



usha martin®

Usha Martin Limited

2A, Shakespeare Sarani, Kolkata - 700 071, India
Phone : (00 91 33) 71006300, Fax : (00 91 33) 71006400
CIN:L31400WB1986PLC091621
Email:contact@ushamartin.co.in
Website:www.ushamartin.com

Date: 15th July 2023

The Secretary
National Stock Exchange of India Ltd
Exchange Plaza, 5th Floor,
Plot No.C/1, G Block,
Bandra Kurla Complex, Bandra (E)
Mumbai – 400 051
[Scrip Code: USHAMART]

The Secretary
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street
Mumbai – 400 001
[Scrip Code: 517146]

Societe de la Bourse de
Luxembourg
35A Boulevard Joseph II
L-1840, Luxembourg
[Scrip Code: US9173002042]

Dear Sir / Madam,

Sub : Business Responsibility and Sustainability Report for FY 2022-23

Please find enclosed the Business Responsibility and Sustainability Report ('BRSR') of Usha Martin Limited ('Company') for Financial Year 2022-23. The BRSR forms part of the Company's Annual Report for FY 2022-23.

The BRSR along with the Annual Report is available on Company's website at www.ushamartin.com.

This is for your information and record.

Thanking you,

Yours faithfully,
For Usha Martin Limited

Shampa Ghosh Ray
Company Secretary

Encl : as above



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The increased stakeholder activism regarding climate change, social injustices and inequalities have brought Environmental, Social and Governance (ESG) aspects to the forefront. The 2022 United Nations Climate Change Conference or Conference of the Parties of the UNFCCC (COP 27) has further garnered attention towards losses and damages from the impact of climate change. As corporates across the globe focus towards climate urgency and social inequalities, ESG mandates and considerations have also tracked momentum.

In India, the Business Responsibility and Sustainability Report (BRSR) by the Securities and Exchange Board of India (SEBI) is the first step in mandating ESG disclosures for top 1000 listed companies. At Usha Martin, we took a voluntary stance at publishing the BRSR in FY 21-22 and we continue to track and disclose our ESG performance.

We continuously rebuild and realign our practices to increase the well-being of the people and planet. In this regard, we strive to enhance our social and environmental initiatives as showcased in our BRSR.

Section A: General Disclosures

Details of the listed entity

1.	Corporate Identity Number (CIN) of the company	L31400WB1986PLC091621
2.	Name of the Listed Entity	Usha Martin Limited
3.	Year of incorporation	1986
4.	Registered office address	2A Shakespeare Sarani, Kolkata – 700071
5.	Corporate address	Usha Martin Limited, 2A Shakespeare Sarani, Kolkata – 700071
6.	E-mail	investor@ushamartin.co.in
7.	Telephone	033 - 7100 6300
8.	Website	www.ushamartin.com
9.	Financial year for which reporting is being done	April 1, 2022 to March 31, 2023 (FY 2022-23)
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited National Stock Exchange of India Ltd. Societe de la Bourse de Luxembourg (For GDRs)
11.	Paid-up Capital	Rs. 304,741,780
12.	Name and Contact Details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Tapas Gangopadhyay Director Tel. No. 033 - 7100 6300 Email ID: tapas@umsingapore.com
13.	Reporting boundary	Standalone Basis

Products/ Services -

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

Sr. no.	Description of the main activity	Description of business activity	% Of turnover of the entity
1.	Manufacturing	Manufacturing of Wire Rope, Wire, Strands including locked coil.	95.22

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	Product/Service NIC Code % of total Turnover contributed	Product/Service NIC Code % of total Turnover contributed
1.	Wire Rope	3310	57.91
2.	LRPC Strand	3310	24.14
3.	Wire	3310	13.17

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	3	6 (Kolkata, Chennai, Mumbai, Delhi, Bangalore and Hyderabad)	9
International	3	14	17

17. Markets served by the entity
a. Number of locations:

Locations	Number
National (No. of States)	28
International (No. of Countries)	71

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

32.66%

c. A brief on types of customers

The Company caters to many industries pertaining its operations in various sectors such as Construction, Elevator, Crane, Mining, Rope Way, Oil & Gas, Automobile, Fishing, Steel Plants, Power Plant, Shipping and Metro Rail.

Employees -
18. Details as at the March 31, 2023:
a. Employees and workers (including differently abled):

Sr. No.	Particulars	Total	Male		Female	
		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
Employee						
1	Permanent (D)	524	517	98.66	7	1.34
2	Other than Permanent (E)	65	62	95.38	3	4.62
3	Total employees (D + E)	589	579	98.30	10	1.70
Workers						
4	Permanent (F)	1628	1626	99.88	2	0.12
5	Other than Permanent (G)	2434	2409	98.97	25	1.03
6	Total Workers (F + G)	4062	4035	99.33	27	0.66

b. Differently abled Employees and workers:

Sr. No.	Particulars	Total	Male		Female	
		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
Differently Abled Employees						
1	Permanent (D)	0	0	0	0	0
2	Other than Permanent (E)	0	0	0	0	0
3	Total employees (D + E)	0	0	0	0	0
Differently Abled Workers						
4	Permanent (F)	0	0	0	0	0
5	Other than Permanent (G)	0	0	0	0	0
6	Total Workers (F + G)	0	0	0	0	0

The Company presently does not have any differently abled employees as per Rights of Person with Disabilities Act, 2016

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19. Participation/Inclusion/Representation of women:

	Total		No. and percentage of Females	
	(A)		No. (B)	% (B / A)
Board of Directors	7		1	14
Key Management Personnel (KMP)	5*		1	20

*KMP includes 3 Whole Time Directors.

20. Turnover rate for permanent employees and workers

	FY 2022-23*			FY 2021-22			FY 2020-21		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	9.65	0	9.52	4.50	14.29	18.79	6.12	21.05	27.17
Permanent Workers	11.45	0	11.44	8.99	-	8.99	6.73	-	6.73

*Turnover rate is inclusive of employees who left the organization voluntarily or due to dismissal, retirement or death in service.

Holding, Subsidiary and Associate Companies (including joint ventures) -

21. Names of holding / subsidiary / associate companies / joint ventures

Sr. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	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	U M Cables Limited	Subsidiary	100	No
2	Usha Martin Power and Resources Limited	Subsidiary	100	No
3	Bharat Minex Private Limited	Subsidiary	100	No
4	Gustav Wolf Specialty Cords Limited	Subsidiary	100	No
5	Usha Martin International Limited	Subsidiary	100	No
6	Brunton Wire Ropes FZCo.	Subsidiary	100	No
7	Usha Martin Americas Inc.	Subsidiary	100	No
8	Usha Siam Steel Industries Public Company Limited	Subsidiary	97.98	No
9	Usha Martin Singapore Pte. Limited	Subsidiary	100	No
10	Usha Martin Australia Pty. Ltd.	Subsidiary	100	No
11	PT Usha Martin Indonesia	Subsidiary	100	No
12	Usha Martin Vietnam Company Limited	Subsidiary	100	No
13	Usha Martin China Company Limited	Subsidiary	100	No
14	De Ruiters Staalkabel BV Sliedrecht	Subsidiary	100	No
15	Usha Martin Italia SRL	Subsidiary	100	No
16	Usha Martin Europe B.V.	Subsidiary	100	No
17	Usha Martin UK Limited	Subsidiary	100	No
18	Brunton Shaw UK Limited	Subsidiary	100	No
19	European Management and Marine Corporation Limited	Subsidiary	100	No
20	Pengg Usha Martin Wires Private Limited	Joint Venture	40	No
21	CCL Usha Martin Stressing Systems Limited	Joint Venture	49.99	No
22	Tesac Usha Wirerope Company Limited	Joint Venture	50	No

