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National Stock Exchange of India Limited  
"Exchange Plaza" Bandra-Kurla Complex,  
Bandra (E),  
Mumbai-400051

Department of Corporate Services/Listing  
BSE Limited  
Phiroze Jeejeebhoy Tower,  
Dalal Street, Fort,  
Mumbai-400001

NSE Symbol : APLAPOLLO

Scrip Code : 533758

Dear Sir/Madam,

**Re: Business Responsibility and Sustainability Report**

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Company's Business Responsibility and Sustainability Report for the financial year 2022-23, which also forms part of the Annual Report 2022-23 of the Company in the format as specified by the Securities and Exchange Board of India.

This is for your kind reference and records.

Thanking you

Yours faithfully  
**For APL Apollo Tubes Limited**

**Deepak C S**  
**Company Secretary**

Encl: a/a

**APL Apollo Tubes Limited** (CIN-L74899 DL 1986PLC023443)

Corp. Office : 36, Kaushambi, Near Anand Vihar Terminal, Delhi -NCR -201010, India Tel: +91-120-4041400 Fax : +91-120-4041444

Corp. Office : Tapasya Corp. Heights 4th Floor, Sector-126, Noida, Uttar Pradesh-201303 India

Regd. Office : 37, Hargovind Enclave, Vikas Marg, Delhi - 110092, India Tel: +91-11-22373437 Fax : +91-11-22373537

Unit-I : A-19, Industrial Area, Sikandrabad, Distt. Bulandshahar, U.P.-203205, India Unit-II : 332-338, Alur Village, Perandapalli, Hosur, Tamilnadu-635109, India

Unit-III : Plot No. M-1, Additional M.I.D.C. Area, Kudavali, Murbad, Maharashtra, Thane-421401, India Unit-IV : Village Bendri Near Urla Indl. Area Raipur, Chhattisgarh-493661, India

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# business responsibility and sustainability report (BRSR)



## SECTION A General disclosures

## SECTION B Management and process disclosures

## 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
- Principle 2** Businesses should provide goods and services in a manner that is sustainable and safe
- Principle 3** Businesses should respect and promote the well-being of all employees, including those in their value chains
- Principle 4** Businesses should respect the interests of and be responsive to all its stakeholders
- Principle 5** Businesses should respect and promote human rights
- Principle 6** Businesses should respect and make efforts to protect and restore the environment
- Principle 7** Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
- Principle 8** Businesses should promote inclusive growth and equitable development
- Principle 9** Businesses should engage with and provide value to their consumers in a responsible manner

## Section A: General Disclosures

### I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the Company	L74899DL1986PLC023443
2.	Name of the Company	APL Apollo Tubes Limited
3.	Year of Incorporation	1986
4.	Registered office address	37, Hargobind Enclave, Vikas Marg, Delhi 110092
5.	Corporate office address	36, Ram Nagar, Kaushambi, Ghaziabad, Uttar Pradesh, Pin-201010
6.	E-mail	comsec@aplapollo.com
7.	Telephone	011-44457164
8.	Website	www.aplapollo.com
9.	Financial year for which reporting is being done	FY2022-23
10.	Name of the Stock Exchange(s) where shares are listed	NSE & BSE
11.	Paid-up Capital	INR 554,661,628
12.	Name and contact details (telephone, email address) of the person for BRSR Reporting	Deepak C S Company Secretary deepakcs@aplapollo.com 0120-4742700
13.	Reporting boundary	Consolidated basis

### II. Products/Services

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

S. No.	Description of Main Activity	Description of Business Activity	% Of Turnover of the entity
1.	Steel Tube manufacturer	Manufacturing & Selling of Structural Steel tubes	100%

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

S. No.	Product/Services	NIC Code	% Of total turnover contributed
1.	Black Hollow Section and Round Pipe	27152	68%
2.	Galvanized Pipe	27152	5%
3.	Pre Galvanized Pipe	27152	27%

### III. Operations

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

S. No.	Location	Number of plants	Number of offices	Total
1.	National	11	3	14
2.	International	0	2	2

#### 17. Markets served by the entity

- a. **Number of locations:** India (800 distributors and warehouses cum-branch offices in over 20 cities) and 30 countries outside India

S. No.	Number of Locations served	Number
1.	National (Number of states)	All states
2.	International (Number of countries)	30

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

Revenue from operations: ₹16,166 crores

Contribution of exports: ₹450 crores (2.8% of total revenue)

**c. A brief on types of customers**

APL Apollo takes pride in its unparalleled customer base, supported by a vast network of over 800 distributors. Our reach extends to 100,000 retailers and fabricators, establishing us as the go-to choice for structural tube solutions in India. Operating across, 2000+ towns and cities, with ten strategically located production facilities, we guarantee swift response times and punctual delivery. This expansive reach positions APL Apollo as the leading provider, empowering customers with unmatched convenience and reliability.

