The Institute of Chartered Accountants of India

(Set up by an Act of Parliament)

Sustainability Reporting Standards Board

SUSTAINABILITY REPORTING MATURITY MODEL

Manufacturing Sector-
SRMM® Version 3.1

Sustainability Reporting Maturity Model

(SRMM VERSION 3.1-Manufacturing Sector)

Issued by

Sustainability Reporting Standards Board

The Institute of Chartered Accountants of India

(Set up by an Act of Parliament)

New Delhi

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FOREWORD

In a dynamic business environment, sustainability has assumed strategic significance, shaping the manner in which entities conduct their operations, make decisions, manage risks and pursue long-term value creation. As expectations relating to sustainability continue to evolve, entities need to reinforce not only their disclosures but also the underlying systems and practices that drive effective sustainability performance and credible reporting.

Recognising this imperative, the Sustainability Reporting Standards Board (SRSB) of the Institute of Chartered Accountants of India (ICAI) has been actively engaged in advancing sustainability reporting in India. In furtherance of this objective, the Board developed the Sustainability Reporting Maturity Model (SRMM), a practical framework for self-assessment and continuous improvement designed to support entities in strengthening their sustainability practices and reporting capabilities.

To address the distinct sustainability priorities of different sectors, the Board reviewed and updated SRMM, leading to SRMM Version 3.1 for the Manufacturing Sector and SRMM Version 3.2 for the Service Sector. The present publication focuses on SRMM Version 3.1, formulated specifically for the Manufacturing Sector with due consideration to the Business Responsibility and Sustainability Reporting (BRSR) framework and relevant global sustainability reporting frameworks. The SRMM provides a structured mechanism for entities to evaluate their current level of sustainability maturity, identify gaps in existing practices and formulate a roadmap for systematic improvement.

For manufacturing entities, the Model encompasses key areas, including governance, environmental management, resource efficiency, energy and emissions, climate action, waste management, circular economy, responsible sourcing, employee well-being, stakeholder engagement and sustainable value creation. By integrating these critical dimensions, the Model enables entities to reinforce their systems and processes and progressively enhance the quality and effectiveness of their sustainability practices and reporting. The Model also incorporates an independent validation mechanism that enables Chartered Accountants to review and validate the maturity assessment undertaken by an entity, thereby instilling greater confidence in its outcomes and reinforcing its credibility among stakeholders.

I extend my appreciation to CA. Pramod Jain, Chairman, SRSB, CA. Sanjib Sanghi, Vice-Chairman, SRSB and all members of the Sustainability Reporting Standards Board of ICAI for their valuable contributions to this initiative.

I am confident that SRMM Version 3.1 will serve as a useful tool for entities in the Manufacturing Sector, enabling them to assess their sustainability maturity, identify areas for improvement and strengthen their sustainability reporting practices.

CA. Prasanna Kumar D
President, ICAI

PREFACE

The global business environment is changing, and sustainability is increasingly becoming an important part of business strategy rather than just a compliance requirement. Investors, regulators, customers, and other stakeholders expect entities to be transparent, accountable, and able to demonstrate meaningful progress in managing their environmental, social, and governance (ESG) impacts.

Recognising the growing importance of sustainability reporting, the Sustainability Reporting Standards Board (SRSB) of the Institute of Chartered Accountants of India (ICAI) has been working towards strengthening sustainability reporting practices in India. As part of these efforts, SRSB developed Sustainability Reporting Maturity Model (SRMM) to provide entities with a structured approach to assess the maturity of their sustainability reporting practices, identify areas for improvement, and progressively strengthen their reporting systems and processes.

With the sustainability reporting landscape continuing to evolve, there was a need to review and enhance the SRMM to reflect emerging reporting practices and sector-specific considerations. Accordingly, the Board has updated the model and developed **SRMM Version 3.1 for the Manufacturing Sector and SRMM Version 3.2 for the Service Sector**. This publication presents SRMM Version 3.1, specifically developed for entities in the Manufacturing Sector.

The development of SRMM Version 3.1 has considered the Business Responsibility and Sustainability Reporting (BRSR) framework along with relevant global sustainability reporting frameworks. This has helped incorporate current reporting practices and make the model more relevant to the changing sustainability reporting environment.

SRMM Model enables manufacturing entities to assess their sustainability practices across areas such as governance, environmental management, resource efficiency, climate action, employee welfare, responsible sourcing, circular economy, stakeholder engagement, and sustainable value creation.

This model is designed as a Self-Assessment tool enabling entities to independently assess its sustainability reporting practices and determines their maturity level. It helps organisations identify gaps in their existing practices, strengthen systems and processes, and develop a roadmap for improving their sustainability maturity.

The model also includes an independent validation mechanism by Chartered Accountants, providing additional confidence in the maturity assessment and enhancing its credibility among stakeholders.

We place on record our sincere appreciation to all the contributors, **CA. Lakshmi Narayanan S (Convenor), Mr. Ashish Gupta, Mr. Naimish Upadhyay, CA. Vikash Kumar Sharda**, for their valuable insights and contributions towards the development of this publication.

We also thank CA. Hari Wadhwa, Secretary, SRSB, Ms. Vipula Pandita, Sustainability Professional, SRSB and the dedicated SRSB team for their efforts in finalising this publication.

We trust that **SRMM Version 3.1** will serve as a useful tool for manufacturing organisations in assessing their current sustainability reporting practices, identifying areas for improvement, and progressing towards more effective and credible sustainability reporting and responsible business practices.

CA. Pramod Jain	**CA. Sanjib Sanghi**
Chairman	Vice Chairman
SRSB	SRSB

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CHAPTER 1
INTRODUCTION

1.1 Evolution of Sustainability Reporting in India:

Sustainability reporting has evolved from a voluntary communication tool to an integral component of corporate governance and accountability. Investors, regulators, customers, lenders and other stakeholders increasingly expect entities to disclose reliable, transparent and decision useful information on their environmental, social and governance (ESG) performance, risks, opportunities and long-term value creation. Consequently, sustainability reporting has gained significant prominence globally, supported by the development of internationally recognised reporting frameworks and standards that promote consistency, comparability and credibility of sustainability information.

In India, the evolution of sustainability reporting has been shaped by both policy initiatives and regulatory developments. The Ministry of Corporate Affairs (MCA) issued the **National Voluntary Guidelines (NVGs)** on Social, Environmental and Economic Responsibilities of Business in 2011, introducing nine principles to encourage responsible business conduct. To facilitate disclosures against these principles, the Securities and Exchange Board of India (SEBI) introduced the Business Responsibility Report (BRR) for specified listed entities. Subsequently, the MCA revised the NVGs and issued the **National Guidelines on Responsible Business Conduct (NGRBC)** in 2019, reaffirming the nine principles while strengthening expectations around responsible business conduct and sustainable value creation across the value chain.

Building on the NGRBC, SEBI introduced the **Business Responsibility and Sustainability Reporting (BRSR)** as the principal sustainability reporting framework for listed entities. BRSR replaced the BRR and significantly expanded the scope and depth of sustainability disclosures through quantitative and qualitative reporting on environmental, social and governance matters. To further enhance the reliability of key sustainability information, SEBI subsequently introduced BRSR Core, comprising a focused set of material ESG disclosures supported by a phased assessment and assurance requirement. At present, BRSR is applicable to the top 1,000 listed entities by market capitalisation. The assurance requirement for BRSR Core is being implemented in phases and is currently applicable to the top 150 listed entities, with phased expansion to cover the top 1,000 listed entities by FY 2026–27.

While BRSR represents the regulatory reporting framework for specified listed entities in India, entities across sectors increasingly prepare sustainability reports using a combination of national and internationally recognised reporting frameworks and standards, including the Global Reporting Initiative (GRI) Standards, IFRS Sustainability Disclosure Standards issued by the International Sustainability Standards Board (ISSB) and SASB Standards, depending on their reporting objectives and stakeholder expectations.

1.2 Overview of Scope 1, Scope 2 and Scope 3 Emissions:

Climate change has emerged as one of the most significant sustainability challenges globally. This has increased the importance of measuring, managing and reporting greenhouse gas (GHG) emissions as an integral component of sustainability reporting. Transparent reporting of GHG emissions enables entities to assess their climate-related impacts, establish emission reduction targets, monitor progress and communicate performance to stakeholders.

The **Greenhouse Gas (GHG) Protocol**, developed by the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD), is the most widely recognised global framework for accounting and reporting greenhouse gas emissions. It provides standardised methodologies for quantifying emissions and forms the basis for several sustainability reporting frameworks and regulatory disclosure requirements across jurisdictions.

Under the GHG Protocol, greenhouse gas emissions are categorised into three scopes:

- **Scope 1 – Direct Emissions:** Greenhouse gas emissions from sources that are owned or controlled by the entity, such as emissions from fuel combustion in boilers, furnaces, company-owned vehicles and industrial processes.

