

The Sandur Manganese & Iron Ores Limited

(An ISO 9001:2015; ISO 14001:2015 and 45001:2018 certified company)

CIN: L85110KA1954PLC000759; Website: www.sandurgroup.com

REGISTERED OFFICE

'SATYALAYA', No.266
Ward No.1, Palace Road
Sandur – 583 119, Ballari District
Karnataka, India
Tel: +91 8395 260301/ 283173-199
Fax: +91 8395 260473



CORPORATE OFFICE

'SANDUR HOUSE', No.9
Bellary Road, Sadashivanagar
Bengaluru – 560 080
Karnataka, India
Tel: +91 80 4152 0176 - 79 / 4547 3000
Fax: +91 80 4152 0182

SMIORE/SEC/2023-24/42

29 August 2023

BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai – 400 001

Dear Sir / Madam,

Sub: Submission of Business Sustainability & Responsibility Report 2022-23

Ref: Company Code: 504918

Pursuant to Regulation 34(2)(f) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith Business Sustainability & Responsibility Report (BRSR) for the financial year 2022-23 which forms part of the Annual Report for the financial year 2022-23.

We request you to kindly take the same on record.

Thanking you.

For The Sandur Manganese & Iron Ores Limited

Bijan Kumar Dash
Company Secretary & Chief Compliance Officer

Encl: A/a

MINES OFFICE: Deogiri - 583112, Sandur Taluk, Ballari District

Tel: +91 8395 271025 / 28 / 29 / 40; Fax: +91 8395 271066

PLANT OFFICE: Metal & Ferroalloy Plant, Vyasankere, Mariyammanahalli – 583 222, Hosapete Taluk, Ballari District

Tel: +91 8394 244450 / 244335

Business Responsibility & Sustainability Report

Section A: General Disclosures

I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity	L85110KA1954PLC000759
2. Name of the Listed Entity	The Sandur Manganese & Iron Ores Limited
3. Year of incorporation	1954
4. Registered office address	'SATYALAYA', Door No. 266 (Old No. 80), Ward No. 1, Behind Taluka Office, Sandur - 583119, Ballari District, Karnataka.
5. Corporate address	Sandur House, No 9, Bellary Road, Sadashiva Nagar, Bengaluru - 560 080, Karnataka.
6. E-mail	secretarial@sandurgroup.com
7. Telephone	Tel: 08395 260301, Fax: 08395 260473
8. Website	www.sandurgroup.com
9. Financial year for which reporting is being done	Financial year 2022-23
10. Name of the Stock Exchange(s) where shares are listed	BSE Limited
11. Paid-up Capital	₹ 27,00,58,230/-
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Bijan Kumar Dash, Company Secretary +91 94484 97985 bijan.dash@sandurgroup.com

13. Reporting Boundary:

Reporting Boundary	Registered office located at SATYALAYA, Sandur, Bellary District, Karnataka Mines located at Deogiri, Subbarayanahalli, Kammathuru & Ramghad, Sandur taluk, Bellary District, Karnataka Plant located at Vyasanakere, Hosapete, Vijayanagara District, Karnataka Corporate office at Sandur House, No 9, Sadashivanagar, Bengaluru	The disclosure under this BRSR is on standalone basis unless otherwise stated.
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II. Products/services

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

Sr. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Mining	Manganese Ore Iron Ore	29
2	Ferroalloys	Silicomanganese	20
3	Coke and Energy	Coke Power	51

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

Sr. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Manganese Ores	07293	7
2	Iron Ores	07100	22
3	Ferroalloys	24104	20
4	Coke	19101	48

III. Operations

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

Location	Number of plants	Number of offices	Total
National	1	3	4
International	-	-	-

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

17. Markets served by the entity:

a. Number of locations where plants and/or operations/offices of the entity are situated:

Location	Number locations where plants and/or operations/offices of the entity are situated
National	4
International	-

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

All the Company's products are sold in Nationally.

c. A brief on types of customers:

The customers dealt with by the Company are mostly industrial customers, manufacturing steels and other allied products for end consumers.

IV. Employees

18. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1	Permanent (D)	447	402	90	45	10
2	Other than Permanent (E)	34	34	100	-	-
3	Total employees (D + E)	481	436	90.64	45	9.36
Workers						
4	Permanent (F)	1,813	1,672	92	141	8
5	Other than Permanent (G)	-	-	-	-	-
6	Total workers (F + G)	1,813	1,672	92	141	8

b. Differently abled Employees and workers:

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Differently Abled Employees						
1	Permanent (D)	7	6	86	1	14
2	Other than Permanent (E)	-	-	-	-	-
3	Total differently abled employees (D + E)	7	6	86	1	14
Differently Abled Workers						
4	Permanent (F)	-	-	-	-	-
5	Other than Permanent (G)	-	-	-	-	-
6	Total differently abled workers (F + G)	-	-	-	-	-

19. Participation/Inclusion/Representation of women:

	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	7	1	14.28
Key Management Personnel	2	-	-

20. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	Turnover rate in current FY 2022-23 (percentage)			Turnover rate in FY 2021-22 (percentage)			Turnover rate in FY 2020-21 (percentage)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	15.17	13.33	14.98	12.36	8.88	11.98	8.61	8.69	8.62
Permanent Workers	4.18	4.96	4.24	3.46	2.75	3.51	2.34	-	2.16

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

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

Sr. No.	Name of the holding/subsidiary	Indicate whether holding/Subsidiary/ Associate/Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Skand Private Limited	Holding Company (52.34% Shares held in Listed Company)	Nil	No
2	Sandur Pellets Private Limited	Subsidiary	100%	No
3	Renew Sandur Green Energy Private Limited	Associate	49%	No

VI. CSR Details

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

i. Turnover (₹ lakh): 2,18,464.51

ii. Net worth (₹ lakh): 1,93,382.01

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 (NGRBC):

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
		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	Nil	Nil	NA	Nil	Nil	NA
Investors (other than shareholders)	Yes	Nil	Nil	NA	Nil	Nil	NA
Shareholders	Yes	17	Nil	NA	Nil	Nil	NA
Employees and workers	Yes	Nil	Nil	NA	Nil	Nil	NA
Customers	Yes	Nil	Nil	NA	Nil	Nil	NA
Value Chain Partners	Yes	Nil	Nil	NA	Nil	Nil	NA
Other (please specify)	Nil	Nil	Nil	NA	Nil	Nil	NA

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

24. 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:

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk or opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the R/O (Indicate positive or negative implications)
1	i. Business ethics ii. Corporate governance, transparency, and disclosures	R & O	<ul style="list-style-type: none"> Gain trust of different stakeholders Address reputational risk Improve brand image Attract talent and investment 	The Company has adopted various codes of conduct to conduct the affairs of the Company in a fair and transparent manner. The code of conduct and ethics policy inculcate good principles, values, and discipline in employees, vendors, customers, and other stakeholders while performance of their duties	<ul style="list-style-type: none"> Increased operational costs in Audit and various checks Punitive actions by regulators/legal authority
2	Conflict of interest involving members, employees and business partners	Risk	<ul style="list-style-type: none"> Increase business transparency Regulatory compliances Improve stakeholder's confidence 	The code of conduct of the Company contains the details regarding how to effectively manage conflicts	<ul style="list-style-type: none"> Increased operational costs in Audit and various checks Punitive actions by regulators/legal authority
3	Responsible production and consumptions	Risk & Opportunities	<ul style="list-style-type: none"> Gain trust of different stakeholders Address reputational risk Improve brand image Attract talent and investment 	<ul style="list-style-type: none"> Safe, sustainable and scientific mining Preserving earth's natural resources Product and process integration 	<ul style="list-style-type: none"> Investment opportunities Reduction of cost in long run Improve margin and profitability
4	Occupational health & safety	Risk	<ul style="list-style-type: none"> Health & safety impact Company's practice as a responsible organisation Effective health & safety performance assist in attracting and retaining quality talent 	<ul style="list-style-type: none"> The Company has an effective health and safety practices deployed in accordance with the policies and SOPs on health and safety measures The Company's Occupational Health & Safety Management Systems are in conformity with the OHSAS 9001:2015 Standards 	<ul style="list-style-type: none"> Reduction in operational cost Punitive actions under different legislation
5	Employee development & retention	Opportunity	<ul style="list-style-type: none"> Reduced turnover, reduced external hiring costs and a more engaged and committed workforce Mitigate risk of non-compliance Increased productivity Continuous upgradation of skills Changing expectation of the workforce and work environment 	Several welfare programmes have been carefully planned and effectively implemented over the years under the guidance of Company's founder Patron M. Y. Ghorpade, for more than 4,000 direct and indirect employees. The welfare programmes are tailored with priority for right to food, clothing, housing, medical care, and education	NA
6	Relationship management with different stakeholders i. Grievance redressal mechanism ii. Stakeholders Engagement iii. Conflict management	Opportunity	<ul style="list-style-type: none"> Essential for the success of businesses' operations Increased productivity and morale. Boost companies' social performance as an attractive employer. Better working relations with other stakeholders Brand image/reputation Long term value creation 	The Company has designated email ID's where the grievances can be sent by the stakeholders and the same is being replied in reasonable timeframe	NA

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk or opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the R/O (Indicate positive or negative implications)
				<ul style="list-style-type: none"> The Company has adopted Code of Conduct and Ethics Policy to address the conflict of interest that may arise in the business of the Company. If an employee believes they may have a conflict of interest, then they should disclose such conflict of interest and seek directions from their supervisor, a member of senior management or the Company Secretary The Company engage with different stakeholders directly, through business meets, through AGM, quarterly communications through Stock Exchange, through websites and half yearly internal magazine, Sandur Antaranga 	
7	Human rights	Risk	<ul style="list-style-type: none"> Potential to negatively impact companies ESG performance Violation of Human Rights leads to regulatory, legal, and legislative challenges 	<ul style="list-style-type: none"> SMIORE has the practice to track and address any issues related to child labour, forced labour, involuntary labour and sexual harassment The Company caters to the right of the employees to work in just and favorable conditions (safe and healthy) and upholds the dignity of every individual associated with it. Policy on Prevention of Sexual Harassment (POSH) of the Company, promotes a free, fair and discrimination free working environment for employees and provides a mechanism for raising concerns and resolution of disputes 	<ul style="list-style-type: none"> Increased operational cost Punitive actions for human right violations Reputational/Brand images Operational inconvenience
8	GHG emissions	Risk	<ul style="list-style-type: none"> Reducing the GHG emissions is a vital component of a larger sustainability plan to mitigate the impact of climate change Mitigate the regulatory risk Cost savings through resource efficiency 	<p>We are measuring emissions on an annual basis and tracking the same to identify opportunities for reduction. The Company has taken up upgradation of its entire pollution control equipment to ensure that all emissions from plant operations are well within prescribed norms. Necessary environmental compliance report is filed on quarterly basis with Pollution Control Board. We are also increasing the contribution on renewables at our own premises substituting with cleaner fuels to reduce our Scope 1 and Scope II emissions.</p> <p>Ensuring energy efficient HEMM, DG Sets, Tippers thereby reducing the carbon footprint.</p>	<ul style="list-style-type: none"> Increased operational costs in the short term Cost saving through resource efficiency in long run Regulatory implications
9	Circular economy	Risk & Opportunity	<ul style="list-style-type: none"> Waste management at mines, plant and other locations are indispensable for maintaining salubrious environment Meet the regulatory requirements 	<ul style="list-style-type: none"> The Company has fully reclaimed and rehabilitated stabilised waste dump Masonry toe wall with vents is built prior to dumping of waste 	<ul style="list-style-type: none"> Increased operational costs in the short term Cost saving through resource efficiency in long run

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Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk or opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the R/O (Indicate positive or negative implications)
			<ul style="list-style-type: none"> Ensures sustainable development Reduce negative impact on environment 	<ul style="list-style-type: none"> Out of the generated waste, some waste will be back filled in exhausted mine pits, some will be put as surface dumps & others will be used for backfilling/tail storage facility by having suitable embankment. All waste oil generated in the manufacturing process is collected through drain ports and stored in leak proof drum before being disposed of agencies duly authorized for recycling. The Ferro Manganese (FeMn) slag which was produced previously during FeMn production is recycled by converting into bricks and introducing in the raw material charge mix for Silicomanganese (SiMn) production. Likewise, the Company has enabled a vendor to set up a M-sand unit within the plant premises using SiMn slag. 	<ul style="list-style-type: none"> Regulatory implications
10	Afforestation	Risk & Opportunity	<ul style="list-style-type: none"> Environmental protection Meet regulatory requirements and requirement of Environmental Clearance Counter balance greenhouse emissions Protect flora and fauna of the region 	<ul style="list-style-type: none"> Fruit, fodder, and native species of plants are being cultivated by the Company to cater the needs of afforestation. Avenue plantation along haul road, external roads and on dump terraces. Till date 38 lakh saplings has been planted within and outside the lease area. The generated topsoil is used for plantation/afforestation work up to end of lease period. 	<ul style="list-style-type: none"> Increased operational costs in the short term Cost saving through resource efficiency in long run Regulatory implications
11	Energy management/zero net	Risk & Opportunity	<ul style="list-style-type: none"> Energy management reduces costs while reducing the risk of energy scarcity Effective energy management reduces the GHGs emissions and protects the environment To meet the statutory compliance 	<ul style="list-style-type: none"> The Company is targeting to generate its entire requirement of non-production energy from solar energy by installing solar products like water heaters, street lighting systems, home lighting systems, industrial power systems. With a focus to eliminate utilization of thermal coal for power generation for ferro alloys production, the Company has set-up Waste Heat Recovery Boilers and is producing power using waste heat from Coke Oven plant. The Waste Heat Recovery Boiler, which is a co-generation plant as classified by the Government of Karnataka, has potential to generate about 32 MW energy. 	<ul style="list-style-type: none"> Increased operational costs in the short term Cost saving through resource efficiency in long run Regulatory implications