* The subsidiary / joint venture companies define their own initiatives based on their specific content and have access to information and expertise residing with the parent company

CSR Details

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes. However, the Company need not statutorily incur any CSR spending owing to absence of net profits (calculated in the manner as laid down in Section 198 of Companies Act, 2013) over the last 3 FYs. The Company carries out voluntary CSR activities through its CSR arm - Usha Martin Foundation.
- (ii) Turnover (Rs. in lakhs): 2,04,170.77
- (iii) Net worth (Rs. in lakhs): 1,07,971.24

Transparency and Disclosures Compliances -

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)*	FY (2022-23)			FY (2021-22)		
		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, community members can submit a formal application to the Usha Martin Foundation, CSR wing of the Company, highlighting their grievances.	0	0	-	0	0	-
Shareholders	Yes, the Company attends shareholder grievances / correspondences expeditiously and has in place a grievance redressal mechanism. A dedicated email ID "investor@ushamartin.co.in" is available to all shareholders to share their grievances / complaints. The website of the Company also has an exclusive section for Shareholders where all information relating to the Company including exchange filings are uploaded. Further, a designated official of the Company is allocated for correspondences with the shareholders and their queries, details of which is also available on the website of the Company.	48	0	All complaints received during the year were resolved.	55	0	All complaints received during the year were resolved.
Investors (Other than shareholders)	Yes, the Company provides open communication channels to all investors to raise their queries / complaints against the Company. A designated official of the Company is allocated to look into the grievances of the investors.	0	0	-	0	0	-
Employee & Workers	Yes, the employees can raise their grievances through one-to-one meetings conducted between them and the Human Resource Team or directly share their concerns with their immediate supervisors. The company has also established a vigil mechanism and Whistleblower policy along with human rights and sexual harassment policy which operates as a formal platform for reporting complaints and grievances.	0	0	-	0	0	-
Customers	Yes, the company has integrated Customer Value Management (CVM) to address the needs of customers. The organization conducts Customer Satisfaction Feedback Survey to receive feedback regarding its products and services and gain insights regarding preferences and complaints of strategic customers.	162	21	complaints pending as at financial year end but subsequently resolved	119	20	complaints pending as at financial year end but subsequently resolved
Value Chain Partners	Company's supply chain management policy and business responsibility and sustainability policy are extended to its value chain partners which enables them to comply with Company's business practices and raise concerns/grievances if any	0	0	-	0	0	-
Others (Please specify)	-	-	-	-	-	-	-

*The Policies of the Company can be accessed at <https://ushamartin.com/investor-relations/policies#Code-Policy>



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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:

Sr. No.	Material issue identified	Indicate whether Risk or Opportunity	Rationale for identifying Risk / Opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Occupational Health and Safety	Risk	Non-Adherence to set safe work practice and Standard Operating Procedure framed by the organization based on statutory norms and national/international framework.	Well defined onsite & offsite emergency plan and robust occupational health and safety management system can mitigate the risk. i) Access to PPE tools wherever required for all employees and workers. ii) Training all employees and workers on Safe work practice. iii) Investigation of each case and preparation of remedial plan. iv) Ensuring elimination, substitution and engineering control in place, wherever required.	Any failure in the OHS management system may cause loss in man-days, also impact the productivity of the operations. Further, it has intangible effect by demoralizing employees and workers.
2.	Water Stewardship	Risk	Shortage of surface water during summer can lead to a loss of productivity. Additionally, poor management of wastewater can implicate legal complications.	(i) Conducting water audits to develop benchmarks for different processes. (ii) Developed a sufficient capacity of storage reservoirs for rainwater harvesting and have enhanced the water consumption using 3R's approach (Recycle, Reuse and Reduce).	Unavailability of water can affect productivity of the organization and noncompliance with regulatory norms on wastewater discharged can lead to fines and penalties.
3.	Employee Wellbeing	Risk and Opportunity	Opportunity: Enhancing employee relationship by undertaking several measures and providing several material/non-material benefits for our employees and workers. Risk: Non-compliance with the statutory guidelines can affect business activity.	To enhance employee relationship, the organization has integrated robust mechanism to evaluate employee performance and to provide (i) skill development (ii) technical (iii) operation health & safety trainings to all its employees and workers. Ensuring fair and transparent communication with all stakeholders, as well as maintaining compliance with statutory guidelines and frameworks	By enhancing the employee relationship and fair and transparent engagement can result increase in productivity and low attrition rate. Any instance of non-compliance with statutory norms and guidelines can attract the several implications and reputational loss.
4.	Human Rights	Risk	Any instances of violation of human rights policy can lead to non-compliance with the statutory norms and can have negative implications	Developed comprehensive policies and procedures to increase Human Rights awareness amongst the employees and workers. Trainings imparted on Human rights, Code of Conduct, POSH, etc.	Instances of non-compliance can affect industrial relations and company's reputation.
5.	Energy	Opportunity	Enhancing and utilizing green energy to reduce carbon footprint of the organization.	(i) Implementing solar projects of low capacity at captive power plant. (ii) Use of alternate energy such as use of LPG and biomass briquette as fuel, less consumption of conventional energy such as use of energy efficient LED bulbs and motors, establishing and expanding green footprint by focusing on greenery & greenbelt development. (iii) Green packaging for certain products for resource conservation.	Self-reliance on sustainable and green energy.

