

# KALYANI STEELS

C.I.N. : L27104MH1973PLC016350

KSL:SEC:

July 24, 2023

**BSE Limited**

Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Fort, Mumbai – 400 001

**Scrip Code : 500235**

**National Stock Exchange of India Limited**

Exchange Plaza,  
Bandra Kurla Complex, Bandra (E)  
Mumbai – 400 051

**Scrip Symbol : KSL**

Dear Sir,

Sub. : Business Responsibility and Sustainability Report  
for the Financial Year 2023-24

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Business Responsibility and Sustainability Report (“BRSR”) for the Financial Year 2023-24, which forms an integral part of the Annual Report of the Company for the Financial Year 2023-24.

The same is also available on the Company’s website at the following link :

Click [here](#)

Thanking you,

Yours faithfully,  
For KALYANI STEELS LIMITED

MRS.D.R. PURANIK  
COMPANY SECRETARY  
E-mail : puranik@kalyanisteels.com

Encl. : As above



KALYANI  
GROUP COMPANY

KALYANI STEELS LIMITED, CORPORATE BUILDING, 2ND FLOOR, MUNDHWA, PUNE – 411036, INDIA  
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**ANNEXURE - G TO DIRECTORS' REPORT****BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT**

[Pursuant to Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

**SECTION A : GENERAL DISCLOSURES****I. Details of the Listed Entity**

1.	Corporate Identity Number (CIN) of the Listed Entity	L27104MH1973PLC016350
2.	Name of the Listed Entity	Kalyani Steels Limited
3.	Year of incorporation	1973
4.	Registered office address	Mundhwa, Pune - 411036, Maharashtra, India
5.	Corporate address	Mundhwa, Pune - 411036, Maharashtra, India
6.	E-mail	investor@kalyanisteels.com
7.	Telephone	+91-020-66215000
8.	Website	www.kalyanisteels.com
9.	Financial year for which reporting is being done	FY 2023-24
10.	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited (NSE) BSE Limited (BSE)
11.	Paid Up Capital	₹ 218.64 Million
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mrs.D.R. Puranik, Company Secretary Contact No : +91-020-66215000 Email ID : investor@kalyanisteels.com
13.	Reporting boundary - Are the disclosures under this report 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)	The disclosures under this report are made on a standalone basis.
14.	Name of the assurance provider	Not Applicable
15.	Type of assurance obtained	Not Applicable

**II. Products / services****16. 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 forging and engineering quality carbon and alloy steel, pig iron and foundry coke	97.67%

**17. Products / Services sold by the entity (accounting for 90% of the entity's Turnover)**

S. No.	Product / Service	NIC Code	% of total Turnover Contributed
1.	Rolled Products As Cast Blooms and Rounds Pig Iron Foundry Coke	24105 24103 24101 19101	97.67%

**III. Operations****18. Number of locations where plants and / or operations / offices of the entity are situated**

Location	Number of plants	Number of offices	Total
National	1	4	5
International	0	0	0

**19. Markets served by the entity****a. Number of locations**

Locations	Number
National (No. of States and Union Territories)	36
International (No. of Countries)	1
<b>b. What is the contribution of exports as a percentage of the total turnover of the entity?</b>	0.46%
<b>c. A brief on types of customers</b>	The forging industry in India is the primary market for the Company's products. Indian and International component manufacturers for commercial vehicles, passenger vehicles, two wheelers, diesel engines, bearings, tractors, turbines, oil and gas and rail form the significant part of the company's clientele. Over the last 5 decades, the Company has earned the status of being the most preferred supplier of steel for critical applications.

**IV. Employees**

The Company's Integrated Steel Manufacturing Facility at Ginigera is under a strategic alliance with Mukand Limited (ML). Under this alliance, the Company and ML share the production in the ratio of 41.38% by the Company and 58.62% by ML.

The said Manufacturing Facility is managed and operated by Hospet Steels Limited (HSL), which is a joint venture between the Company and ML. All employees and workers engaged in Manufacturing Facility are on the roll of HSL.

HSL has 1,105 employees on its roll and 1,447 workers on contract basis. The expenses incurred by HSL are shared by the Company and ML in the production sharing ratio as above. As a result, these employees and workers do not form part of the Company's Business Responsibility and Sustainability Report.

As on March 31, 2024, the Company has 88 employees and 19 workers on its roll and 311 workers on contract basis. These employees and workers form part of the Company's Business Responsibility and Sustainability Report.

