

DEMYSTIFYING
THE ESG
LANDSCAPE
IN INDIA

Report



March 2023

Foreword



Environment, Social and Governance (ESG) parameters help represent how a company interacts with all stakeholders. It is used to quantify this interaction and score the performance of each company. Better compliance is denoted by a better score, which in turn highlights sustainable practices, better employee welfare and strong leadership. There are various reporting frameworks that can be used to calculate ESG scores. Previously, ESG-compliant companies saved on costs incurred due to unsustainable practices and find it easier to clear regulatory requirements and licensing.

The ongoing climate crisis, economic slowdown, and the recent brush with the COVID-19 pandemic have all but highlighted the need for companies that are sustainable, prioritize employees and are run by strong leadership. And these are but three select examples. As we move into 2023, investors are increasingly focusing on adding ESG-compliant companies to their portfolios. Another interesting emerging trend is on the consumer side: how a sustainable brand perception helps companies gain customer loyalty. The effects of good Governance and a focus on employee well-being are multi-fold. The ESG wave is gaining momentum in India for the

right reasons. Recently, SEBI made it mandatory for the top 1000 companies by market cap to submit BRSR reports. This is likely to help increase compliance, and more such regulations especially on the environmental side are expected to be observed in the near future.

This report is intended to highlight the unfolding ESG landscape in India, bring insights into the current Environment, Social and Governance overview, challenges faced in achieving compliance and reporting using the existing frameworks as well the key enablers, growth and adoption drivers that are emerging in the country.

We, at Praxis, look forward to discussions with the stakeholders in the ecosystem, including investors group, Government, policymakers, ESG experts and compliance officers, and exchanging ideas and collaborating on various issues pertaining to ESG compliance in India. We look forward to sharing perspectives and more insights continuously.

Shishir Mankad

Social Impact Advisory

Executive summary



Overview of ESG

- ESG materiality represents an organization's interests and interactions with the Environment, Community and Individuals to determine future sustainability
- Investors are looking for ESG-compliant companies to grow their investments, customers want to be associated with ESG-compliant brands, and business leaders are looking for brand perception and profitability through ESG compliance



Reporting frameworks

- New and revised ESG regulations, laws and policies are being introduced globally to ensure compliance, frameworks available like the GRI, SASB, etc.; the Ministry of Corporate Affairs is the principal regulator for the same in India
- BRSR reporting has been made mandatory for the top 1,000 listed companies in India by the Securities and Exchange Board of India (SEBI), has 3 sections with a broad mix of mandatory and optional disclosures



Implementation & challenges

- Top N 100 companies submit standalone reports on ESG with 79% of those releasing standalone reports, however, reports from recent IPOs remain significantly low across sectors
- Key reporting and evaluation framework challenges that need to be addressed include subjectivity of analysis and complexities in data, one-size-fits-all approach and country perspective bias often coming into play in reporting frameworks



Maturity of ESG reporting

- External accelerators like 3rd party audit combined with internal factors like ease of data collection can be growth drivers for ESG compliance if implemented in India; materiality assessment helps discover ESG parameters that have the most impact on business
- Investments in startups are growing in India, with investors focused on renewable energy, emission reduction, and helping ESG-compliant MSMEs is driving ESG adoption

Source(s): Secondary research, Praxis analysis

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Introduction to ESG

Reporting frameworks

ESG implementation: Key challenges

Maturity of ESG reporting





ESG parameters are being used to represent an organization's interests and determine future sustainability, evaluated by the likes of investors and leaders





Environmental

Companies act and mitigate their effects on the environment

Climate change

GHG emissions

Conservation and restoration

Pollution control, recycling

Energy consumption, green energy



Social

Communication and relationship with employees and customers

Human rights, social protection

Gender equality, diversity, inclusion

CSR projects, ethical supply chains

Healthcare and welfare programs

Employee well-being and benefits



Governance

Concerns leadership, implementation of critical policies

Accounting practices

Business ethics, transparency

Diversity on board, better decisions

Stakeholders' interests, elections

Leadership assessment



Environment: Emissions categorised under Scope 1, 2 and 3, usually from factories and transportation are potentially impacting the quality of natural resources