Sr. No.	Material issue identified	Indicate whether Risk or Opportunity	Rationale for identifying Risk / Opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6.	Risk Management	Opportunity	Robust Risk Management system can identify the risk areas and accordingly, can implement the corrective actions for the same by establishing robust governance system around risk areas.	<p>The organization has in place a Risk Management Committee (RMC) and risk management policy. Studying industry-best internal controls and systems, the Company oversees the risk management and governance process.</p> <p>RMC assists the Board in discharging its responsibilities towards management of material business risk (which includes operational, financial, sustainability, compliance, strategic, ethical, reputational, product quality, human resource, industry, cyber security, legislative or regulatory and market related risks) including monitoring and reviewing the risk management plan / policies.</p>	Enhancing the risk management system of the organization can result sustainable development by identify upcoming roadblocks and implementing necessary actions to mitigate the same, eventually strengthening business activity and operations.
7.	Community Development	Opportunity	Promoting inclusive and equitable growth of communities by empowering local communities to become self-reliant, enhance employability of local youth, and livelihood opportunities.	<p>The organization has undertaken several CSR initiatives such as developing natural resource management, organizing various health camps, spreading awareness on women empowerment, health, nutrition and sanitation.</p> <p>Kindly refer the Corporate Social Responsibility Section of our annual report FY 2022-23</p>	Enhancing brand reputation as a responsible company and maintaining cordial relationship with the local bodies and communities
8.	Responsible Sourcing	Opportunity	Procuring certified raw materials and providing required guidance to suppliers in order to adhere with agreed-upon product specification standards can augment responsible and sustainable supply chain.	The organization has developed robust mechanism to assess its suppliers on QMS & OHSAS certifications. Procured material specifications are assessed in case of any deviation suppliers are asked to take necessary corrective actions.	The procurement of certified raw materials results in the production of high-quality goods and an increase in organizational productivity.
9.	Waste Management	Risk	Legal implications	<p>(i) Robust waste management system to improve storage of hazardous waste and responsible disposal of the same in compliance with statutory requirement and regulatory norms.</p> <p>(ii) Acid recycling and sludge management with approved recyclers</p> <p>(iii) Recycle and reuse of sewage water</p>	The organization can face penalty or severe charges in case of non-compliance with regulatory norms.
10.	Supply Chain Management	Opportunity	Maintaining all details and required information of incoming products in a sustainable manner across the supply chain.	<p>(i) Supply chain management policy is in place to guide the Company to build a sustainable supply chain for growth and sustenance of businesses.</p> <p>(ii) The organization has implemented SAP to enhance traceability of products in more robust and comprehensive manner. Retaining records for a longer period of time than the holding period.</p>	All records and required information are maintained properly, remotely accessible and available for longer period.
11.	Sustainable Product Design & Innovation (R&D)	Opportunity	Investing in development of sustainable product, technologies and solutions to enhance business sustainability.	The organization has integrated comprehensive procedure of analyzing market requirement, understanding environmental implications and conducting product awareness programs.	Analyzing market requirements and strategizing sustainable product development resulting performance development.



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Section B: Management and Process Disclosures

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

- P1** Businesses should conduct and govern themselves with integrity 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, protect, and make efforts to 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	P	P	P	P	P	P	P	P	P
Questions	1	2	3	4	5	6	7	8	9
Policy and management processes									
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	https://ushamartin.com/investor-relations/policies#Code-Policy								
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)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4. Name of the national and international codes/certifications/labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trusted) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	<ol style="list-style-type: none"> 1. ABS - Manufacturing Assessment 2. ABS - Product Design Assessment 3. ABS - Equipment Certification Report 4. American Petroleum Institute (API) Monogram Usage Authority 5. Recognition for BV Mode II Scheme - Bureau Veritas Marine & Offshore 6. China Classification Society - Works Approval 7. Nippon Kaiji Kyokai - Manufacturing process approval - HYFLEX 4 8. DCL - Product Conformity 9. DNV - GL - Approval of manufacturer 10. Lloyd - Approved manufacturer 11. NABL Accreditation 12. ISO 9001:2015 13. ISO 14001:2015 14. ISO 45001:2018 15. Certificate of Conformity (InMetro, Brazil) 16. Standards Organisation of Nigeria Conformity Assessment Program 17. Manufacturers Approval From PGCIL 18. MQP Approval Validity Extension from PGCIL 19. DGMS approval 20. ACRS AUSTRALIA - Certificate of Product Performance 21. Bureau of Indian Standards 								

Disclosure	P	P	P	P	P	P	P	P	P
Questions	1	2	3	4	5	6	7	8	9
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.					Nil				
6. Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.					Nil				

Governance, leadership and oversight

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

Message from Director's desk:

Dear Stakeholders,

At Usha Martin, we are committed to drive a socially relevant and environmentally conscious approach across our value chain. This year, we have navigated the challenging terrain with accelerated achievements across our business operations and heightened action towards Environment, Social and Governance (ESG) commitments. Recognizing our vision to emerge as a global leader in wire rope industry, we have established sustainable practices, innovative technologies and inclusive growth as the key facets of our journey. We are delighted to share the significant milestones that we continue to achieve throughout of journey, inclusive of obtaining ISO 45001:2018 certification (a globally recognized standard for Occupational Health and Safety Management System) for the manufacturing facility situated at Ranchi.

Our holistic approach to sustainability drives the fulfilment of our vision to augment high quality of wire ropes across the globe. This approach, in turn, typifies our business strategy and aim to boost production efficiency, enable cost-effective manufacturing processes and address the needs of our customers, employees and communities. We continuously strive to enhance employee engagement and development at the Company, address the concerns and demands of our customers and considerably take initiatives for the welfare of the communities.

In cognizance of our efforts to create long-term impact, we welcome our stakeholders to our second Business Responsibility and Sustainability Report, developed in line with NGRBC guidelines. We have also stated few restatements in information provided in our previous Business Responsibility and Sustainability Report. Through this report, we aim to showcase our sustainability initiatives as well as the efforts to address critical stakeholder concerns.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Tapas Gangopadhyay Director Usha Martin Limited Tel. No. 033 - 7100 6300 Mail ID: tapas@umsingapore.com
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 Company has in place a "Sustainability Council" constituting of Whole Time Directors and Senior Executives of the Company which is responsible for the overall sustainability performance of the Company. The Council oversees planning, implementation of ESG initiatives in the Company and monitors progress under the purview of 9 principles of NGRBC and other relevant international standards/framework. The Sustainability Council is guided by its terms of reference and reports directly to the Board of Directors. Additionally, the Company also has in place the Risk Management Committee of the Board of Directors consisting of Independent Directors and Whole time Directors to periodically review sustainability related issues.

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 programmes 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 Key Managerial Personnel	4	The Company has embraced knowledge transfer and enhancement as a key aspect of the responsible business activity. The Company has organized various trainings and awareness programs. It covers the aspects of Principle 1 on Ethics, Transparency & Accountability, Principle 3 on promotion of wellbeing, Principle 4 on Stakeholder Responsiveness and Principle 8 on Support Inclusive Growth and Equitable Development.	100
Employees other than BOD and KMPs	22	Various trainings are undertaken for skill development for employees such as developing effective communication, upgrading knowledge on various ERP softwares, occupational health and safety, machine capacity study, team building, interpersonal skills and roleplay. Additionally, several awareness programs are conducted on work ethics, legal compliances, prevention of sexual harassment (POSH), HR practices, health and safety.	39.88
Workers	50	Programs are conducted on work ethics, safety, health and hygiene, quality system, HR practices, environment, fire drills and safety, importance of PPE tools and safety kits. Various technical trainings on product / machinery handling, usage and different processes provided to workers for operations at the shopfloor	55.22

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.

Monetary				
NGRBC Principle	Name of the Regulatory/ Enforcement agencies/ Judicial institution	Amount (In Rs.)	Brief of the Case	Has an appeal been preferred? (Yes / No)
Penalty/ Fine	-	-	-	-
Settlement	-	-	-	-
Compounding Fee	-	-	-	-
Non-Monetary				
NGRBC Principle	Name of the Regulatory/ Enforcement agencies/ Judicial institution	Amount (In Rs.)	Brief of the Case	Has an appeal been preferred? (Yes / No)
Imprisonment	-	-	-	-
Punishment	-	-	-	-
		Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions	
Of the instances disclosed in above Question, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed		-	-	

3. 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 in place an Anti-Bribery and Anti-Corruption Policy which provides a framework for ensuring compliance with legislations governing bribery and corruption globally and conducts its business activities in consonance with applicable laws, highest ethical standards and ensures prevention, detection of fraud, bribery and corruption. The Policy is available on the website of the Company at https://ushamartin.com/upload/investorrelations/Anti-BriberyandAnti-CorruptionPolicy_20230218080438.pdf

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4. 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	FY 2021-22
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NIL	NIL

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

	FY 2022-23	FY 2021-22
Number of complaints received in relation to issues of Conflict of Interest of the directors.	0	1*
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	0

*Please refer Directors' Report and Notes to Accounts for further information.