**20. Details as at the end of Financial Year****a. Employees and workers (including differently abled) :**

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>EMPLOYEES</b>						
1.	Permanent (D)	75	71	94.67	4	5.33
2.	Other than Permanent (E)	13	13	100	0	0
3.	Total employees (D + E)	88	84	95.45	4	4.55
<b>WORKERS</b>						
4.	Permanent (F)	19	18	94.74	1	5.26
5.	Other than Permanent (G)	311	311	100	0	0
6.	Total Workers (F + G)	330	329	99.70	1	0.30

**b. Differently abled Employees and workers :**

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1.	Permanent (D)	0	0	0	0	0
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total differently abled employees (D + E)	0	0	0	0	0
<b>DIFFERENTLY ABLED WORKERS</b>						
4.	Permanent (F)	0	0	0	0	0
5.	Other than Permanent (G)	0	0	0	0	0
6.	Total differently abled workers (F + G)	0	0	0	0	0

**21. Participation / Inclusion / Representation of Women**

	Total (A)	Number and Percentage of Females	
		No. (B)	% (B/A)
Board of Directors	13	2	15.38%
Key Management Personnel*	8	1	12.50%

\*Key Management Personnel includes Vice President and above

**22. Turnover rate\* for permanent employees and workers**

	FY 2023-24			FY 2022-23			FY 2021-22		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	22.72%	25.00%	22.85%	26.23%	20.00%	25.75%	19.64%	0	18.03%
Permanent Workers	0	0	0	0	0	0	0	0	0

\*includes employees who left voluntarily or due to retirement, dismissal or death.

**V. Holding, Subsidiary and Associate Companies (including Joint Ventures)****23. (a) Names of holding / subsidiary / associate companies / joint ventures**

Please refer to Form AOC-1 (Annexure F to the Directors' Report) for the above information. The Company's Subsidiary Company, Associate Company and Joint Venture Company do not participate in its Business Responsibility initiatives.

**VI. CSR Details**

24. i) Whether CSR is applicable as per Section 135 of Companies Act, 2013 : Yes

ii) Turnover ( in ₹ ) : ₹ 19,595 Million

iii) Net Worth ( in ₹ ) : ₹ 16,914 Million

**VII. Transparency and Disclosures Compliances**

**25. Complaints / grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct (NGRBC)**

Stakeholder group from whom complaint is received	Grievance Redressal Mechanisms in Place (Yes / No) (If yes, then provide web-link for grievance redressal policy)	FY 2023-24			FY 2022-23		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes. <a href="https://www.kalyanisteels.com/contact-us/">https://www.kalyanisteels.com/contact-us/</a>	0	0	—	0	0	—
Investors (other than Shareholders)	NA	0	0	—	0	0	—
Shareholders	Yes. As per SEBI Listing Regulations	1	0	—	5	0	—
Employees and Workers	Yes	0	0	—	0	0	—
Customers	Yes. <a href="https://www.kalyanisteels.com/contact-us/">https://www.kalyanisteels.com/contact-us/</a>	37	0	—	39	0	—
Value Chain Partners	Yes. <a href="https://www.kalyanisteels.com/contact-us/">https://www.kalyanisteels.com/contact-us/</a>	0	0	—	0	0	—

**26. Overview of the entity’s material responsible business conduct issues : Please indicate material responsible business conduct and sustainability 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 (R / O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implication of the risk or opportunity (indicate Positive / Negative implications)
1	Energy Management	Opportunity	Manufacturing of Steel involves high energy consumption. The main thrust of the Company is utilization of renewable energy sources and reuse process waste heat recovered from Blast Furnace, Coke Oven etc.	The Process Waste Heat recovered from Coke Oven is further utilized in the plant. The technology of PCI Coal injection leads to reduction of consumption of blast furnace coke. The Company strives continuously to reduce its consumption of fossil fuel sources.	Positive impact due to optimization of usage of energy.

2	Health and Safety	Risk	Health and Safety is directly related in a labour intensive industry like manufacturing of steel and directly impacts workers, people and community at large.	The Company ensures regular training of its employees and workers on health and safety. Additionally, near-miss and other unsafe conditions and unsafe acts are identified on regular basis to ensure risk mitigation and improvement in processes and procedures.	Interruption in business operations may have negative financial implication.
3	Corporate Governance	Risk	Corporate Governance risk refers to the potential risks associated with the way a company is governed and how it operates. These risks can arise from, the effectiveness of internal controls to name a few.	The company has a strong internal control systems to ensure compliance with rules and regulations. The Company believes in continuous communication with shareholders and provides timely and accurate updates about the company's performance, strategy, and governance practices.	Non-Compliance of Corporate Governance Requirements may lead to negative implications on the Company.
4	Water Stewardship	Risk	The Company emphasizes need to minimize water requirements and maximize water recycling.	Optimum water consumption is ensured by 3 R's (Recycle, Reuse and Reduce). The Company operates a Wastewater Treatment Plant that treats 100% of the wastewater into reusable water.	Shortage of water can have negative implications on the Company.
5.	Supply Chain Management	Opportunity	Maintaining all required information of inward and outward products in a systematic manner.	SAP, which is the Company's Enterprise software enhances traceability of products in efficient manner. SAP also helps in retention of records for a longer period of time.	Positive implication on the Company since it helps segregation and efficient storage of data.