Potential contributing factors





Company A Fuel and energy Waste



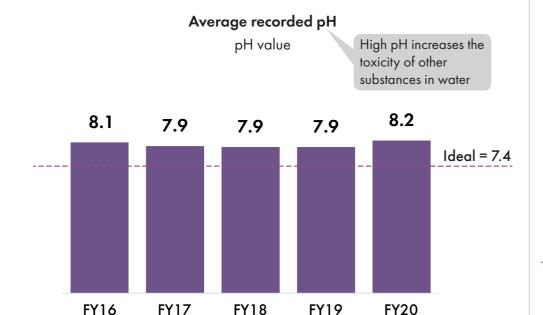


Company vehicles

Scope 1 emission Direct emissions that occur from sources that are controlled or owned by an organization

Untreated waste from industrial discharge has kept the pH of

Yamuna river above the ideal value for the last 5 years



Potential contributing factors







Employee A

Scope 2 & 3 emissions

FY16

FY17

- Scope 2: Indirect emissions associated with the purchase of electricity, steam, heat, or cooling
- Scope 3: Not produced or controlled by the company but are indirectly responsible for

PM₁₀* particles concentration in air is high due to highest inter-city transport and commute in Mumbai

Presence of PM₁₀ particles in air Exposure to PM₁₀ particles $\mu g/m3$ leads to respiratory diseases 216 like asthma 166 151 125 119 Ideal

FY18

FY19

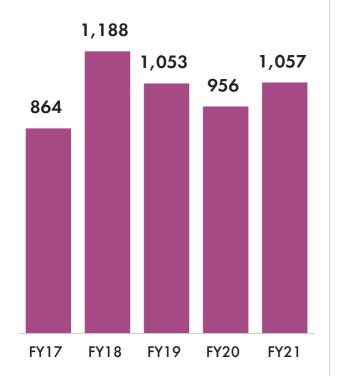
FY20



Social: Inclusion and workplace well-being still poses a challenge in India

1000+ workplace death reported

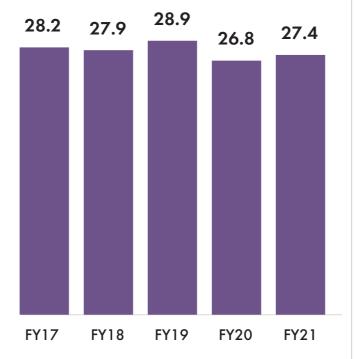
workplace deaths reported*#



Female participation remains below 30% over past 5 years



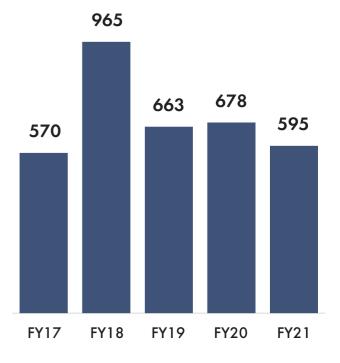
Female to male labor force participation %



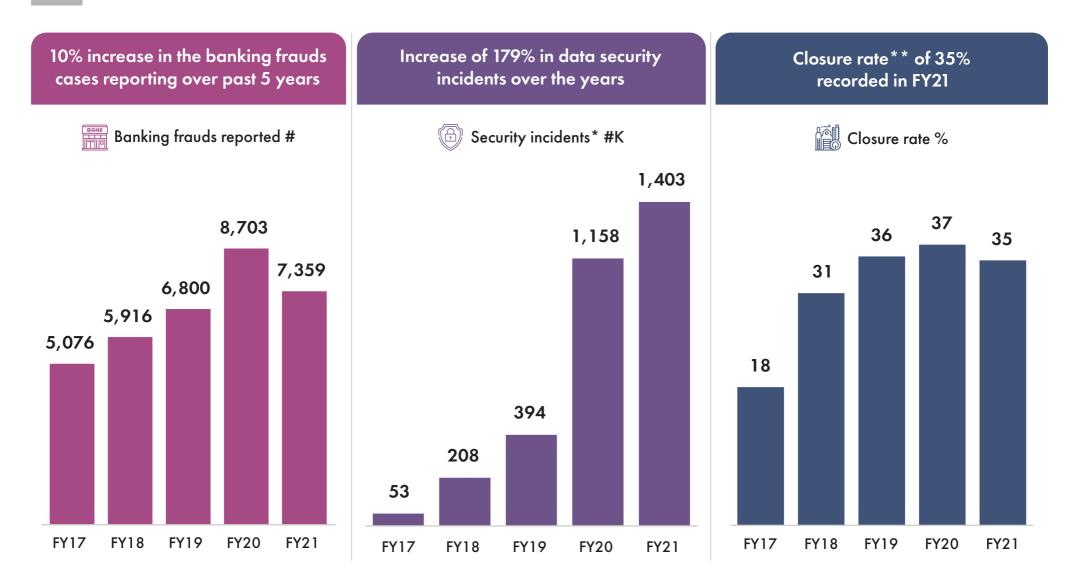
Social media movements led to higher reporting of harassment cases in 2018