- **Scope 2 – Indirect Energy Emissions:** Indirect greenhouse gas emissions resulting from the generation of purchased or acquired electricity, steam, heating or cooling consumed by the entity.
- **Scope 3 – Other Indirect Emissions:** All other indirect greenhouse gas emissions occurring across the entity's value chain, both upstream and downstream. These may include emissions from purchased goods and services, transportation and distribution, business travel, employee commuting, waste generated in operations, use of sold products and end-of-life treatment of products.

The comprehensive measurement and reporting of Scope 1, Scope 2 and Scope 3 emissions enable entities to better understand their carbon footprint, identify opportunities for emissions reduction and support informed decision-making. As sustainability reporting continues to evolve, entities are increasingly expected to establish robust systems for collecting, managing and reporting greenhouse gas emissions data in a transparent and consistent manner.

1.3 The Need for a Sustainability Reporting Maturity Model

As sustainability reporting practices continue to mature, organisations are expected to move beyond disclosure and demonstrate meaningful integration of sustainability into their governance, strategy, operations, and risk management processes. This growing expectation highlights the need for a structured framework that enables entities to assess the maturity of their sustainability practices, benchmark their performance against defined criteria, and identify areas for continuous enhancement. Such an approach supports organisations in strengthening both their sustainability performance and the quality of their disclosures.

Recognising this need, the Sustainability Reporting Standards Board (SRSB) of the Institute of Chartered Accountants of India (ICAI) developed the Sustainability Reporting Maturity Model (SRMM), initially issued as v1.0 and subsequently updated to the present Version 3.1. The Sustainability Reporting Maturity Model (SRMM) is a registered trademark of the Institute of Chartered Accountants of India (ICAI). The model provides a structured approach to assess the maturity of sustainability reporting and related entity practices across key environmental, social, and governance areas.

The SRMM is designed to help entities:

- understand their current level of sustainability reporting maturity,
- identify gaps and improvement areas,
- strengthen internal sustainability processes and governance,
- improve transparency and stakeholder confidence, and
- progressively align with evolving sustainability expectations and practices.

The model recognises that entities may be at different stages of their sustainability journey and encourages continuous improvement over time.

To improve sectoral relevance, separate versions of the model have been developed for the manufacturing and the service sector. The model evaluates sustainability-related disclosures, governance mechanisms, operational practices, and performance indicators through a structured scoring methodology covering multiple aspects of ESG performance.

1.4 Structure and Scope of SRMM Version 3.1

SRMM Version 3.1 has been designed specifically for the manufacturing sector, recognising that these businesses typically operate with a larger environmental footprint, a greater dependence on natural resources, and distinct challenges around supply chain sustainability, energy efficiency, and waste management. Manufacturing sector excludes service sector (to which SRMM v 3.2 applies) but includes activities such as extraction, processing, mining and similar activities. The model evaluates sustainability performance and reports maturity across three sections:

- **Section A – General Disclosures and Management Procedures** (40 points): Covers corporate identity, governance structures for sustainability, risk management, and stakeholder accountability.
- **Section B – Sustainability Reporting and Performance Assessment** (200 points): Evaluates quantitative and qualitative performance across ethics, workforce wellbeing, environmental impact, human rights, consumer responsibility, and community engagement.

- **Section C – Sustainability Leadership and Strategic Initiatives** (60 points): Assesses strategic depth including climate risk and opportunity management, science-based targets (SBTi), participation in India's Carbon Credit Trading Scheme (CCTS) and the Green Credit Programme, circular economy adoption, supply chain ESG, green finance, and SDG alignment.

Entities should use SRMM Version 3.1 to self-evaluate their current maturity level, identify priority areas for improvement, and develop a roadmap to advance to higher levels of sustainability reporting over successive financial years. The model focuses not only on whether disclosures are made, but also on how meaningful, detailed, reliable, and consistent those disclosures are over time.

To further enhance the credibility and reliability of the SRMM self-assessment process, SRMM Version 3.1 provides for an optional independent validation by a Chartered Accountant (CA) in Practice (Refer Chapter 2 for eligible Chartered Accountant's). Any entity that has completed the SRMM self-assessment may voluntarily engage a Chartered Accountant in Practice to validate the maturity scores assigned under the Model.

The validation shall be carried out based on the sustainability-related disclosures, information, records, and supporting documents made available by the entity for the relevant reporting period. The Chartered Accountant conducting the validation shall maintain independence and objectivity throughout the engagement and shall provide an appropriate declaration of independence as part of the assessment documentation.

Upon satisfactory completion of the validation procedures, the Chartered Accountant in Practice should issue an SRMM Validation Certificate indicating that the entity's self-assessment has been independently validated and specifying the maturity level determined based on the validation performed under the Model. Such validation enhances the credibility of the self-assessed maturity scores and provides greater confidence to stakeholders regarding the entity's sustainability reporting and governance practices.

The four maturity levels defined under SRMM Version 3.1 are as follows:

Maturity Level[1]	Score Range	Description
Level 1 – Formative	>30% to ≤50%	Minimal sustainability disclosures; compliance-driven; no formal ESG governance or targets.
Level 2 – Developing	>50% to ≤65%	Essential reporting norms met; policies established; limited quantitative tracking; no external assurance.
Level 3 – Emerging	>65% to ≤80%	Quantitative ESG metrics tracked; stakeholder engagement formalised; external assurance initiated; partial strategic integration.
Level 4 – Established	>80% to 100%	Comprehensive disclosures; science-based targets; value chain coverage.

[1] An entity shall be assigned a Sustainability Reporting Maturity Level only if it achieves a minimum score of 30% in each section. Entities failing to meet this criterion shall be classified as "Below Level 1 – Not Rated".

CHAPTER 2

ROLE OF CHARTERED ACCOUNTANTS

This section sets out the eligibility criteria, professional obligations, scope of work, evidence requirements, scoring methodology, and certification process applicable to Chartered Accountants undertaking independent validation of SRMM assessments.

1. Qualification Requirement (Eligible CA)

- Only Chartered Accountants who have successfully passed the certificate course on Sustainability and BRSR (or any successor course/certificate notified by Sustainability Reporting Standards Board, ICAI) conducted by ICAI shall be eligible to undertake SRMM assessments.
- Chartered Accountant must be a member of ICAI, holding a valid Certificate of Practice.

2. Continuing Professional Education (CPE) Requirements

- Eligible Chartered Accountants should fulfil the annual CPE requirements to continue their eligibility, including a minimum of 10 hours of Structured/Unstructured CPE annually related to sustainability.

3. Scope of the Independent Validation

The SRMM assessment is undertaken by the entity as a self-assessment under the model. Where an entity opts for independent validation, the Chartered Accountant's role is to validate the maturity scores assigned by the entity based on an evaluation of the sustainability disclosures, supporting records, and other relevant evidence against the requirements of the SRMM.

The validation is subject to the following:

- The validation is based on the disclosures, supporting documents, explanations, and evidence provided by the entity's management.
- The validation does not constitute a financial audit, nor does it provide assurance or a guarantee regarding the entity's future sustainability or ESG performance.
- Where the entity has obtained independent external assurance on its BRSR or sustainability report, the Chartered Accountant may consider such assurance as part of the evidence base, subject to professional judgement.

4. Responsibilities of Management

The management of the entity is primarily responsible for the completeness, accuracy, and authenticity of the information, records, and supporting documentation submitted for the SRMM self-assessment and, where applicable, its independent validation. Specifically, the management shall be responsible for:

- Providing complete, accurate, and consistent information across all SRMM parameters.
- Maintaining adequate supporting records, data, and documentation to substantiate all disclosures.
- Providing the Chartered Accountant with access to relevant documents, policies and internal records.
- Ensuring that no material information relevant to the SRMM assessment has been withheld or misrepresented.

5. Responsibilities of the Chartered Accountants

The Chartered Accountant undertaking the independent validation of the SRMM self-assessment is expected to exercise the highest standards of professional competence, objectivity, and integrity. The Chartered Accountant's responsibilities include:

5.1 Professional Conduct

- Exercise professional judgement, objectivity, and independence throughout the independent validation process.
- Apply the SRMM scoring criteria consistently and without bias across all parameters.
- Document the rationale for scoring wherever professional judgement is applied, particularly for partial disclosures, qualitative assessments, or Not Applicable treatments.
- Maintain strict confidentiality of all entity information obtained during the engagement.

5.2 Verification of Evidence

- Verify underlying supporting documents, records, policies, certifications, management representations, and publicly available disclosures before assigning scores.
- Do not rely solely on management assertions; independently cross-verify disclosures against supporting evidence wherever possible.
- Flag material discrepancies or inconsistencies in disclosures and document them in the working papers.