**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.

The National Guidelines for Responsible Business Conduct (NGRBC) as prescribed by the Ministry of Corporate Affairs advocates Nine Principles referred to as P1-P9, as given below :

P1	Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent and accountable.
P2	Businesses should provide goods and services in a manner that is sustainable and safe.
P3	Businesses should respect and promote the well-being of all employees, including those in their value chains.
P4	Businesses should respect the interests of and be responsive towards all its stakeholders.
P5	Businesses should respect and promote human rights.
P6	Businesses should respect and make efforts to protect and restore the environment.
P7	Businesses when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
P8	Businesses should promote inclusive growth and equitable development.
P9	Businesses should engage with and provide value to their consumers in a responsible manner.

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>									
1. a. Whether your entity's policy / policies cover each principle and its core elements of the NGRBCs. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
c. Web Link of the Policies, if available	Policies on CSR, Prohibition of Insider Trading, RPTs, Whistle Blower are available on the link : <a href="https://www.kalyanisteels.com/profile/policies/">https://www.kalyanisteels.com/profile/policies/</a>								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes / No)	N	N	N	N	N	N	N	N	N
4. Name of the national and international codes certifications / labels / standards adopted by your entity and mapped to each principle.	<p>The National and International Codes / Certifications / Labels / Standards are listed below.</p> <p>a. ISO 9001 : 2015 (Quality Management Certification for Manufacturing of Plain Carbon and Alloy Steel Rolled Products)</p> <p>b. IATF 16949 First Edition (Automotive Quality Management System Certification for Manufacturing of Plain Carbon and Alloy Steel Rolled Products)</p> <p>c. ISO 14001 : 2015 (Environment Management System Certification)</p> <p>d. ISO 45001 : 2018 (Health &amp; Safety Management System Certification)</p> <p>e. IBR Certificate (Well-known Steel Maker Certificate from Central Boilers Board)</p>								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	The Company is in the process of setting up specific goals and targets with defined timelines.								
6. Performance of the entity against the specific commitments, goals and targets alongwith reasons in case the same are not met.	N.A.								
<b>Governance, leadership and oversight</b>									
7. Statement by Director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements The Company is committed to integrating Environmental, Social and Governance (ESG) Principles into its business which is central to improving the life of the communities it serves. The Company is also committed to reduce Carbon Footprint and continuously exploring promising ways to improve operational efficiency, reduce fossil fuel consumption and increase usage of greener materials.									
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).	Managing Director								
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.	No.								

**10. Details of Review of NGRBCs by the Company**

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee	Frequency (Annually / Half Yearly / Quarterly / Any other – please specify)
	P1 to P9	P1 to P9
Performance against above policies and follow up action	Yes	Annually
Compliance with Statutory requirements of relevance to the principles and rectification of any non-compliances	Yes	Annually

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

No

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

Not applicable

**SECTION C : PRINCIPLE-WISE PERFORMANCE DISCLOSURE**

**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 programs on any of the Principles during the financial year**

Segment	Total number of training and awareness programmes held	Topics / Principles covered under the training and its impact	% of persons in respective category covered by the awareness programmes
Board of Directors & Key Managerial Personnel (KMP) (includes VPs and above)	Nil	Nil	Nil
Employees other than BoD and KMPs	4	Latest Trends in Steel Industry  POSH workshop, Prevention of Disorders through Healthy Living, Pneumocare, Combating Stress through Yoga, Investment planning and secrets of long-term wealth creation.	70%  100%
Workers	4	Various trainings were organized on work ethics, Safety Management, Health & Hygiene, Fire Drills, POSH workshop.	100%



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 Requirements) Regulations, 2015 and as disclosed on the entity's website).**

No Fines / Penalties / Punishment / Award / Compounding Fees / Settlement amount were paid in any proceedings (by the entity or by Directors / KMPs) with any regulators / law enforcement agencies / judicial institutions, in the financial year.

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.**

Not Applicable

4. **Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.**

The Company has zero tolerance for any form of corruption or bribery and has an Anti-Corruption and Anti-Bribery Policy. The said Policy commands strict actions against anyone caught engaging in such unethical behaviour. The copy of the said Policy is accessible through the intranet of the Company.

5. **Number of Directors / KMPs / Employees / Workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery / corruption.**

No disciplinary action was taken by any law enforcement agency against any of the Company's Directors, KMPs, Employees or Workers for the charges of bribery or corruption.

6. **Details of complaints regarding conflict of interest.**

No complaints are reported with regard to conflict of interest of Directors as well as KMPs.

