





# 08th July, 2024

To	To
BSE Limited	National Stock Exchange of India Limited
Phiroze Jeejeebhoy Towers	'Exchange Plaza', C-1, Block G,
Dalal Street	Bandra Kurla Complex,
Mumbai 400001	Bandra (E), Mumbai – 400 051
<b>Scrip Code – 517522</b>	Symbol - RAJRATAN

Subject: Submission of Business Responsibility and Sustainability Report for the FY 2023-24 pursuant to Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir

In compliance with Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, please find enclosed Business Responsibility and Sustainability Report for the financial year 2023-24 which is being sent to the Members through electronic mode and forms part of Annual Report for financial year 2023-24.

It is also available on the Company's website which can be accessed at <a href="www.rajratan.co.in">www.rajratan.co.in</a>.

This is for your information and records.

Yours Faithfully, For Rajratan Global Wire Ltd.

**Shubham Jain Company Secretary & Compliance Officer** 

## Annexure - VIII

# Business Responsibility & Sustainability Report

## **SECTION A: GENERAL DISCLOSURES**

## I. Details of the listed entity

	Details of the listed entity	
No.	Information	Details
1.	Corporate Identity Number (CIN)	L27106MP1988PLC004778
2.	Name of the Company	RAJRATAN GLOBAL WIRE LIMITED
3.	Year of incorporation	1988
4.	Registered office address	Rajratan House' 11/2 Meera Path Dhenu Market, Indore – 452003 M.P
5.	Corporate address	Rajratan House' 11/2 Meera Path Dhenu Market, Indore – 452003 M.P
6.	E-mail id	investor.cell@rajratan.co.in
7.	Telephone	+91 731 2546401
8.	Website	http://www.rajratan.co.in/
9.	Financial year reported	April 1, 2023 to March 31, 2024
10.	Name of the Stock Exchanges where shares are listed	NSE and BSE
11.	Paid-up Capital	1015 Lakhs
12.	Name and contact details (telephone, email address) of	Mr. Sunil Chordia, Chairman and Managing Director, DIN 00144786, Contact
	the person who may be contacted in case of any queries	No. +91 731 – 2546401,
	on the BRSR report	
13.	Reporting Boundary - Are the disclosures under this report	Disclosures made on a consolidated basis
	made on a standalone basis (i.e. only for the entity) or	
	on a consolidated basis (i.e. for the entity and all the	
	entities which form a part of its consolidated financial	
	statements, taken together).	

### II. Products/services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacturing	Manufacturing of tyre bead wire and high carbon steel wire	100%

## 15. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

S.	Product/Service	NIC Code	% of Total Turnover Contributed
No.			
1	Tyre bead wire	2410	87%
2	High carbon steel wire	2410	13%

## III. Operations

# 16. Nmber of locations where plants and/or operations/offices of the entity are situated:

Location Number of plants		Number of offices	Total
National	2	1	3
International*	1	2	3

<sup>\*</sup>The Company has incorporated One Private Limited (C-Corp) namely Rajratan Wire USA Inc. in the United States of America on 24.01.2024, as wholly owned subsidiary. However, no investment has been made in the said subsidiary till date.

## 17. Markets served by the entity:

### a. Number of locations

Locations	Number
National (No. of States)	Pan India
International (No. of Countries)	21

b. What is the contribution of exports as a percentage of the total turnover of the entity? 36.84%

## c. A brief on types of customers

Rajratan Global Wire Limited's B2B model addresses the growing bead wire needs of automotive tyre companies, cycle tyre bead manufacturers, and electric transmission project companies with patented technologies. The company produces essential wire products, including black wire for industrial applications, addressing diverse and specialized markets. This focus has translated into enduring relationships within industrial sectors.

# IV. Employees

Detailed as at end of Financial Year, i.e March 31, 2024

## 18. a. Employees and workers (including differently abled): 677

S.	Particulars	Total	Ma	ıle	Fem	ale	
No.			No. (B)	% (B/A)	No. (C)	% (C / A)	
		EMPLOYEES					
1.	Permanent (D)	205	175	85%	30	15%	
2.	Other than Permanent (E)	0	0	0%	0	0%	
3.	Total employees (D + E)	205	175	85%	30	15%	
		WORKERS					
4.	Permanent (F)	442	398	90%	44	10%	
5.	Other than Permanent (G)	30	30	100%	0	0%	
6.	Total workers (F+G)	472	428	91%	44	9%	

## b. Differently abled Employees and workers:

S.	Particulars	Total	Male		Female		
No.			No. (B)	% (B/A)	No. (C)	% (C / A)	
	DIFFEREI	NTLY ABLED EMPL	.OYEES				
1.	Permanent (D)	0	0	0	0	0	
2.	Other than Permanent (E)	0	0	0	0	0	
3.	Total employees (D + E)	0	0	0	0	0	
	DIFFERE	NTLY ABLED WO	RKERS				
4.	Permanent (F)	0	0	0	0	0	
5.	Other than Permanent (G)	0	0	0	0	0	
6.	Total workers (F+G)	0	0	0	0	0	

## 19. Participation/Inclusion/Representation of women

Particulars	Total	No. and percentage of Females		
		No. (B)	% (B / A)	
Board of Directors	6	1	16.67%	
Key Management Personnel	3	0	0%	

## 20. Turnover rate for permanent employees and workers

# (Disclose trends for the past 3 years)

(	· · · · · · · · · · · · · · · · · · ·								
	FY 2024 (Tu	rnover rate in	current FY)	`	nover rate in t	, ,	`	nover rate in t	, ,
				to previous FY)			to previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent	19%	46%	24%	7%	2%	9%	9%	4%	13%
Employees									
Permanent	16%	18%	16%	17%	1%	18%	14%	2%	16%
Workers									

## V. Holding, Subsidiary and Associate Companies (including joint ventures)

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

SI.	Name of the holding/subsidiary/	Indicate whether Holding/	% of shares held by the	Does the entity indicated at column
No	associate companies/joint ventures	Subsidiary/Associate/Joint	Company	A participate in the Business
	(A)	Venture		Responsibility initiatives of the
				Company (Yes/No)
1	Rajratan Thai Wire Co. Limited	Subsidiary	100%	No
2.	Rajratan Wire USA Inc.*	Subsidiary	100%	No

<sup>\*</sup>The Company has incorporated One Private Limited (C-Corp) namely Rajratan Wire USA Inc. in the United States of America on 24.01.2024, as wholly owned subsidiary. However, no investment has been made in the said subsidiary till date.