6. Evidence Documentation

6.1 Sources of Information

The Chartered Accountant should verify SRMM parameters primarily using the following sources. All information should be drawn from the entity's official disclosures and records:

- Annual Report and Directors' Report
- Business Responsibility and Sustainability Report (BRSR)
- Standalone ESG / Sustainability Report
- Board-approved sustainability, ESG, and related policies (available on company website or as annexures)
- Audited financial statements and statutory filings (MGT-7, Form AOC-4, etc.)

- Third-party assurance statements and external audit reports on sustainability data
- Internal MIS reports, HR records, utility bills, certifications, and compliance filings
- Board and committee meeting minutes relevant to ESG oversight
- Invoices, vendor agreements, and supply chain documentation

6.2 Working Papers

A Chartered Accountant must maintain comprehensive assessment working papers as required by Guidance Note on Reports or Certificates for Special Purpose (Revised 2016) and Code of Ethics issued by ICAI.

7. Scoring Methodology and Guidance

7.1 General Principles

- Scores must be assigned strictly in accordance with the criteria specified in the SRMM for each parameter.
- Where management uses estimates or assumptions in sustainability data, the Chartered Accountant should assess their reasonableness and document findings.

7.2 Partial Disclosures

- Where an entity has partially disclosed information on a parameter, the Chartered Accountant should assign the score corresponding to the level of disclosure evidenced, as per the scoring criteria.
- Partial credit should not be awarded beyond the level supported by available evidence.
- The Chartered Accountant must document what evidence was available and what was absent.

7.3 Proportionality Note

- For mid-sized or unlisted manufacturing entities, where external validation (e.g., third-party LCA, EIA public disclosure, SBTi validation) is not reasonably available due to cost or scale constraints, the Chartered Accountant may accept credible internal or self-declared evidence for partial credit, provided this is clearly recorded as a limitation and does not attract the top scoring tier reserved for externally validated disclosures.

7.4 Not Applicable Parameters

- A parameter may be treated as Not Applicable (NA) only where the Chartered Accountant is satisfied, based on evidence and the entity's nature of operations, that the parameter is genuinely inapplicable.
- Where a parameter is treated as NA, it shall be excluded from the denominator for computing the maturity score, and the score will be recalculated on the adjusted total.

8. Use of Experts

Chartered Accountant may, where necessary, rely on the work of external domain experts to assess certain technical parameters under the SRMM. This may include areas such as:

- Environmental engineering and pollution control assessments
- Energy audits and renewable energy certifications
- Carbon accounting and GHG emission verification
- Biodiversity and natural capital assessments
- Occupational health and safety audits
- Lifecycle assessments (LCA) and service footprint evaluations

Where the Chartered Accountant relies on the work of such an expert, the Chartered Accountant should assess the expert's competence, objectivity, and the relevance of their findings to the SRMM parameter being evaluated but is not required to re-perform or validate the expert's underlying technical work. The basis for reliance, and the extent to which the expert's findings were relied upon, should be documented in the working papers.

9. Certification by the Chartered Accountant

Upon satisfactory completion of the assessment, the Chartered Accountant should issue the SRMM Assessment Validation Certificate, after ensuring:

- The Chartered Accountant has independently validated the entity's self-assessed SRMM maturity score based on the information, records, explanations, and supporting evidence made available by the management, in accordance with the SRMM framework.
- The Chartered Accountant is satisfied that no material misstatement, omission, or misrepresentation exists in the disclosures reviewed.
- Compliance of Guidance Note on Reports or Certificates for Special Purpose (Revised 2016) issued by ICAI.

The SRMM Assessment Certificate must disclose:

- Name and membership number of the issuing Chartered Accountant
- Name of the entity assessed
- Reporting period covered
- Section-wise scores (A, B, C) and total maturity scores out of 300
- Maturity level achieved
- Qualifications, limitations, or observations, if any
- Date of issue
- Unique Document Identification Number (UDIN)

An illustrative SRMM Validation Certificate template is provided as Annexure I.

10. Publication of Maturity Scores

Entities assessed under the SRMM framework by an eligible Chartered Accountant may have their maturity scores displayed on the official ICAI website (www.icai.org), subject to the following:

- The entity must provide written consent for publication of the score.
- Entities achieving a maturity score under the SRMM may display the ICAI certification in their sustainability report, annual report, and official website.
- The entity may disclose its Sustainability Reporting Maturity Model (SRMM) score in the Annual Report, including within the Notes to the Consolidated Financial Statements, to provide stakeholders with an

understanding of the entity's sustainability reporting maturity, governance practices, and ongoing improvement initiatives.

- ICAI may withhold or withdraw a published score in the event of a quality review finding, a material restatement by the entity, or a disciplinary proceeding against the Chartered Accountant.

11. Reassessment of Maturity Level

- Entities should undergo annual reassessment to evaluate their reassessed maturity levels.

12. Limitations of the SRMM Validation

Users and stakeholders of the SRMM Validation Certificate should note the following inherent limitations:

- The validation is based on information made available by management and may involve the use of estimates and assumptions.
- The SRMM maturity score does not guarantee future ESG performance or compliance.
- The validation is not equivalent to a financial audit.
- The Chartered Accountant shall not be responsible for the technical accuracy of engineering studies, scientific measurements, environmental testing, carbon calculations, or other specialised reports prepared by competent professionals, except to the extent relied upon during the SRMM assessment.

13. Legal and Standards Framework[2]

Chartered Accountant issuing SRMM Assessment certificates must apply the following layered framework:

- SSAE 3000[3] (SRSB, ICAI, January 2023) – The primary Indian standard for assurance engagements on sustainability information. It is

[2] All standards, regulations, circulars, and guidance documents referred to in this document shall be read as amended, updated, or superseded from time to time, unless otherwise specified.

[3] SSAE 3000 to be read as reference to any successor standard once notified.

mandatory for assurance reports on sustainability information for reporting periods ending on or after 31 March 2024.

- Handbook on Certificates by Chartered Accountants (October 2025) (Centre for Audit Quality, ICAI) – Most recent operational guidance with checklists, illustrative formats, and procedures.
- SEBI BRSR Core Assurance Circular (SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated 12 July 2023, as amended) – mandates reasonable assurance on BRSR Core for the top 150 listed entities by market capitalisation from FY 2023-24, phased to the top 1,000 by FY 2026-27, along with value-chain BRSR disclosures for the top 250 entities; Chartered Accountant's should assess where SRMM validation overlaps with or supplements this statutory BRSR assurance.

14. Additional Guidance for Chartered Accountants

14.1 Professional Scepticism

The Chartered Accountant should exercise professional judgement and remain alert to information that may indicate the entity's self-assessment is incomplete, inconsistent, or unsupported by the available evidence. Where management representations are inconsistent with the supporting evidence, appropriate clarification should be obtained before finalising the validation.

14.2 Materiality Considerations

The Chartered Accountant should apply professional judgement when evaluating disclosures, considering the entity's size, sector, and the significance of the parameter. Minor errors that do not materially impact the evaluation need not affect the score.

14.3 Sampling methodology

Where it is not practical to review all records, the Chartered Accountant may review a representative sample. The basis of sampling and any significant observations should be documented and considered while validating self-assessment.

14.4 Reliance on management representations

Where sufficient supporting evidence is not available, the Chartered Accountant may rely on management representations, provided such reliance is reasonable and supported by other available evidence wherever possible. The reliance placed on management representations should be documented.

15. Step-by-Step Protocol

Step	Stage	Actions Required
Step 1	**Eligibility**	Chartered Accountant in practice, with competence in sustainability related assurance engagements and SRMM / SEBI BRSR subject matter, and who is independent of the entity.
Step 2	**Engagement Letter**	Issue a formal Engagement Letter covering scope, applicable standards (SSAE 3000, GN 2016), level of assurance (limited), fees, management responsibilities, and reporting restrictions. Do not proceed without a signed letter.
Step 3	**Planning**	Obtain the SRMM Version 3.1 self-assessment workbook. Identify high-risk scoring areas (qualitative scores, leadership indicators with limited documentation). Plan procedures scaled to risk.
Step 4	**Obtaining Self Evaluation**	Obtain the Self Evaluation of the maturity model done by the company duly certified by the authorised person of the company.
Step 5	**Management Representation Letter**	Obtain a signed Management Representation Letter confirming completeness of information, no material misstatement, and acknowledgement of engagement boundaries.
Step	**UDIN**	Generate UDIN on udin.icai.org before or at signing. UDIN is mandatory for all Chartered

6		Accountant certificates. The certificate is not valid without it.
Step 7	**QC Review**	Subject the draft certificate to quality control review (engagement partner / QC reviewer) before issuance. Retain working paper file for minimum 7 years (SQC 1).
Step 8	**Issuance**	Issue addressed to the Board of Directors only. If the Company wishes to include it in the Annual Report, ensure verbatim reproduction without alteration.

16. Illustrative Pre-Issuance Compliance Checklist

Complete all items before signing the certificate. Retain this checklist in the working paper file.