Workplace harassment cases reported #



Governance: Increased banking-related frauds and data security incidents raises governance concern for Indian companies



Note(s): *Security incidents comprises of phishing, probing, vulnerable services, malicious code, virus, website defacements, website intrusion and malware propagation **Closure rate is the ratio of total companies registered to the companies closed with MCA



FIIs and DIIs are looking for ESG-compliant companies to grow their investment; Customers with increasing awareness want to be associated with ESG-compliant brands

Importance of ESG reporting

FIIs	 Foreign investors are looking at ESG reporting and whether the norms are being followed closely Many financial institutions have made it mandatory for the company to follow ESG norms
Raising working capital from bank	 Banks may deny lending short-term finances to companies if they are not complying with ESG norms Many Asian Banks like in South Korea and Japan are doing the same Organizations' day-to-day operations can get impacted as they may find it difficult to manage funds
Customers' interest	 Aware and environment-conscious customers are compelling companies to follow ESG norms more closely; Will eventually be associated with companies with sustainable products Global B2B customers in America and Europe have committed to reducing their carbon emissions (including Scope 3 emissions) Hence, Indian manufacturers catering to these global B2B customers are being positively pressurized for reducing their carbon emissions
Stock price	 If diligent and transparent reporting in BRSR with full disclosures is not properly followed, it may affect the brand and image of the company The report is seen by several stakeholders as well as regulators and investors Foreign and Domestic institutional investors might not invest in an ESG non-compliant company, which may have an impact on its stock price

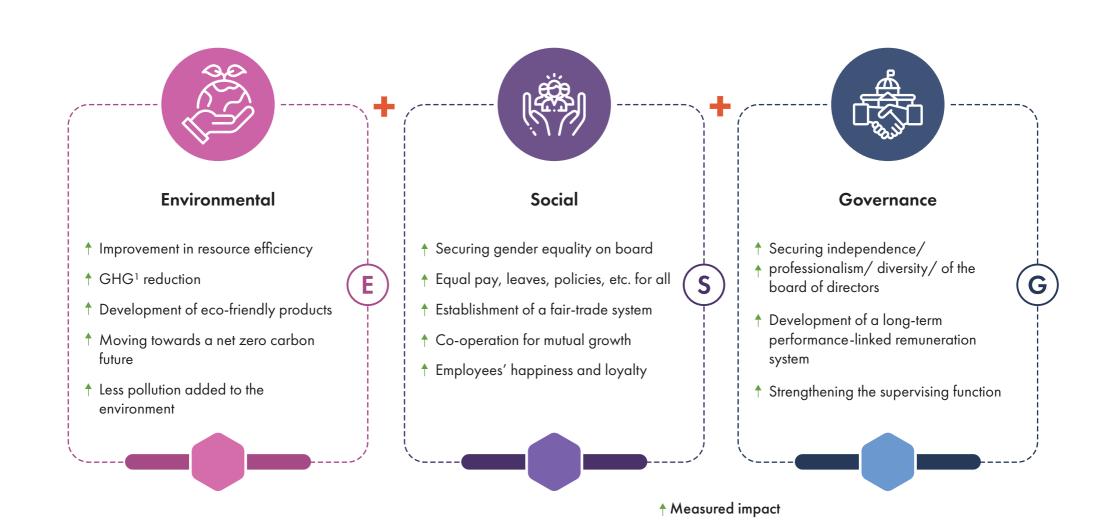


ESG parameters are interconnected from customers to investors and hence increasingly becoming relevant for business life cycle