## VI. CSR Details

- 22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes
  - (ii) Turnover (in Rs.) 61421 Lakhs
  - (iii) Net worth (in Rs.) 30205 Lakhs

## VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place(Yes/No) (If Yes, then	Curr	FY 2024 ent Financial	Year	(Previ	FY 2023 ious Financial	Year)
	provide web-link for grievance redress policy)	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks		Number of complaints pending resolution at close of the year	Remarks
Employees and workers	Yes https://www.rajratan.co.in/ wp-content/ uploads/2015/08/ Whistle-Blower-Policy-Vigi- Mechanism.pdf	NIL	NIL	NA	NIL	NIL	NA
Customers	Yes https://rajratan.co.in/contact-us	NIL	NIL	NA	NIL	NIL	NA
Value Chain Partners	Yes https://rajratan.co.in/ contact-us/	NIL	NIL	NA	NIL	NIL	NA
Other (please specify)		NIL	NIL	NA	NIL	NIL	NA
Communities Please share complaints received from customer, client, employees, value chain partners.	Yes https://rajratan.co.in/contact-us/	NIL	NIL	NA	NIL	NIL	NA
Investors (other than shareholders)	Yes  Company has its dedicted  Stakeholders' Relationship	NIL	NIL	NA	NIL	NIL	NA
Shareholders	Committee https://rajratan.co.in/investor- correspondence/	NIL	NIL	NA	NIL	NIL	NA

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

Pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format.

S. No.	Material issue identified	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity (R/O)	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Water Management	Risk	Water scarcity remains a pressing global concern, making efficient and responsible water management crucial for ensuring availability for essential needs, such as drinking water, agriculture, and industrial purposes.	The organization upholds a rigorous and proactive approach to water conservation and management, focusing on recycling and optimization. Through its 'zero liquid discharge' policy, no wastewater is released; instead, treated water is repurposed for developing green areas. This practice enhances environmental preservation and resource efficiency.	Positive. While maintaining the "Zero Liquid Discharge" system requires ongoing investments, the long-term benefits outweigh the associated costs, ensuring sustainable water practices and resource efficiency.
2.	Ethics and Compliance	Opportunity	Maintaining a strong culture of ethics and compliance helps minimize legal risks, potential reputational damage, and costly legal consequences, while fostering trust among stakeholders.	The organization continues to integrate ethics and compliance into its organizational culture, establishing a solid foundation for sustainable growth and maintaining a positive reputation.	Positive. Reduced attrition yields cost savings in re-hiring and training expenses, while enhancing overall employee efficiency.
3.	Employee Wellbeing	Risk	Neglecting employee wellbeing poses substantial risks that can detrimentally affect the organization's overall performance and success.	The organization maintains transparent policies regarding employee compensation, promotion, and grievance redressal processes, fostering a supportive and inclusive work environment. Internal programs and initiatives enhance employee belonging, engagement, and commitment.	Positive. Investing in employee wellbeing contributes to increased productivity, reduced absenteeism, and improved employee retention, ultimately leading to cost savings and improved profitability.
4.	Product Innovation, Safety, and Quality	Opportunity	Developing innovative products that align with evolving customer needs and preferences, all while upholding stringent standards of safety and quality, is paramount for distinguishing the organization amidst competitors. This not only attracts a wider customer base it also cultivates trust among stakeholders.	The organization continues to prioritize innovation, safety, and quality in its product development and manufacturing processes, ensuring compliance with regulations and meeting customer expectations.	Positive. Innovative and high- quality products can command premium pricing, leading to increased revenue and profitability, while building customer loyalty and trust.
5.	Waste Management	Risk	Adhering to government regulations and guidelines regarding waste disposal is crucial to avoid penalties, legal consequences, and adverse environmental effects such as pollution and ecosystem damage.	The organization prioritizes environmentally-conscious manufacturing practices, reducing chemical use, and implementing waste reduction strategies. Meticulous scrutiny ensures generated waste is recyclable thereby, conserving valuable resources and minimizing environmental impact.	Negative. While waste management practices require investments in responsible disposal and recycling processes, the costs are offset by avoiding potential fines, legal expenses, and damage control measures linked with noncompliance.

S. No.	Material issue identified	Indicate whether risk or opportunity	Rationale for identifying the risk / opportunity (R/O)	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6.	Energy Consumption	Risk	Increasing energy costs and potential availability restrictions pose risks to business operations and profitability.	The organization prioritizes energy efficiency measures, such as implementing renewable energy sources, optimizing processes, and adopting energy-saving technologies to reduce overall energy consumption and mitigate the impact of rising costs and potential disruptions.	Negative, but mitigated. While energy costs may increase, the organization's proactive approach to energy efficiency and diversification of energy sources helps minimize the financial impact and ensure long-term operational sustainability.
7.	Respect for Human Rights	Opportunity	Demonstrating a strong commitment to human rights builds trust among stakeholders, including customers, investors, employees, and the community, while creating a safe and inclusive environment that helps attract and retain top talent.	The organization continues to uphold its commitment to respecting human rights through its policies, practices, and fostering an inclusive and equitable work environment.	Positive. Respecting human rights contributes to a positive reputation, improved employee retention, and increased stakeholder confidence, ultimately leading to long-term financial benefits and sustainable growth.
8.	Customer Satisfication	Opportunity	Customer satisfaction plays a crucial role in shaping the brand's reputation and driving continuous improvement through customer engagement, feedback gathering, and addressing concerns.	The organization upholds strong customer engagement strategies by actively seeking feedback and promptly addressing customer concerns to ensure high levels of satisfaction and promoting customer loyalty.	Positive. Satisfied customers are more likely to remain loyal, leading to increased customer retention, positive word-of-mouth, and potentially higher revenue streams.
9.	Occupational Health and Safety	Risk	Occupational health and safety incidents can disrupt business operations, leading to productivity loss, increased absenteeism, work stoppages, and potential legal penalties and fines for non-compliance with regulations.	Employee and worker safety remains a top priority, with robust policies, regular training sessions on safety protocols and best practices, and investments in state-of-the-art technologies designed to enhance workplace safety and protect the well-being of the workforce.	Despite the investments in safety-related technology, personal protective equipment (PPE), and training, the organization recognizes that the advantages of uninterrupted operations and compliance with regulations outweigh the associated costs.
10.	Supply Chain Sustainability	Risk	Addressing scope 3 emissions and introducing sustainable materials throughout the supply chain presents a challenging environment, with increasing pressure for transparency on adherence to laws, regulations, principles, and policies.	The organization adopts a proactive approach to supply chain sustainability by engaging with suppliers, conducting audits, and implementing sustainable procurement practices. Efforts are made to improve visibility, traceability, and compliance throughout the supply chain.	Neutral. While sustainable supply chain initiatives may incur additional costs, they mitigate risks associated with non-compliance and contribute to long-term sustainability goals, potentially offsetting the financial impact.

#### SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Dis	closure Questions	P1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Poli	cy and management processes									
1.	a Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Web Link of the Policies, if available			https:/	//rajratan	.co.in/pol	icies-and	-codes/		
2.	Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.	Do the enlisted policies extend to your value chain partners? (Yes/No)	No	No	No	No	No	No	No	No	No
4.	Name of the national and international codes/			R	ajratan (	Global Wi	ire Limite	d		
	certifications/labels/ standards (e.g. Forest Stewardship	IATF 169	949:2016	ISO 1400	1:2015 IS	O-45001:	2018 BIS	IS 4454:2	2001 (Part	:-01)
	Council, Fairtrade, Rainforest Alliance, Trustea) standards	BIS IS 18	35:1976	BIS IS 482	24:2022 E	COVADIS				
	(e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and			R	ajratan T	hai Wire	Co. Limite	ed		
	mapped to each principle.	IATF 169	949:2016	SIRIM ISC	16650:2	2009 BIS I	S 4824:20	)22 ISO 1	4001:201	5
5.	Specific commitments, goals and targets set by the entity	The Con	npany has	launche	d several	initiative	s aimed a	t reducin	g carbon	
	with defined timelines, if any.	emissio	ns, consei	ving wate	er, and im	proving v	waste mai	nagemer	nt efficien	Cy.
		Meanwhile, the development of specific goals and targets for various paramet					ameters			
		is underway.								
6.	Performance of the entity against the specific				No [	Data Reco	orded			
	commitments, goals and targets along-with reasons in									
	case the same are not met.									

#### Governance, leadership and oversight

7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements

Rajratan Global Wire Limited is deeply committed to sustainability across all operational aspects, emphasizing reduction of environmental impact and prioritizing the well-being of its employees and partners. The company proactively implements eco-friendly materials in its manufacturing processes, adopting energy-saving practices, minimizing waste, and ensuring zero-liquid discharge.

To reinforce its sustainability initiatives, the Company actively utilizes renewable energy sources like wind and solar power to meet energy demands. By integrating these clean energy alternatives, Rajratan significantly lowers its carbon footprint and advances towards a greener future.

Collaboration is also a key focus, as the Company works closely with suppliers and customers to promote sustainable practices throughout the supply chain. Engaging stakeholders at every level, Rajratan encourages the adoption of environmentally friendly practices, ensuring that sustainability principles are upheld by all involved parties.

Rajratan Global Wire Limited's unwavering dedication to sustainability not only fosters a healthier planet but also contributes to a more sustainable and prosperous society for future generations. Through its diligent efforts and commitment to sustainable practices, the company sets a benchmark in the industry, inspiring positive change and paving the way for a better future for all.

8.	Details of the highest authority responsible for	Mr Sunil Chordia
	implementation and oversight of the Business	Chariman and Managing Director
	Responsibility policy (ies).	DIN 00144786
		Contact No : +91 731-2546401

9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.

The Company's Risk Management Committee is responsible for overseeing sustainability-related matters, particularly those concerning ESG (Environmental, Social, and Governance) issues. This Committee reports to and updates the Board on actions to mitigate any relevant concerns.

The Company also has a CSR Committee that oversees community-facing initiatives and CSR (Corporate Social Responsibility) activities.

The company have an internal Environmental Committee as required by the Thai Laws

#### Risk Management Committee

Name	Role	Position
Mr. Sunil Chordia	Chairman	Chairman & MD
Mr. Rajesh Mittal	Member	Independent Director
Mr. Hitesh Jain	Member	CFO

#### **CSR Committee**

Name	Role	Position	
Mrs. Alka Arora Misra	Chairperson	Independent Director	
Mr. Sunil Chordia	Member	Chairman & MD	
Mr. Abhishek Dalmia	Member	Non-Executive Director	

## 10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/	Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)			
	Any other Committee				
Performance against above policies and follow	The company's Business Responsibility policies are regularly reviewed by the Senior				
up action	Leadership Team, which includes the Managing Director and other Directors.				
Compliance with statutory requirements of	All regulatory and statutory compliances				
relevance to the principles, and, rectification of any	are regularly reviewed. Any observed				
non-compliances	non-compliances are addressed through a				
	time-bound program.				

P 1

P 3

P 2

P 4

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

Certification bodies perform comprehensive annual audits to evaluate compliance with quality, health and safety, environmental, and energy conservation policies. Additionally, third-party audits are conducted to assess EHS management, energy efficiency, financial practices, quality assurance, engineering standards, and HR processes in the factories.

P 5

Р7

P 6

P 8

P 9

## 12. If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated:

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

#### SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as "Essential" and "Leadership". While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

# PRINCIPLE 1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable. Essential Indicators

1. Percentage coverage by training and awareness programmes on any of the Principles during the financial year:

Segment	Total number of	Topics / principles covered under the	%age of persons in respective category
	training and awareness	training and its impact	covered by the awareness programmes
	programmes held		
Board of Directors	4	Business strategy, risk,Principle of	100%
		corporate Governance	
Key Managerial Personnel	7	Business strategy,risk,update of laws,	100%
		Principle of corporate Governance	
Employees other than BoD	70	ISO, Six Sigma, TPM, Customer	95%
and KMPs		Engagement, Safety Awareness, Fire Drill,	
Workers	169	ISO, Six Sigma, TPM, , MSA Measurement	98%
		System, Safety Awareness, Fire Drill Crane	
		Training,	

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

Monetary	y
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	NGRBC Principle	Name of the regulatory/ enforcement	Amount	Brief of the Case	Has an appeal been
		agencies/ judicial institutions	(In INR)		preferred? (Yes/No)
Penalty/ Fine	NIL	NIL	NIL	NIL	NIL
Settlement	NIL	NIL	NIL	NIL	NIL
Compounding fee	NIL	NIL	NIL	NIL	NIL

## Non-Monetary

NGRBC Principle		Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)	
Imprisonment	NIL	NIL	NIL	NIL	
Punishment	NIL	NIL	NIL	NIL	

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial			
	institutions			
NIL				

#### 4. Does the entity have an anti-corruption or anti-bribery policy?

Yes, The Company has a Zero tolerance approach to acts of bribery and corruption by any of its employees. Any breach is regarded as a serious matter and is likely to result in serious disciplinary action which could ultimately lead to dismissal. The Code of Conduct is extended to all employees and associates.

The web link for the same is https://rajratan.co.in/wp-content/uploads/2021/09/Code-of-Conduct-for-Directors-Senior-Management-1-3.pdf

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

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	1

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

		)23-24 nancial Year)	FY 2022-23 (Previous Financial Year)		
	Number	Remarks	Number	Remarks	
Number of complaints received in relation to issues of Conflict of Interest of the Directors	NIL	NIL	NIL	NIL	
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	NIL	NIL	NIL	NIL	

7. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.

No Such Instances

The Company has a dedicated team which regularly monitors all evolving regulations (both in India and Thailand) and provides timely inputs to the Company for prompt and corrective action.

#### Leadership Indicators

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

The Company routinely audits its suppliers, engages in discussions with chemical suppliers about the potential for reusing or recycling chemicals, and consults with wire rod suppliers to explore pathways toward green or sustainable steel.