6. 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.

Please refer Directors' Report and Notes to Accounts for further information.

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

Total number of awareness programmes held	Topics / principles covered under the training	Percentage of value chain partners covered (by value of business done with such partners) under the awareness programmes
1 (One)	The programme focused on the 9 principles as enumerated in the NGRBC guidelines and various ESG parameters inclusive of ethical business practices, sustainable sourcing, human rights, community development, among others	83%

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 has developed a robust framework and governance mechanism to manage and combat any issues arising due to the conflict of interests. The Company seeks formal declaration from all Board Members in regard to their related parties and their directorships in other companies at the beginning of the Financial Year. The Audit Committee of the Board grants annual omnibus approval for probable related party transactions before the commencement of a financial year. During a financial year, the necessary approval of the Audit Committee as well as the Board of Directors is taken as and when required. Quarterly Related Party Statements are placed before the Audit Committee for review. Further, every half year an external agency is engaged for independently reviewing related party transactions and their report is tabled and discussed at the Audit Committee Meetings. The Company has in place a Standard Operating Procedure (SOP) for Related Party Transactions which acts as a framework for the Company in undertaking required action and obtaining the necessary approvals in an effective and efficient manner.

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.**

The Company continuously strives to integrate eco-friendly innovation and technology within its business operations. The organization prioritizes to invest in digital interventions leading to reduction in its carbon emissions. The Company has further undertaken multiple initiatives to improve its product design and processes to mitigate the environmental and social impact of the products. Some of the initiatives includes installation of shell and additional wall insulation on furnace to reduce loss of heat, using trolley for zinc and lead waste shifting to mitigate the land contamination, and have substituted

core of the rope with natural fiber to enhance life cycle perspective of the product and make it eco-friendly. Additionally, the company has developed combination fishing ropes as a replacement for conventional wire ropes (bare rope with lubrication) for fishing market to cater the needs of local market and to reduce environmental impact of the product.

	FY 2022-23	FY 2021-22#	Details of improvements in environmental and social impacts
R&D	8.69%	11.10%	Development of light weight combination fishing rope for shallow water fishing, leading to positive social impacts on the fishermen
Capex	2.44%	14.56%	Equipment for energy conservation & better environmental performance

Restatement of information (Value in Lakhs converted to percentage of contribution)

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

Yes, the Company being a responsible corporate citizen tries to ensure sourcing majority of its inputs sustainably. Most of the suppliers are entities who have their own sustainability development programmes and have benchmarked processes under accredited frameworks. Of the wide spectrum of suppliers, approximately 2% account for Micro Small and Medium Enterprises (MSMEs). In order to enhance sustainability across its supply chain we try to source our materials from at least 32% of these MSMEs who are from local and neighboring districts.

3. Describe the processes in place to safely reclaim your products for reusing, recycling, and disposing at the end of life, for (a) plastic (including packing) (b) e-waste (c) hazardous waste and (d) other waste.

The Company is working in specialty steel and wire rope sector with its products being exported across the globe. The Company integrates newer technologies to enhance its market dynamics. Majority of Company's products are fabricated by steel or specialty steel, which can be recycled easily by the local vendors and have high resale value at the end of life as well. The Company has a limited range of use of recycled materials as process inputs owing to its nature of business.

However, the waste generated during the manufacturing process is safely recycled as follows:

- a) Plastic waste is sold to recyclers.
- b) The E-waste and recyclable hazardous waste are sold to registered recyclers and other non-saleable hazardous waste are disposed with authorized TSDF.
- c) Other saleable wastes are being sold to vendors.

4) Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Extended Producers Responsibility (EPR) is applicable effective 1st April 2023. The Company is in the process of obtaining requisite EPR registration.

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.

Presently, no products are subjected to a life cycle assessment. The Company is progressing towards developing a comprehensive framework to examine the environmental and social impacts of its products across each stage of their lifecycle and incorporating mechanism to mitigate any anticipated impacts.

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.

Not Applicable.

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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	FY 2021-22#
Wire drawing soap	11%	14 %
Maintenance oil	2.34%	3.80%

* Data specific to Ranchi plant only

Restatement of information as only recyclable waste oils as an input material has been considered.

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

Not Applicable

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

Not Applicable

Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains**Essential Indicators****1. Measures undertaken for Employee Wellbeing –****a. Details of measures for the well-being of employees:**

Category	Total (A)	% of employees covered by									
		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	517	517	100	517	100	0	0	517	100	0	0
Female	7	7	100	7	100	7	100	0	0	0	0
Total	524	524	100	524	100	7	1.34	517	98.66	0	0
Other than Permanent employees											
Male	62	1	1.61	62	100	0	0	0	0	0	0
Female	3	0	0	3	100	3	100	0	0	0	0
Total	65	1	1.54	65	100	3	4.62	0	0	0	0

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

Category	Total (A)	% of workers covered by									
		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	1626	487	29.95	1626	100	0	0	1626	100	0	0
Female	2	0	0	2	100	2	100	0	0	0	0
Total	1628	487	29.91	1628	100	2	0.12	1626	99.88	0	0
Other than Permanent Workers											
Male	2409	2391	99.25	2409	100	0	0	0	0	0	0
Female	25	24	96	25	100	25	100	0	0	0	0
Total	2434	2415	99.22	2434	100	25	1.03	0	0	0	0

2. Details of retirement benefits for FY 2022-23 and FY 2021-22

Benefits	FY 2022-23			FY 2021-22		
	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	100	100	Y	100	100	Y
Other (Superannuation)#	92.37	0	Y	-	0	-

#Superannuation was not accounted in previous FY. It is applicable to permanent officers only as per Company policy.

3. Accessibility of workplaces:

Are the premises / offices of the entity accessible to differently abled employees any 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, at present does not have any differently abled employee as per the Rights of Persons with Disabilities Act, 2016 but provisions such as ramps for ease of walking and wheelchairs are in place at the premises of the Company.

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.

Yes, being a responsible employer, the Company has in place non-discrimination & equal opportunity policy and maintains strict adherence to equal employment opportunity for all its employees across its organization. This policy is accessible by all employees on the Company's intranet.

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

The Company endeavors to provide safe and healthy work environment to all its employees and workers. The organization proactively provides maternity benefits for all its female employees. Zero parental leaves were availed for the current reporting year.