Source(s): Secondary research, Praxis analysis

Companies with a strong ESG alignment end up saving costs of operation and capital, securing brand perception and retaining customer loyalty



Initiatives with a focus on community benefits launched by the Govt. are indirectly supporting sustainability and climate change, a major ESG parameter

Environmental projects undertaken	Key features		
Mumbai's Climate Action Plan	 Agencies such as BMC, MMRDA, BEST and others have already initiated work across several areas to deal with the climate crisis MCAP will focus on six action tracks to introduce sector-specific strategies Some thematic action areas are Sustainable waste management Urban greening and biodiversity Urban flooding and water resource management City's first desalination plant, to process 200 million liters of water per day, will be built near Manori, Malad (West) 5000 rainwater harvesting pits across Mumbai By 2030, BEST will run all-electric buses 		
The Pradhan Mantri Ujjwala Yojana (PMUY)	 Make LPG, a clean cooking fuel, available to rural and marginalized households Led to an increase in LPG coverage from 62% in 2016 to 99.8% as of 2021 		
Powerguda in Andhra Pradesh	 Villages selling around 150 tonnes of saved CO2 credits Also, saved 147 MT of CO2 by extracting bio-diesel from 4500+ Pongamia trees 		
Handia forest in Madhya Pradesh	 100 financially aggrieved villages collectively earn USD 300K/ year from carbon payments Restores 10K hectares of community forests 		

Areas and activities to be focussed upon for Carbon Credits



Household level biogas plants treating Kitchen, organic farmyard, & biowastes



Agri-biomass oriented Energy **Projects**



Implementation of projects

Afforesto Projects Afforestation and reforestation



Bio-methanation, Power Generation Bio-methanation, rower route, Organic Fertilizer



Special Manure producing

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New and revised ESG regulations, laws and policies are being introduced globally to ensure compliance

Global Regulations

	India	UK UK	USA
Current ESG progress	 ESG mutual funds schemes and ESG rating providers regulations by SEBI From 2023, shift to BRSR reporting requirements which are evaluated on 9 NGRBC principles (2021) 	 Two new laws introduced:- Compliance Regulations 2022 Limited Liability Partnership Regulations, 2022 	Climate-risk disclosure requirements proposed by SEC in March 2022
Criteria	Top 1000 listed companies based on market capitalization need to comply with BRSR framework	Businesses with >500 employees or EUR 500M in annual revenue	NA
Reporting requirements	NA	 Report on UK energy use and carbon emissions to be mentioned in annual report 	 Disclose Scope 1 and 2 emissions in line with GHG Protocol If revenue > US\$ 75M, disclose scope 3 emissions also
Active regulatory bodies	 Ministry Of Corporate Affairs (MCA) – Principal regulator SEBI – strategy implementation and mandates ESG related disclosures 	 Financial Conduct Authority (FCA) – Principal regulator European commission, UK govt, FRC, regulators of securities exchange 	 Securities and Exchange Commission (SEC) – Principal regulator Department of Labor (DOL) – Federal regulator
Other governing laws	 Environment Protection Act, 1986 Water Act, 1974 Companies Act, 2013 Factories Act, 1948 Securities and Exchange Board of India (SEBI) Act, 1992 	 UK Corporate Governance Code, 2018 Disclosures Guidelines and Transparency Rules UK Stewardship Code, 2020 Climate Change Act, 2008 Bribery Act, 2010 	 Federal and state requirements Securities Act, 1933 Securities Exchange Act, 1934 Various state regulations like Climate Corporate Accountability Act in California, 2022

Multiple ESG frameworks and standards exist globally; GRI is the most comprehensive & widely used framework