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.**

Not Applicable

8. **Number of days of accounts payables [(Accounts payable \*365) / Cost of goods / services procured] in the following format :**

	FY 2023-24	FY 2022-23
Number of days of accounts payables	65.53	83.09

9. **Openness of Business**

Details of concentration of purchases and sales with trading houses, dealers and related parties along with loans and advances & investments, with related parties :

Parameter	Metrics	FY 2023-24	FY 2022-23
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	58.19%	49.66%
	b. Number of trading houses where purchases are made from	36	34
	c. Purchases from Top 10 trading houses as % of total purchases from trading houses	47.82%	41.46%

Parameter	Metrics	FY 2023-24	FY 2022-23
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	The Company supplies its finished products (steel and speciality alloy steel) to the vendors of Original Equipment Manufacturers who use the same as raw material. Hence, it does not have any sale / supply to dealers and distributors.	
	b. Number of dealers / distributors to whom sales are made		
	c. Sales to Top 10 dealers / distributors as % of total sales to dealers / distributors		
Share of RPTs in (as respective %)	a. Purchases (purchases with related parties / total purchases)	1.76%	1.98%
	b. Sales (sales to related parties / total sales)	55.61%	58.38%
	c. Loans & Advances (loans & advances given to related parties / total loans & advances)	—	—
	d. Investments (investments in related parties / total investments made)	100%	100%

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

### ESSENTIAL INDICATORS

- 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 2023-24	FY 2022-23	Details of Improvements environmental and social impacts	
			FY 2023-24	FY 2022-23
R&D	—	—	—	—
Capex	1.83%	0.30%	<ul style="list-style-type: none"> <li>a) Wind Breaker Sheets along the periphery of RM Yard.</li> <li>b) Canon Mist Fogger</li> <li>c) Construction of approach road (subway to diesel yard)</li> <li>d) Construction of RM yard storm water pits / Coke fines yard entry drain / Construction of MBF Ground Hopper Ramp and Dust Settling Tank</li> <li>e) Construction of subway</li> <li>f) Concreting of subway approach road</li> <li>g) Concreting of RM yard.</li> <li>h) Construction of new Coal Shed.</li> <li>i) Improved raw material vehicle tyre washing facility.</li> <li>j) Installation of Rain Gun &amp; Sprinkler System.</li> </ul>	<ul style="list-style-type: none"> <li>a) Wind Breaker Sheets along the periphery of RM Yard.</li> <li>b) Canon Mist Fogger</li> <li>c) Revamping of Air Pollution Control Equipment</li> <li>d) Concreting of Coke yard.</li> </ul>

- Does the entity have procedures in place for sustainable sourcing?

Yes. Steel is fifth largest carbon emitting industry in the world. Globally, research and development is underway to de-carbonize the steel making process. However, the development of such technology is yet to be matured for a large commercial scale operations. Considering this, sustainable sourcing of input raw materials (major carbon emitting materials) is a significant challenge. Nonetheless, the Company is working with few suppliers to have sustainable sourcing of some of the key input materials.

- If yes, what percentage of inputs were sourced sustainably?

Not Applicable

- 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.

The Company manufactures products (steel and speciality steel) which are intermediate products (input materials) for customers who in turn finally produce finished products. End-of-life steel or scrap steel, generated

internally, is not considered as waste product by the Company, instead used as input product by recycling, which shows the Company's commitment to the principle of 'recycle, reuse and reduce.' The steel slag generated during the production is sold to cement manufacturers which helps to make the cement more durable and workable. The Company has system in place to recycle plastics, e-waste and hazardous waste in a safe manner. The Company also has implemented waste segregation mechanism at its office as well as in the manufacturing plant.

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.**

Not Applicable

**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 well-being of employees :**

Category	% of employees covered by										
	Total (A)	Health Insurance		Accident insurance		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)
<b>Permanent employees</b>											
Male	71	71	100	71	100	0	0	0	0	0	0
Female	4	4	100	4	100	4	100	0	0	0	0
<b>Total</b>	<b>75</b>	<b>75</b>	<b>100</b>	<b>75</b>	<b>100</b>	<b>4</b>	<b>5.33</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Other than Permanent employees</b>											
Male	13	13	100	13	100	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>13</b>	<b>13</b>	<b>100</b>	<b>13</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

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

Category	% of workers covered by										
	Total (A)	Health Insurance		Accident insurance		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)
<b>Permanent workers</b>											
Male	18	18	100	18	100	0	0	0	0	0	0
Female	1	1	100	1	100	1	100	0	0	0	0
<b>Total</b>	<b>19</b>	<b>19</b>	<b>100</b>	<b>19</b>	<b>100</b>	<b>1</b>	<b>5.26</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Other than Permanent workers</b>											
Male	311	311	100	311	100	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>311</b>	<b>311</b>	<b>100</b>	<b>311</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) :**

	FY 2023-24	FY 2022-23
Cost incurred on well-being measures as a % of total revenue of the Company	0.16%	0.15%

**2. Details of retirement benefits, for Current and Previous Financial Year :**

Benefits	FY 2023-24			FY 2022-23		
	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	100	100	Y	100	100	Y
Gratuity	100	100	Y	100	100	Y
ESI	0	100	Y	0	100	N.A.

**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’s various locations, including the offices / premises have been equipped with lifts and handrails for stairwells to facilitate the movement of differently abled individuals. Thus, Company’s premises has been made access friendly.