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk or opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the R/O (Indicate positive or negative implications)
				<ul style="list-style-type: none"> The Company has entered into Shareholder's Agreement and Power purchase agreement with Renew Power to use renewable power from solar and wind and meet the energy requirements. The Company is slowly inching towards meeting its energy requirements from renewable sources. 	
12	Community relationships	Opportunity	<ul style="list-style-type: none"> Build strong relationship with the communities in and around the vicinity where the Company operates Promote economic growth and improve standard of living in the areas through CSR interventions 	<ul style="list-style-type: none"> Continuous consultations are carried out with local communities in the buffer zone of the mining lease and the surroundings of the Plant during various stages of operations that could impact/affect community lives. The Company engages in robust focus group discussions with community leaders and local community stakeholders to address different areas of concern and sharing of information. Dedicated community liaison teams maintain regular and open dialogue with stakeholders, particularly local communities and undertake various community-related initiatives including preferential employment of local people, training, and skill-development of locals, promoting and assisting local small businesses and self-help activities. Based on such stakeholders' consultation, the Company has, in the interest of public, undertaken construction of 35 kilometres of external roads surrounding the mining area at a cost of ₹ 8,500 lakh to mitigate the impact of dust due to transportation of ores through trucks. The cost of construction of these external roads is being shared by other mining lessees and customers in the region. 	NA

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 Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business ('NVGs') released by the Ministry of Corporate Affairs has adopted the following nine areas of Business Responsibility:

Principle 1:	Businesses should conduct and govern themselves with ethics, transparency and accountability
Principle 2:	Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle
Principle 3:	Businesses should promote the wellbeing of all employees
Principle 4:	Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized
Principle 5:	Businesses should respect and promote human rights

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Principle 6:	Businesses should respect, protect, and make efforts to restore the environment
Principle 7:	Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner
Principle 8:	Businesses should support inclusive growth and equitable development
Principle 9:	Businesses should engage with and provide value to their customers and consumers in a responsible manner

Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy & Management Process										
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)	Certain policies are approved by the Board of Directors and certain policies are internal and issued by Managing Director. Implementation of policy decision is carried out by the management.								
	c. Web Link of the Policies, if available	https://sandurgroup.com/policies Certain policies are internal to the Company and not placed on the website.								
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/certifications/ labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.		ISO 9001: 2015	ISO 45001: 2018			ISO 14001: 2015			
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	* At the end of this Section.								
6	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	NA								
Governance, leadership and oversight										
7	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (<i>listed entity has flexibility regarding the placement of this disclosure</i>).	** At the end of this Section.								
8	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Bijan Kumar Dash Company Secretary & Chief Compliance Officer								
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.	Yes, The Board level Corporate Sustainability Committee (CSC) has been constituted for decision making on sustainability related issued. The details on CSC have been provided in the corporate governance report forming part of Annual Report.								
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	P2	P3	P4	P5	P6	P7	P8	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, Ongoing

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.	P1 P2 P3 P4 P5 P6 P7 P8 P9
	We periodically conduct a comprehensive internal audit of our policies and evaluate and monitor gaps found in the implementation of these policies.

*** Specific commitments, goals and targets set by the entity with defined timelines, if any**

Sr. No.	Specific commitment and goals	Timeline Mandatory/ voluntary	Performance/Status of implementation
1	Plantation shall be raised including green belt of adequate width by planting the native species around the Mining Lease (ML) area, plant sites, roads, Overburden dump sites etc. in consultation with the local DFO/Agriculture Dept. The density of the trees shall be around 2000 plants per hectare.	Mandatory	Ongoing
2	100% solid waste are reused and utilized	Mandatory	Ongoing
3	Recycle and reuse iron ore fines, coal and coke fines, lime fines and such other fines collected in the pollution control devices and vacuum cleaning devices the after in process briquetting/agglomeration.	Mandatory	Ongoing
4	Top soil shall be stacked properly with proper slope with adequate safeguards and shall be backfilled for reclamation and rehabilitation of mined out area.	Mandatory	Ongoing
5	Regular monitoring of ground water level and quality shall be carried out by establishing a network of existing wells and constructing new piezometers during the mining operation. The monitoring shall be carried out four times in a year.	Mandatory	Ongoing
6	Conservation measures for protection of flora and fauna in the core & buffer zone shall be drawn up in consultation with the local forest and wildlife department.	Mandatory	Ongoing
7	Fugitive dust emissions from all the sources be controlled regularly. Water spraying arrangement on haul roads, loading, and unloading and at transfer points be provided and properly maintained.	Mandatory	Ongoing
8	Occupational health surveillance program of the workers be undertaken periodically to observe any contractions due to exposure to dust and take corrective measures, if needed.	Voluntary	Ongoing
9	Industrial waste water (workshop and the waste water from the mines and plants) should be properly collected, treated so as to conform to the prescribed standards	Voluntary	Ongoing
10	A Final Mine Closure Plan, along with details of Corpus Fund, shall be submitted to the Ministry of Environment & Forests 5 years in advance of final mine closure for approval.	Mandatory	Complied

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

The Company has pioneered working on sustainability issues from its inception. Development of local areas, community development, employee wellbeing, quality education, health care facilities, taking care of biodiversity, flora & fauna etc have been predominant aspects taken care by the Company and are part of the Company's philosophy and vision statement. During the course of the Company's development, these issues have become integral part of business and its culture. BRSR reporting will undoubtedly provide further thrust to understand and undertake already existing sustainability issues in a more systematic and meticulous manner. Host of issues ranging from environment protection, waste management, water management, renewable energy consumption, stakeholders' engagement, ethics, transparency, accountabilities etc. are being identified as key sustainability issues to be addressed now and in future too.