Global Recognised Frameworks











	Goal	Stakeholder engagement & materiality assessment	 Measure and manage ESG topics for long-term value creation 	Strategic actions on SDG and UN principles-based business ethics	Measure concentration of carbon related assets in financial systems	 Measure and reduce greenhouse gas emissions
ters	Structure	• 10 reporting principles 2 main standards with over 300 topics in both	• 77 standards divided in 11 industry categories	10 principles in alignment with 17 UN SDG goals	11 disclosure recommendations in 4 areas	Area specific questionnaire
Parameters	Audience of reporting	• Stakeholders + investors	Primarily investors	Stakeholders + investors	 Stakeholders + investors 	Primarily investors
	Primary business user	 Chief Finance, Legal, HR, CSR Head, ESG Head 	Chief Executive, Finance, Legal, ESG Head	Chief Executive, Finance, Legal, ESG Head	-	ESG Head, Chief Financial Officer
	Voluntary or guidance framework	Guidance: Range of ESG topics deemed relevant to org. and management	Guidance: Focus on financial information relevant to investors	Voluntary: 10 principles become part of strategy, culture and operations	Guidance: Targets - Governance, strategy, risk management, and metrics	Voluntary disclosures of non-financial data

Multiple ESG frameworks and standards exist globally; GRI is the most comprehensive & widely used framework

Global Recognised Frameworks TCFD Company specific • Sustainability info Annual report (CoP) Disclose material • An online response and performance climate issues with reports written in having company's key system pursuant to the **Prescribed** accordance with GRI metrics included in info on global activities SEC, regulatory questionnaires. No Parameters format CSR/ESG report agencies and reports prescribed methodology Standards Different meaning for Identify financially Act as a goal oriented Emphasis on the Mapping of industry Materiality stakeholders and framework and doesn't materiality for climate segment to KPIs that material sustainability influence company's info through identify material correspond to it's impact assessment similar to other info decisions perspective of an information on environment

Less comprehensive

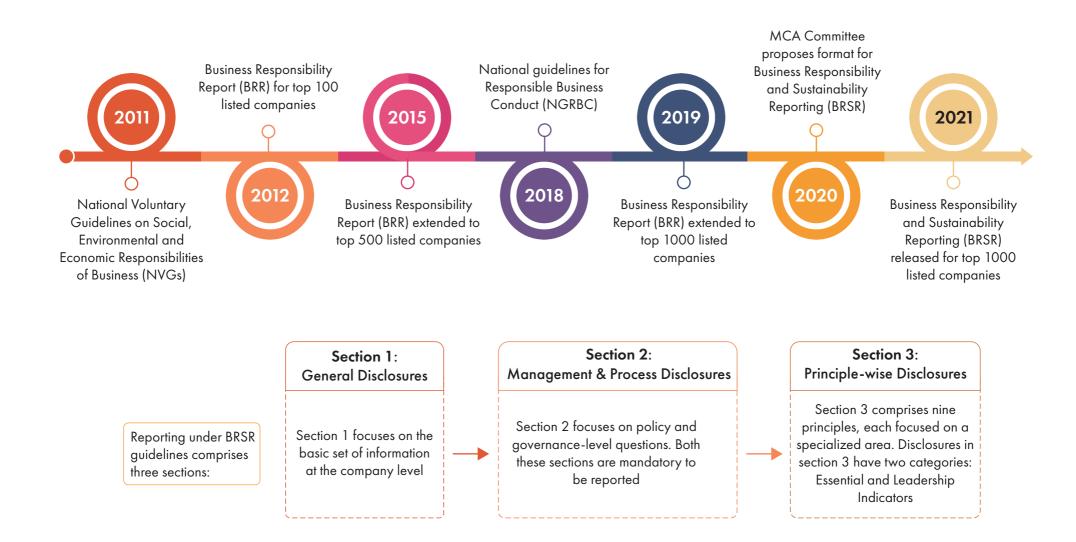




More comprehensive



BRSR reporting, now made mandatory for top 1,000 listed companies in India, has 3 sections with a broad mix of mandatory and optional disclosures





Praxis ESG framework addresses current assessment challenges and enables evaluation of individual businesses, portfolios and sectors