**IV. Employees****18. Details as at the end of Financial Year:****a. Employees and workers (including differently abled):**

S. No.	Particulars	Total	Male		Female	
		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
<b>Employees</b>						
1.	Permanent (D)	1198	1176	98.2%	22	1.8%
2.	Other than permanent (E)	0	0	0	0	0.0%
3.	<b>Total employees (D+E)</b>	1198	1176	98.2%	22	1.8%
<b>Workers</b>						
4.	Permanent (F)	1389	1389	100%	0	0.0%
5.	Other than permanent (G)	1730	1730	100%	0	0.0%
6.	<b>Total workers (F+G)</b>	3119	3119	100%	0	0.0%

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

S. No.	Particulars	Total	Male		Female	
		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
<b>Differently abled Employees</b>						
1.	Permanent (D)	0	0	0	0	0
2.	Other than permanent (E)	0	0	0	0	0
3.	<b>Total Differently abled employees (D+E)</b>	0	0	0	0	0
<b>Differently abled Workers</b>						
4.	Permanent (F)	0	0	0	0	0
5.	Other than permanent (G)	0	0	0	0	0
6.	<b>Total Differently abled workers (F+G)</b>	0	0	0	0	0

**19. Participation/Inclusion/Representation of women**

	Total	No. and percentage of Females	
	No. (A)	No. (B)	% (B/A)
Board of Directors	10	1	10%
Key Management Personnel	2	0	0

20. Turnover rate for permanent employees and workers

Category	FY 2023			FY 2022			FY 2021		
	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)
Permanent employees	4.2%	0%	4.2%	4.4%	0%	4.4%	4.1%	5%	4.5%
Permanent workers	5%	NA	5%	4.5%	NA	4.5%	4.5%	NA	4.5%

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

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

S. No.	Name of the holding/subsidiary/associate companies/joint ventures	Is it a holding/ Subsidiary/ Associate/Joint Venture	% of shares held by listed entity	Does the entity participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Apollo Metalex Private Limited	Subsidiary	100	Yes
2.	APL Apollo Building Products Private Limited	Subsidiary	100	Yes
3.	Blue Ocean Projects Private Limited	Subsidiary	100	Yes
4.	APL Apollo Mart Limited	Subsidiary	100	Yes
5.	APL Apollo Tubes FZE	Subsidiary	100	Not applicable
6.	APL Apollo Tubes Company LLC	Subsidiary	100	Not applicable

VI. CSR details

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

II. If yes, Turnover: ₹14,730 crore

III. Net worth: ₹2,571 crore

VII. Transparency and Disclosures Compliances

23. **Grievance Redressal Mechanism in place (Yes/ No):** Yes, APL Apollo has a grievance redressal mechanism in place to address the concerns and grievances of all stakeholders whether it is shareholders, investors, communities, customers, employees etc. There is also a board level stakeholders' relationship committee which periodically reviews the grievance redressal mechanism and its adequacy. There is also a whistleblower Policy which is publically available on the company's website. We are committed to maintaining the highest standard of honesty, openness, and accountability. The Company intends to prevent the occurrence of any practice not in compliance with the internal Codes, thus establishing a vigil mechanism enabling the Directors and Employees to report their genuine concerns or grievances using this policy. Furthermore, it also enables other stakeholders to freely communicate their concerns regarding illegal or unethical practices in the Company.

24. **If yes, then provide web-link for Grievance Redressal Policy:**

<https://aplapollo.com/wp-content/uploads/2020/06/Whistle-blower-Policy-25012022.pdf>

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

Stakeholder group from whom complaint is received	FY 2023			FY 2022		
	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	0	0	-	0	0	-
Investors	0	0	-	0	0	-
Shareholders	3	0	All Resolved	4	0	All Resolved
Employees and workers	0	0	-	0	0	-
Customers	54	0	All Resolved	34	0	All resolved
Value Chain Partners	0	0	-	0	0	-
Other (please specify)	-	-	-	-	-	-

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

Material concerns are those that have a direct or indirect impact on a company's operations and footprint, as well as the company's economic, environmental, and social value. APL Apollo recognizes sustainable development entails not just addressing material challenges relating to corporate governance operations and strategy, but also identifying and prioritizing its most important challenges based on stakeholder concerns.

Therefore, to understand the stakeholder's perspective, we initially identified the universe of relevant ESG topics pertaining to our industry by evaluating different standards and frameworks. Secondly, we carried out detailed stakeholder engagements through questionnaires and collected the response from various stakeholder groups. The issues identified are deeply relevant to our ability to succeed and are addressed in our stakeholder communications, internal strategic priorities, and corporate responsibility approach. During the reporting period, the list of material topics was revalidated through internal stakeholder consultations. The information collected from internal and external stakeholders was analyzed and the 15 key material issues were identified and grouped into 4 major categories:

Responsible Business	Responsible Operations	Responsible Employment	Responsibility towards communities
Corporate Governance	Energy Management	Health and Safety	Local Communities
Market Presence	Water and Effluent Management	Labour Relations and Human Rights	Corporate Social Responsibility
Economic Performance	Emissions Management	Training and Education	
Compliances	Waste Management	Diversity and Equal Opportunity	
	Environmental Compliance		

For details, refer to ESG Report FY 2022: <https://aplapollo.com/wpcontent/uploads/2020/06/ESG-Report-30-09-22.pdf>

## 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. These are briefly as under:

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

### Policy and Management processes

Points	P1	P2	P3	P4	P5	P6	P7	P8	P9
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
1(b) Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1(c) Web Link of the Policies, if available	<a href="https://aplapollo.com/downloads">https://aplapollo.com/downloads</a>								
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)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Points	P1	P2	P3	P4	P5	P6	P7	P8	P9
4	Name of the national and international codes/certifications/ labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.								
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.								
6	Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.								

Most of the policies are aligned to various standards like: ISO9001(Quality Management System), ISO 14001 (Environment Management System), ISO 45001 (Occupational Health & Safety Management System). Most of the plants are certified in ISO standards such as ISO 9001, ISO 14001 & ISO 45001

- All plants to have access to renewable energy by 2025
- All Zero Liquid Discharge (ZLD) facilities by 2025
- The ratio of female workforce to be 5% in the permanent employee category by 2025
- Formalize CSR Strategy by 2025

- 6 out of 11 plants have access to renewable energy
- 2 Plants are equipped with ZLD facilities and others are in advanced stage
- CSR Strategy has been formalized in FY23

### Governance, leadership, and oversight

7	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets, and achievements (listed entity has flexibility regarding the placement of this disclosure)	Statement of CMD: ESG has emerged as an unquestionable facilitator of organizational value development as well as a productivity and endurance indicator. We anticipate that including ESG considerations into our governance and decision-making processes will improve our capacity to identify emerging opportunities and mitigate risks. APL Apollo's unwavering dedication to excellence has resulted in not just greater financial efficiency, but also the potential to achieve critical ESG targets, therefore contributing to value creation for stakeholders.							
8	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Board of Directors							
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, APL Apollo formalized its process towards ESG Governance. Our ESG vision and mission are a reflection to the commitments we have taken in the last year towards all our stakeholders which includes our employees, suppliers, and customer to ensure high quality materials. With our underlying objective of being honest and transparent, we are clearly outlining the targets taken, our progress and efforts for continual improvement. The ESG Charter is a policy document which outlines the purpose and allows stakeholders to communicate sustainability issues, targets, and report progress in short-, medium-, and long-term goals. We have formed a strong ESG governance structure to follow the ESG Charter and this oversight of this is through three levels broadly: The Board (ESG Committee), Corporate Management (ESG Council) and Site Management (Site Council).							

## 10 Details of Review of NGRBCs by the Company

Subject for Review		a. Indicate whether review was undertaken by Director/ Committee of the Board/ Any other Committee								
		P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Performance against above policies and follow up action	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
2	Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Subject for Review		b. Frequency (Annually/Half yearly/Quarterly/ Any other – please specify)								
		P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Performance against above policies and follow up action					Annually				
2	Compliance with statutory requirements of relevance to the principles, and the rectification of any non-compliances					Annually				

11 Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.		P1	P2	P3	P4	P5	P6	P7	P8	P9
		No external evaluation was undertaken, however, the processes and compliances are subject to scrutiny by internal auditors, and regulators, as applicable. Policies are periodically evaluated and updated by various department heads, business heads, and approved by the management and/or board.								

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

### Section C: Principle-wise performance disclosure

This section is intended to assist demonstrating their ability to integrate the principles and core elements into essential processes and decisions. The information needed is divided into 'Essential' and 'Leadership' categories. While the essential indicators must be given by every institution required to file this report, the leadership indicators may be voluntarily disclosed by entities that desire to be leaders to advance in their drive to be more socially, ecologically, and ethically responsible.

### Principle 1: Business 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

S. No.	Segment	Total number of training & awareness programmes held	Topics / principles covered under the training	% Of persons in respective category covered by the awareness programmes
1	Board of Directors	1	All 9 principles have been covered	100%
2	Key Managerial Personnel	1	All 9 principles have been covered	100%
3	Employees other than BOD and KMPs	1	Code of Conduct	96%
4	Workers	24	Occupational Health & Safety Awareness	92%



2. Details of fines/penalties/punishment/award/compounding fees/settlement amount paid in proceedings (by the entity or by its directors/KMPs) with regulators/law enforcement agencies/judicial institutions in FY 2023

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	-	-	-	-	-
Compounding fee	-	-	-	-	-
Non-Monetary					
	NGRBC Principle	Name of the regulatory/enforcement agencies/Judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	-	-	-	-	-
Punishment	-	-	-	-	-

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

Case Details	Name of the regulatory/enforcement agencies/judicial institutions
None	NA

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

The company believes in upholding the values of transparency, accountability, and good governance. Apart from the Business Responsibility Policy, the Company has a 'Corporate Ethics and Code of Conduct' (inter alia covering Anti-Bribery and Anti-Corruption Directives) and an effective vigil mechanism and Whistle Blower Policy. The Corporate Ethics and Code of Conduct covers the Directors and Employees of the Company. The Company also encourages its Suppliers, contractors, NGOs, others to practice the same in a fair manner.