Mohammed Abdul Saleem
Director (Mines)
Director responsible for BRSR

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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	P2	P3	P4	P5	P6	P7	P8	P9
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)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									Not Applicable
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 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	%age of persons in respective category covered by the awareness Programmes
Board of Directors (BoD)	There are no separate training / awareness programme conducted covering any of the principles during the financial year.		100
Key Managerial Personnel (KMPs)	However, principles are discussed in the Board and committee meetings at different times as an ongoing activity.	Principle 1 to 9	100
Employees other than BoD and KMPs	The Company organize a month-long employee engage program in the named as Sandur Sambhrama undertaking several activities covered under different principles.	1. Code of conduct 2. Leadership 3. Behavioral 4. Environmental Sustainability 5. Employee engagement in the name of Sandur Sambhrama	100
Workers	The Company organize a month-long employee engage program in the name of Sandur Sambhrama undertaking several activities covered under different principles.	1. Occupational health & Safety training 2. Employee wellbeing in the name of Sandur Sambhrama	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 Obligations) Regulations, 2015 and as disclosed on the entity's website):

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

Non-Monetary				
NGRBC Principle	Name of the regulatory enforcement agencies/judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)	
Imprisonment				
Punishment		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? If yes, provide details in brief and if available, provide a web-link to the policy.

Yes, employee code of conduct policy contains stipulations on anti corruption and anti-bribery. It reads as under.

"Employees shall not, directly or indirectly, offer bribes or kickbacks, nor promise any other improper benefit for the purpose of influencing any customer, supplier, public official or any other person, nor will they, directly or indirectly, accept bribes, kickbacks or any other improper benefit which could influence or appear to influence them in the performance of their duties." <https://sandurgroup.com/policies>

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 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Directors		
KMPs	Nil	Nil
Employees		
Workers		

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

	FY 2022-23 (Current Financial Year)		FY 2021-22 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	NA	Nil	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs				

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

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

Leadership Indicators

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

Total number of awareness programme held	Topic/Principles covered under the training	%age value chain partners covered (by value of business done with such partners) under the awareness programmes
	Nil	

2. Does the entity have processes in place to avoid/manage conflict of interests involving members of the Board? (Yes/No) If Yes, provide details of the same.

Yes, the Company receives requisite declaration from the Board Members and the KMPs on the entities they are interested in and ensures requisite approvals as required under the statute as well as the Company's policies are in place before transacting with such entities/individuals.

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 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)	Details of improvements in environmental and social impacts
	Nil	Nil	

2. a. Does the entity have procedures in place for sustainable sourcing? Yes

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

Yes. Mining operations does not require sourcing of any raw material. In the case of ferro-alloys production major portion (about 85 %) of strategic raw material like manganese ore is from captive mines and is transported through road transportation. In case of coke production, 100% of strategic raw material which is coking coal is sourced through importing from different countries. The sustainable sourcing procedure adopted for coking coal procurement is by placing orders well in advance to schedule discharge of shipments and transportation through trucks/trains to meet consumption requirement. Sourcing of materials other than raw materials are from various sources. The Company strives to avail services of the local vendors.

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.

Hazardous Waste:

SMIORE has obtained authorization from Karnataka State Pollution Control Board (KSPCB) under the Hazardous and Other Wastes (Management and Trans boundary Movement) Rules, 2016 for generation, storage and safe disposal of the following type of hazardous wastes.

Category 5.1 used waste oil and

Category 5.2 oil soaked cotton waste

Used waste oil and oil-soaked cotton waste generated during maintenance of machinery and vehicles is flammable. Hence, these wastes are hazardous in nature.

The Company has well defined SOPs for generation, storage and safe disposal of Hazardous waste. All waste oil generated in the manufacturing process is collected through drain ports and stored in leak proof drum before being disposed off to agencies duly authorized for recycling.

Other waste:

Solid waste generation and its management		
Waste	Generation point	Disposal Methodology
Overburden	Mines	Landfilling
Coke fines	Coke Oven Plant	Used in sinter plant and sold to pellet plant
SiMn/FeMn slag	Ferroalloy plant	SiMn slag sold to cement industries and FeMn slags are reused
Baghouse dust	Ferroalloy plant	Resused in SiMn production
Sludge from combined ETP	ETP at plant	Disposed to secured landfill facilities

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

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:

NIC Code	Name of Product/ Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective/ Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link
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During the year the Company has not conducted any life cycle study of the products manufactured by the Company.

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 the Product/Service	Description of the Risk/concern	Action Taken
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During the year the Company has not conducted any life cycle study of the products manufactured by the Company.

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 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Value of slag generated to total value of raw material for production of Ferroalloys	0.2	0.2

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

	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	Re-Used	Recycled	Safely	Re-Used	Recycled	Safely
Plastics (including packaging)		NA			NA	
E-waste		NA			NA	
Hazardous waste (MT)	-	2.73	-	-	2.57	-
Bio medical waste (MT)	-	0.263	-	-	0.9	-

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
	Nil

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

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	% 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)
Permanent employees											
Male	402				0	0%	-	-			
Female	45	*Please refer the note below			5	11%	-	-	#Please refer the note below		
Total	447				5	11%	-	-			
Other than Permanent employees											
Male	34				-	-	-	-			
Female	0	*Please refer the note below			-	-	-	-	#Please refer the note below		
Total	34				-	-	-	-			

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)
Permanent workers											
Male	1,672				0	0%	-	-			
Female	141	*Please refer the note below			3	2%	-	-	#Please refer the note below		
Total	1,813				3	2%	-	-			
Other than Permanent workers											
Male	-	-	-	-	-	-	-	-	-	-	
Female	-	-	-	-	-	-	-	-	-	-	
Total	-	-	-	-	-	-	-	-	-	-	

*The Company maintains its own hospital & dispensaries at its registered office, mine locations and plant locations for treatment of employee's and their dependants. Employees are also eligible to avail 20% of their salaries as medical entitlements during illness. Besides all these, financial assistance is also provided to the employees for major illness.

#The Company maintains day care facilities at mines locations. However, during the year under review and previous years facilities were not availed by any employees.

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

Benefit	FY 2022-23 Current Financial Year			FY 2021-22 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/NA.)	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/NA.)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI	4.47	7.55	Y	6.35	7.19	Y

Benefit	FY 2022-23 Current Financial Year			FY 2021-22 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/NA.)	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/NA.)
Others - Please specify	Nil	Nil	Nil	Nil	Nil	Nil

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.

Yes

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's code of conduct policy has stipulated the following points to deal with equal rights of employees.

Human Resource Relations, Health, Safety and Human Rights

- i) Employees have a right to work in a professional, respectful and safe workplace environment. SMIORE expects its employees to treat each other, customers and third-parties with respect and dignity. SMIORE has zero tolerance for harassment, including violence (verbal or physical), discrimination, sexual harassment, retaliation and any other form of abusive or inappropriate behaviour in the workplace.
- ii) SMIORE is committed to ensuring its employees are treated fairly, compensated appropriately, and hired and promoted without discrimination by reason of race, nationality, ethnic origin, colour, religion, age, gender, marital status, family status, sexual orientation, political belief or disability. Any employee whose actions are inconsistent with these principles will be disciplined, up to and including dismissal.
- iii) SMIORE shall establish and maintain safe working conditions and conduct its operations in an environmentally responsible manner in accordance with applicable environmental laws, regulations and standards.