ESG Framework and Methodology

Key advantages and enablement



Multi-stakeholder approach

Cater different users such as corporates, investors and government bodies



Metrics-driven assessment

Comprehensive research to create a fundamental basis for judgment



Reduced refresh effort

Tool and models created which can be updated with input values refresh



Goes beyond rating

Identifies the core issues, their causes, and their potential effects

Multiple use cases





Individual Company Evaluation





Portfolio Assessment



Sector Scan

Outcomes



Enforce Norms

Know what are the core issue and where they enable rectification



Better Investment Decisions

Asses potential challenges in future for company cause of ESG



Ensure compliance over time

Tool created enables recurring analysis at reduced efforts

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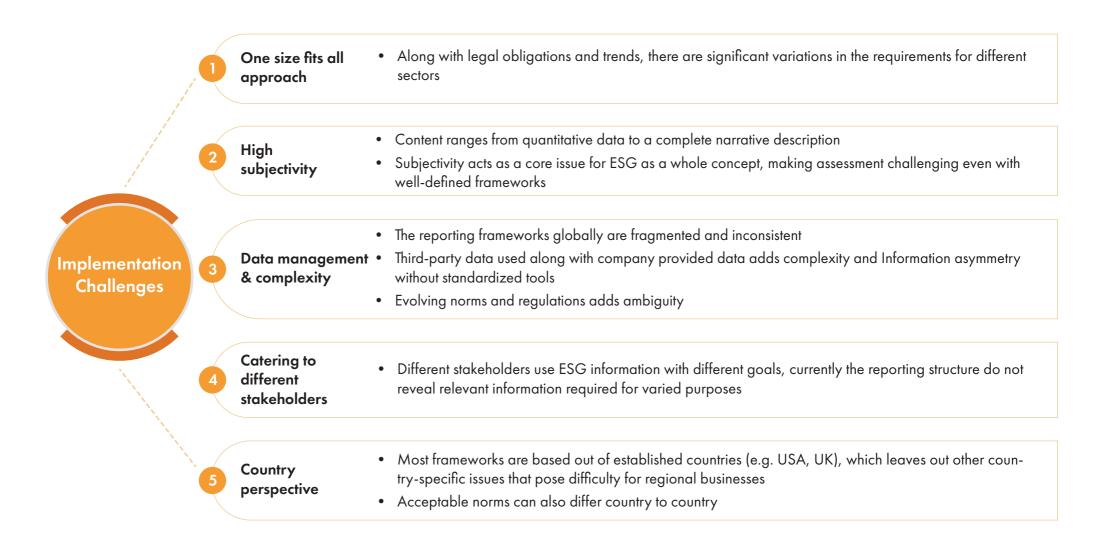
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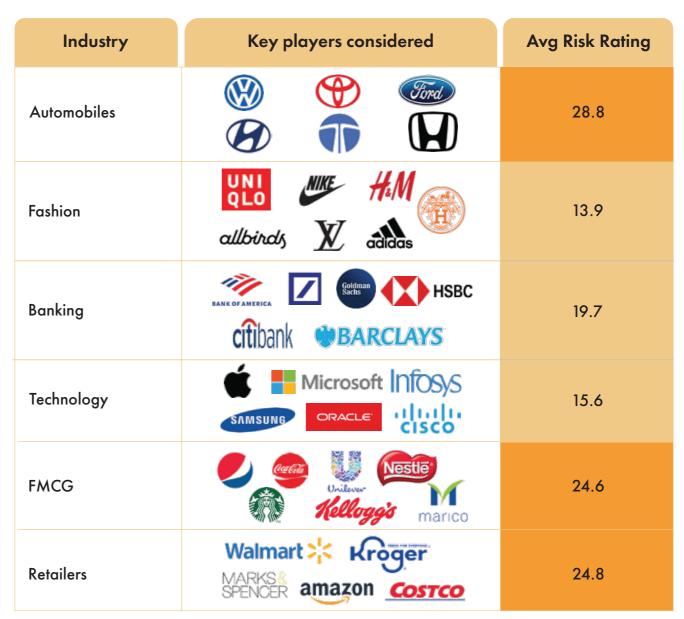


Fashion, banking and tech industry lies in the low-risk band as per average ESG ratings



0-10 10-20
10-20
20-30
30-40
40+

Scoring considers subindustry and company-specific factors such as business model and management, assessing robustness of company's ESG programs, practices, and policies



Yet, past incidents reflect the reality of the difference between ESG reporting and **ESG** compliance

Incidents

Automobile

- Top vehicle manufacturer fitted ~ 11 M diesel cars with a "defect" device, altering emission test performance
- These cars remitted up to 40 times more pollution than allowed