**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 provides equal employment opportunities, without any discrimination on the grounds of age, colour, disability, marital status, nationality, race, religion, sex, sexual orientation. The Company strives to maintain a work environment that is free from any harassment based on above considerations. This Equal Opportunities Policy is subject to applicable regulations, qualifications and merit of the individual and the same is available on the intranet of the Company.

**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	0	0	0	0
Female	0	0	0	0
<b>Total</b>	0	0	0	0

Parental leave was not availed by any of the permanent employees / workers during the year.

**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, give details of the mechanism)
<b>Permanent Workers</b>	Yes - HR Department has established a grievance handling mechanism.
<b>Other than Permanent Workers</b>	Yes - HR Department has established a grievance handling mechanism.
<b>Permanent Employees</b>	Yes - HR Department has established a grievance handling mechanism.
<b>Other than Permanent Employees</b>	Yes - HR Department has established a grievance handling mechanism.

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

Category	FY 2023-24			FY 2022-23		
	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)
<b>Total Permanent Employees</b>	75	0	0	70	0	0
Male	71	0	0	66	0	0
Female	4	0	0	4	0	0
<b>Total Permanent Workers</b>	19	0	0	0	0	0
Male	18	0	0	0	0	0
Female	1	0	0	0	0	0

8. Details of training given to employees and workers :

Cat-egory	FY 2023-24					FY 2022-23				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
<b>Employees</b>										
Male	84	84	100	44	52.38	67	67	100	25	37.31
Female	4	4	100	1	25.00	4	4	100	0	0
<b>Total</b>	88	88	100	45	51.14	71	71	100	25	35.21
<b>Workers</b>										
Male	329	329	100	329	100	214	214	100	214	100
Female	1	1	100	1	100	0	0	0	0	0
<b>Total</b>	330	330	100	330	100	214	214	100	214	100

9. Details of performance and career development reviews of employees and workers :

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
<b>Employees</b>						
Male	84	84	100	67	67	100
Female	4	4	100	4	4	100
<b>Total</b>	88	88	100	71	71	100
<b>Workers</b>						
Male	18	18	100	0	0	0
Female	1	1	100	0	0	0
<b>Total</b>	19	19	100	0	0	0

**10. Health and safety management system :****a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage of such system.**

Yes. The health and safety management systems of the Company has been designed so as to ensure that the Company meets EHSMS (Environmental, Health, and Safety Management System) related legal obligations and provides a safe and healthy working environment for its workers and 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 places highest importance for health and safety of employees and workers and hence, has undertaken the following steps to identify work-related hazards and risk assessment :

- Internal Safety visits, which involve regular inspections of the workplace to identify potential hazards and unsafe practices.
- Elimination of Commonly Accepted Unsafe Practices.
- Third Party Safety Audits.

**c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks ? (Yes/ No)**

Yes. The Company has put in place Safety Observation and Near Miss Reporting System to identify unsafe conditions and practices. The Company also conducts regular safety audits, safety assessments and safety walk-downs to identify and address any safety risks in the workplace.

**d. Do the employees / workers of the entity have access to non-occupational medical and healthcare services? (Yes/ No)**

All the employees are offered a variety of health and wellness benefits, including medical insurance and accident insurance. Regular medical consultation is provided on weekly basis.

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

Safety Incident / Number	Category*	FY 2023-24	FY 2022-23
Lost Time Injury Frequency Rate (LTIFR) (per one million person hours worked)	Employees	0	0
	Workers	0	0
Total recordable work related injuries	Employees	0	0
	Workers	0	0
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

\* including in the contract workforce.

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

The Company considers employees as its most valued asset and hence prioritizes their health and safety. The Company has created extensive compliant measures at all touch points to safeguard everyone's safety in the work place and ensure safe working environment. The Company has taken the following measures to ensure a safe and healthy work place :

- The Company has taken measures which are compliant with all statutory preventive healthcare and occupational health and safety requirements.
- The Company provides training on health and safety measures to all employees on a periodic basis.
- The Company has benchmarked its practices against the best practices of the industry that are regularly shared across the business units.
- The Company has deployed Safe and Healthy system of work through periodic safety audits.

**13. Number of Complaints on the working conditions, health and safety made by employees and workers**

No complaints were made by any employee or worker, on the working conditions and / or health and safety practices of the Company.

**14. Assessments for the year :**

	<b>% of your plants and offices that were assessed (by entity or statutory authorities or third parties)</b>
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.**

Safety related incidences, if any, are studied in detail by internal / external audits. Corrective and preventive action plans are implemented to avoid re-occurrence of similar incidents.

**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.**

Internal and External group of stakeholders have been identified. Presently the said stakeholders' group have the immediate impact on the working and operations of the Company which includes employees, investors, suppliers and service providers, customers and community.