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	The Company has open door policy to address any kind of concern/grievances. The Company also conduct open sessions and town hall meetings to address any queries/concerns of employees. The Company has a Works Committee to address and redress grievances of employees.
Other than permanent workers	
Permanent employees	
Other than permanent employees	

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

Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	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 (A)	No. of employees/workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	447	-	-	409	-	-
Male	402	-	-	364	-	-
Female	45	-	-	45	-	-
Total Permanent Workers	1,813	1,747	96.35	1,849	1,678	90.75
Male	1,672	1,608	96.17	1,704	1,541	90.45
Female	141	139	98.58	145	137	94.48

8. Details of training given to employees and workers:

Category	FY 2022-23 (Current Financial Year)					FY 2021-22 (Previous Financial Year)				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		Number (B)	% (B/A)	Number (C)	% (C/A)		Number (E)	% (E/D)	Number (F)	% (F/D)
Employees										
Male	402	402	100	383	95.27	364	351	96	364	100
Female	45	18	40	14	31.11	45	29	64	26	57.77
Total	447	420	94	397	88.81	409	380	93	390	95.35
Workers										
Male	1,672	1,618	96	589	35.22	1,704	1,616	95	759	44.54
Female	141	40	28	-	-	145	24	17	-	-
Total	1,813	1,658	91.45	589	32.48	1,849	1,640	89	759	41.04

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

Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	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	447	447	100	409	409	100
Male	402	402	100	364	364	100
Female	45	45	100	45	45	100
Total Permanent Workers	1,813	1,813	100	1,849	1,849	100
Male	1,672	1,672	100	1,704	1,704	100
Female	141	141	100	145	145	100

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 such system? Yes, it covers all the employees and staffs working at mining locations and plant location.

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

A well-defined safety observation system, hazard Identification and risk assessment procedures are in place. Some of them are enlisted below:

- 1) Hazard identification & risk assessment
- 2) Barrier health management
- 3) Quantitative risk assessment
- 4) Job safety analysis
- 5) Hazop
- 6) Inspections
- 7) Audits
- 8) Safety observation system

Refer occupational health & safety and safety measures of sustainability report 2022-23.

c) Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N): Yes

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

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

	Category	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	Nil	Nil
	Workers	Nil	Nil
Total recordable work-related injuries *	Employees	3	5
	Workers	15	33
No. of fatalities	Employees	Nil	Nil
	Workers	Nil	Nil
High consequence work-related injury or ill-health (excluding fatalities)	Employees	Nil	Nil
	Workers	Nil	Nil

*Total recordable injuries are minor injuries and the workers resumed work after minor treatment at plant. There were no injuries at mines during the financial year 2021-22 and 2022-23.

12. Describe the measures taken by the entity to ensure a safe and healthy at workplace:

Yes, occupational health and safety management system coverage is as per ISO 45001:2018. SMIORE recognises health and safety as an integral part of its operations by promoting “Zero Harm” in its operations and endeavors to prevent all injuries and work-related illnesses. It aspires to set the highest standards required to comply and exceed applicable statutory health and safety requirements. It provides appropriate trainings to employees, associates, contractors and suppliers to help them work safely. The system helps in assessing risks and provide controls on health and safety hazards in operations and activities. Regular assurance programs are conducted and timely actions are taken. The systems ensures that incidents are reported timely, investigated for root causes and deployment of lessons learnt across organisation.

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

	FY 2022-23 (Current Financial Year)			FY 2021-22 (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
Working Conditions	Nil	Nil	Nil	Nil	Nil	Nil
Health & Safety	Nil	Nil	Nil	Nil	Nil	Nil

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14. Assessment for the year:

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

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.

Refer occupational health & safety and safety measures of sustainability report 2022-23.

Leadership Indicators

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

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 compliant to statutory dues of employees towards income tax, provident fund, professional tax, ESIC etc. as applicable from time to time.

The other value chain partners (vendors) are equally responsible to comply as per the contract which are verified from time to time as per the contract.

3. Provide the number of employees/workers having suffered high consequence work-related 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:

	Total no. of affected 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 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Employees	Nil	Nil	Nil	Nil
Workers	Nil	Nil	Nil	Nil

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/No)

Yes

5. Details on assessment of value chain partners:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	The Company expects its value chain partners to follow extant regulations, including health and safety practices and working conditions, these parameters are explicitly captured in the procurement contracts. Although no specific assessment has been carried out pertaining to health and safety practices and working conditions of value chain partners, periodic inspections of material value chain partners are performed.
Working Conditions	

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.

Nil

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.

From the inception the Company depends on and deal with various external and internal parties to seamlessly perform the Company's operation. SMIORE maintains a dynamic and strategic stakeholder engagement process at its offices where it identifies key stakeholder groups from the larger universe of all possible stakeholders. This is done after considering the material influence each group has on the Company's ability to create value (and vice-versa). Through this mechanism, the Company has currently identified seven stakeholder groups: Shareholders, Board of Directors, Employees, Villagers/Local communities, Customers, Government Bodies, Supplier/Business partners.

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 & 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 & scope of engagement including key topics and concerns raised during such engagement
Shareholders	No	<ul style="list-style-type: none"> Annual general meeting Periodic meetings Corporate regulatory disclosures Annual report Website 	Quarterly/Annually	<ul style="list-style-type: none"> Economic performance Capital allocation. Successful strategy implementation Business ethics ESG issues Environmental impact Regulatory issues
Employees	No	<ul style="list-style-type: none"> Employee induction Performance reviews Internal communications through Sandur Antaranga Company events Training and developments Policies & procedures Exit interviews 	Regular, Email, Half yearly news letter	<ul style="list-style-type: none"> Employee wellbeing Business ethics Diversity & inclusion Health & safety Training & development Sustainable workplace Compensation Succession planning
Villagers/Community	No	<ul style="list-style-type: none"> Day-to-day interactions & meetings Local initiatives and volunteering activities CSR activities, Donations and sponsorship Website 	As and when required	<ul style="list-style-type: none"> Environmental impact Community Wellbeing Industry practices

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Stakeholder Group	Whether identified as vulnerable & 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 & scope of engagement including key topics and concerns raised during such engagement
Customers	No	<ul style="list-style-type: none"> Day-to-day interactions & meetings Website Marketing material (e.g., annual reports, sustainability reports, social media, etc.) Exhibitions and conferences Business Development efforts Networking events 	Regular	<ul style="list-style-type: none"> Client wellbeing Privacy & security Responsiveness to their requirements Quality, safety and cost Business ethics Company impact on the environment
Government Bodies	No	<ul style="list-style-type: none"> Direct engagement through on-site, licensing department National development plans and programmes Audits Press releases Local forums 	As and when required	<ul style="list-style-type: none"> Alignment with national development plans & programmes Regulatory compliance Labour practices Transparency Community wellbeing National employment
Supplier & Business partners	No	<ul style="list-style-type: none"> Day to day interactions Supplier assessment and audit Regular meetings with key suppliers and subcontractors Supplier satisfaction survey 	Regular	<ul style="list-style-type: none"> Procurement practices Environmental impact & sustainability practices Business ethics Waste Management

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.