2. Does the entity have processes in place to avoid/manage conflict of interests involving members of the Board?

The Company has established a 'Code of Conduct' that also applies to board members. This Code outlines principles to guide their actions and ensure they perform their duties ethically. Additionally, as required by the Companies Act, 2013, board members regularly disclose any relevant interests in other entities to the Board. For transactions involving board members or entities in which they have an interest, approval must be obtained from the Audit Committee or the Board of Directors, as appropriate. During discussions on these matters, the concerned directors abstain from participating in the meetings.

### PRINCIPLE 2 Businesses should provide goods and services in a manner that is sustainable and safe

#### **Essential Indicators**

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

	FY 2024	FY 2023	Details of improvements in environmental and social
			impacts
R&D	-	-	By implementing a mechanical vapor recompression (MVR)
Capex	100%	100%	system, the Company has made substantial strides in water reuse, aiming to decrease its water footprint and limit the discharge of treated water into natural water bodies. Additionally, by sourcing energy from alternative sources, the Company is actively working to reduce its carbon footprint and support the use of clean, sustainable energy.

- 2. a Does the entity have procedures in place for sustainable sourcing? (Yes/No)
  - The Company prioritizes sustainable practices. In its Thailand plant, wire rods are sourced from recycled steel, supporting green production and ethical labor standards. While India currently lacks a similar system, the Company fosters strong supplier relationships, emphasizes sustainable sourcing, and integrates more recycled steel into its products. Through thorough onboarding and regular audits, the Company ensures adherence to sustainability goals, showcasing its dedication to responsible sourcing and a sustainable future.
  - b If yes, what percentage of inputs were sourced sustainably? 85%(thailand only)
- 3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.
  - Not Applicable, the Company is into manufacturing of tyre bead wire and steel wire that require steel as input. The products have elongated useful life and the same can be recycled at local level as well. As such recovery of residual or waste product (Mainly steel) is not required. There are no significant (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste
- 4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Extended Producer Responsibility is Not Applicable.

#### Leadership Indicators

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

NIC Code	Name of Product /	% of total Turnover	Boundary for	Whether conducted	Results			
	Service	contributed	which the Life	by independent	communicated in			
			Cycle Perspective	external agency (Yes/	public domain (Yes/			
			/ Assessment was	No)	No)			
	conducted							
The company has not conducted LCA of its Products.								

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

Name of Product /Service	Description of the risk / concern	Action Taken
NA	NA	NIL

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

Indicate input material	Recycled or re-used input material to total material					
	FY 2024	FY 2023				
	Current Financial Year	Previous Financial Year				
	NIL	NIL				

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

${\bf Stakeholdergroupfromwhomcomplaintisreceived}$		FY 202		FY 2023 Previous Financial Year		
	Re-Used		Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	NIL	NIL	NIL	NIL	NIL	NIL
E-waste	NIL	NIL	NIL	NIL	NIL	NIL
Hazardous waste	NIL	NIL	NIL	NIL	NIL	NIL
Other waste	NIL	NIL	NIL	NIL	NIL	NIL

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

Indicate product category	Reclaimed products and their packaging materials as % of total		
	products sold in respective category		
N	iil		

## PRINCIPLE 3 Businesses should respect and promote the well-being of all employees, including those in their value chains

#### **Essential Indicators**

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

Category	Total	% of employees covered by									
	(A)	Health insur	ance	Accident ins	urance	Maternity be	nefits	Paternity Be	nefits	Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F/A)
					Permane	nt employees					
Male	175	175	100%	175	100%	0	0%	0	0%	175	100%
Female	30	30	100%	30	100%	7	23%	0	0%	7	23%
Total	205	205	100%	205	100%	7	3.41%	0	0%	178	86%
				Oth	ner than Per	manent emplo	oyees				
Male	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0

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

Category	Total					% of workers	covered by					
	(A)	Health insurance		Accident ins	urance	Maternity be	Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D/A)	Number (E)	% (E / A)	Number (F)	% (F/A)	
					Permane	ent employees						
Male	398	398	100%	398	100%	0	0%	0	0%	304	76%	
Female	44	44	100%	44	100%	2	4.5%%	0	0%	2	4.5%	
Total	442	442	100%	442	100%	2	0%	0	0%	306	69%	
				Oth	er than Per	manent emplo	oyees					
Male	30	30	100%	30	100%	0	0%	0	0%	30	100%	
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%	
Total	30	30	100%	30	100%	0	0%	0	0%	30	100%	

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

Benefits	C	FY 2024 Current Financial Yea	ır	FY 2023 Previous Financial Year			
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	
PF	97%	100%	Yes	100%	100%	Yes	
Gratuity	100%	100%	No	100%	100%	No	
ESI	4.5%	35%	Yes	4.5%	35%	Yes	
Others – please specify (Social Security for Thailand)	42%	29%	Yes	44%	28%	Yes	

# 3. Accessibility of workplaces

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

The Company is actively working to improve the work environment and ensure inclusivity for all employees. To facilitate accessibility for individuals with disabilities, the Company has outfitted its premises with essential infrastructure like ramps, elevators, and additional necessary facilities.

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

The Company strongly values and embraces diversity, fostering an inclusive environment where no individual is subjected to discrimination based on their race, gender, religion/beliefs, disability, marital or civil partnership status, age, sexual orientation, gender identity, gender expression, or any other protected class as defined by the country's laws. The company's committed to treating all individuals with respect, fairness, and equality, ensuring that everyone has an equal opportunity to thrive and contribute their unique perspectives and talents. Its dedication to creating a diverse and inclusive workplace is at the core of our values

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

Gender	Permanent	employees	Permanent workers		
	Return to work rate	Retention rate	Return to work rate	Retention rate	
Male	100%	100%	100%	100%	
Female	100%	100%	100%	100%	
Total	100%	100%	100%	100%	

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes, HR Helpdesk
Other than Permanent Workers	Yes, HR Helpdesk
Permanent Employees	Yes, HR Helpdesk
Other than Permanent Employees	Yes, HR Helpdesk

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

Category		FY 2024		FY 2023			
	Total employees/ workers in respective category (A)	No. of employees/ workers in respective category, who are part of association(s) or Union (B)	%(B/A)	Total employees/ workers in respective category (C)	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	%(D/C)	
Total Permanent Employees	205	0	0%	217	0	0%	
Male	175	0	0%	172	0	0%	
Female	30	0	0%	45	0	0%	
Total Permanent Workers	442	259	59%	378	253	67%	
Male	398	257	65%	353	247	70%	
Female	44	2	5%	26	6	23%	

## 8. Details of training given to employees and workers

Category Total (	Total (A)	F	Y 2024 Currer	nt Financial Ye	ar	Total (B)	FY 2023 Current Financial Year			
		On Health and safety measures		On Skill upgradation			On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / A)	No. (F)	% (F/A)
					Employees					
Male	175	175	100%	175	100%	171	163	95%	160	94%
Female	30	30	100%	30	100%	48	46	96%	37	77%
Total	205	205	100%	205	100%	219	209	95%	197	90%
					Workers					
Male	398	398	100%	398	100%	413	396	96%	388	94%
Female	44	44	100%	44	100%	36	32	89%	32	89%
Total	442	442	100%	442	100%	449	428	95%	420	100%

#### 9. Details of performance and career development reviews of employees and worker:

Category		FY 2024			FY 2023	
	•	Current Financial Yea	ar		Current Financial Yea	ar
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
			Employees			
Male	175	175	100%	171	171	100%
Female	30	30	100%	48	48	100%
Total	205	205	100%	219	219	100%
			Workers			
Male	398	398	100%	413	413	100%
Female	44	44	100%	36	36	100%
Total	442	442	100%	449	449	100%

#### 10. Health and safety management system:

#### a. Whether an occupational health and safety management system has been implemented by the entity?

Yes, the Company is dedicated to acknowledging the essential importance of health and safety initiatives in achieving operational excellence in the workplace. Its extensive health and safety policies are crafted to tackle fatality concerns, set up efficient medical emergency response procedures, and ensure regulatory compliance to reduce injuries and incidents. In line with this commitment, the company runs an Occupational Health Centre and conducts annual health check-ups for all employees.