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

Stakeholder Group	Whether identified as Vulnerable and Marginalized Group (Yes / No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually / Half yearly / Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	Performance Dialogue and Appraisals, Employee Feedback Programs, Conferences and Town Hall Briefings.	Annually	<ul style="list-style-type: none"> <li>• Help the employees to meet business goals with collective knowledge and experience.</li> <li>• Create an encouraging and empowering work environment.</li> <li>• Getting employee feedback and resolving their issues.</li> </ul>
Investors	No	Annual Report, Company's Website, Quarterly & Annual Results, Annual General Meeting	Annually, Quarterly, Periodically as applicable	Investors prefer to invest in the organizations that have sound corporate governance mechanisms in place and also are compliant with applicable laws.
Suppliers and Service providers	No	Contract Agreements, Regular discussions with Supplier and Vendors, Membership in industry associations.	Continuous and Ongoing	<ul style="list-style-type: none"> <li>• Timely payments schedule and supply of materials and services.</li> <li>• Regular communication &amp; updates on business plans.</li> <li>• Feedback on quality of supplies.</li> </ul>
Customers	No	Personal visits, Plant visits, Emails, Conferences and events	Continuous and Ongoing	<ul style="list-style-type: none"> <li>• Sale of materials and services, product quality and timely delivery of products.</li> <li>• Address key concerns, if any.</li> </ul>
Community	No	Personal meetings / training / workshops	Continuous and Ongoing	CSR obligations

**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 2023-24			FY 2022-23		
	Total (A)	No of employees / workers covered (B)	% (B / A)	Total (C)	No of employees / workers covered (D)	% (D / C)
<b>EMPLOYEES</b>						
Permanent	75	75	100	70	70	100
Other than permanent	13	13	100	1	1	100
<b>Total Employees</b>	88	88	100	71	71	100
<b>WORKERS</b>						
Permanent	19	19	100	0	0	0
Other than permanent	311	311	100	214	214	100
<b>Total Workers</b>	330	330	100	214	214	100

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

Category	FY 2023-24					FY 2022-23				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C /A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>EMPLOYEES</b>										
<b>Permanent</b>										
Male	71	0	0	71	100	66	0	0	66	100
Female	4	0	0	4	100	4	0	0	4	100
<b>Other than Permanent</b>										
Male	13	0	0	13	100	1	0	0	1	100
Female	0	0	0	0	0	0	0	0	0	0
<b>WORKERS</b>										
<b>Permanent</b>										
Male	18	0	0	18	100	0	0	0	0	0
Female	1	0	0	1	100	0	0	0	0	0
<b>Other than Permanent</b>										
Male	311	0	0	311	100	214	62	28.97	152	71.03
Female	0	0	0	0	0	0	0	0	0	0



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

## a. Median remuneration / wages :

	Male		Female	
	Number	Median remuneration / salary / wages of respective category (₹ in Million)	Number	Median remuneration / salary / wages of respective category (₹ in Million)
Board of Directors (BoD) (Only Executive Directors)	1	137.57	0	0
Key Managerial Personnel (includes VPs and above)	7	11.50	1	7.66
Employees other than BoD and KMP	63	1.01	3	1.00
Workers (Permanent)	18	0.20	1	0.19

## b. Gross Wages paid to female as % of total wages paid by the entity, in the following format :

	FY 2023-24	FY 2022-23
Gross wages paid to females as a % of total wages	4.27%	4.00%

## 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/No)

Yes. The Company has formulated a Human Rights Policy which states that the employees can address their complaints or grievances to the Human Resource Department. There shall be no retaliation taken against any employee who raises concern in accordance with the policy. Human Resource Department is responsible to investigate the reported issues and ensure that they are addressed and rectified.

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

The Company is actively involved in the protection and enhancement of human rights and is fully committed in promoting inclusivity and equality and prohibiting any discrimination. The Company has formulated Human Rights Policy which works in combination with the Grievance Policy to ensure that grievances are addressed promptly and effectively.

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

	FY 2023-24			FY 2022-23		
	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	0	0	—	0	0	—
Discrimination at workplace	0	0	—	0	0	—
Child Labour	0	0	—	0	0	—
Forced Labour / Involuntary Labour	0	0	—	0	0	—
Wages	0	0	—	0	0	—
Other Human Rights related issues	0	0	—	0	0	—

## 7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format :

	FY 2023-24	FY 2022-23
Total Complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013	0	0
Complaints on POSH as a % of female employees / workers	0	0
Complaints on POSH upheld	0	0

**8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.**

The Company underscores that any form of retaliation against any individual raising legitimate concerns will not be tolerated. The Company is committed to the protection of the identity of the complainant and all such matters related to discrimination / harassment are dealt with in strict confidence, with appropriate measures taken to maintain such confidentiality.

**9. Do human rights requirements form part of your business agreements and contracts? (Yes / No)**

Yes, human rights requirements form part of Supplier Code of Conduct, whereby suppliers are insisted to respect human rights standards and work towards them in all business activities.

**10. Assessments for the year :**

	<b>% of your plants and offices that were assessed (by entity or statutory authorities or third parties)</b>
Child labour	100%
Forced / involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	

**11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above**

The Plant and Offices of the Company were found to be having no significant risks / concerns and as a result, no corrective actions were required on the criteria stated above.