SMIORÉ's stakeholder engagement strategy seeks feedback on a regular basis, which is then integrated into the organization's medium and long-term strategy and planning exercises. This also enables the Company to promote the idea of shared growth and a common prosperous future for the society at large. The Company has formal mechanisms in place to engage key stakeholder groups in a constructive manner and collect valuable feedback, including on areas that are under the purview of the NGRBC Principles. This proves to be a valuable input for the risk assessment and strategy formulation process of the Company.

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.

Many of the environmental and social management activities such as de-silting of tanks, construction of toilets, medical camps, etc., have been taken up in consultation with the stakeholders.

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

Nil

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:

	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	Total (A)	No. of employees/workers covered (B)	% (B/A)	Total (C)	No. of employees/workers covered (D)	% (D/C)
Employees						
Permanent	Nil	Nil	Nil	Nil	Nil	Nil
Other permanent		Nil	Nil	Nil	Nil	Nil
Total Employees	Nil	Nil	Nil	Nil	Nil	Nil
Workers						
Permanent	Nil	Nil	Nil	Nil	Nil	Nil
Other permanent	Nil	Nil	Nil	Nil	Nil	Nil
Total Workers	Nil	Nil	Nil	Nil	Nil	Nil

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

Category	FY 2022-23 (Current Financial Year)					FY 2021-22 (Previous Financial Year)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		Number (B)	% (B/A)	Number (C)	% (C/A)		Number (E)	% (E/D)	Number (F)	% (F/D)
Employees										
Permanent										
Male	402	9	2.23%	393	97.76%	364	356	97.8%	8	2.19%
Female	45	3	6.66%	42	93.33%	45	43	95.55%	2	4.55%
Other than Permanent										
Male	34	0	0%	34	100%	27	27	100%	0	0%
Female	0	0	0%	0	100%	2	2	100%	0	0%
Workers										
Permanent										
Male	1,672	136	8.13%	1,536	91.86%	1,704	1,647	96.65%	57	3.45%
Female	141	5	3.54%	136	96.45%	145	140	96.55%	5	3.44%
Other than Permanent										
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-

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

Gender	Male		Female	
	Number	Median remuneration/salary/wages of respective category	Number	Median remuneration/salary/wages of respective category
Board of Directors (BoD)*	2	5,50,32,040	Nil	Nil
Key Managerial Personnel	2	1,80,42,336	Nil	Nil
Employees other than BoD and KMP	398	39,15,49,632	45	2,63,25,302
Workers	1,672	50,78,20,972	141	3,46,14,768

*The details of Directors' remuneration provided above are of executive directors. Remuneration given to all other directors is provided in other part of annual report. Please refer page no 97.

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 Corporate Sustainability Committee for addressing human rights issues.

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

The Company has put in place a robust Grievance Redressal process for investigation of employee concerns and has instituted a Code of Conduct that clearly delineates employee responsibilities and acceptable employee conduct. All employees can put in a written grievance letter through respective HR departments. The issue once registered is duly addressed through a High Level Committee constituted for the purpose. The Company has also constituted a Works Committee and a Welfare Committee for the purpose.

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

	FY 2022-23 (Current Financial Year)			FY 2021-22 (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	Nil	Nil	Nil	Nil
Discrimination at workplace	Nil	Nil	Nil	Nil	Nil	Nil
Child Labour	Nil	Nil	Nil	Nil	Nil	Nil
Forced Labour/ Involuntary Labour	Nil	Nil	Nil	Nil	Nil	Nil
Wages	Nil	Nil	Nil	Nil	Nil	Nil
Other human rights related issues	Nil	Nil	Nil	Nil	Nil	Nil

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

The Company has adopted different policies in order to prevent adverse consequences to the complaint in discrimination and harassment case. The details of policies are.

Code of Conduct

Whistle Blower Policy

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

Yes

9. Assessment for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	Nil
Forced/voluntary labour	Nil
Sexual harassment	Nil
Discrimination at workplace	Nil
Wages	Nil
Others - Specify	Nil

10. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 9 above.

There were no significant risks or concerns (considering Q9)

Leadership Indicators

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

As there were no Human Rights issues in FY23 no business process was modified/introduced due to this.

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

Nil

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?

Yes, all premises and offices are accessible to differently abled visitors.

4. Details on assessment of value chain partners:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	
Forced/voluntary labour	
Sexual harassment	
Discrimination at workplace	The process is not in place and to be assessed
Wages	
Others - Specify	

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

No formal assessment was carried out.

PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

Essential Indicators

1. Details of total energy consumption (in Gigajoules) and energy intensity, in the following format:

Parameter	FY 2022-23	FY 2021-22
Total electricity consumption (A)	86,587.69	1,24,154.31
Total fuel consumption (B)	1,92,323.16	2,08,286.09
Energy consumption through other sources (C)		
Green Energy (Solar)	1,366.64	1,022.36
Clean Energy (WHRB)*	17,13,834.00	16,01,686.80
Total energy consumption (A+B+C)	19,94,111.50	19,35,149.56

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Parameter	FY 2022-23	FY 2021-22
Energy intensity per rupee of turnover (Total energy consumption/turnover in rupees)	0.0000913	0.0000847
Energy intensity (optional) - the relevant metric may be selected by the entity		

*WHRB - Waste Heat Recovery Boiler

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an 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 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	4,32,595	3,85,194
(ii) Groundwater	2,09,672	2,37,250
(iii) Third party water	1,456	1,595
(iv) Seawater/desalinated water	NA	NA
(v) Others	NA	NA
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	6,43,723	6,24,039
Total volume of water consumption (in kilolitres)	6,43,723	6,24,039
Water intensity per rupee of turnover (Water consumed/turnover)	0.00003	0.00003
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.

SMIORE understands the need for efficient management of water resources and has adopted the principle of 'Zero Liquid Discharge' in all its operational units, further enhancing our sustainability efforts. Wastewater/blow down water generated in CFBC boiler, WHRB boiler is being treated and reused for maintaining green belt plantations, gardens and dust suppression. Similarly, wastewater generated at cooling towers of Ferro Alloy Furnaces is being used for slag granulation, coke quenching and dust suppression.

SMIORE has installed 1 X 250 KLD capacity, and 1 X 100 KLD capacity Sewage Treatment Plant (STP) with state-of-the-art Moving Bed Biofilm Reactor (MBBR) technology to treat domestic sewage generated from SMIORE colonies at Mines. Treated water is reused for dust suppression and green belt plantation maintenance.