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

The Company possesses an EHS certification, highlighting its dedication to upholding high standards of environmental, health, and safety practices. As part of its continuous efforts, the company meticulously carries out Hazard Identification and Risk Analysis procedures. These processes systematically identify and analyze potential hazards to assess associated risks, allowing the company to implement suitable control measures and preventive actions. This ensures the well-being of its workforce and the protection of the environment.

#### c. Whether you have processes for workers to report the work related hazards and to remove themselves from such risks.

Yes, all work-related hazards in routine activities are identified and assessed through Hazard Identification and Risk Assessment (HIRA), and control measures are implemented accordingly. The site risk register is regularly reviewed and updated. At Rajratan, we encourage our workers to report any irregularities or near-miss accidents to the management.

#### d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? Yes

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

Safety Incident/Number	Category	FY 2024 Current Financial Year	FY 2023 Previous FinancialYear
Lost Time Injury Frequency Rate (LTIFR) (per one million-person	Employees	Nil	Nil
hours worked)	Workers	Nil	0.77
Total recordable work-related injuries	Employees	Nil	Nil
	Workers	3	16
No. of fatalities	Employees	Nil	Nil
	Workers	Nil	Nil
High consequence work-related injury or ill-health (excluding	Employees	Nil	Nil
fatalities)	Workers	Nil	1

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

The Company strongly believes in the importance of health and safety initiatives as key drivers of operational excellence. It conducts dedicated workshops on behavioral safety and promotes cohesive efforts to enhance operational discipline, systems, and processes. Additionally, the company provides Health Insurance Policies to employees not covered by the Employees' State Insurance Program. Inclusive measures such as organizing eye check-up camps and health camps for all employees support visually challenged individuals and help prevent easily avoidable diseases.

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

		FY 2024		FY 2023			
	Current Financial Year			Previous Financial Year			
	Filed during the year	Pending Resolution at the	Remarks	Filed during the year	Pending Resolution at the	Remarks	
		end of year			end of year		
Working Conditions	NIL	NIL	NIL	NIL	NIL	NIL	
Health & Safety	NIL	NIL	NIL	NIL	NIL	NIL	

#### 14. Assessments for the year:

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

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

The Company has conducted thorough Hazard Identification and Risk Analysis, detecting several significant risks. Most of these risks have already been eliminated through proactive measures, and the company is diligently working to address the remaining ones. This ongoing effort underscores the company's commitment to ensuring the safety and well-being of its employees.

#### **Leadership Indicators**

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

Yes, the company has implemented a mediclaim policy, Employees' Deposit Linked Insurance Scheme cover, ESIC, and a provident fund in India, as well as a social security policy in Thailand.

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

The Company is dedicated to ensuring that all its value chain partners fulfill their obligation to pay their statutory dues. This involves conscientiously monitoring and verifying that required payments are made in accordance with applicable regulations, a process that is ensured through statutory audits conducted by the company.

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

	Total no. of affecte	d employees/ workers	No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment		
	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)	
Employees	-	-	-	-	
Workers	-	-	-	-	

- 4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? Yes
- 5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100% (for Thailand)
Working Conditions	100% (for Thailand)

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

#### PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders

#### **Essential Indicators**

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

The company's stakeholders include employees, customers, dealers, vendors, technical collaborators, suppliers, shareholders, regulatory authorities, NGOs, social institutions, nearby communities, and the broader society, all of whom are directly or indirectly affected by the company's operations.

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

Stakeholder Group	Identified as Vulnerable & Marginalised Group	Channels of Communication	Frequency of Engagement	Purpose and Scope of Engagement
Employees	No	Individual interactions, Team meetings, Events, Workshops and training programmes, Employee feedback survey	Regularly	Fair wages, Growth opportunities, Health & Safety, Various skill development and training programmes
Customers	No	Meetings, E-mails, Newsletters, Press releases and articles, Annual and quarterly reports, Events	Regularly	Superior product quality, Timely delivery, Competitive pricing
Investors, Financers, and Shareholders	No	Annual general meetings, Investor meetings / presentations, Quarterly results, Press releases about recent updates	Quarterly, Annually	Sustainable Financial and operational performance, Strong Corporate governance framework, Better dividend payouts, Liquidity Management
Suppliers & Service Providers	No	Supplier and vendor meetings, Workshops and seminars, Implementing enterprise and supplier development initiatives, Annual meetings, Website, E-mails	Regularly	On-time payments, Building long- term relationships, Service delivery and quality, Agreed terms of service
Government & Regulators	No	Meetings on audits and inspection, Annual/Quarterly Reports, Formal meetings, Periodic report submissions, Workshops and training organised by different government forums, Annual Reports	Regularly	Regulatory and legislative compliance, Compliance with relevant laws and regulations, Giving back to society
Communities	No	In-person interactions, Focused group discussions, Volunteering activities with various NGOs	Monthly	Holistic Community development, Quality education, Job and livelihood creation, Conducting Health care and sanitation initiatives, Tree plantations

### **Leadership Indicators**

- 1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.
  - In India, the company consistently stresses the significance of maintaining active and forward-thinking engagement with key stakeholders to enhance the communication of strategies and performance. This approach allows the company to integrate valuable feedback from stakeholders into its ongoing processes and operations, fostering a culture of continual improvement and transparency.
  - In Thailand, the company complies with regulatory requirements by organizing quarterly environmental committee meetings. These gatherings provide a platform for interacting with key stakeholders, including representatives from the Environmental Board, Industrial Estate of Thailand, Mahachai Land Development Authority, and village leaders. Through these collaborative sessions, the company encourages effective dialogue and cooperation on environmental matters, ensuring compliance with local regulations and promoting sustainable environmental practices.
- 2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

Indeed, the results of stakeholder engagement are analyzed to pinpoint any sustainability concerns for the Company. This process aids in identifying and prioritizing issues pertaining to pertinent economic, environmental, and social matters.