#	Checklist Item	Done ✓
1	Engagement Letter signed by authorised signatory of the Company	[ ]
2	Independence confirmed – no financial or other interest that impairs objectivity	[ ]
3	Subject-matter competence verified (own or external expert engaged in writing)	[ ]
4	SRMM Version 3.1 self-assessment workbook obtained from the Company	[ ]
5	Scoring parameters of SRMM Version 3.1 (Sections A, B, C) reviewed in full	[ ]
6	Scores reconciled to underlying documentation for each section	[ ]
7	Analytical procedures and management inquiries performed and documented	[ ]

8	Duly certified Self Evaluation of SRMM Version 3.1 obtained from the company	[ ]
9	Working paper file prepared and complete	[ ]
10	Management Representation Letter obtained and signed	[ ]
11	Quality control review completed (engagement partner / QC reviewer sign-off)	[ ]
12	UDIN generated on ICAI portal before signing	[ ]
13	Key Observations / Qualifications finalised and agreed with client	[ ]
14	Certificate reviewed for accuracy of all placeholders, dates, and firm details	[ ]
15	Final certificate signed, dated, and UDIN affixed	[ ]
16	Copy retained in firm's records for minimum 7 years	[ ]

Chapter 3

SRMM VERSION 3.1 – SCORING FRAMEWORK

The quantitative thresholds prescribed under this scoring framework have been developed through a combination of industry benchmarking, applicable regulatory expectations, consultation with subject-matter experts, and alignment with internationally recognised sustainability practices and frameworks (including GRI, TCFD, ISSB, and BRSR). The thresholds are intended to serve as indicative benchmarks for evaluating the maturity of sustainability practices and may be reviewed and updated periodically in line with evolving regulations, industry developments, and emerging best practices.

SECTION A: GENERAL DISCLOSURES AND MANAGEMENT PROCEDURES				
Sr. No.	**Parameters**	**Scoring Criteria**	**Max Score**	**Score Obtained**
A1	Does the company disclose general information such as CIN, registered office address, financial year, sectors of operation as per NIC code, listed/unlisted status, Paid-up capital, Reporting boundary and number of operational locations?	*3 for complete disclosure of all applicable details; 2 for partial disclosure; 0 for insufficient or no information available.*	**3**	
A2	Whether the entity has a specified Board, Committee, Directors, or designated officials	*2 for entity has a specified Board, Committee, Directors, or designated officials and discloses their*	**2**	

	responsible for decision-making on sustainability-related matters?	*composition and/or clear allocation of responsibilities; 1 for sustainability governance structure exists and is disclosed without clear composition details or responsibility allocation; 0 for no disclosure on sustainability-related governance responsibility*		
A3	Does the entity identify and disclose the highest authority responsible for oversight and implementation of the sustainability policy?	*1 for the entity clearly identifies and discloses the highest authority responsible for oversight and implementation of the sustainability policy (e.g., Board, Committee, or designated senior leadership role); 0 for no disclosure or incomplete disclosure on the authority responsible for sustainability oversight and implementation*	**1**	
A4	How frequently are the ESG policies reviewed by the company?	*3 for half-yearly; 2 for annual review; 1 for ad-hoc review; 0 for no review mechanism or not reported.*	**3**	

A5	What level of assurance and independent assessment has been obtained for the BRSR/Sustainability Report and sustainability-related policies/programs?	*3 for reasonable assurance and external assessment/audit report available in the public domain; 2 for limited assurance and/or external assessment not available in the public domain; 1 for internal assessment only; 0 for no assurance/assessment or not reported.*	**3**	
A6	What percentage of the total employees are differently abled employees?	*3 for >5%; 2 for 2% to 5%; 1 for <2% (including zero representation if disclosed); 0 for data not disclosed / not available*	**3**	
A7	What percentage of the total workers (including contract/temporary workers) are differently abled workers?	*3 for >5%; 2 for 2% to 5%; 1 for <2% (including 0% if disclosed); 0 for data not disclosed / not available*	**3**	
A8	What percentage of the total workforce comprises women employees?	*2 for more than 10%; 1 for 5% to 10%; 0 for less than 5% or data not disclosed*	**2**	
A9	What has been the average employee turnover rate for permanent employees	*2 for less than 10%; 1 for between 10% and 15%; 0 for greater than 15% or data not*	**2**	

	during the past three financial years?	*disclosed*		
A10	Does the entity establish a grievance/redressal mechanism for addressing stakeholder complaints relating to responsible business conduct?	*3 for no complaints or >80% resolved; 2 for 60–80% resolved; 1 for <60% resolved and if there is any mechanism in place; 0 for no mechanism in place*	**3**	
A11	Does the entity conduct risk assessments covering environmental, social, and governance (ESG) matters in alignment with TCFD recommendations (now consolidated into IFRS S2/ISSB climate disclosures, which BRSR is progressively aligning with)?	*3 for full assessment with financial implications and mitigation; 2 for assessment done but not addressed; 1 for partial assessment; 0 for not reported*	**3**	
A12	Do subsidiaries participate in and align with the parent company's Business Responsibility initiatives?	*4 if subsidiaries have aligned ESG targets, KPIs and implementation mechanisms with the parent company; 2 if partially aligned; 0 if no alignment framework exists*	**4**	
A13	Does the entity establish	*3 for comprehensive commitments,*	**3**	

	sustainability-related commitments, goals, and targets along with defined timelines?	*measurable goals, and clearly defined timelines; 2 for partial commitments/goals with limited timelines or coverage; 1 for broad sustainability commitments without clearly defined targets or timelines; 0 for no defined commitments, goals, or timelines available.*		
A14	What percentage of the entity's disclosed ESG commitments and targets were achieved during the reporting period?	*3 for more than 75% of disclosed ESG targets achieved, with explanations for unmet targets; 2 for 50%–75% of disclosed ESG targets achieved; 1 for up to 50% of disclosed ESG targets achieved; 0 for no ESG targets disclosed or progress not reported*	**3**	
A15	Does the entity disclose a statement from the Director or responsible officer highlighting the entity's ESG challenges, commitments, targets, and key achievements?	*2 for a statement covering ESG challenges, commitments, targets, and key achievements; 1 for statement disclosed with partial coverage; 0 for no such statement disclosed*	**2**	
Section A Total			**40**	

SECTION B: SUSTAINABILITY REPORTING AND PERFORMANCE ASSESSMENT				
Sr. No.	**Parameter**	**Scoring Criteria**	**Max Score**	**Score Obtained**
Ethics, Governance & Anti-Corruption				
B1	Does the entity have a formally documented anti-corruption and anti-bribery policy, and has the same been disclosed?	*2 for Formally documented anti-corruption and anti-bribery policy in place and disclosed; 1 for General disclosure on anti-corruption or anti-bribery practices provided, but no formal policy disclosed; 0 for No disclosure provided on anti-corruption or anti-bribery policy/practices*	**2**	
B2	Does the entity report any cases of disciplinary action taken against Directors, KMPs, or employees for bribery or corruption during the financial year?	*2 for entity reports no cases of disciplinary action; 1 for entity reports cases along with actions taken/resolution status; 0 for no disclosure provided on bribery or corruption-related disciplinary actions*	**2**	
B3	Does the entity disclose the number of conflicts of interest complaints received against Directors/KMPs and	*2 for entity discloses that no conflicts of interest complaints were received; 1 for entity discloses the number received and*	**2**	

	the status of their resolution?	*the status of their resolution; 0 for no disclosure provided on conflicts of interest complaints or resolution status*		
B4	Does the entity report details of monetary and non-monetary fines, penalties, or punishments imposed during the financial year?	*2 for entity discloses that no monetary or non-monetary fines, penalties, or punishments were imposed; 1 for entity discloses details of fines, penalties, or punishments imposed; 0 for no disclosure provided*	**2**	
B5	Does the entity disclose corrective actions taken in response to regulatory or judicial orders relating to corruption or conflicts of interest?	*2 for entity discloses orders along with corrective actions taken in response; 1 for entity discloses orders but without details of corrective actions taken; 0 for no disclosure provided on such regulatory or judicial orders or corrective actions*	**2**	
B6	Are training and awareness programs on ethics conducted for Directors, KMPs, employees, and workers across the entity?	*3 for training conducted for all 4 categories (Directors, KMPs, employees, and workers); 2 for training conducted for any 3 categories; 1 for training conducted for*	**3**	