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

Parameter	Please specify unit	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
NOx	KG	1,99,681.92	2,41,407.26
SOx	KG	3,05,351.15	9,73,285.96

Parameter	Please specify unit	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Particulate matter (PM)	KG	23,278.86	38,224.37
Persistent organic pollutants (POP)		NA	NA
Volatile organic compounds (VOC)		NA	NA
Hazardous air pollutants (HAP)		NA	NA
Others-please Specify		NA	NA

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an 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 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	t CO ₂ e	1,33,172.73	1,16,814.74
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	t CO ₂ e	17,197.28	24,658.43
Total Scope 1 and Scope 2 emissions per rupee of Turnover		0.00000688	0.00000619
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. Please refer Sustainability report for the year 2022-23, Section energy management.

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

Parameter		FY 2022-23	FY 2021-22
Total Waste generated (in Tonnes)			
Plastic waste (A)		NA	NA
E-waste (B)		NA	NA
Bio-medical Waste (C)	Category	Quantity	Quantity
	Yellow	0.042	0.526
	Red	0.114	0.203
	White	0.014	0.044
	Blue	0.093	0.127
	Total	0.263	0.900
Construction and demolition waste (D)		NA	NA
Battery waste (E)		Nil	Nil
Radioactive waste (F)		NA	NA

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Parameter		FY 2022-23	FY 2021-22
Other Hazardous waste. Category (5.1)		2.61	2.53
Please specify, if any. (G)	Category (5.2)	0.119	0.040
Other Non-hazardous waste generated (H). Please specify, if any.			
a.	Si Mn Slag (Silico-Manganese Slag)	49,720.60	34,113.00
b.	Bag house dust (Break-up by composition i.e., by materials relevant to the sector)	5,132.00	4,200.00
Total (A+B + C + D + E + F + G + H)		54,855.59	38,316.47
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tons)			
Category of waste			
(i) Recycled			
(ii)	Re-used Bag house dust	5,132.00	4,200.00
(iii) Other recovery operations			
Total		5,132.00	4,200.00
For each category of waste generated, total waste disposed by nature of disposal method (in metric tons)			
Category of waste			
(I) Incineration			
(ii)	Landfilling*	Nil	Nil
(iii) Other disposal operations Disposed to authorized recycler			
a.	5.1 Used spent oil	2.61	2.53
b.	5.2 Waste residues containing oil	0.12	0.04
c.	Si Mn Slag	49,720.60	34,113.00
Total		49,723.33	34,115.57

*Landfilling done through mining process has not been considered.

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an 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.

Please refer point no 3 of principle 2.

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:

Sr. No.	Location of operations/offices	Type of Operations	Whether the conditions of environmental approval/clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
1	Deogiri, Subbarayanahalli, Kammathuru, Ramghad of Sandur Taluk, Bellary District, Karnataka	Mining	Complied

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	Increase of Iron Ore production from 1.60 to 4.50 MTPA, Manganese Ore production from 0.286 MTPA to 0.582 MTPA with total excavation of 26.42 MTPA (Iron Ore ROM – 7.85 MTPA, Manganese Ore ROM – 1.34 MTPA, Top Soil – 0.19 MTPA & Waste – 17.04 MTPA) along with proposed 7.0 MTPA Ore Beneficiation Plant, 1.2 km Down Hill Conveyor System, & 0.15 MTPA Crushing & Screening Plant of Iron Ore and Manganese Ore Mine (ML No: 2678) by The Sandur Manganese & Iron Ores Limited.
EC Identification No.:	EC23A001KA158909
Date	25.04.2023
Whether conducted by independent external agency (Yes/No)	Yes
Results communicated in public domain (Yes/No)	Yes
Relevant web Link	https://www.sandurgroup.com/downloads/Business-Verticals-Statutory-Compliance/EC.pdf

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. No.	Specify the law/regulation/ guidelines which was not complied with	Provide details of the non-compliance	Any fines/penalties/ action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
Nil				

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 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
From renewable sources		
Total electricity consumption (A)	1,366.64	1,022.36
Total fuel consumption (B)		
Energy consumption through other sources (C) Clean Energy from Waste Heat Recovery Boilers (WHRB).	17,13,834.00	16,01,686.80
Total energy consumed from renewable sources (A+B+C)	17,15,200.64	16,02,709.16
From non-renewable sources		
Total electricity consumption (D)	86,587.69	1,24,154.31
Total fuel consumption (E)	1,92,323.16	2,08,286.09
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewable sources (D+E+F)	2,78,910.85	3,32,440.40

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

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

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres): Nil *		
(i) To Surface water	-	-
- No treatment	-	-
- With treatment – please specify level of Treatment	-	-
(ii) To Groundwater	-	-
- No treatment	-	-
- With treatment – please specify level of Treatment	-	-
(iii) To Seawater	-	-
- No treatment	-	-
- With treatment – please specify level of Treatment	-	-
(iv) Sent to third-parties	-	-
- No treatment	-	-
- With treatment – please specify level of Treatment	-	-
(v) Others	-	-
- No treatment	-	-
- With treatment – please specify level of Treatment	-	-
Total water discharged (in kilolitres)	-	-

*The wastewater is treated and reused in various plant processes, green belt maintenance and dust suppression. Water is not discharged into surface water bodies, groundwater, the sea or any other natural water sources.

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

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

For each facility/plant located in areas of water stress, provide the following information:

- (i) Name of the area
- (ii) Nature of operations
- (iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Water withdrawal by source (in kilolitres): Nil		
(i) Surface water	-	-
(ii) Groundwater	-	-
(iii) Third party water	-	-
(iv) Seawater/desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilolitres)	-	-
Total volume of water consumption (in kilolitres)	-	-
Water intensity per rupee of turnover (Water consumed/turnover)	-	-
Water intensity (optional) – the relevant metric may be selected by the Entity	-	-

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres): Nil *		
(i) Into Surface water	-	-
- No treatment	-	-
- With treatment – please specify level of Treatment	-	-
(ii) Into Groundwater	-	-
- No treatment	-	-
- With treatment – please specify level of Treatment	-	-
(iii) Into Seawater	-	-
- No treatment	-	-
- With treatment – please specify level of Treatment	-	-
(iv) Sent to third-parties	-	-
- No treatment	-	-
- With treatment – please specify level of Treatment	-	-
(v) Others	-	-
- No treatment	-	-
- With treatment – please specify level of Treatment	-	-
Total water discharged (in kilolitres)	-	-

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

*The wastewater is treated and reused in various plant processes, green belt maintenance and dust suppression. Water is not discharged into surface water bodies, groundwater, the sea or any other natural water sources.