FMCG

- Beverage companies are huge contributors to plastic pollution because of packaging used like plastic bottles, straw-less lids, straws, etc
- Wellness products in India was accused of promoting negative stereotypes around dark skin tones through its branding and advertising for certain beauty products
- Leading ready-to-make product brand was accused of using child sourced raw materials like cocoa beans

Retailers

- The leading furniture retailer faced charges of illegal wood logging to make children's furniture
- Retail industry chains giant in USA under fire for marketing ~2 dozen rayon textile items falsely as made from bamboo using eco-friendly processes

Fashion

- Fast fashion brands are responsible for producing monumental amounts of textile waste
- Multiple labour rights violations and complaints were filed against popular sports brands
- Unethical sourcing of raw materials and animal abuse were charges raised against the apparel brand

Technology

- Leading phone maker has faced accusations of utilizing child labor in its mining efforts for sourcing aluminum
- Excessive e-waste generated due to multiple part replacements made necessary due to software updates

Finance

• Major investment banks have faced backlash due to lending to the industries that contribute the most to global warming, like fossil fuels, deforestation

Non-compliance consequences

Impact on customer perception

- Loss of consumer interest in reported product category and significant drop in sales
- Criticism in media channels among customers, asking for boycott until appropriate measures taken by the companies to resolve raised issues
- High operating expense (in legal battles and marketing mitigation activities)
 - Penalties imposed by government authorities
 - Managing lawsuits with different action groups, human rights activists and others
 - Brand image hampered post labels such as which requires expensive campaigns to rebuild brand

Loss in trust and company's reputation

- Overall shareholders trust lost when company engaged in deceptive activity/promises
- Conflicts especially with government bodies, decreases credit worthiness

Top N100 companies submit standalone reports on ESG, however, reports from recent IPOs remain significantly low across sectors

79% of the N100 companies submit standalone reports on ESG

ESG reporting for N100 companies

(% companies reporting)



Top 5 sectors for N100 companies in India



Retail & e-commerce



Electronic systems



IT & BPM



Construction



Defence manufacturing

ESG reports submitted by recent IPOs across sectors

IPO year	Sectors with most # IPO	# IPO	# companies reporting ESG*
	Technology	6	-
	Capital goods	5	-
2022	Trading & distributors	5	-
	Pharmaceuticals	4	-
	Logistics solutions provider	4	1
	Technology	11	4
	Auto components & equipment	5	1
2021	Pharmaceuticals	5	1
	Speciality chemicals	4	-
	Residential commercial projects	4	1

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Materiality assessment can equip the company with discovery of ESG parameters that have the most impact on the company's business

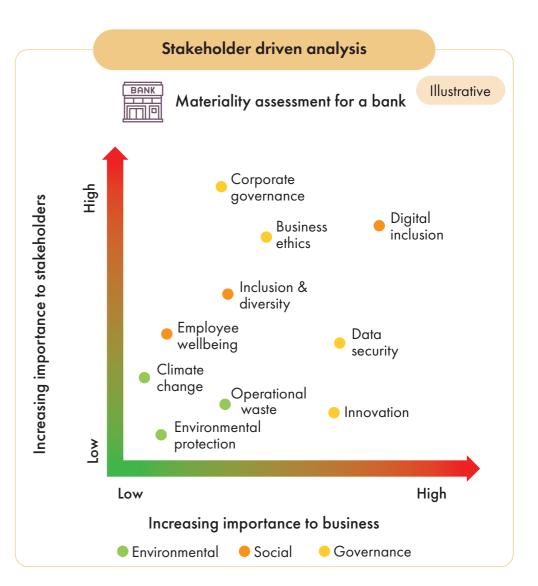
What is materiality?