5. No of Directors/KMPs/Employees against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/corruption

Segment	FY 2023	FY 2022
1 Directors	-	-
2 Key Managerial Personnel	-	-
3 Employee	-	-
4 Workers	-	-

6. Details of complaints with regard to conflict of interest

Segment	FY 2023		FY 2022	
	Number	Remarks	Number	Remarks
1 Number of complaints received in relation to issues of Conflict of Interest of the Directors	-	-	-	-
2 Number of complaints received in relation to issues of Conflict of Interest of the KMPs	-	-	-	-

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

None

## 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	% of value chain partners covered (by value of business done with such partners) under the awareness programmes
1	GHG Emission, Supply code of conduct, Human rights	46%

## 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 a Code of Conduct for directors and senior management which requires all concerned to act in the interest of the Company and ensure that any other business or personal association does not involve any conflict of interest with the operations of the Company. In case of any actual or potential conflicts of interest, the Director concerned is required to immediately report the same.

Further annual statutory disclosures in Form MBP-4 are taken from the directors regarding the entities and concerns the directors may be interested in.

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

## ESSENTIAL INDICATORS

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

S. No.	Segment	FY 2023	FY 2022	Details of improvements in environmental and social impacts
1	R&D	(100%) 5 Crore	(100%) 5 Crore	The Company is working towards energy efficiency, waste management and process optimization
2	Capex	19%	16%	Investments in renewable energy, zero liquid discharge, rainwater harvesting and improvement of health and safety initiatives

## 2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)

As part of the vendor on boarding process, all vendors are made aware of our expected standards related to human rights, health and safety, and quality.

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

94% suppliers (by spend) adhere to SA8000 and ISO 45001 standards

## 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

At APL Apollo, we are deeply committed to environmental sustainability. As part of our eco-friendly approach, we ensure that 100% of our process scraps are recyclable, reducing waste and promoting a circular economy. Moreover, we have established partnerships with trusted third-party vendors to responsibly manage and dispose of any non-steel materials generated from our facilities. By actively minimizing plastic usage and embracing recycling practices, we strive to create a greener and more sustainable future for generations to come.

## 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.

APL Apollo does not have EPR Liability.

## LEADERSHIP INDICATORS

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

NIC Code	Name of Product/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.
-	-	-	-	-	-

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

Name of Product/Service	Description of the risk/ concern Action Taken	Description of the risk/ concern Action Taken
-	-	-
-	-	-

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 2023	FY 2022
Processing of solid waste like steel tube end-cuts, and mild steel craps	3%	3%

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

	FY 2023			FY 2022		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	NA	NA	NA	NA	NA	NA
E-waste	NA	NA	NA	NA	NA	NA
Hazardous waste	NA	NA	NA	NA	NA	NA
Other Waste	NA	NA	NA	NA	NA	NA

(The Company does not reclaim any specific product at the end of life, However, at the manufacturing facilities, there are systems in place to recycle, reuse and dispose in line with regulatory guidelines)

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
Steel Scrap/ tube end cuts	APL Apollo is the leading structural steel tube producer. During the course of manufacturing, the company produces steel scrap/steel tube end cuts, which are not considered as waste. Accordingly, this question is not applicable to APL Apollo. Similarly, use of packaging in the sale of steel is insignificant

## 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)
<b>Permanent Employees</b>											
Male	1176	1176	100%	-	-	NA	-	-	-	NA	-
Female	22	22	100%	-	-	No Cases	-	-	-	No Cases	-
<b>Total</b>	<b>1198</b>	<b>1198</b>	<b>100%</b>	-	-	-	-	-	-	-	-
<b>Other than Permanent Employees</b>											
Male	-	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

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

Category	% Of workers covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent Workers</b>											
Male	1389	1389	100%	-	-	NA	-	-	-	NA	-
Female	-	-	-	-	-	No Cases	-	-	-	No Cases	-
<b>Total</b>	<b>1389</b>	<b>1389</b>	<b>100%</b>	-	-	-	-	-	-	-	-
<b>Other than Permanent Workers</b>											
Male	1730	1730	100%	-	-	NA	-	-	-	NA	-
Female	-	-	-	-	-	No Cases	-	-	-	No Cases	-
<b>Total</b>	<b>1730</b>	<b>1730</b>	<b>100%</b>	-	-	-	-	-	-	-	-

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

Benefits	FY 2023			FY 2022		
	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.)
1 PF	100%	100%	Unexempted EPFO	100%	100%	Unexempted EPFO