**Principle 6 : Businesses should respect and make efforts to protect and restore the environment**

**ESSENTIAL INDICATORS**

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

Parameter	Unit	FY 2023-24	FY 2022-23
<b>From Renewable Sources</b>			
Total electricity consumption (A)	GJ	143,223	172,554
Total fuel consumption (B)	—	0	0
Energy consumption through other sources (C)	—	0	0
Total energy consumed from renewable sources (A+B+C)	GJ	143,223	172,554
<b>From Non-Renewable Sources</b>			
Total electricity consumption (D)	GJ	226,149	185,174
Total fuel consumption (E)	GJ	8,290,827	7,455,803
Energy consumption through other sources (F)	—	0	0
Total energy consumed from non-renewable sources (D+E+F)	GJ	8,516,976	7,640,977
<b>Total Energy Consumed (A+B+C+D+E+F)</b>	GJ	8,660,199	7,813,531
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)		0.00044	0.00041
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)* (Total energy consumed / Revenue from operations adjusted for PPP)		0.00990	0.00912
Energy intensity in terms of physical output		—	—

\*PPP Conversion factor for 2024 is 22.4 & for 2023 is 22.17 as per implied PPP Conversion rate of IMF.

**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.

Yes. The target under PAT Scheme is for FY 2024-25. The Company is working to reduce its specific energy consumption by increasing the operational efficiency, reducing usage of fuel consumption etc.

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

Parameter	FY 2023-24	FY 2022-23
<b>Water withdrawal by the source in Kilolitres (KLs)</b>		
i) Surface Water	607,415	1,085,271
ii) Ground water	0	0
iii) Third party water	0	0
iv) Sea water / Desalinated water	0	0
v) Other	0	0
<b>Total volume of water withdrawal (in Kilolitres) (i + ii + iii + iv + v)</b>	607,415	1,085,271
<b>Total volume of water consumption (in Kilolitres)</b>	950,628	681,278
Water intensity per rupee of turnover (Water consumed / turnover)	0.000049	0.000036
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)* (Total water consumption / Revenue from operations adjusted for PPP)	0.00011	0.00080
Water intensity in terms of physical output	—	—

\* PPP Conversion factor for 2024 is 22.4 & for 2023 is 22.17 as per implied PPP Conversion rate of IMF.

**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. Provide the following details related to water discharged :

Parameter	FY 2023-24	FY 2022-23
<b>Water discharge by destination and level of treatment in Kilolitres (KLs)</b>		
(i) To Surface water No treatment With treatment (specify the level of treatment)	N.A.	N.A.
(ii) To Groundwater No treatment With treatment (specify the level of treatment)	N.A.	N.A.
(iii) To Seawater No treatment With treatment (specify the level of treatment)	N.A.	N.A.
(iv) Sent to Third Parties No treatment With treatment (specify the level of treatment)	N.A.	N.A.
(v) Others No treatment With treatment (specify the level of treatment)	N.A.	N.A.

**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

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

Yes, the Company acknowledges the importance of effective water resource management both inside and outside of its operational sites. The Company is committed to improving water use efficiency while ensuring that water is available to all stakeholders. The Company, at its plant at Hospet, operates a Wastewater Treatment System which treats 100% of waste water into re-usable water. The treated wastewater is then used to reduce the consumption of freshwater and also used in various areas of the Plant like recreational garden. As a result the company operates on Zero Liquid Discharge (ZLD).

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

Parameter	Unit	FY 2023-24	FY 2022-23
NOx	µgm/m <sup>3</sup>	20.20	16.96
SOx	µgm/m <sup>3</sup>	19.99	17.15
Particulate matter (PM)	µgm/m <sup>3</sup>	46.54	45.27
Persistent organic pollutants (POP)	—	—	—
Volatile organic compounds (VOC)	—	—	—
Hazardous Air Pollutants (HAP)	—	—	—

**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.

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

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 1 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	609,370	592,624
Total Scope 2 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	8,282	21,876
Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO <sub>2</sub> equivalent / rupee turnover	0.000032	0.000032
Total Scope 1 and Scope 2 emissions intensity per rupee of turnover adjusted for Purchasing Power Parity. (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)*		0.000706	0.000717
Total Scope 1 and Scope 2 emissions intensity in terms of physical output		—	—

\* PPP Conversion factor for 2024 is 22.4 & for 2023 is 22.17 as per implied PPP Conversion rate of IMF.

**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.**

Yes. Deutsch Quality Systems (India) Private Limited

**8. Does the entity have any project related to reducing Green House Gas emission? If yes, then provide details.**

The Company continuously strives to track all of its energy consumption to identify avenues of energy conservation which creates a positive impact for the community and environment in which it operates.