		any 1 or 2 categories; 0 for no training conducted or not reported		
Responsible Business & Value Chain				
B7	What percentage of the entity's R&D capital expenditure is directed towards improving the environmental and social performance of its products and processes?	*3 for more than 10% of R&D capital expenditure directed towards sustainability-related improvements; 2 for 5% to 10%; 1 for up to 5%; 0 for no disclosure provided*	**3**	
B8	Does the entity have defined sustainable sourcing procedures, and what proportion of total procurement is covered under these sustainable sourcing practices?	*5 for Sustainable sourcing procedures established and more than 30% of procurement sourced sustainably; 4 for Sustainable sourcing procedures established and 20%–30% of procurement sourced sustainably; 3 for Sustainable sourcing procedures established and 10%–20% of procurement sourced sustainably; 2 for Sustainable sourcing procedures established and less than 10% of procurement sourced sustainably;* ***1*** *for General disclosure on sustainable sourcing*	**5**	

		provided without quantitative procurement data; 0 for No disclosure on sustainable sourcing procedures or practices		
B9	Is Extended Producer Responsibility (EPR) applicable to the entity's operations, and is the waste collection system aligned with the EPR plan submitted to the relevant pollution control boards under the applicable EPR regime, such as the Plastic Waste Management Rules, 2016 (as amended), the E-Waste (Management) Rules, 2022, and the Battery Waste Management Rules, 2022?	*3 for EPR applicable and waste collection system fully aligned with EPR plan with supporting evidence; 2 for EPR applicable and system in place but alignment only partially demonstrated; 1 for EPR acknowledged but limited or general disclosure on waste collection systems with no clear linkage to the EPR plan; 0 for EPR applicability not addressed or no information provided*	**3**	
B10	Does the entity have a defined process for reclaiming products and packaging for reuse, recycling, or safe disposal, including materials such as plastic, e-waste, and hazardous waste?	*3 for a defined and structured process exists and is clearly reported with implementation details; 1 for general reference to reclaiming or waste handling practices without a defined process or clear coverage across key*	**3**	

		waste streams; 0 for no information provided on reclaiming products or packaging for reuse, recycling, or safe disposal		
B11	What is the total waste generated by the entity, disaggregated by type, and how is it disposed of across different disposal methods?	*3 for full disclosure by waste type and disposal route with hazardous/non-hazardous split and year-on-year trend; 2 for total waste reported without type/disposal breakdown; 0 for not reported*	**3**	
B12	Has the entity adopted or disclosed any national or international sustainability-related codes, certifications, labels, or standards (such as FSC, Fairtrade, ISO standards, SA 8000, BIS, etc.)?	*3 for adoption and disclosure of multiple recognised certifications/standards; 2 for adoption/disclosure of limited certifications or standards; 1 for broad mention without adequate details; 0 for no information available.*	**3**	
Workforce Wellbeing, Safety & Inclusion				
B13	Does the entity provide health benefits, accident coverage, maternity/ paternity benefits, and day care facilities for its employees and	*Each benefit category (health benefits, accident coverage, maternity/paternity benefits, and day care facilities) is assessed separately based on*	**8**	

	workers?	*coverage among employees and workers: 2 for more than 75% covered; 1 for 50% to 75% covered; 0 for less than 50% coverage or not provided. Maximum 8 points across all 4 categories.*		
B14	Is the coverage of PF, gratuity, and ESI deductions for employees and workmen, along with confirmation of deposit with relevant authorities, disclosed by the entity? (Note: assessors should track the entity's transition readiness to the Code on Social Security, 2020 and other Labour Codes upon their notification, which will subsume the EPF & MP Act and the ESI Act.)	*3 for entity discloses coverage of PF, gratuity, and ESI for employees and workmen, along with confirmation that deductions are duly deposited with relevant government authorities; 0 for no disclosure or incomplete disclosure on coverage and/or deposit compliance*	**3**	
B15	Are offices and operational premises accessible to differently abled employees and workers, and are measures implemented in line	*3 for full accessibility provided across major premises with documented measures aligned to the RPwD Act, 2016; 2 for partial accessibility and/or basic measures implemented*	**3**	

	with the Rights of Persons with Disabilities Act, 2016?	*with limited coverage or documentation; 0 for no disclosure or no measures implemented.*		
B16	Does the entity have an Occupational Health & Safety (OHS) management system, and what is the extent of its coverage and implementation?	*3 for comprehensive OHS and mental well-being programme covering operations with defined implementation and monitoring mechanisms; 2 for OHS/well-being system exists but with partial coverage or limited implementation details; 0 for no OHS/well-being system disclosed.*	**3**	
B17	Does the entity have a defined process for workers to report work-related hazards?	*3 for formal and structured mechanism for reporting work-related hazards is established and disclosed; 1 for general or informal process for reporting work-related hazards disclosed without a clearly defined mechanism; 0 for no disclosure provided on hazard reporting mechanisms*	**3**	
B18	Does the entity provide life insurance or compensatory benefits to employees and workers in the	*2 for entity provides and discloses life insurance or compensatory benefits to employees/workers in the event of death; 0*	**2**	

	event of death?	*for no information provided on such benefits*		
B19	Does the entity disclose transition assistance programs that support continued employability and career transition arising from retirement or termination of employment?	*2 for entity discloses transition assistance programs supporting continued employability and career transition arising from retirement or termination of employment; 0 for no information provided on such transition assistance programs*	**2**	
B20	Does the entity disclose LTIFR (Lost Time Injury Frequency Rate), recordable work-related injuries, and fatalities, along with year-on-year performance trends or reduction measures?	*4 for nil fatalities reported and LTIFR maintained at zero or negligible levels during the reporting period; 3 for LTIFR, recordable injuries, and fatalities disclosed with demonstrated year-on-year reduction/improvement; 2 for LTIFR, recordable injuries, and fatalities disclosed without clear evidence of year-on-year reduction; 1 for partial disclosure of safety performance indicators; 0 for no disclosure provided on LTIFR, injuries, or fatalities*	**4**	

B21	What percentage of employees and workers are trained in health, safety, and skill upgradation?	*3 for more than 80% of employees/workers trained; 2 for 60% to 80% of employees/workers trained; 1 for up to 60% of employees/workers trained; 0 for no disclosure provided on training coverage*	**3**	
B22	Does the entity disclose return-to-work and retention rates for employees who took parental leave?	*2 for return-to-work and retention rates for employees availing parental leave are disclosed; 0 for no disclosure provided on return-to-work and retention rates*	**2**	
Stakeholder Engagement & Human Rights				
B23	Does the entity disclose the process for identifying key stakeholder groups and the frequency of stakeholder engagement?	*4 for entity discloses both the process for identifying key stakeholder groups and the frequency of engagement; 2 for entity discloses either the stakeholder identification process or the frequency of engagement; 0 for no disclosure provided on stakeholder identification or engagement frequency*	**4**	
B24	Does the entity disclose processes	*2 for disclosure provided on*	**2**	

	for stakeholder consultation with the Board on economic, environmental, and social matters, including mechanisms for communicating feedback to the Board where consultation is delegated?	*stakeholder consultation processes and feedback communication mechanisms with the Board; 0 for no disclosure provided on stakeholder consultation or feedback mechanisms*		
B25	What percentage of employees and workers are trained in human rights issues and related policies?	*2 for 80% to 100% of employees/workers trained on human rights issues and policies; 1 for 60% to less than 80% of employees/workers trained; 0 for less than 60% trained or no disclosure provided*	**2**	
B26	Does the entity disclose details of minimum wages paid to employees and workers, including compliance with applicable minimum wage requirements under the Minimum Wages Act, 1948 (to be subsumed by the Code on Wages, 2019 upon notification), as and when notified and amended from time to time?	*5 for 100% of their employees and workers paid more than minimum wages; 2 for all permanent employees and workers paid more than minimum wages and 50% of other workers more than minimum wages; 1 for all employees paid more than minimum wages and all workers paid equal to minimum wages; 0 otherwise*	**5**	

B27	Does the entity disclose details of complaints and grievances related to sexual harassment (including constitution and functioning of the Internal Committee under the POSH Act, 2013), child labour, forced labour, and other related human rights issues, along with their resolution status?	*4 for entity discloses that no complaints or grievances related to sexual harassment, discrimination or related human rights issues were reported during the reporting period; 2 for entity discloses complaints/grievances received along with their resolution status; 0 for no disclosure provided.*	**4**	
B28	Has the entity assessed its operations and suppliers for risks related to forced or compulsory labour?	*3 for risk assessments conducted across operations and/or suppliers, with findings and actions disclosed; 2 for risk assessment conducted with limited disclosure on findings or actions taken; 1 for general statement on forced or compulsory labour provided without detailed assessment disclosure; 0 for no disclosure provided on forced or compulsory labour risks*	**3**	
B29	What is the scope and coverage of the entity's human rights due diligence process, including	*3 for Human rights due diligence process disclosed with coverage of more than 60% of the value chain;*	**3**	

	coverage across its value chain?	*2 for Human rights due diligence process disclosed with coverage of up to 60% of the value chain; 1 for General disclosure on human rights due diligence provided without clear value chain coverage details; 0 for No disclosure provided on human rights due diligence*		
B30	Has the entity designated a focal point, individual, or committee responsible for addressing human rights impacts or issues caused or contributed to by the business?	*3 for dedicated focal point, individual, or committee responsible for human rights issues is identified and disclosed; 0 for no such focal point or responsibility disclosed*	**3**	
B31	Does the entity have internal mechanisms in place to redress grievances related to human rights issues?	*2 for internal grievance redressal mechanism for human rights issues is established and disclosed; 0 for no disclosure provided on such mechanism*	**2**	
Environmental Performance & Climate Action				
B32	Does the entity disclose total energy consumption, energy intensity, and performance against	*3 for energy consumption and intensity data disclosed with external assurance, and PAT*	**3**	