Benefits	FY 2023			FY 2022		
	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.)
2 Gratuity	100% as per the gratuity eligibility	100% as per the gratuity eligibility	We maintain gratuity trust with Kotak Mahindra Bank for APL Apollo Tubes Limited; subsidiaries pay directly	100% as per the gratuity eligibility	100% as per the gratuity eligibility	We maintain gratuity trust with Kotak Mahindra Bank for APL Apollo Tubes Limited; subsidiaries pay directly
3 ESI	100% as per ESI limit	100% as per ESI limit	Employee State Insurance Corporation	100% as per ESI limit	100% as per ESI limit	Employee State Insurance Corporation
4 Superannuation	100%	100%	-	100%	100%	-
5 After Retirement Medi-Claim	-	-	-	-	-	-

**3. Accessibility of workplaces - Are the premises/offices of the entity accessible to differently abled employees, 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.**

All our premises/offices are accessible for differently abled persons.

**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 advocates and promotes diversity and equal opportunity policies and adheres to equal opportunity

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

Gender	Permanent Employees		Permanent Workers	
	Return to work Rate (%)	Retention Rate (%)	Return to work Rate (%)	Retention Rate (%)
Male	N/A	N/A	N/A	N/A
Female	N/A	N/A	N/A	N/A
<b>Total</b>	N/A	N/A	N/A	N/A

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

	Yes/No (If yes, then give details of the mechanism in brief)
1 Permanent workers	At APL Apollo, we prioritize a safe and inclusive work environment for our employees. To ensure transparency and address any concerns, we have implemented a robust Vigil mechanism. Additionally, our Anti-Sexual Harassment Policy is in place to effectively handle and resolve any grievances related to such issues. We are committed to fostering a culture of respect and providing a platform for employees to voice their concerns confidentially, thereby upholding our commitment to a harassment-free workplace.
2 Other than Permanent Workers	
3 Permanent Employees	
4 Other than Permanent Employees	

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

Category	FY 2023			FY 2022		
	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	N/A	N/A	N/A	N/A	N/A	N/A
Male	N/A	N/A	N/A	N/A	N/A	N/A
Female	N/A	N/A	N/A	N/A	N/A	N/A
Total Permanent Workers	N/A	N/A	N/A	N/A	N/A	N/A
Male	N/A	N/A	N/A	N/A	N/A	N/A
Female	N/A	N/A	N/A	N/A	N/A	N/A

## 8. Details of training given to employees

Category	FY 2023					FY 2022				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
Male	1176	-	-	1176	100%	1141	-	-	1141	100%
Female	22	-	-	22	100%	11	-	-	11	100%
<b>Total</b>	<b>1198</b>	<b>-</b>	<b>-</b>	<b>1198</b>	<b>100%</b>	<b>1152</b>	<b>-</b>	<b>-</b>	<b>1152</b>	<b>100%</b>
<b>Workers</b>										
Male	3119	3119	100%	-	-	2454	2454	100%	-	-
Female	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>3119</b>	<b>3119</b>	<b>100%</b>	<b>-</b>	<b>-</b>	<b>2454</b>	<b>2454</b>	<b>100%</b>	<b>-</b>	<b>-</b>

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

Category	FY 2023			FY 2022		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	1176	1176	100%	1141	1141	100%
Female	22	22	100%	11	11	100%
<b>Total</b>	<b>1198</b>	<b>1198</b>	<b>100%</b>	<b>1152</b>	<b>1152</b>	<b>100%</b>
<b>Workers</b>						
Male	3119	3119	100%	2454	2454	100%
Female	-	-	-	-	-	-
<b>Total</b>	<b>3119</b>	<b>3119</b>	<b>100%</b>	<b>2454</b>	<b>2454</b>	<b>100%</b>

## 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?

At APL Apollo, we prioritize the well-being and safety of our employees. We have implemented a comprehensive safety manual that adheres to the standards set by ISO 45001, ensuring a robust occupational health and safety management system. This manual encompasses detailed practices and guidelines aimed at creating a secure working environment. We leave no stone unturned in taking all necessary measures to safeguard our employees' health and safety, as we firmly believe that their well-being is paramount.

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

At APL Apollo, we prioritize proactive safety measures on our shop floors. We conduct regular morning meetings to identify, assess, and effectively mitigate any safety and hazard-related issues. These meetings serve as a platform for open communication, empowering our team to address potential risks and ensure a secure working environment. By actively engaging in these discussions, we demonstrate our commitment to maintaining a culture of safety, and continuously improving our workplace conditions.

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

Yes, At APL Apollo, we have well-defined process in place that empowers our employees to report any work-related hazards they encounter and take necessary action to remove themselves from such risk. Our safety manual provides comprehensive details on this process, ensuring that every employee is equipped with the knowledge and resources to prioritize their own safety and the safety of their colleagues. We are committed to fostering a culture of proactive hazard reporting and risk mitigation, placing the well-being of our employees at the forefront of our operations.