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

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

Yes/No	
(If yes, then give details of the mechanism in brief)	
Permanent Workers	Yes, the Company encourages open and transparent communication with all its employees/workers and addresses all their concerns and grievances. Employees raise their grievances through one-to-one meetings conducted between them and the Human Resource Team or directly share their concerns with their immediate supervisors. Grievances and concerns are addressed and resolved through discussions and necessary interventions of senior management. The company has also established a vigil mechanism and whistleblower policy which operates as a formal platform for reporting complaints and grievances.
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 recognized by the listed entity:

Category	FY 2022-23			FY 2021-22		
	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	524	0	0.00	520	0	0.00
Male	517	0	0.00	513	0	0.00
Female	7	0	0.00	7	0	0.00
Total Permanent Workers	1628	1268	77.89	1660	1322	79.64
Male	1626	1268	77.98	1658	1322	79.73
Female	2	0	0.00	2	0	0.00

8. Details of training given to employees and workers:

Category	FY 2022-23					FY 2021-22				
	Total (A)	On Health Safety		On Skill Upgradation		Total (D)	On Health Safety		On Skill Upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	579	455	78.6	294	50.78	572	262	45.80	145	25.35
Female	10	4	40	8	80.00	7	1	14.29	1	14.29
Total	589	459	77.93	302	51.27	579	263	45.42	146	25.22
Workers										
Male	4035	3575	88.60	2185	54.2	3683	1028	27.91	1684	45.72
Female	27	17	62.96	1	3.7	23	12	52.17	0	-
Total	4062	3592	88.43	2186	53.82	3706	1040	28.06	1684	45.44

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

Benefits	FY 2022-23			FY 2021-22		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employee						
Male	517	517	100	513	513	100
Female	7	7	100	7	7	100
Total	524	524	100	520	520	100
Workers						
Male	1626	1626	100	1658	1658	100
Female	2	2	100	2	2	100
Total	1628	1628	100	1660	1660	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, the Company has developed a comprehensive framework for Occupational Health and Safety (OHS). During the Financial Year 2022-23, the manufacturing facility of the Company located at Ranchi was certified with ISO 45001:2018, a globally recognized standard for Occupational Health and Safety Management System.

The Company has implemented 'Integrated Management Safety Policy' in order to provide a safe and healthy working environment for its employees. This policy was specifically developed in accordance with the guidelines provided by National & International Standards, such as ISO 9001, ISO 14001, and OHSAS 18001 for designing, manufacturing, supplying and other services. Furthermore, the Company has established a centralized safety committee which

ensures alignment of all its operations with the specified policy and conducts continuous assessment across all its operations to identify hazards, manage risks, prepare investigation reports of each incident observed and take corrective actions for the same.

Additionally, the Company has undertaken several OHS programs to train and guide its employees and workers about the potential hazards across operations and educate them on safe working practices and methodologies. The Company has embarked upon 'Safety Excellence Journey' with a target of achieving zero reportable accidents by March 2024.

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

As part of its OHS system, the Company periodically conducts internal as well as third-party safety audits to identify potential hazards and accordingly implements mitigation strategies for the same. A safety observation is a formal evaluation of safety practices in the workplace. Managers, Supervisors or other employees conduct safety observations in person with the goals of identifying positive and negative safety behaviors, addressing the behaviors and recording them for necessary actionable. The Company has corrective and preventative action plans based on the identified safety risks and hazards, allowing it to highlight the gap areas and create closure procedures.

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

Yes, the Company has developed a standard operating procedure (SOPs) which covers a reporting system and escalation methodology in case any near-miss incidents are reported.

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

Yes, the Company being a responsible employer, provides access to non-occupational medical and healthcare services to all employees/ workers by providing them medical support in case of accidents. Group personal accident insurance policy and special leaves are also extended to employees and workers.

11. Details of safety related incidents.

Safety Incident/Number	Category	FY 2022-23	FY 2021-22
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	10	5
Total recordable work-related injuries	Employees	0	0
	Workers	48	17
No. of fatalities	Employees	0	0
	Workers	1	1
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

During the Financial Year 2022-23, the manufacturing facility of the Company situated at Ranchi was certified with ISO 45001:2018, a globally recognized standard for Occupational Health and Safety Management System. During the year under review the Company had engaged the services of an internationally recognized consultant to assess the existing safety management procedures and protocols. By taking cognizance of the recommendations of the consultant, the Company has embarked upon "Safety Excellence Journey" with a target of achieving zero reportable accidents by March 2024. The Company has created a comprehensive occupational health and safety framework, as well as several other initiatives, such as incorporating safety aspects into performance management systems (PMS) and annual key result areas (KRA), which aid in evaluating the safety performance of all of its employees and workers. Furthermore, safety audits are periodically conducted internally as well as through external auditors and Corrective and Preventive Action plan are implemented based on the safety assessments. The Company has aligned all its standard operating procedures and policy framework with international standards and specifications. Additionally, it ensures strict supervision and guidance while providing work permit for the heightened and confined area.

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

	FY 2022-23			FY 2021-22		
	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	0	0	-	0	0	-
Health & Safety	0	0	-	0	0	-

14. Assessments for the year:

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

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

The Company ensures healthy and safe working conditions throughout its facilities and offices for all its employees. The Company engages in continuous assessment of its business activities on safety parameters and ensures that immediate corrective actions are implemented for any safety/health related risk assessed or any incident that occurred at its premises. Some of the corrective actions taken include:

- Periodic checking of all roof sheets and rectification of the same.
- Periodic checking of all lifting machines at plants.
- Minimization load to avoid unbalancing or falling of material
- Ensuring wearing of full body harness & anchoring with life-line rope or any anchorage point available for safe movement & work.
- Providing sensor to restrict the movement of crane after caution area.
- Running machines only after closing the machine guards
- Ensuring proper PPE usage and regulatory norms for operating equipments.

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, the Company extends compensatory package to its employees and workers if they suffer any partial/permanent disablement or any adverse event occurs such as accidental death is reported across its facilities.

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

The organization has undertaken following measures to ensure deduction of statutory dues by its value chain partners:

- Reconciliation of annual balance for any type of deduction.
- Mandatory statutory details are reported while onboarding a new vendor.

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 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	FY 2021-22	FY 2022-23	FY 2021-22
Employees	0	0	-	-
Workers	1	1	-	-

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:

The Company has a robust vendor assessment framework that includes requesting declarations via a vendor registration form, conducting physical and virtual audits, understanding health and safety practices during the vendor onboarding process such as certifications from the local Pollution Control Board and safety norms as required.

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

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.

There were no such instances in current financial year. The organization has adopted comprehensive vendor assessment framework comprising of gap identification, providing recommendations on the corrective action plan and policy upgradation for essential certifications.

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.

Any individual or an entity, institution, group that impacts the organization's activity is identified as a core stakeholder of the Company. The Company has developed stakeholder-centric approach in all its business activities enabling socially relevant and future oriented approach to business. The Company engages with a wide range of stakeholder categories viz. investors, customers, suppliers and employees through scheduled events and various channels.