	PAT Scheme targets, where applicable?	*Scheme targets achieved (where applicable); 2 for energy consumption and intensity data disclosed, and PAT Scheme targets achieved (where applicable); 1 for energy consumption and intensity data disclosed without assurance and/or without PAT target achievement details; 0 for no disclosure provided on energy consumption or intensity* *Note: Where PAT Scheme applies, disclosure of specific energy consumption (SEC) reduction achieved against the notified target is expected to substantiate the top scoring tier.*		
B33	What percentage of the entity's total energy consumption is derived from renewable energy sources?	*5 for more than 10%; 3 for 5% to 10% derived from renewable energy sources; 1 for less than 5% derived from renewable energy sources; 0 for no disclosure provided on*	**5**	

		renewable energy consumption		
B34	Does the entity disclose details of water consumption and water intensity, along with external assurance status?	*4 for water consumption and intensity disclosed with external assurance; 2 for water consumption and intensity disclosed without external assurance; 0 for no disclosure provided on water consumption or intensity*	**4**	
B35	Does the entity disclose water withdrawal by source and identify operations located in water-stressed areas (with reference to Central Ground Water Board (CGWB's) over-exploited/critical/semi-critical assessment unit classification or an equivalent recognised water-risk tool such as World Resources Institute (WRI) Aqueduct)?	*5 for water withdrawal by source disclosed, operations in water-stressed areas identified, and disclosure externally verified/assured; 3 for water withdrawal by source disclosed, including identification of operations in water-stressed areas; 1 for only total water withdrawal disclosed without source-wise breakup or water-stressed area identification; 0 for no disclosure provided on water withdrawal*	**5**	
B36	Does the entity have a Zero Liquid Discharge (ZLD) mechanism in place, and what is the extent	*3 for ZLD mechanism is fully operational and implemented across all applicable operations, with clear evidence of*	**3**	

	of its implementation and operational coverage?	*its operational coverage; 2 for ZLD mechanism is established and operational across some applicable operations; 1 for ZLD initiatives are disclosed or planned, but implementation is limited or the operational status or coverage is unclear; 0 for no disclosure or evidence of a ZLD mechanism.*		
B37	Does the entity disclose Scope 1 and Scope 2 GHG emissions, emission intensity, and year-on-year reduction performance?	*5 for Scope 1 and Scope 2 emissions, intensity, and reduction trends disclosed with external assurance; 3 for Scope 1 and Scope 2 emissions, intensity, and reduction trends disclosed without external assurance; 1 for Scope 1 and Scope 2 emissions disclosed without reduction trends or intensity metrics; 0 for no disclosure provided on Scope 1 and Scope 2 emissions*	**5**	
B38	Does the entity disclose Scope 3 GHG emissions and related emission	*5 for Scope 3 emissions disclosed with category-wise breakup and emission*	**5**	

	intensity across its value chain?	*intensity metrics; 3 for Scope 3 emissions disclosed with partial category-wise breakup or limited intensity disclosure; 1 for general disclosure on Scope 3 emissions without detailed breakup or intensity metrics; 0 for no disclosure provided on Scope 3 emissions*		
B39	Does the entity disclose air emissions (such as NOx, SOx, particulate matter, and other significant emissions) benchmarked against Central Pollution Control Board (CPCB) National Ambient Air Quality Standards (NAAQS) and applicable State Pollution Control Board consent limits, along with waste management and hazardous waste disposal practices?	*3 for disclosure of air emissions, waste management, and hazardous waste disposal details with external assurance; 2 for disclosure of air emissions, waste management, and hazardous waste disposal details without external assurance; 1 for partial disclosure of air emissions or waste management practices; 0 for no disclosure provided on emissions or waste management practices.*	**3**	
B40	Has the entity conducted Environmental Impact Assessments (EIA) for applicable	*6 for independent/external EIA conducted and available in the public domain; 4 for internal*	**6**	

	projects, and are such assessments independently conducted and available in the public domain?	*EIA or environmental assessment conducted and disclosed; 2 for general reference to EIA/environmental assessment without adequate disclosure details; 0 for no disclosure provided on EIA or not applicable not explained*		
B41	Does the entity disclose compliance with applicable environmental laws and regulations, including the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, and the status of Consent to Establish/Operate issued by the relevant State Pollution Control Board?	*5 for entity reports full compliance with applicable environmental laws and regulations during the reporting period; 3 for entity discloses compliance status, including instances of non-compliance and corrective measures taken; 1 for partial disclosure provided on environmental compliance; 0 for no disclosure provided on environmental compliance*	**5**	
B42	Does the entity disclose significant direct and indirect impacts on biodiversity in ecologically sensitive	*2 for comprehensive disclosure of significant biodiversity impacts and related prevention, mitigation and remediation measures;*	**2**	

	areas (including areas notified under the Wildlife Protection Act, 1972, the Biological Diversity Act, 2002, and Eco-Sensitive Zone notifications), along with prevention, mitigation, and remediation measures?	*1 for partial disclosure of biodiversity impacts or related prevention, mitigation or remediation measures; 0 for no disclosure provided on biodiversity impacts or related measures.*		
B43	Has the entity adopted innovative technologies or initiatives to improve sustainability outcomes in its operations?	*5 for dedicated sustainability/ESG innovation programme in place with quantified outcomes (such as emissions reduced, waste eliminated, or water saved); 4 for sustainability-related technologies adopted with reported outcomes, but without a formal innovation programme; 2 for sustainability initiatives or pilot projects underway without quantified outcomes; 0 for no disclosure provided on sustainability-related innovation or technology adoption*	**5**	
B44	Does the entity have a business continuity	*3 for business continuity and disaster*	**3**	

	and disaster management plan in place?	*management plan disclosed; 0 for no disclosure provided on such plans*		
Consumer Responsibility, Public Policy & Inclusive Growth				
B45	Does the entity disclose adverse judicial or regulatory orders relating to anti-competitive conduct, along with corrective actions taken?	*3 for entity reports no adverse judicial or regulatory orders relating to anti-competitive conduct during the reporting period; 2 for adverse orders disclosed along with corrective actions taken; 1 for adverse orders disclosed without details of corrective actions; 0 for no disclosure provided on anti-competitive conduct matters*	**3**	
B46	Has the entity conducted Social Impact Assessments (SIA) during the financial year?	*6 for SIA conducted by an independent external agency; 4 for internal SIA conducted by the entity; 0 for no disclosure provided on SIA conducted during the financial year. Full marks applicable where SIA requirement is not relevant/applicable to the entity and appropriate justification is disclosed.*	**6**	
B47	What percentage of	*3 for more than 30% of*	**3**	

	the entity's total procurement inputs (by value) is sourced from MSMEs and small producers as defined under the Micro, Small and Medium Enterprises Development Act, 2006 (MSMED Act, 2006) and does the entity disclose its payment timeline compliance for MSME dues (including the 45-day limit under Section 43B(h) of the Income-tax Act, 1961)?	*total procurement inputs sourced from MSMEs and small producers; 2 for 25% to 30% sourced from MSMEs and small producers; 1 for 15% to less than 25% sourced from MSMEs and small producers; 0 for less than 15% sourced or no disclosure provided*		
B48	Has the entity undertaken Rehabilitation and Resettlement (R&R) activities for applicable projects?	*2 for Rehabilitation and Resettlement activities undertaken and disclosed for applicable projects; 0 for no Rehabilitation and Resettlement activities disclosed for applicable projects. Full marks where requirement is not applicable to the entity/project and appropriately disclosed.*	**2**	
B49	What percentage of total employment generated by the entity is in rural and semi-urban areas?	*3 for rural and semi-urban employment exceeds 10% of total employment; 2 for rural and semi-urban*	**3**	

		employment exceeds 5% but is up to 10%; 1 for rural and semi-urban employment generation up to 5%; 0 for no disclosure provided on rural or semi-urban employment generation		
B50	What actions has the entity taken to mitigate negative social impacts identified through Social Impact Assessments (SIA)?	*5 for corrective actions implemented for all identified negative social impacts, or requirement reported as not applicable with justification; 3 for corrective actions initiated or partially implemented for identified impacts; 1 for general commitments or limited actions disclosed without clear implementation details; 0 for no disclosure provided on mitigation or corrective actions for identified social impacts*	**5**	
B51	What percentage of the entity's products and services carry information relating to recycling and safe disposal?	*3 for recycling and safe disposal information provided for 80% to 100% of products/services; 2 for 50% to less than 80% of products/services; 1 for less than 50% of*	**3**	