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

Yes, at APL Apollo, we prioritize the well-being of our employees beyond their occupational health. We provide access to non-occupational medical and healthcare facilities, ensuring that our employees have comprehensive healthcare support. By offering this access, we demonstrate our commitment to their overall health and welfare, fostering a supportive and holistic work environment.

## 11. Details of Safety related incidents

Safety Incident/Number	Category	FY 2023	FY 2022
1 Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	1.1	2.6
	Workers	3.1	0
2 Total recordable work-related injuries	Employees	5	4
	Workers	12	14
3 No. of fatalities	Employees	0	0
	Workers	0	0
4 High consequence work-related injury or ill-health (excluding fatalities)	Employees	2	2
	Workers	4	5

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

An internal safety committee comprised of one safety in-charge and four supporting members from cross functional departments conducts safety and health inspections at each APL Apollo Group Premise.

Internal Safety Committee is responsible for:

- Daily Safety round of whole company
- Noting down of all unsafe conditions
- Regular in-house safety training and awareness of all employees of the unit
- Planning and conducting mock-drill on regular intervals
- Regular monitoring of all firefighting equipment's
- Conduct weekly meetings with unit head for review of safety standard of the unit

### 13. Number of Complaints on the following made by employees

Category	FY 2023			FY 2022		
	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		
Health & Safety						

### 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% (ISO 45001)
Working Conditions	100% (IS14489)

Note: Assessment by the senior management team

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

Safety is our utmost priority at APL Apollo. To ensure the well-being of our workers, we strictly enforce the use of safety equipment such as "Safety Helmets" and "Safety Gloves". Our commitment to safety extends to prohibiting any employee from working without these essential protective measures. Additionally, we conduct regular safety audits, provide comprehensive safety training, and maintain a robust incident reporting system. These precautionary measures collectively contribute to creating a secure and hazard-free work environment for all our employees.

### 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)?

(A) Employees: Yes

(B) Workers: Yes

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

The contracts with the value chain partners contain necessary clauses to ensure that statutory dues are regularly deducted and deposited by the value chain partners and adherence to the same is constantly monitored by us.

#### 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 2023	FY 2022	FY 2023	FY 2022
Employees	Nil		Nil	
Workers				

#### 4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/No)

Yes, the Company continually invests in human capital development, which includes the development of current skills and competences as well as the provision of a variety of experiences to employees. These increase workforce employability and, if desired, provide for a smooth transition to different prospects.

The gratuity scheme provides for a lump sum payment to vested employees at retirement/death while in employment or on termination of employment of an amount equal to 15 days salary payable for each completed year of service or part thereof in excess of 6 months. Vesting takes place after 5 years of service.



5. **Details on assessment of value chain partners:**

	<b>% Of value chain partners (by value of business done with such partners) that were assessed</b>
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.**

APL Apollo has taken several actions to address significant risks/concerns arising from assessments of health and safety practices and working conditions of value chain partners. APL Apollo collaborates with suppliers to improve their sustainability performance by sharing opportunities for improvements, especially with those who have been identified as 'Basic' and 'Improving' under the Responsible Supply Chain Policy assessment. This includes defining follow-up actions.

**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.**

Key stakeholders are defined based on their influence and impact on the Company's operations. The corporation undertook a materiality evaluation in which the opinions of external and internal stakeholders were solicited via online and offline surveys. The first phase in this procedure was to identify internal stakeholders as employees and external stakeholders as investors and shareholders, suppliers/partners, and customers/dealers. Furthermore, community groups were picked by the corporation to spend resources in the form of CSR projects to ensure community welfare.

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

<b>Stakeholder group</b>	<b>Whether identified as Vulnerable &amp; Marginalized Group (Yes/No)</b>	<b>Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other</b>	<b>Frequency of engagement (Annually/Half yearly/ Quarterly/others – please specify)</b>	<b>Purpose and scope of engagement including key topics and concerns raised during such engagement</b>
Shareholders & Investors	No	Investor calls, analyst meets and general meetings	Quarterly  As and when required  As and when required  Annually	1. Transparent and effective communication of business performance 2. Addressing investor queries and concerns 3. Sound corporate governance mechanisms 4. Providing insights into the Company's corporate strategy and business environment
Employees	No	Employee engagement initiatives, continuous interaction with management, appraisals, grievance redressal mechanism	Regularly (weekly/ monthly)	1. Personal development and growth 2. Health and safety 3. Grievance resolution 4. Competitive remuneration
Suppliers/ Partners	No	Regular meetings with key suppliers by senior management, supplier visits, suppliers' meet, supplier tour of manufacturing facilities	Quarterly/ half yearly	1. Infrastructure support 2. Intearactive engagement 3. Inclusion of local and MSME vendors

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
Customers/ Dealer	No	Regional meets, visits to dealers, need-based visits, Customer meets, Customer visits by the marketing team and senior management	Quarterly	1. Grievance redressal 2. Product quality 3. Post-sales support
Community	Yes	Need-based assessment surveys, community visits by company management, periodic cultural meets	As per regulatory requirements and as per needs	1. Public hearings 2. Meetings with community leaders

## 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.

APL Apollo believes that an effective stakeholder engagement system is critical to achieving long-term sustainability goals and overall company success. The company's ESG targets are prioritized by the board of directors.