ESG materiality assessment is a tool used to identify and prioritize issues that are most critical to organization

Procedure to evaluate

- Identify and categorize potential topics and stakeholders'
- Detailed survey with questionnaire
- Result analysis according to topic impact and importance

Value proposition **Improved** Informed Optimal performance strategy resource use





External accelerators like 3rd party audits combined with internal factors like ease of data collection can be growth drivers for ESG compliance if implemented in India

External accelerators: Government and Regulators



- Sector-wise reporting regulations and expected performance metrics
- Legal bounds set on additional services provided by rating agencies to the companies



- Tax incentives for ESG-centred investments and initiatives (E.g.- Tax credit for qualified electric motor vehicles, USA)
- Penalisation on cases of greenwashing and purpose washing



- Mandatory 3rd party audit and reporting system
- Check on the social and political backlash for defaming ESG by several high-profile critiques

Internal drivers: Within organisations



- Ensure system in place to enable ease of data collection for relevant assessment
- Eliminate need for repetitive checks by integrating ESG practices in existing processes



- Effective communication channels across stakeholders for long-term value creation
- Appoint in-house ESG expert/compliance officer and conduct training for employees



- Careful identification of material topics which impact the business and sector
- Manage indirect GHG emissions like scope 3 by integrating appropriate metrics in daily management process



ESG investments are growing in India, investors focused on renewable energy, emission reduction, helping ESG-compliant MSMEs

		Investment areas						
		Carbon & climate technology	Circular economy & Supply chain	Risk assessment & Internal audits		Fintech/ FI, & Finance operations	Healthcare services, infra & wellness	Education & gender diversity
	ESG fund		✓			~		
in Indio	Renewable energy			✓				
Investment themes of major funds in India	Networking & Internet users					~	~	~
s of ma	Healthcare & Pharma		✓					
theme	Real estate management	✓	~		✓	~		
restment	Emissions reduction			✓				~
- In	@ ♂⑤ Impact ૾ૺૺૺ૾૽ૢૺ driven, ඖ⊅ ఄ early-stage	✓	~	✓				



Proactive actions taken by corporates have resulted in progress on UN SDG goals and ESG compliance

Parameters	Indian company in action	Steps taken	Impact achieved	Goals met
Environment	Food chain with leading brands Global Energy & Petroleum Company	 Increased efficiency of energy sources, used resources efficiently under UNGP protocols Undertaken programs under CSR¹, like Dairy Farmer Development programs Hazard Identification, Risk Assessment and Management under HIRA², JSA³ procedure 	 3K+ Giga Joules of energy saved, 2Cr+ new saplings planted Animal welfare and development, investment of INR 2Cr+ in livestock management Reduced total # of safety-related incidents, down by ~20% 	7 APPOINTMENT END CILIAR DESIGNATE ACTION
Social	Tech consultancy provider Leading manufacturer	 Introduced apps for COVID support, like 'Apthamitra app' with the Karnataka gov Introduced and reworked internal policies like Health Assessment and Lifestyle Enrichment program Diverse representation-based hiring policies to mitigate lack of diversity in workforce 	 Spread information and awareness, impacted 3M+ lives ~40% of Women in the workforce in fiscal 2022 for the sample cases Workforce diversity, religion, gender, etc., 90%+ local hires 	3 GOOD REALTH AND WILL BEING 10 REGULED INCHMAINES
Governance	Tech services company Digital insurance player	 Community initiatives for a cause like 'Dhan Utsav', tie up with NGOs Employee satisfaction and engagement identified and raised using surveys Building capability in women at senior management through 'Disha' program 	 Encouraged contribution, supported education 20K+ of underserved children Increased engagement by 80%+, participation and satisfaction by 90%+ Increased female participation in workforce to ~25% 	5 GENDER EQUALITY 17 PARTIMERSHIPS FOR THE GOALS

ESG compliance is in a nascent stage in India, the way forward will be driven by investors, guided by the evolving regulatory and reporting landscape



Enhance Judgement

Better assessment of ESG

compliance and ratings by Investors, with expected performance metrics benchmarked with the company before investing



Increase Adoption

Standards and protocols catering to all types of audiences, enable increase in usability and reduce implementation efforts



Realistic Approach

ESG regulations set by policymakers and representatives should be aimed at capturing industry nuances and complexities



Commit to action

Investors and stakeholders need to commit and vote for climate-tackling actions and strategies despite the challenges in the market



Sustainable practice

Environment-friendly and sustainable practices in the supply chain, product, packaging, transport, etc. can be enforced through regulators, CXOs, etc.

Connect with us

We will be happy to share perspectives



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