		products/services; 0 for no disclosure provided on recycling or safe disposal information		
B52	Does the entity provide product information over and above what is legally mandated?	*2 for additional product information beyond legal requirements is provided and disclosed; 0 for no disclosure provided on additional product information initiatives*	**2**	
B53	Has the entity taken steps to inform and educate customers or end-users about the safe and responsible use of its products and services?	*4 for steps taken to educate clients or end-users on safe and responsible usage are disclosed; 0 for no disclosure provided on client awareness or education initiatives.*	**4**	
B54	What percentage of customer or consumer complaints relating to product safety, quality, data privacy, cybersecurity, or advertising were resolved during the reporting period?	*3 for 80% to 100% of customer or consumer complaints resolved during the reporting period; 2 for 50% to less than 80% of such complaints were resolved; 0 for less than 50% of such complaints were resolved, or no disclosure was provided on complaint resolution status*	**3**	
B55	Does the entity have a cybersecurity and	*3 for cybersecurity and data privacy*	**3**	

	data privacy framework or policy in place?	*framework/policy established and disclosed; 0 for no disclosure provided on cybersecurity or data privacy framework/policy*		
B56	Does the entity disclose product recalls undertaken on safety grounds, including voluntary and forced recalls?	*3 for no product recalls reported during the reporting period, with clear disclosure provided; 2 for product recalls disclosed along with details of voluntary and/or forced recalls and corrective actions taken; 1 for general disclosure on product recalls without adequate details; 0 for no disclosure provided on product recalls or product safety-related actions*	**3**	
B57	Does the entity conduct consumer satisfaction surveys for its major products/services and disclose the findings along with corrective actions taken?	*2 for consumer satisfaction survey conducted with findings and corrective actions disclosed; 1 for survey conducted with findings disclosed but no corrective actions; 0 for no survey conducted or not disclosed.*	**2**	
B58	Does the entity disclose the number and/or percentage of	*3 for entity discloses number/percentage of CSR beneficiaries with*	**3**	

	CSR project beneficiaries belonging to vulnerable and marginalised groups?	*clear identification of vulnerable/marginalised groups covered; 1 for general disclosure on CSR beneficiaries without breakdown by vulnerable/marginalised groups; 0 for no disclosure provided.*		
Diversity, Equality & Community Engagement				
B59	Does the entity disclose diversity information for governance bodies and employees, including gender, age group, and minority group representation?	*2 for comprehensive diversity information disclosed for both governance bodies and employees; 1 for partial diversity information disclosed for governance bodies and/or employees; 0 for no disclosure provided on diversity composition.*	**2**	
B60	Does the entity disclose incidents of discrimination during the reporting period, along with corrective actions taken?	*2 for no incidents of discrimination reported during the reporting period, with disclosure provided; 1 for incidents of discrimination disclosed along with corrective actions or resolution measures; 0 for no disclosure provided on discrimination-related incidents or actions*	**2**	

		taken		
B61	Does the entity undertake local community engagement, impact assessments, and development initiatives in areas of operation (e.g., under Schedule VII of the Companies Act, 2013, or otherwise)?	*3 for structured community engagement programmes in place with impact assessments and measurable outcomes disclosed; 2 for community engagement and development initiatives disclosed with limited outcome reporting; 1 for general disclosure on community engagement or development initiatives without structured assessment details; 0 for no disclosure provided on community engagement or development initiatives*	**3**	
Section B Total			**200**	
SECTION C: SUSTAINABILITY LEADERSHIP AND STRATEGIC INITIATIVES				
Sr. No.	**Parameter**	**Scoring Criteria**	**Max Score**	**Score Obtained**
C1	Has the entity assessed climate change-related physical risks and opportunities, including risks such as flooding, extreme	*3 for physical climate risks/opportunities assessed, quantified, and financial implications disclosed; 2 for physical climate risks/opportunities*	**3**	

	heat, and water scarcity (drawing on tools such as the Department of Science and Technology (DST) Climate Vulnerability Atlas of India or state-level Heat Action Plans, where relevant)?	*assessed and disclosed; 1 for qualitative discussion provided on physical climate risks/opportunities without detailed assessment or quantification; 0 for no disclosure provided on physical climate risks or opportunities*		
C2	Has the entity assessed climate change-related transition risks and opportunities, including policy, market, technology, and reputational risks?	*3 for transition climate risks/opportunities assessed, quantified, and financial implications disclosed; 2 for transition climate risks/opportunities assessed and disclosed; 1 for qualitative discussion provided on transition climate risks/opportunities without detailed assessment or quantification; 0 for no disclosure provided on transition climate risks or opportunities*	**3**	
C3	Has the entity adopted Science-Based Targets (SBTi), Net Zero commitments, or climate targets	*4 for SBTi-validated targets adopted and disclosed; 3 for Net Zero commitment disclosed with an approved or clearly*	**4**	

	aligned with a recognised decarbonisation pathway?	*defined transition pathway; 2 for internal climate targets aligned to a 1.5°C pathway disclosed; 1 for general Net Zero commitment stated without a defined pathway or target framework; 0 for no disclosure provided on climate targets or Net Zero commitments* *Note: Entities demonstrating readiness under the National Green Hydrogen Mission (e.g., electrolyser capacity addition, green hydrogen procurement commitments, or pilot projects) may be credited within the applicable tier as evidence of an aligned decarbonisation pathway.*		
C4	Does the entity disclose the use of carbon credits or offsets in support of carbon neutrality or emissions reduction claims?	*4 for certified carbon offsets/credits used with detailed disclosure on quantity, certification standard, and application; 2 for carbon offsets/credits used but without certification details or adequate disclosure; 1*	**4**	

		for general reference to carbon neutrality or offsets without supporting details; 0 for no disclosure provided on carbon neutrality or carbon offsets		
C5	Does the entity have a circular economy strategy covering recyclability, resource loop-closing, or waste-to-value initiatives?	*4 for circular economy strategy disclosed with quantified outcomes or measurable impacts; 2 for circular economy initiatives disclosed without quantified outcomes; 1 for general policy intent or commitment towards circular economy disclosed; 0 for no disclosure provided on circular economy initiatives or strategy*	**4**	
C6	Has the entity conducted Life Cycle Assessments (LCA) for key products or services?	*4 for cradle-to-gate or broader LCA conducted by an external agency, with results available in the public domain; 3 for LCA conducted by an independent external agency; 2 for internal LCA conducted by the entity; 1 for partial or limited LCA conducted/disclosed; 0 for no disclosure provided on Life Cycle Assessment*	**4**	

C7	What percentage of total raw material consumption comprises recycled or reused input materials?	*4 for more than 20% of raw materials are recycled or reused inputs; 3 for 15% to 20% recycled or reused inputs; 2 for 10% to less than 15% recycled or reused inputs; 1 for less than 10% recycled or reused inputs; 0 for no disclosure provided on recycled or reused input materials*	**4**	
C8	What percentage of total water consumption is recycled or reused within the entity's operations?	*3 for more than 50% of water recycled/reused within operations; 2 for 25% to 50% recycled/reused; 1 for less than 25% recycled/reused; 0 for no disclosure provided on water recycling or reuse practices*	**3**	
C9	Does the entity have a Supplier ESG Code of Conduct or Responsible Sourcing Policy covering its value chain (e.g., aligned with the National Guidelines on Responsible Business Conduct (NGRBC), 2019)?	*3 for supplier ESG Code/Responsible Sourcing Policy mandatory for all suppliers, with compliance monitoring/tracking mechanisms; 2 for supplier ESG Code/Responsible Sourcing Policy established and communicated to suppliers; 1 for general*	**3**	

		supplier sustainability policy disclosed without implementation or communication details; 0 for no disclosure provided on supplier ESG or responsible sourcing practices		
C10	Does the entity disclose assessments of value chain partners with respect to working conditions and occupational health & safety practices?	*3 for assessments of value chain partners on working conditions and occupational health & safety practices disclosed; 0 for no disclosure provided on such assessments*	**3**	
C11	What percentage of suppliers, by procurement value, have been assessed or audited against ESG criteria?	*4 for more than 75% of suppliers assessed/audited against ESG criteria; 3 for 50% to 75% assessed/audited; 2 for 25% to less than 50% assessed/audited; 1 for less than 25% assessed/audited; 0 for no disclosure provided on supplier ESG assessments or audits*	**4**	
C12	Does the entity undertake supplier capacity-building initiatives on sustainability practices?	*3 for structured supplier sustainability training or technical support programmes conducted with measurable outcomes disclosed; 1 for general awareness programmes or*	**3**	