- The board of directors has delegated the process of taking valuable inputs from the key internal and external stakeholders.
- During the fiscal year, the company conducted a thorough materiality assessment and stakeholder engagement process to better understand the critical environmental, social, and governance (ESG) concerns that are important to the Company's businesses.
- As part of this effort, the company engaged with key internal and external stakeholders to understand their challenges and incorporate their perspectives into materiality assessments for prioritizing ESG concerns.
- Stakeholder engagement insights were analyzed to create the materiality matrix and finalize the list of ESG priority areas.

### 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 company has always maintained a regular and proactive engagement with the Company's important stakeholders, allowing it to work efficiently on its ESG strategies and be transparent about the results. In response to current requirements and interactions with stakeholders, the Company performs periodic evaluations to update and revise policies.

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

The Company actively engages and responds to the underprivileged, vulnerable, and marginalized segments of society. The Company, as part of its CSR initiatives, takes care of the needs of the poor and disadvantaged, either directly or through NGOs operating in the neighborhood of activities. In FY 23, the company has invested 111 million INR in people upliftment initiatives.

## Principle 5: Businesses should respect and promote human rights

### ESSENTIAL INDICATORS

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

Category	FY 2023			FY 2022		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	1198	1,198	100%	1152	1152	100%
Other than permanent	0	0	NA	0	0	NA
<b>Total employees</b>	<b>1198</b>	<b>1,198</b>	<b>100%</b>	<b>1152</b>	<b>1152</b>	<b>100%</b>
<b>Workers</b>						
Permanent	1,389	1,389	100%	1308	1308	100%
Other than permanent	1,730	1,730	100%	1146	1146	100%
<b>Total workers</b>	<b>3,119</b>	<b>3,119</b>	<b>100%</b>	<b>2454</b>	<b>2,454</b>	<b>100%</b>

2. Details of minimum wages paid to employees and workers

Category	FY 2023					FY 2022				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
<b>Permanent</b>										
Male	1176	0	0	1,176	100%	970	0	0	970	100%
Female	22	0	0	22	100%	15	0	0	15	100%
<b>Other than permanent</b>										
Male										
Female										
<b>Workers</b>										
<b>Permanent</b>										
Male	1389	-	-	1,389	100%	1308	-	-	1308	100%
Female										
<b>Other than permanent</b>										
Male	1730	-	-	1,730	100%	1146	-	-	1146	100%
Female	0	0	0	0	0	0	0	0	0	0

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

	Male		Female	
	Number	Median remuneration/ salary/wages of respective (monthly)	Number	Median remuneration/ salary/wages of respective (monthly)
Board of Directors (BoD)	1	29.17 lakh	-	-
Key Managerial Personnel	2	6,01,310	-	-
Employees other than BoD and KMP	1176	41649	22	44076
Workers	3119	24747	-	-

**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, APL Apollo, we have a dedicated complaints committee in place to address and handle all human rights-related issues. This committee ensures that grievances are handled swiftly, impartially, and with utmost confidentiality. We prioritize creating a safe and inclusive work environment, where every employees' rights are respected, and any concerns are promptly and effectively resolved.

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

Human rights are inherent, universal, indivisible, and interrelated in nature, according to the Company. Within its sphere of influence, the Company supports gaining knowledge about human rights and awareness throughout its value chain.

The organization has a strong and detailed Grievance Redressal Mechanism in place to protect employees and directors. Procedures have been established to ensure that the process of registering a complaint, investigating it, and ultimately reaching an appropriate decision is handled professionally and confidentially. and also in the grievance redressal policy.

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

Segment	FY 2023		FY 2022	
	Filed during the year	Pending resolution at the end of year	Filed during the year	Pending resolution at the end of year
Sexual Harassment	NIL	NIL	NIL	NIL
Discrimination at workplace	NIL	NIL	NIL	NIL
Child Labour	NIL	NIL	NIL	NIL
Forced Labour/ Involuntary Labour	NIL	NIL	NIL	NIL
Wages	NIL	NIL	NIL	NIL
Other human rights related issues	NIL	NIL	NIL	NIL

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

APL Apollo has established a well-defined policy to combat gender-based misconduct and to build a welcoming work environment for female personnel and others. The policy establishes guidelines, processes, procedures, and forums for the filing, hearing, and resolution of complaints alleging sexual harassment and discrimination. The complaints are heard by the Complaints Committee, which has been established by the Company's management.

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

Yes, Human Rights forms an integral part of the company's business agreements and contracts. The company is committed to protect and uphold human rights of its workforce, communities and of those who are directly or indirectly affected by the company's business ventures.