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

The Company upholds a commitment to fair, impartial, and non-discriminatory treatment for all stakeholder needs and concerns. Vulnerable or marginalized stakeholder groups are identified and given priority attention.

# PRINCIPLE 5 Businesses should respect and promote human rights

#### **Essential Indicators**

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

Category	FY 2024 Current Financial Year			FY 2023 Previous Financial Year		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. Of employees / workers covered (D) Of/	% (D / C)
			Employees			
Permanent	205	205	100%	219	219	100%
Other than permanent	0	0	NA	0	0	NA
Total Employees	205	205	100%	219	219	100%
			Workers			
Permanent	442	442	100%	413	413	100%
Other than permanent	30	30	100%	36	36	100%
Total Employees	472	472	100%	449	449	100%

2. Details of minimum wages paid to employees and workers, in the following format:

Category	Total (A)	FY 2024 Current Financial Year			Total (D)	FY 2023 Current Financial Year				
		Equal to Minimum Wage		More than Minimum Wage			Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E/D)	No. (F)	% (F/D)
				Em	ployees					
Permanent	205	0	0%	205	100%	219	2	92%	217	99.07%
Male	175	0	0%	175	100%	171	1	58%	170	99.4%
Female	30	0	0%	30	100%	48	1	2.1%	47	97.9%
Other than										
Permanent										
Male										
Female										
				V	orkers/					
Permanent	442	68	15%	374	85%	413	58	14%	355	86%
Male	398	46	12%	352	88%	347	35	10%	312	90%
Female	44	22	50%	22	50%	36	23	64%	13	36%
Other than		-	-	-	-	-	-	-	-	-
Permanent										
Male	30	29	1	3%	-	36	-	-	36	100%
Female	-	-	-	-	-	-	-	-	-	-

## 3. Details of remuneration/salary/wages, in the following format:

		Male	Female		
	Number	Salary/ wages of respective category	Number	Salary/ wages of respective category	
Board of Directors (BoD)	2	217	-		
Key Managerial Personnel	3	184			
Employees other than BoD and KMP	598	2995	74	456	

# 4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business?

Yes, the Company complies with the stipulations outlined in the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013, ensuring adherence to its regulations and mandates. Additionally, the Company has formulated and put into effect a policy aimed at preventing sexual harassment in the workplace. This policy encompasses a systematic framework for averting incidents of sexual harassment, facilitating the filing of complaints, and establishing a dedicated committee to handle such issues.

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

The Company acknowledges the significance of addressing human rights violations and is committed to fostering a positive and secure work environment. This commitment is demonstrated through the implementation of policies such as **Prevention of Sexual Harassment (POSH)**, grievance redressal, and whistle-blower policies. These policies provide avenues for both employees and contractors to voice their concerns regarding human rights issues. Encouraging open discussions on human rights matters during safety and canteen committee meetings provides a platform for dialogue. The site HR and site EHS teams collaborate closely with the Site Head to address these concerns, with the option to escalate issues to the corporate level if needed. Key stakeholders, including the Corporate HR Head and the Operation Head, are involved in such escalations, and detailed discussions take place within the respective governance committees.

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

		FY 2024 Current Financial Year			FY 2023 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks	
Sexual Harassment	NIL	NIL	NA	NIL	NIL	NA	
Discrimination at workplace	NIL	NIL	NA	NIL	NIL	NA	
Child Labour	NIL	NIL	NA	NIL	NIL	NA	
Forced Labour/Involuntary Labour	NIL	NIL	NA	NIL	NIL	NA	
Wages	NIL	NIL	NA	NIL	NIL	NA	
Other human rights related issues	NIL	NIL	NA	NIL	NIL	NA	

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

The Company emphasizes protecting individuals who report discrimination and harassment by implementing strong governance frameworks. These frameworks include a Code of Conduct, a Prevention of Sexual Harassment (POSH) Policy, and a whistleblower mechanism. They offer clear guidelines for addressing complaints, ensuring confidentiality and well-being of the complainant. The Company is committed to fostering a safe and inclusive workplace, empowering individuals.

## 8. Do human rights requirements form part of your business agreements and contracts? Yes

## 9. Assessments for the year:

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

Note: Internal and external auditors perform evaluations according to the Audit schedule. Additionally, assessments are conducted by relevant government authorities, and the Company has not been issued any certifications of non-compliance.

# 10. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above. – Not Applicable

#### Leadership Indicators

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

The Company acknowledges the critical importance of human rights and commits to their full protection. To foster a safe and inclusive workplace, the Company has enacted strong policies, including the Prevention of Sexual Harassment (POSH) and a dedicated whistleblower policy. These frameworks allow stakeholders to report any human rights violations or unethical behavior. The Company prioritizes confidentiality, fairness, and swift resolution in addressing these issues.

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

The Company is dedicated to actively managing both potential and actual negative impacts on human rights stemming from its operations. Recognizing the necessity to identify and mitigate these impacts, the Company engages in proactive due diligence to prevent any adverse effects and fulfill its obligation to respect and advocate for human rights across its influence.

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

The Company is committed to improving the work environment to be more inclusive for all staff members. It has made its premises accessible to individuals with disabilities by installing necessary facilities like ramps and elevators, ensuring compliance with the Rights of Persons with Disabilities Act, 2016.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	Currently, the Company has not performed a formal assessment of its value chain
Discrimination at workplace	partners. However, it is dedicated to ensuring that all its value chain partners
Child Labour	adhere to applicable regulatory requirements. The Company strongly focuses on
Forced Labour/Involuntary Labour	sustaining a responsible and ethical supply chain by enforcing compliance with
Wages	legal and ethical standards.
Others – please specify	

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

The Company actively enhances the work environment and fosters inclusivity among employees. It acknowledges the importance of accessibility and has made significant investments in infrastructure to ensure equal opportunities for individuals with disabilities. This involves installing ramps, elevators, and other facilities for smooth mobility. Prioritizing accessibility aims to create a welcoming environment where all employees can contribute fully. These efforts underscore the Company's dedication to diversity and nurturing a workplace culture that respects the needs of every individual.

## ${\bf PRINCIPLE}\, 6: Businesses \, should \, respect \, and \, make \, efforts \, to \, protect \, and \, restore \, the \, environment$

#### **Essential Indicators**

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

Parameter	FY 2023-24	FY 2022-23
	(Current Financial Year)	(Previous Financial Year)
Total electricity consumption (A)	197422 GJ	173841.3 GJ
Total fuel consumption (B)	205997 GJ	204285.2 GJ
Energy consumption through other sources (C)	0 GJ	0 GJ
Total energy consumption (A+B+C)	403419 GJ	378126.50 GJ
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	4.53	4.22
Energy intensity (optional) – the relevant metric may be selected by the entity		

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

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

Not Applicable

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

Parameter	FY 2024	FY 2023	
	(Current Financial Year)	(Previous Financial Year)	
Water withdrawal by source (in kilolitres)			
(i) Surface water			
(ii) Groundwater (India)	21019 KL	31546 KL	
(iii) Third party water			
India	67652 KL	74068 KL	
Thailand	119826 KL	108524 KL	

Parameter	FY 2024	FY 2023
	(Current Financial Year)	(Previous Financial Year)
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	208497 KL	214138 KL
Total volume of water consumption (in kilolitres)	216775 KL	214138 KL
Water intensity per rupee of turnover (Water consumed / turnover)	2.43	2.39
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. NO

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

The Company has installed advanced wastewater treatment systems at its Pithampur facility, including an Effluent Treatment Plant (ETP), Reverse Osmosis (RO), Multiple Effect Evaporator, and Advanced Thermal Fluid Dryer (ATFD). These systems are designed to achieve zero liquid discharge, highlighting the company's strong commitment to environmental sustainability and responsible water management.