The Company used 39.8 million kWh of renewable energy to replace equivalent number of units from Karnataka Power Transmission Corporation Limited (KPTCL) Grid Power. Various other initiatives include introduction of Energy Efficient Pump for mould and spray cooling in caster that saves power. Energy saving is also achieved by installing VFD in Sinter cooler motor, for adjusting speed with sinter discharge temperature.

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

Parameter	FY 2023-24	FY 2022-23
<b>Total Waste Generated (in metric tonnes)</b>		
Plastic waste (A)	0	0
E-waste (B)	10.02	10.25
Bio-medical waste (C)	0.023	0.025
Construction and Demolition Waste (D)	0	0
Battery waste (E)	0	178
Radioactive waste (F)	0	0
Other Hazardous waste (Used Oil / Waste Oil) (G)	0.55 KL	0.264 KL
Other Non-hazardous waste generated (H) Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	208,221	206,356
i) Granulated Slag	111,230	106,741
ii) MBF Slag	1,281	1,330
iii) Iron Powder	829	997
iv) Pig Iron Scrap	6,227	6,475
v) GCP Dust	6,344	4,759
vi) RMS Mill Scale	3,230	2,816
vii) RMS End Cuts	5,726	5,543
viii) SMS End Cuts	5,164	5,457
ix) Iron Ore Fines	58,243	59,735
x) Coke Fines	9,947	12,503
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>208,221 MTs and 0.55 KL</b>	<b>206,356 MTs and 0.264 KL</b>
<b>Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)</b>	0.000011	0.000011
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)*</b> (Total waste generated / Revenue from operations adjusted for PPP)	0.00024	0.00024
<b>Waste intensity in terms of physical output</b>	—	—

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)

Category of Waste		
(i) Recycled	95,709	98,285
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
<b>Total</b>	<b>95,709</b>	<b>98,285</b>

For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)

Category of Waste		
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations	112,511	108,071
<b>Total</b>	<b>112,511</b>	<b>108,071</b>

\* PPP Conversion factor for 2024 is 22.4 & for 2023 is 22.17 as per implied PPP Conversion rate of IMF.

**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

10. 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.

Hazardous wastes and other wastes that include e-waste, are stored in a designated place and they are safely disposed as per the norms laid by Karnataka State Pollution Control Board (KSPCB).

11. 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 :

Not Applicable.

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

Not Applicable

13. 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 :

The Company is in compliance with all applicable environmental laws.

**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 a member of 8 Trade 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

Sr. No.	Name of the trade and industry chambers / associations	Reach of trade and industry chambers / associations (State / National)
1.	Confederation of Indian Industry	National
2.	The Alloy Steel Producers Association of India	National
3.	Associated Chamber of Commerce & Industries of India	National
4.	Indian Stainless Steel Development Association	National
5.	Steel Furnace Association of India	National
6.	Engineering Export Promotion Council	National
7.	Federation of Indian Export Association	National
8.	Thane Belapur Industrial Association	State

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

There were no incidents of anti-competitive behaviour, abuse of dominant position or unfair trade practices involving the Company during the reporting period i.e. FY 2023-24.

**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.

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 has regular engagement with key community institutions and representatives from key neighbourhood areas. The Company has provided e-mail ID and drop box system for grievance redressal, to enable the stakeholders to easily communicate their concerns and suggestions.

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

	FY 2023-24	FY 2022-23
Directly sourced from MSMEs / small producers	10.76%	2.72%
Directly from within India	37.01%	29.86%

**5. Job creation in smaller towns (Wages paid to persons employed [including employees or workers employed on a permanent or non-permanent / on contract basis] in the following locations as % of total wage cost to be disclosed)**

Location	FY 2023-24	FY 2022-23
Rural	43.63%	75.99%
Semi Urban	—	—
Urban	56.37%	24.01%
Metropolitan	—	—

**Principle 9 : Businesses should engage with and provide value to their customers in a responsible manner.****ESSENTIAL INDICATORS****1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.**

Customer complaints are captured through e-mails and personal meetings and the same are addressed as per documented procedure.

**2. Turnover of products and / services as a percentage of turnover from all products / service that carry information about Environmental and social parameters relevant to the product, Safe and responsible usage, Recycling and / or safe disposal**

Not Applicable

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

	FY 2023-24			FY 2022-23		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data Privacy	0	0	—	0	0	—
Advertising	0	0	—	0	0	—
Cyber Security	0	0	—	0	0	—
Delivery of essential services	0	0	—	0	0	—
Restrictive Trade Practices	0	0	—	0	0	—
Unfair Trade Practices	0	0	—	0	0	—
Others	0	0	—	0	0	—

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

Not Applicable

**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.**

Yes. The Company has a formal policy on Data Protection and Privacy and a copy of the same is available on the Intranet of the Company.

**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.**

Not Applicable

**7. Provide the following information relating to data breaches**

a. Number of instances of data breaches : No instances of data breaches were recorded.

b. Percentage of data breaches involving personally identifiable information of customers : Not Applicable

c. Impact, if any, of the data breaches : Not Applicable