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

Parameter	Unit	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	<i>Metric tonnes of CO2 Equivalent</i>		
Total Scope 3 emissions per rupee of turnover		Not been calculated	
Total Scope 3 emissions 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

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:

Nil

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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:

Sr. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Renewable energy-based power plant at Kudligi	SMIORE has entered into an equity-based agreement with Renew Green Energy Solutions Pvt. Ltd., to develop a state-of-the-art power plant that combines wind and solar energy to generate sustainable electricity.	Expected to generate 33 MW solar and 9.9 MW wind energy and aims to reduce carbon emissions.
2	Renewable Energy (Solar Installations)	On-grid and off-grid solar installations at mines to cater the electricity need. Installation of Flat Plate Collector (FPC) solar water heating system, solar streetlights, home lighting and solar pumps, etc., at registered office, mines, and residential colonies.	3,79,623.30 kWh renewable energy generation in FY 2022-23.
3	Clean Energy	Two number of Waste Heat Recovery Boilers (WHRB) having 60 TPH capacity electricity generation were installed to recover heat from the waste gas produced by non-recovery type of coke oven.	47,60,65,000 kWh clean energy was generated in FY 2022-23 that contributed to to 85.94% of SMIORE's total energy consumption.
4	Installation of Variable Frequency Drive (VFD) for ID fans and FD fans	VFDs are installed for the ID fans and FD fans at power plant and ferro alloy plant for energy conservation. VFDs allow motors to operate at a variable speed hence reduce the energy consumption of the equipment and saves energy.	Approximately 2,000 kWh energy per year is conserved.
5	Installation of Air-Cooled Condenser (ACC)	Air cooled condenser is a direct dry cooling system that uses ambient air to extract the sensible heat and latent heat of condensation released by the exhaust steam from turbines.	ACC has almost 1/3 rd water footprint as compared to a conventional Water-Cooled Condenser (WCC). Approximately, 2,000 cubic meter of water is saved per day.
6	Sewage Treatment Plant (STP) and Effluent Treatment Plant (ETP)	Domestic effluents are treated in state-of-the-art Moving Bed Biofilm Reactor (MBBR) technology based STP and trade effluents are treated in ETP. Treated water is reused in various processes, plantation maintenance and dust suppression.	350 cubic meter of water is treated every day.

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

The Company has a Business Continuity Policy (BCP). The main objective of BCP is to maintain business continuity under disruptive incidents with an aim to minimize impact on:

- Human life and other living beings;
- Environment and related eco systems;
- Economic losses;
- All stakeholders (such as investors, employees).

To make this BCP more robust, the Company plans training and awareness sessions across the mines and plant locations. Apart from training, BCP testing is done periodically to check its efficacy and improving it further based on the gaps observed during testing.

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: Nil

9. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts: Not yet been assessed

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.
- 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:

S. No.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (State/National)
1	Federation of Indian Mineral Industries ('FIMI')	National
2	Indian Ferro Alloy Producers Association ('IFAPA')	National
3	Associated Chambers of Commerce and Industry of India ('ASSOCHAM')	National
4	Mines Safety Association of Karnataka	State
5	Mines Environment & Mineral Conservation 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:

Name of Authority	Brief of case	Corrective action taken
No adverse orders received from regulatory authorities for anti-competitive conduct.		

Leadership Indicators

Details of public policy positions advocated by the entity:

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of review by Board
Nil				

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 & Brief details of the project	SIA notification number	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant web link
Nil					

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

Sl. No	Name of project for which R&R is ongoing	State	District	No of affected families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (in ₹)
Not Applicable						

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

All grievances could be submitted at investors@sandurgroup.com. The grievances of the community could also be sent to any of the plant locations HR / Admin teams who will handle the same.

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

Parameter	FY 2022-23 Current Financial Year (percentage)	FY 2021-22 Current Financial Year (percentage)
Directly sourced from MSMEs/Small producers	17.34	25.48
Sourced directly from within the district and neighbouring districts	54.00	40.54

Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
No SIA was done in the current financial year	

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

S. No.	State	Aspirational Director	Amount spent INR
Not Applicable			

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized/vulnerable groups? (Yes/No)

(b) From which marginalized/vulnerable groups do you procure?

(c) What percentage of total procurement (by value) does it constitute?

No, we do not have a policy on this yet.

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. No.	Intellectual property based on traditional knowledge	Owned/Acquired (Yes/No)	Benefit shared (Yes/No)	Basis of calculating benefit shared
Nil				

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 case	Corrective action taken
Nil		

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	Name of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized group
Not assessed			

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.

Customer complains and feedback can be received through following ways:

- 1) Email communication with the personnel from marketing department
- 2) investors@sandurgroup.com
- 3) Website: <https://www.sandurgroup.com/connect-with-us>

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	
Environment and social parameters relevant to the product	The Company is in the business of mining, manufacturing of ferroalloys, coke and energy. The product dealt by the Company are the input for steel manufacturing and supplied to the steel manufacturers. Hence, the products do not require to carry any information mentioned under this point.
Safe and responsible usages	
Recycling and/or safe disposal	

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

	FY 2022-23 (Current Financial Year)		Remarks	FY 2021-22 (Previous Financial Year)		Remarks
	Received during the year	Pending resolution at the end of year		Received during the year	Pending resolution at the end of year	
Data privacy	There have been no consumer complaints received in respect of these points.			There have been no consumer complaints received in respect of these points.		
Advertising						
Cyber security						
Delivery of essential services						
Restrictive trade practices						
Unfair trade practices						
Others						

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

	Number	Reasons for recall
Voluntary recalls	Nil	N.A.
Forced recalls		

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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 under the Code of Conduct policy, included the Cyber security, including data and information security. The Company also has a Board Level Committee on 'Risk management' and framed risk management policy covering Cyber Security Risk.

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

Leadership Indicators

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

All information regarding business of the Company can be accessed through the Company's website and in its periodic disclosures such as the annual report and other reports.

Link: <https://www.sandurgroup.com/>

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

Not Applicable: The Sandur Manganese & Iron Ores Limited deals with products like Manganese ore, Iron ore, Silico Manganese, Ferromanganese, Coke and energy and it is not directly involved in the distribution services to the consumer.

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

Not Applicable: The Sandur Manganese & Iron Ores Limited deals with products like Manganese ore, Iron ore, Silico Manganese, Ferromanganese, Coke and energy and it is not directly involved in the distribution services to the consumer.

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)

Not Applicable: The Sandur Manganese & Iron Ores Limited deals with products like Manganese ore, Iron ore, Silico Manganese, Ferromanganese, Coke and energy and it is not directly involved in the distribution services to the consumer.

5. Provide the following information relating to data breaches:

- Number of instances of data breaches along-with impact: None
- Percentage of data breaches involving personally identifiable information of customers: Not Applicable