In Thailand, the company is undertaking a project to install a Zero Liquid Discharge (ZLD) system, which will complement the existing Effluent Treatment Plant. This initiative demonstrates the company's proactive approach to minimizing liquid discharge and ensuring compliance with stringent environmental regulations.

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

Parameter	Please specify unit	FY 2024	FY 2023	
		(Current Financial Year)	(Previous Financial Year)	
NOx	Mg/Nm3	ND	ND	
SOx	Mg/Nm3	ND	ND	
Particulate matter (PM)	Mg/Nm3	11.76	24.55	
Persistent organic pollutants (POP)	NA	NA	NA	
Volatile organic compounds (VOC)	NA	NA	NA	
Hazardous air pollutants (HAP)	NA	NA	NA	
Others – please specify	NA	NA	NA	

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No.

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

Parameter	Unit	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
		(Current mancial real)	(Flevious i ilialiciai leai)
Total Scope 1 emissions (Break-up of the GHG into CO2,	Metric tonnes of CO2	10291	13413
CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	equivalent		
Total Scope 2 emissions (Break-up of the GHG into CO2,	Metric tons of CO2	35079	34794
CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	equivalent		
Total Scope 1 and Scope 2 emissions per rupee of turnover		0.43	0.54
Total Scope 1 and Scope 2 emission intensity (optional)			
– the relevant metric may be selected by the entity			

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? No

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

Yes, the Company, being deeply committed to environmental responsibility, actively strives to reduce greenhouse gas emissions through various initiatives. The Company actively reduces power and fuel consumption by utilizing waste heat from flue gases as an alternative energy source, eliminating the need for electrical heating. Additionally, the Company focuses on optimizing the consumption of liquefied natural gas (LNG) through the insulation of heating equipment

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

Parameter	FY 2024	FY 2023
	(Current Financial Year)	(Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	108.637 MT	180.36 MT
E-waste (B)	0.22 MT	0.33 MT
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	NA	NA
Battery waste (E)	NA	NA
Radioactive waste (F)	0	0
Other Hazardous waste. (G) ETP Waste Sludge	658.58 MT	732.27 MT
Other Hazardous waste. (G) Lead waste	248.974 MT	215.724 MT
Other Non-hazardous waste generated (H) Steel Scrape	1575 MT	1739
Canteen Waste	2.700 MT	2.148 MT
Total (A+B+C+D+E+F+G+H)	2594.111 MT	2869.832 MT
For each category of waste generated, total waste recovered through recycling	g, re-using or other recovery opera	tions (in metric tonnes)
Category of waste		
(i) Recycled	Nil	Nil
(ii) Re-used	Nil	Nil
(iii) Other recovery operations	Nil	Nil
Total		
For each category of waste generated, total waste disposed by nature of dispo	sal method (in metric tonnes)	
Category of waste		
(i) Incineration	Nil	Nil
(ii) Landfilling	Nil	Nil
(iii) Other disposal operations	658.58 MT	732.27 MT
Total		

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

No

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

The Company is dedicated to reducing its environmental impact through a comprehensive NOPLASTIC campaign. This initiative focuses on diligently segregating recyclable materials like plastic, glass, and paper to lower the company's carbon footprint. Emphasizing waste reduction and recycling, the company prioritizes reusing old scrap products over acquiring new ones.

Process line design improvements are aimed at minimizing chemical waste through effective drag control measures. Rigorous monitoring of Key Performance Indicators (KPIs) ensures proactive waste management, supported by a robust scrap monitoring system to reduce waste generation. Other types of waste, including paper, plastic, and wood, are collected in designated bags and centrally stored for proper disposal.

The Company's commitment to advanced technologies is demonstrated by the installation of a quench cooling system, which significantly cuts water consumption in patenting and coating lines. Metallic scrap is meticulously prepared and sent to suppliers in a ready-to-use condition, fostering recycling and circular economy practices.

Ongoing efforts to boost environmental sustainability include upgrading dust collector systems to manage dust from wire drawing machines. To eliminate consumable waste, the 'Plug and Save' initiative promptly addresses and fixes any leakage points within the plant.

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

S.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance			
No.			are being complied with? (Y/N)			
			If no, the reasons thereof and corrective action taken, if any.			
	Not Applicable					

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

Name and brief details of project	EIA Notification No	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link	
As of now company has not conducted EIA						

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

S.	Specify the law / regulation	Provide details of the non -	Any fines / penalties / action taken by	Corrective taken, if any		
Ν	o. / guidelines which was not	compliance	regulatory agencies such as pollution	action		
	complied with		control boards or by courts			
	The Company ensures full compliance with relevant Environmental, Health, and Safety (FHS) rules and regulations across all its					

The Company ensures full compliance with relevant Environmental, Health, and Safety (EHS) rules and regulations across all its manufacturing plants.

#### Leadership Indicators

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Parameter	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
From renewable sources		
Total electricity consumption (A)	22473 GJ	22938 GJ
Total fuel consumption (B)	0 GJ	0 GJ
Energy consumption through other sources (C)	0 G]	0 GJ
Total energy consumed from renewable sources (A+B+C)	22473 GJ	22938 GJ
From non-renewable sources		
Total electricity consumption (D)	174947 GJ	150902.46 GJ
Total fuel consumption (E)	205997 GJ	204285.2 GJ
Energy consumption through other sources (F)	0 GJ	0 GJ
Total energy consumed from non-renewable sources (D+E+F)	380944 GJ	355187.66 GJ

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

2. Provide the following details related to water discharged:

The Company have adopted ZLD system (Zero liquid discharge) hence this is not applicable.

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

The company does not have any operation in water stress area.