		sustainability communication initiatives disclosed; 0 for no disclosure provided on supplier sustainability capacity building		
C13	What percentage of key raw materials used by the entity are traceable to their source?	*3 for more than 50% of key raw materials traceable to source; 2 for up to 50% of key raw materials traceable to source; 1 for limited or partial traceability initiatives disclosed without percentage coverage; 0 for no disclosure provided on raw material traceability*	**3**	
C14	Does the entity disclose CSR expenditure as a percentage of the average net profit of the last three financial years (as mandated under Section 135 of the Companies Act, 2013 read with the CSR Rules, 2014, as amended), along with key CSR focus areas or themes?	*4 for CSR expenditure of 2% or more along with disclosure of strategic themes aligned to sustainability or SDG priorities; 3 for disclosure of CSR expenditure of 2% or more; 1 for CSR expenditure below 2% but disclosed; 0 for no information available.*	**4**	
C15	Does the entity disclose sustainability-linked financial instruments,	*3 for clear disclosures provided with quantified financial linkage or measurable allocation*	**3**	

	green financing initiatives (such as green bonds/loans aligned to SEBI's Green Debt Security framework or RBI's Green Deposit guidelines), or integration of ESG considerations into capital allocation decisions?	*towards sustainability initiatives; 1 for sustainability-related disclosure provided but without quantified financial linkage or measurable allocation; 0 for no information disclosed on sustainability-related financial linkage or allocation*		
C16	Are ESG risks integrated within the entity's Enterprise Risk Management (ERM) framework and overseen by the Risk Management Committee as required under Regulation 21 of the SEBI (LODR) Regulations, 2015 (where applicable)?	*5 for ESG risks are fully integrated into the company's risk management process, reviewed by the Board, financially assessed, and supported with mitigation plans; 3 for ESG risks are included in the risk register with mitigation measures, but financial impact assessment is not provided; 1 for ESG risks are identified and discussed broadly, but not formally integrated into the risk management framework; 0 for no disclosure on ESG risks or their management*	**5**	
C17	Does the entity align its ESG reporting and	*3 for comprehensive mapping with*	**3**	

	sustainability initiatives with the United Nations Sustainable Development Goals (UN SDGs)?	*performance data; 2 for mapping without performance data; 1 for mentioned but not mapped; 0 for not reported*		
Section C Total			**60**	

Consolidated Scoring Summary

An entity should score a minimum of 30% under each section to become eligible for getting a level assigned. Based on this criterion, the minimum qualifying scores for each section are as follows:

Section	Description	Maximum Score	Minimum Score Required	Score Obtained
Section A	General Disclosures and Management Procedures	**40**	**12**	
Section B	Sustainability Reporting and Performance Assessment	**200**	**60**	
Section C	Sustainability Leadership and Strategic Initiatives	**60**	**18**	
Grand Total		**300**	**90**	

Please Note: Where parameters are treated as NA, the 30% minimum applies to the NA-adjusted maximum for each section.

ANNEXURE-I

Illustrative Format of Practitioner's Report

Certificate No.: XXX/XXX/XXX/2026-27

Date: DD / MM / YYYY

To

The Board of Directors

[Name of the Company]

[Company Address]

Dear Sir/Madam,

Practitioner's Independent Validation certificate on the Self-assessment Maturity Rating of the Company as determined under the Sustainability Reporting Maturity Model Version 3.1 for the financial year [YYYY-YY] (1 April YYYY to 31 March YYYY).

1. This Certificate is issued in accordance with the terms of my/our engagement letter/agreement dated .... [Specify date].

2. I/we have been requested by ... [Name of the Company] (hereinafter the "Company"), having its registered office at ....[Address of registered office] to certify the Self-assessment Maturity Rating of the Company as determined under the SRMM Version 3.1 (hereinafter referred to as the "Statement"). The Statement has been initialled by me/us for identification purposes only.

Management's Responsibility

3. The preparation of the Statement is the responsibility of the Management of the company, including the preparation and maintenance of all relevant supporting records and documents. This responsibility includes the design, implementation and maintenance of internal control relevant to the preparation and presentation of the Statement and applying an appropriate basis of SRMM Version 3.1 scoring methodology and ensuring that the self-assessed scores and

resultant maturity rating are free from material misstatement, whether due to fraud or error.

Practitioner's Responsibility

4. It is my/our responsibility to provide limited assurance on the Statement based on my/our examination of the self-assessment scores furnished by the Company under SRMM Version 3.1 and to verify and validate the self-assessed maturity rating under SRMM Version 3.1. The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Accordingly, I/we have performed the following procedures in relation to the Statement presented to us:

   i. Reviewed the sustainability parameters against scoring parameters prescribed in SRMM Version 3.1 (Sections A, B & C)

   ii. Reconciled self-assessed scores to underlying data, disclosures and supporting documentation furnished by the Company;

   iii. Performed analytical procedures and inquiry of responsible management personnel to corroborate stated scores;

   iv. Evaluated appropriateness of the scoring methodology vis-à-vis prescribed scaling criteria in SRMM Version 3.1;

   v. Assessed whether the aggregate score correctly maps to the declared Maturity Band; and

   vi. Cross-validated ESG data consistency for the reporting period with audited financial statements where applicable.

5. I/we conducted my/our examination of the Statements in accordance with the Guidance Note on Reports or Certificates for Special Purpose (Revised 2016) issued by the ICAI. The Guidance Note required that I/we comply with the ethical requirements of the Code of Ethics issued by the ICAI.

6. I/we have complied with the relevant applicable requirements of the Standard on Quality Control (SQC) 1, Quality Control of Firms that

perform Audits and Reviews of Historical Financial Information, and other Assurance and Related Service Engagements.

Conclusion

7. Based on the limited procedures performed by me/us, as above, and the information and explanations given to me/us nothing has come to my/our attention that causes me/us to believe that the self-assessed maturity rating of the Company under SRMM v 3.1 for the financial year [YYYY-YY] is not, in all material respects, fairly stated in accordance with the scoring criteria prescribed under SRMM Version 3.1. The company has achieved Maturity level of [xx] based on SRMM score of [xx] as per Annexure II to this certificate.

<u>Or</u>

[Based on the procedures performed and the evidence obtained, except for the effect of the matter described in the Basis for Qualified Conclusion section of our report, nothing has come to our attention that causes us to believe that the statement does not present fairly, the maturity rating of the Company]

Basis for Qualified Conclusion (if any)

a) *Score claimed – Self-assessed Score: [ ]*/300 (i.e. max. applicable score) (as per the Statement). *Figure in [ ] to be filled with actual self-assessed score.*

b) *Score Validated – Score as validated by me/us [ ]*/300 (i.e. max. applicable score). *Figure in [ ] to be filled with actual validated score.*

c) *Self-assessed Rating (as per the Statement): Level: ....*

d) *My/our Rating: Level: ...*

The difference in a) and b) above is ....

The difference in c) and d) above is ....

The difference is due to ... [Include observations or material variances as the case may be]

[Text in Italics to be retained only if applicable]

Restrictions on Use

8. The certificate has been issued at the request of the management of the Company. This Certificate should not be used for any other purpose or by any person other than the addressee of this Certificate. However, the scoring or rating may be disclosed by the company in its Annual Report and for submission to ICAI for the hosting the same on the portal. Accordingly, I/we do not accept or assume any liability or any duty of care for any other purpose or to any other person to whom this Certificate is shown or into whose hands it may come without my/our prior consent in writing.

For (FIRM/INDIVIDUAL)

Chartered Accountants

(Firm's Registration No.....)

Signature

(Name of the member signing the Report)

(Designation[4])

Membership No:

UDIN:

Place of Signature:

Date:

[4]Partner or Proprietor, as the case may be.

ANNEXURE II

Statement of Self-assessment Maturity Rating of the Company as determined under SRMM Version 3.1

Statement of Self-assessment Maturity Rating of the Company as determined under SRMM Version 3.1

Score Summary-SRMM Version 3.1

Section	Description	Max Score	Score Obtained
Section A	General Disclosures and Management Procedures	**40**	
Section B	Sustainability Reporting and Performance Assessment	**200**	
Section C	Sustainability Leadership and Strategic Initiatives	**60**	
	Grand Total	**300**	

Self-assessed Maturity Rating

Self-Assessed Rating (Company's Claim)

Level: ……

Score Claimed: [ ]*/300 (i.e. maximum applicable score)

***Figure in [ ] to be filled with actual self-assessed score.**

This statement is initialed for identification purposes only and should be read along with Certificate dated ... [specify the date]

Signature and Stamp of the Practitioner

The Institute of Chartered Accountants of India

(Set up by an Act of Parliament)

Sustainability Reporting Standards Board

ICAI Bhawan, A-29, Sector 62, Noida-201309, Uttar Pradesh, India