators</p> <ul style="list-style-type: none"> • Details of instances of engagement with vulnerable/marginalized stakeholder groups. • Details of 3 instances as to how the inputs received from stakeholders were incorporated into policies and activities of the company 	
Principle 5 - Businesses should respect and promote human rights		
	<p>I Essential Indicators</p> <ul style="list-style-type: none"> • Percentage of employees and workmen that have been provided training on human rights issues and policy(ies) of the company in the Financial Year (incl differently abled). • Details of remuneration/salary/wages (including differently abled). 	

Section	Additional Contents	Remarks
	<ul style="list-style-type: none"> • Whether there is a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? • The internal mechanisms to redress grievances related to human rights issues • Stakeholders groups covered by the grievance redressal mechanism for Human Rights issues • Details of Human Rights related grievances. • Do human rights requirements form part of your business agreements and contracts? <p>II Leadership Indicators</p> <ul style="list-style-type: none"> • Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints. • Details of the scope and coverage of any Human rights due-diligence conducted, including in the value chain. 	
Principle 6- Businesses should respect and make efforts to protect and restore the environment		
	<p>I Essential Indicators</p> <ul style="list-style-type: none"> • Details of strategies of the company with respect to resource scarcity, health pandemics, natural disaster • Details of projects related to Low Carbon Economy • Details of environmental impact assessments of projects undertaken by the company both for current FY and previous FY: 	

Section	Additional Contents	Remarks
	<ul style="list-style-type: none"> ○ To populate the fields if conducted ○ Whether conducted by independent external agency ○ Results communicated in public domain ○ Web link ● Details of the material environmental risks to the business identified and the mitigation measures adopted by the company with regard to the following: <ul style="list-style-type: none"> ○ Details of environment component: Land use, Emissions, Water, Energy, Biodiversity, Others ○ Risks identified against each component ○ Mitigation measures adopted against each component ● Details of energy and water consumption by the company for current FY and previous FY: <ul style="list-style-type: none"> ○ Parameters are turnover based ○ % of water consumed from recycled & harvested sources ○ % of water consumed from groundwater resources ● Details of air emissions and liquid discharges per unit of production for the 3 major facilities of the company for both current and previous FY <ul style="list-style-type: none"> ○ Details of actual measured value and permissible limit for each plant wise ● Details of solid waste generated that is recycled and sent to the landfill for both current and previous FY <ul style="list-style-type: none"> ○ In terms of metric tonnes - % recycled and % sent to landfill 	
	<p>II Leadership Indicators</p> <ul style="list-style-type: none"> ● Details of carbon emitted per unit of production and revenue/turnover for each major product manufactured by the company for both current and previous FY. ● Percentage of renewable energy consumed to total energy consumed. 	

Section	Additional Contents	Remarks
	<ul style="list-style-type: none"> • details of solid waste management relating to the non-biodegradable waste, recyclable waste, hazardous waste as to total waste. • Description of solid waste management practices adopted in company's establishments. • Description of the strategy adopted by the company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes. • Details of the innovative technologies, solutions and initiatives undertaken resulting in lower environment footprint adopted by the company. 	
Principle 7- Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent		
	<p>I Essential indicators</p> <ul style="list-style-type: none"> • Details of top 10 (instead of exiting 3) trade and industry chambers/ associations the company is a member of/are affiliated to, on the basis of no. of members • Details of adverse judicial or regulatory orders for anti-competitive conduct by the company in the current Financial Year. 	
	<p>II Leadership Indicators</p> <ul style="list-style-type: none"> • Details of public policy positions advocated by the company. • Details of corrective action for anti-competitive conduct by the company taken based on adverse orders from regulatory authorities. 	

Section	Additional Contents	Remarks
Principle 8- Businesses should promote inclusive growth and equitable development		
	<p data-bbox="409 272 695 300">I Essential Indicators</p> <ul data-bbox="457 342 1507 894" style="list-style-type: none"> <li data-bbox="457 342 1507 407">• Details of Social Impact Assessments (SIA) undertaken by the company for projects in the current Financial Year <li data-bbox="457 444 1507 509">• Information on project(s) for which ongoing Rehabilitation and Resettlement is being undertaken by your company <li data-bbox="457 547 1507 612">• Details of CSR projects undertaken by your company in designated aspirational districts as identified by government bodies <li data-bbox="457 649 1312 682">• Mechanisms to receive and redress grievances of the community <li data-bbox="457 719 1507 784">• Benefits derived of the various intellectual properties owned or acquired by your company based on traditional knowledge been shared equitably <li data-bbox="457 821 1507 886">• List of adverse orders and case details of intellectual property rights disputes related to traditional knowledge during the FY 	
	<p data-bbox="409 933 737 961">II Leadership Indicators</p> <ul data-bbox="457 998 1507 1360" style="list-style-type: none"> <li data-bbox="457 998 1507 1063">• Actions taken to mitigate any negative social impacts identified in the Social Impact Assessments. <li data-bbox="457 1117 1507 1182">• Details of benefits derived of the various intellectual properties owned or acquired by your company based on traditional knowledge shared. <li data-bbox="457 1219 1507 1284">• Corrective actions taken in intellectual property related cases wherein usage of traditional knowledge is involved. <li data-bbox="457 1321 871 1360">• Beneficiaries of CSR Projects. 	
Principle 9- Businesses should engage with and provide value to their consumers in a responsible manner		

Section	Additional Contents	Remarks
	<p>I Essential Indicators</p> <ul style="list-style-type: none"> • Description of the mechanisms in place to receive and respond to consumer complaints and feedback • % of products and services (by turnover) of the business carrying information about environment and social parameters relevant to the product , safe and responsible usage, recycling and safe disposal • Number of consumer complaints in respect of data privacy, advertisement, delivery of essential services, restrictive trade practices, unfair trade practices for both current and previous FY 	
	<p>II Leadership Indicators</p> <ul style="list-style-type: none"> • Channels / platforms where information on products and services of the company can be accessed (provide web link if applicable) • Steps taken to inform and educate consumers, especially vulnerable and marginalised consumers, about safe and responsible usage of products and services. • Corrective actions taken in respect of complaints received on data privacy, advertising, and delivery of essential services; • Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services. 	

Conclusion

The Committee's recommendation is a giant leap towards making the companies mull over their existing BRR as well as CSR models. Since the aim is to cover all companies under the reporting requirements in a phased manner, companies may either take this as an opportunity to showcase their best sustainable and responsible efforts already in place/ to be adopted to gain attention of various stakeholders or take this as a reporting burden.

Since there are two formats, normal and *Lite* versions, it is most likely that companies which are not covered under the existing reporting regime will be initially required to take up the *Lite* version and then be brought into the normal reporting format. It will be interesting to see the exact requirements that come in along with the applicability schedule

Our other resources on BRR can be referred at:

1. http://vinodkothari.com/wp-content/uploads/2020/04/note_on_annual_business_responsibility_report_will_this_make_companies_responsible.pdf
2. http://vinodkothari.com/wp-content/uploads/2017/03/FAQs_on_BRR-1.pdf
3. http://vinodkothari.com/wp-content/uploads/2017/03/Global_overview_of_BRR-1.pdf
4. http://vinodkothari.com/wp-content/uploads/2017/03/Presentation_on_BRR.pdf

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