4. Please provide details of total Scope 3 emissions & its intensity, in the following format:

Parameter	Unit	FY 2024	FY 2023
		(Current Financial Year)	(Previous Financial Year)
Total Scope 3 emissions (Break-up of the GHG into CO2,CH4,	Metric tonnes of CO2	-	-
N2O, HFCs, PFCs, SF6, NF3, if available)	equivalent		
Total Scope 3 emissions per rupee of turnover	-	-	-
Total Scope 3 emission intensity (optional) – the relevant	-	-	-
metric may be selected by the entity			

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

5. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not Applicable

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

S.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided	Outcome of the initiative
No.		along-with summary)	
NA	NA	NA	NA

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

The company has established a strong risk management system encompassing detailed risk mapping, trend analysis, risk exposure assessment, and mitigation procedures. A comprehensive process is in place to identify, evaluate, manage, and monitor both business and non-business risks. The Audit Committee and the Board frequently review these risks and recommend appropriate actions within a structured framework. To ensure readiness, the company keeps sufficient stocks of essential supplies and equipment, conducts regular drills and simulations, and continually updates its risk management strategies to address new and emerging risks.

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

NII

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

No such assessment was carried.

# PRINCIPLE 7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent Essential Indicators

- 1. a. Number of affiliations with trade and industry chambers/ associations The Company is proudly affiliated wth 12 trade and industry chambers / associations
  - b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

SI.	Name of the Trade and Industry Chambers/Associations	Reach of Trade and Industry Chambers/Associations (State/National)
No.		
1	EEPC India	National
2	CII	National
3	SWMAI	National
4	IMA	State
5	Pithampur Audhyogik Sangathan	State
6	India Thai Chamber of Commerce	National
7	Wire Rod Association	National
8	Association of SME Federation	National
9	Board of Investment Thailand	National
10	Dharmniti Training and Seminar Company Limited	National
11	Quest Asia - CFO Thailand Innovation Forum	National
12	Rotary Ratchaburi	State

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

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

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

The Company is committed to actively engaging with industry chambers and associations, encouraging them to adopt best practices in policy formulation. While the Company has not yet started specific policy-making activities, it remains dedicated to collaborating with industry stakeholders to advocate for sound policies that benefit the entire industry. Through these partnerships, the Company aims to contribute to the development of policies that align with industry standards and promote sustainable practices.

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#### PRINCIPLE 8 Businesses should promote inclusive growth and equitable development

#### **Essential Indicators**

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

Name and brief	SIA Notification No.	Date of	Whether conducted by	Results communicated in	Relevant Web link	
details of project		notification	independent external agency	public domain (Yes / No)		
			(Yes / No)			
Not Applicable						

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

Not Applicable

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

The company engages with the community through various Corporate Social Responsibility (CSR) activities, placing importance on listening to community members' concerns and feedback. Understanding their needs and addressing any issues is a priority during these initiatives. Through open and transparent communication, the company aims to build a strong and mutually beneficial relationship with the community, collaborating towards shared development and well-being.

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

	FY 2024	FY 2023
Directly sourced from MSMEs/small producers	1%	1%
Sourced directly from within the district and neighbouring districts	1%	1%

#### Leadership Indicators

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

Name and brief	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Not Applicable					

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

S.	State	Aspirational District	Amount Spent (in Inr)
No.			
		Not Applicable	

- 3. a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized / vulnerable groups? No
  - b) From which marginalized /vulnerable groups do you procure? NA
  - c) What percentage of total procurement (by value) does it constitute?  $\ensuremath{\mathsf{NA}}$
- 4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

S.	Intellectual Property based on	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit	
No.	traditional knowledge			share	
	The company does not drive any benefits from intellectual properties.				

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Name of authority	Brief of the case	Corrective action taken	
	NA		

### 6. Details of beneficiaries of CSR Projects:

S.	CSR Projects	No. of persons benefitted form CSR Projects	% of beneficiaries from vulnerable and marginalized
No.			group
1	Promoting Education	The Company has successfully implemented	
2	Women Empowerment	numerous CSR projects across various states,	
3	Promoting Sports	positively impacting the lives of numerous	
4	Protection of Art & Culture	beneficiaries. While it may be challenging	100%
5	Health Care	to precisely quantify the exact number of	100/0
6	Promoting Sports	beneficiaries, the Company's efforts have	
		reached a wide range of individuals and	
		communities.	

#### PRINCIPLE 9 Businesses should engage with and provide value to their consumers in a responsible manner

#### **Essential Indicators**

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

The company conducts an annual Customer Feedback Survey to assess satisfaction and gather valuable insights from each customer. Our marketing team regularly visits customers to provide dedicated service and support. A comprehensive system is in place to handle customer complaints promptly and efficiently, with most issues resolved within 15 to 20 days, reflecting the company's commitment to timely resolution.

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

	As a percentage to total turnover	
Environmental and social parameters relevant to the product	The product carries all the necessary information mandated by law.	
Safe and responsible usage		
Recycling and/or safe disposal		

#### 3. Number of consumer complaints in respect of the following:

	FY 202	FY 2024 (Current Financial Year)			FY 2023 (Previous Financial Year)		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks	
Data privacy	NIL	NIL	NA	NIL	NIL	NA	
Advertising	NIL	NIL	NA	NIL	NIL	NA	
Cyber-security	NIL	NIL	NA	NIL	NIL	NA	
Delivery of essential services	NIL	NIL	NA	NIL	NIL	NA	
Restrictive Trade Practices	NIL	NIL	NA	NIL	NIL	NA	
Unfair Trade Practices	NIL	NIL	NA	NIL	NIL	NA	
Other	NIL	NIL	NA	NIL	NIL	NA	

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

	Number	Reasons for recall
Voluntary recalls	NIL	NA
Forced Recalls	NIL	NA

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

The Company has a thorough IT policy applicable to both temporary and permanent employees. This policy also covers contractors, vendors, and customers visiting our premises. It establishes clear guidelines and expectations for the proper and secure use of IT resources, ensuring the protection of sensitive information and maintaining the integrity of our systems.

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

NII

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#### **Leadership Indicators**

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

Yes, the company provides details about its products and services on its official website, accessible at https://rajratan.co.in/product/. You can also follow us on LinkedIn at https://www.linkedin.com/company/rajratanglobal-wire-limited/.

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

Yes, to ensure customer safety and encourage responsible product usage, the company holds technical meetings and distributes product catalogues to educate consumers. These initiatives demonstrate the company's commitment to customer well-being and its dedication to informing consumers about the safe and responsible use of its products.

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

The company has set up efficient communication channels, including email, phone calls, and personal meetings, to promptly and thoroughly share information with consumers about potential risks from the disruption or discontinuation of essential services. These proactive steps highlight the company's dedication to transparent communication, keeping consumers informed and enabling them to make educated decisions. By using a multi-faceted communication approach, the company prioritizes consumer engagement, addresses concerns, and ensures uninterrupted access to vital services, maintaining a strong relationship with its valued customers.

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

Customer feedback is systematically gathered during key interactions, especially at the point of product delivery. The company collects this essential feedback through its business partners, who handle operations on its behalf. Although the company doesn't interact directly with end customers, it depends on its business partners to obtain valuable insights from them. Therefore, the company does not conduct consumer surveys or independently track consumer satisfaction trends.

- 5. Provide the following information relating to data breaches:
  - a. Number of instances of data breaches along-with impact

NIL.

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

NIL.