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 and scope of engagement including key topics and concerns raised during such engagement
Senior Management & KMPs	No	Emails, SMS, Physical Meetings, Online platforms	Daily	Envisioning the sectoral growth of the organization.
Employees	No	Email, SMS Physical Meetings, Online Platforms	Daily	Organization has transparent and open communication channels.
Workers	No	Safety Meetings, Notice Boards, Counselling	Daily	Organization has transparent and open communication channels.
Communities	Yes	Community Meeting, Website, CSR Events	Quarterly, Need based	Inclusive growth across the communities living in the vicinity of production facilities
Investors	No	Emails, Telephonic conversations, Online Platforms, Meetings, Website, Newspaper Advertisement	Quarterly, Need Based	Communication on financial performance, growth perspective and any material information.
Vendors and Suppliers	No	Emails, Telephonic Conversations, Meetings	Weekly, Need Based	Maintaining strong relationship with value chain partners.
Customers	Yes	Emails, Telephonic Conversations, Physical Meetings, Online Platforms Advertisements, Website	Weekly, Need Based	Understand customer requirement, alignment of business operations to such requirements.



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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.

The Company consistently focuses on building strong and meaningful relationships with a diverse range of stakeholders. The Board has constituted a Sustainability Council comprising of Directors and Senior Management of the Company. The Council interacts with various stakeholders and apprises the Board on material issues.

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.

Yes, the organization's stakeholder engagement mechanism aims to foster inclusivity, accountability, and responsibility. The organization works with its stakeholders on a myriad of issues on a regular basis, allowing the company to identify risk areas and develop to convey mitigation actions accordingly. There is an ongoing effort to incorporate stakeholder requirements into its business activities and to address its performance and progress on each material topic presented throughout the stakeholder engagement exercise.

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

The Company prioritizes its stakeholder groups based on the influence of each stakeholder group on its business operations. The organization considers all its stakeholder group in a fair, just and non-discriminative manner and continuously strives to address stakeholder concerns and disseminate fair disclosure of information material to such groups.

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:

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. employees' workers covered (B)	% (B / A)	Total (C)	No. employees' workers covered (D)	% (D / C)
Employees						
Permanent	524	56	10.69	520	32	6.15
Other than permanent	65	0	0	59	0	0
Total Employees	589	56	9.51	579	32	5.53
Workers						
Permanent	1628	498	30.59	1660	122	7.35
Other than permanent	2434	426	17.50	2046	143	6.99
Total Workers	4062	924	22.75	3706	265	7.15

2. Details of minimum wages paid to employees and workers:

Category	Total (A)	FY 2022-23				Total (D)	FY 2021-22			
		Equal to Minimum Wages		More than Minimum wages			Equal to Minimum Wages		More than Minimum wages	
		Number (B)	% (B / A)	Number (C)	% (C / A)		Number (E)	% (E / D)	Number (F)	% (F / D)
Employees										
Permanent										
Male	517	1	0.19	516	99.81	513	1	0.19	512	99.81
Female	7	0	0	7	100	7	0	0	7	100
Other than permanent										
Male	62	0	0	62	100	59	0	0	59	100
Female	3	0	0	3	100	0	0	0	0	0

Category	FY 2022-23					FY 2021-22				
	Total (A)	Equal to Minimum Wages		More than Minimum wages		Total (D)	Equal to Minimum Wages		More than Minimum wages	
		Number (B)	% (B / A)	Number (C)	% (C / A)		Number (E)	% (E / D)	Number (F)	% (F / D)
Worker										
Permanent										
Male	1626	0	0	1626	100	1658	0	0	1658	100
Female	2	0	0	2	100	2	0	0	2	100
Other than permanent										
Male	2409	80	3.32	2329	96.68	2025	66	3.26	1959	96.74
Female	25	1	4	24	96	21	0	0	21	100

3. Details of remuneration/salary/wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (in Rs.)	Number	Median remuneration/ salary/ wages of respective category (in Rs.)
Board of Directors (Body)	6	5,505,000	1	1,500,000
Key Managerial Personnel (KMP)	4*	11,042,440	1	6,083,228
Employees other than BOD and KMP	513	787,668	6	748,986
Workers	1626	390,288	2	403,242

* KMP includes 3 Whole Time Directors.

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, all complaints regarding human rights issues are taken directly to Human Resource Department or Head of the respective departments and appropriate actions are taken as per the certified standing orders of the Company. The Head of Human Resource Department of the Company is the authorized personnel responsible for implementing human right functions in the Company.

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

The Company has developed a vigil mechanism and whistleblower policy providing all its internal stakeholders with a formal platform to raise their concerns/grievances. The stakeholders can report any misconduct/ violation directly to the chairperson of the Audit Committee and appropriate actions are undertaken accordingly. Additionally, there is a Human Rights Policy in place which envisages an open channel of communication between the workforce and the HR department for redressal of those grievances which are not covered under the whistle blower policy.

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

	FY 2022-23			FY 2021 - 22		
	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	-	
Discrimination at workplace	0	-		0	-	
Child Labour	0	-		0	-	
Forced Labour/ Involuntary Labour	0	-		0	-	
Wages	0	-		0	-	
Other human rights related issues	0	-		0	-	



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

The Company ensures strict adherence of all its business activities in compliance with the Business Responsibility and Sustainability Policy. The Company respects human rights of each employee and strives to address all concerns raised by stakeholders. If any discrimination or misconduct is observed in connection with the complainant, in such instances the employee/workers can escalate their issues to labor unions/ association representative/ Human Resource department.

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

Human rights issues are stringently addressed and mitigated throughout the organization by adhering to robust policies and grievance redressal mechanisms. The organization has a well framed BRSR policy which is extended to its value chain partners and is easily accessible on the website of the company. Additionally, we have in place a Supply chain management policy by which our business conduct principles are applicable to all our suppliers providing goods and/or services.

9. Assessments for the year:

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

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

The Company strongly adheres to human rights values and promotes them throughout its value chain and business operations. The Company reported zero instances of non-compliance with human rights issues such as child labor, forced labor, sexual harassment, among others for the current financial year. Furthermore, the Company has laid out stringent policies and procedures to combat with any adverse incidents pertaining to human rights.

Leadership Indicators

- Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.**
 No such cases were reported in FY 2022-23.
- Details of the scope and coverage of any Human rights due diligence conducted.**
 No due diligence by any external agency was conducted in FY 2022-23.
- Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?**
 The premises/plants of the Company have been made accessible to differently abled visitors by inclusion of ramps and other provisions for ease of usage.
- Details on assessment of value chain partners:**
 No such assessments were carried out for our value chain partners in FY 2022-23.
- Provide details of any corrective actions taken or underway to address significant risks /concerns arising from the assessments at Question 4 above.**
 Not Applicable

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:**

Parameter	FY 2022-23 (GJ)*	FY 2021-22 (GJ)#
Total electricity consumption (A)	51,544.72	51,713.75
Total fuel consumption (B)	3,913,746.11	3,664,980.50
Energy consumption through other sources (C)	-	-
Total energy consumption (A+B+C)	3,965,290.83	3,716,694.25
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	0.00019	0.00020
Energy intensity (optional) – the relevant metric may be selected by the entity.		

*# Electricity consumption for FY21-22 and FY22-23 is inclusive of consumption at corporate and branch offices and Hoshiarpur plant

*# Fuel consumption is inclusive of LPG used in furnace, HSD used for forklift and DG, biomass briquette used for hot water generator, coal used for electricity production at Ranchi plant, LPG and DA used in cylinders and cutting, Petrol and diesel used by company vehicles across plants and corporate offices

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:

Parameter	FY 2022-23	FY 2021-22
Water Withdrawn by the source (KL)		
Surface Water	7,93,985	6,99,308
Ground Water	2,23,397	2,03,735
3 rd Party Water	34,539	29,943
Seawater/ desalinated water	-	-
Other sources	-	-
Total Vol of Water Withdrawn	10,51,921	932,986
Total Vol of Water Consumed (KL)*	9,57,211	834,311
Water intensity per rupee of turnover. (Water consumed/turnover)	0.00004688	0.000046093
Water intensity (optional) – the relevant metric may be selected by the entity		

* Note: The water consumption is equal to water withdrawal minus water discharged. The data represents water withdrawn at plants located at Ranchi and Hoshiarpur and water discharged at Hoshiarpur site. During the third quarter of FY 22-23, the Company installed water meters at Ranchi to monitor water discharge quantity. However, the monitoring for water discharge was initiated in the fourth quarter. Since data for only 3 months of water discharge quantity is available, the same has not been included here.

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency. (Y/N) If yes, name of the external agency. We have not conducted any independent assessment/evaluation/assurance on the numbers above.

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

The Company has recognized water stress as an imminent environmental risk and has identified water stewardship as one the key material topic. During the year under review, an assessment of the existing water management system was conducted by an external consultant. Basis recommendations of such consultant, several initiatives have been put in place to minimize water consumption, reduce reliability on fresh water and optimally use water. These initiatives include wastewater recycling and reuse.

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

Parameter	Please specify unit	FY 2022-23**	FY 2021-22**
NOx	Mg/Nm3	137.56	172.44
SOx	Mg/Nm3	251.23	212.19
Particulate matter (PM)	Mg/Nm3	43.14	40.19
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Others – please specify	-	-	-

*Data reported only specific to Ranchi plant

#Unit of measurement has been revised

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency. (Y/N) If yes, name of the external agency. We have not conducted any independent assessment/evaluation/assurance on the numbers above.

6. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity:

Parameter	Unit	FY 22-23*	FY 21-22*
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	3,65,911.23	3,42,918.06
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	10,165.76	11,348.29
Total Scope 1 and Scope 2 emissions per rupee of turnover		0.000018	0.000019
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-

*Scope 1 and Scope 2 emissions are inclusive of Ranchi plant, Hoshiarpur plant and corporate and branch offices of the Company.

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency. (Y/N) If yes, name of the external agency. We have not conducted any independent assessment/evaluation/assurance on the numbers above.

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

The Company strives to track all its energy consumption to identify opportunities for energy conservation and process optimization in its business activities. The Company has been gradually implementing several energy efficient accessories to reduce energy consumption and eventually reduce carbon footprint of the organization. As part of the ongoing focused effort on reducing greenhouse gas emissions, setting up of solar panels / projects is in the pipeline. The Hoshiarpur site of the organization has replaced its conventional furnace oil fired burners with the Propane Gas fired burners in order to reduce its greenhouse gas emissions. Additionally, the specified initiative has potential to save high monetary values by using propane gas as fuel.

8. Provide details related to waste management by the entity:

Parameter	FY 2022-23	FY 2021-22
Total Waste generated (in metric tonnes)		
Plastic waste (A)	-	-
E-waste (B)	2.23	3.70#
Bio-medical waste (C)	0.05	0.05
Construction and demolition waste (D)	1150	890
Battery waste (E)	-	-
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any. (G)	2509.44	2256.78
Other Non-hazardous waste generated (H).	-	-
Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector)		
Total (A + B + C + D + E + F + G + H)	3661.72	3150.53

Parameter	FY 2022-23	FY 2021-22
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	-	-
(ii) Re-used	-	-
(iii) Other recovery operations	-	-
Total		
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)**		
Category of disposal Method		
(i) Incineration^	0.05	0.05
(ii) Landfilling	2034.25	1821.20
(iii) Other disposal operations*	1718.74	1507.85
Total	3753.04	3329.10

Note: E-waste and other saleable hazardous waste are being recycled by a third party.

^Incineration is carried out by approved third party.

*Other Disposal Operations comprises of the Hazardous Waste disposed through Pollution Board Authorized Party.

**Data reported inclusive of Waste disposed for recycling from Plant and Corporate offices

#Restatement of information: E-waste generated is inclusive of plants and corporate offices

##Zero waste recovered through recycling

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency. (Y/N) If yes, name of the external agency. We have not conducted any independent assessment/evaluation/assurance on the numbers above.

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

The Company has adopted comprehensive procedures to minimize waste generated, several interventions are in planning phase to adopt practices for waste minimization, segregation, and safe disposal as per the regulatory guidelines and complying with all standards and regulatory norms.

Waste management practices are exercised at all the plants of the Company. Waste generated at the organization is categorized into Hazardous and Non-Hazardous waste, wherein the hazardous waste is sold to authorized recyclers, non-saleable hazardous waste is disposed to secured landfill, other saleable waste is sold to reputed vendors, non-saleable non carbonaceous waste is used for land levelling and carbonaceous waste is composted.

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:

The organization has undertaken all required environmental clearance and necessary no objection certification (NOCs) at the time of establishment of the organization. However, none of the production facilities are located in ecologically sensitive areas.

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.
If no, the reasons thereof and corrective action taken, if any.		
Ranchi	Production	Yes
Hoshiarpur	Production	Yes
Chennai	Plant & Regional Office	Yes
Kolkata	Head Office	Not Applicable
Delhi	Regional Office	Not Applicable
Bangalore	Sales Office	Not Applicable
Hyderabad	Sales Office	Not Applicable
Mumbai	Regional Office	Not Applicable

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

The Company has Integrated Management System which assess all its business activities for its impact on environmental, health and safety aspects. However, the organization has been developing a mechanism to undergo environmental impact assessment for several projects that can significantly reduce carbon footprint, water consumption and energy consumption of the organization. For current financial year, the company did not require to take impact assessments for any of its projects.

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:

Yes.

Leadership Indicators**1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources:**

The energy consumed by the organization is from the non-renewable sources, such as fossil fuels and grid electricity.

2. Provide the following details related to water discharged:

Parameter	FY 22-23	FY 21-22 [#]
Water discharge by destination and level of treatment (KL)		
(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)	97,897	98,675
Total Water discharged (KL)	97,897	98,675

* Not Applicable to the Company.

[^] Primary Treatment Provided

[#] Restatement of information: The mode of discharge has been changed from groundwater to other category (primary treatment provided.)

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency. (Y/N) If yes, name of the external agency. We have not conducted any independent assessment/evaluation/assurance on the numbers above.

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

Not Applicable

4. 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:

Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
Assessment of Water Management System	<ul style="list-style-type: none"> - Water Audit conducted to identify potential water saving opportunities using the concept of 4 R's – Reduce, Reuse, Recharge and Recycle. - Installation of water treatment plant (WTP) at riverside – water intake point (capacity 2100KLD). - Pre-fabricated skid mounted sewage treatment plant (STP) being installed (total capacity 150KLD). 	<ul style="list-style-type: none"> - Efficient and optimal use of water. - Waste-water recycling and Reuse. - Supply and use of clean water. - Reduction in fresh water consumption.

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

A comprehensive onsite & offsite emergency control plan, in accordance with the requirements specified as per the Factories Act 1948 (as amended), Hazardous Waste (Management & Handling) Rules,1989 and the Environment (Protections) Rules, 1986 is in place. The Company has a mechanism to mitigate any catastrophic or hazardous situation creating emergency like situation in the plants. The Standard Operating Procedure of this specified disaster management plan has been displayed at several places inside plant premises for awareness of internal stakeholders.

6. 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?

Not Applicable.

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

None.

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 actively takes part in several Trade and Industry Chambers/ Association to enhance its market reach, build strong peer relationship, discuss various industrial best practices and sectoral policies / regulatory decisions. This promotes a collaborative ecosystem focused on delivering sustainable value creation as well as gaining knowledge for informed decision making. The Company is an active member of 6 Trade Associations and Industry Chambers.

- 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	Steel Wire Manufacturers Association of India	National
2	Bengal Chamber of Commerce and Industry	State
3	Confederation of Indian Industry	National
4	Federation of Indian Export Organisation	National
5	Engineering Export Promotion Council of India	National
6	Camera di Commercio di Brescia (Chamber of commerce in Brescia, Italy)	International



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

The Company adheres to policies and procedures to ensure that there are no instances of non-compliance with anti-competitive behavior throughout the organization. Zero instances of anti-competitive conduct were reported for FY 2022-2023.

Leadership Indicators

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

Not Applicable.

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.

The Company is principally engaged in the businesses of:

(a) Manufacture and sale of steel wires, strands, wire ropes, cord, related accessories, etc.

(b) Manufacture and sale of wire drawing and allied machines

There has been no land acquisition undertaken in recent years.

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

The Organization has a comprehensive grievance redressal mechanism for all its stakeholders. CSR Arm of our organization Usha Martin Foundation proactively engages with all the issues shared by the community members. The concerns are discussed and addressed through the elected members of Panchayats and consequently a formal application of the concerns is submitted to the Usha Martin Foundation. Thereafter the Foundation seeks more information on the issue from the community members as well as elected members and takes various necessary mitigatory actions accordingly.

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

	FY 2022-23	FY 2021-22
Directly sourced from MSMEs/ small producers	3.13%	3%
Sourced directly from within the district and neighboring districts	70.46%	80%

Leadership Indicators

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

State	Aspirational District	Amount spent (In Rs.)
Jharkhand	Ranchi	101.11 Lakhs*

* This is a voluntary spending by the Company through Usha Martin Foundation, CSR arm of the Company.

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

No, the organization assesses all its suppliers on a merit basis.

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

The organization provides equal opportunity to all its suppliers.

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

Not Applicable

- 3. **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:**
Not Applicable
- 4. **Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved**
Not Applicable
- 5. **Details of beneficiaries of CSR Projects:**

CSR Projects*	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
Maintenance of a separate dedicated medical wing within the building premises of Shalini Hospital, located at Angara, Ranchi in the State of Jharkhand for providing treatment and care to covid affected persons.	2018	74.33
Arranging and sponsoring of remedial classes to help weaker students and managing and maintaining Gurukul School	2271	95.5
Arrangement of health camps for free eye testing; and awareness programs with respect to HIV / AIDS	6497	79.46
Development of sport, infrastructural facilities for village health centres, aganwadis, Jal minars and drainage systems.	1821	70.56
Skill and Livelihood enhancement projects such as establishment of (i) sewing centres, (ii) cultivation of mushrooms and food items, (iii) livestock cultivation and rearing	3123	77.10

*Undertaken by Usha Martin Foundation – CSR arm of Usha Martin Limited.

Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner.

Essential Indicators

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

A customer centric approach has been adopted to ensure effective management of customer queries, grievances and customer satisfaction of products/services. Customer Value Management (CVM) is practiced judiciously to address the needs of the customers identified from time to time. The organization conducts Customer Satisfaction Feedback Survey to receive feedback regarding its products and services present throughout domestic and international markets yearly. The survey helps to gain insights regarding preferences and complaints of strategic customers.

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

	As a percentage to total turnover*
Environmental and social parameters relevant to the Product	100
Safe and responsible usage	100
Recycling and/or safe disposal	100

*for steel wire ropes only.

The Company being a responsible organization, maintains highest standards of quality, safety and product integrity for its customers. In order to provide a seamless experience to its customers, the company endeavor to provide them with exceptional product, services and knowledge. With each of its products, the Company shares a guideline or leaflet with all its customers guiding them on safe handling and disposal mechanism, storage criterions and product applications. Additionally, the company actively conducts training sessions for its customers on safe handling and other relevant applications, to build strong relationship with customers, and to understand customer's requirement as well as to address all their queries.

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

	FY 2022-23		Remark	FY 2021-22		Remark
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	-	-	0	-	-
Advertising	0	-	-	0	-	-
Cyber-security	0	-	-	0	-	-
Delivery of essential services	0	-	-	0	-	-
Restrictive Trade Practices	0	-	-	0	-	-
Unfair Trade Practices	0	-	-	0	-	-
Other#	162	21*	-	119	20*	-

*Subsequently resolved.

#Data for 'Other' was not included in FY 21-22 report

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

	Number	Reason for Recall
Voluntary Recall	0	-
Forced Recall	0	-

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

The Company prioritizes risks associated with data privacy and cyber security of its customers. The organization has an Information Security Policy in place and has also incorporated IT security aspects in its Business Responsibility Sustainability Policy to ensure zero tolerance to non-compliances pertaining to data security of its stakeholders.

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.

The Company has reported zero instances for issues pertaining to unethical advertising, cyber security and data privacy of customers, product stewardship, among others. Furthermore, the organization also conducts a yearly security audit through a third-party vendor to ensure its compliance with regulatory norms.

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

The Company follows the principle of 'responsible marketing' and complies with all national and international law requirements. The Company proactively provides all information of its product and services to its stakeholders. The information is inclusive of responsible usage, product specifications, ingredients and impacts of the product on the environment.

Website: www.ushamartin.com

Product brochures: <https://ushamartin.com/downloads#brochures>

LinkedIn: <https://www.linkedin.com/company/usha-martin-limited/mycompany/>

Facebook: www.facebook.com/ushamartinofficial

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

Technical training on proper handling of products is provided to its customers. Additionally, the company provides guidance to customers on product knowledge, safe storage & handling along with product application through various technical documents and interactive meetings.

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

Product storage, handling and maintenance manuals are provided to customers for handling of products and understanding the risks associated with them. Consumers are given a manual on product discard criteria so that they can understand the standards for discontinuing the product as and when needed. Training and awareness programs are conducted for customers from time to time.

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)

Yes, all required information are displayed on its products label which are mandated as per industry requirements. The organization also conducts Customer Satisfaction Survey annually for its products and services in both domestic & international markets.

5. Provide the following information relating to data breaches:

- a. Number of instances of data breaches along with impact
None
- b. Percentage of data breaches involving personally identifiable information of customers
None