**9. Assessments for the year**

Section	% Of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Sexual Harassment	During the reporting period, we conducted thorough assessments of all our plants and offices, and we confirmed that there were no instances of sexual harassment, discrimination, child labour, forced labour, or wage-related issues. Our steadfast commitment to ethical practices and creating a safe work environment ensures the well-being and rights of our employees are upheld at all times.
Discrimination at workplace	
Child Labour	
Forced Labour/ Involuntary Labour	
Wages	

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

Not Applicable

## LEADERSHIP INDICATORS

1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.
2. Details of the scope and coverage of any Human rights due diligence conducted.
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?
4. Details on assessment of value chain partners:

Section	% Of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	
Discrimination at workplace	
Child Labour	Nil
Forced Labour/ Involuntary Labour	
Wages	

5. 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 GJ) and energy intensity, in the following format

Parameter	FY 2023	FY 2022
Total electricity consumption (A) (GJ)	479,994	434,904
Total fuel consumption (B) (GJ)	445,173	372,461
Energy consumption through other sources (C) (GJ)		
<b>Total energy consumption (A+B+C) (GJ)</b>	<b>925,167</b>	<b>807,365</b>
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees crore) (in GJ/Crores)	57.23	61.80

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 (N)

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

Parameter	FY 2023	FY 2022
<b>Water withdrawal by source (in kiloliters)</b>		
(i) Surface water	-	-
(ii) Groundwater	458,919	529,498
(iii) Third party water	130,942	117,583
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)</b>	<b>589,861</b>	<b>647,081</b>
<b>Total volume of water consumption (in kiloliters)</b>	<b>589,861</b>	<b>647,081</b>
<b>Water intensity per rupee of turnover (Water consumed/turnover in Crores)</b>	<b>23.64</b>	<b>25.26</b>

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.**

Yes, 2 out of 11 plants have zero liquid discharge facilities, while the rest are in an advanced stage of implementation. Our goal is to implement Zero Liquid Discharge for all our plants by 2025.

**5. Provide details of air emissions (other than GHG emissions) by the entity, in the following format.**

Parameter	Please specify unit	FY 2023	FY 2022
NOx	MT	3.9	3.9
SOx	MT	2.6	2.6
Particulate matter (PM)		-	-
Persistent organic pollutants (POP)		-	-
Volatile organic compounds (VOC)		-	-
Hazardous air pollutants (HAP)		-	-

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

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

Parameter	Please specify unit	FY 2023	FY 2022
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	29,260	24,486
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	59,436	59,186
<b>Total Scope 1 and Scope 2 emissions per Crores of turnover</b>	Gm CO <sub>2</sub> /Rs	5.49	6.41

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

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

No

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

Parameter	Total Waste generated (in MT)	
	FY 2023	FY 2022
Plastic waste (A)	37,610	41,985
E-waste (B)	2,050	2,235
Bio-medical waste (C)	-	-
Construction and demolition waste (D)	-	-
Battery waste (E)	-	-
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any. (G)	8,090	8,818
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector).	55,150	60,227
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>102,900</b>	<b>113,265</b>

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

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

Category of waste	Total Waste generated (in MT)	
	FY 2023	FY 2022
(i) Recycled	22,790	25,046
(ii) Re-used	24,960	27,992
(iii) Other recovery operations	-	-
<b>Total</b>	<b>47,750</b>	<b>53,038</b>

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

Category of waste	Total Waste generated (in MT)	
	FY 2023	FY 2022
(i) Incineration	-	-
(ii) Landfilling	-	-
(iii) Other recovery operations	55,150	60,227
<b>Total</b>	<b>55,150</b>	<b>60,227</b>

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

APL Apollo is concerned about the impact of greenhouse gases (GHG) on global warming and the overall contribution of the industry towards global GHG emission due to the use of coal in steel production. Therefore the Company has committed to be Net Zero emission by 2050. This strategy includes recycling of scrap. Additionally the company's dependency of energy sourcing of almost 40% through the green energy as well as the plan to shift the complete dependency through green energy in coming days will help the Company the targets.

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, specify details in the following format

S. 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.
		N.A.	

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web link
			N/A		

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
			N/A	

## 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	Unit	FY 2023	FY 2022
<b>From renewable sources</b>			
Total electricity consumption (A)	GJ	178,626	59,557
Total fuel consumption (B)	GJ	-	-
Energy consumption through other sources (C)	GJ	-	-
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>GJ</b>	<b>178,626</b>	<b>59,557</b>
<b>From non-renewable sources</b>			
Total electricity consumption (D)	GJ	301,368	269,707
Total fuel consumption (E)	GJ	445,173	372,461
Energy consumption through other sources (F)	GJ	-	-
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>GJ</b>	<b>746,541</b>	<b>642,168</b>

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

2. Provide the following details related to water discharged:

Parameter	FY 2023	FY 2022
<b>Water discharge by destination and level of treatment (in kiloliters)</b>		
(i) To Surface water		
- No treatment	-	-
- With treatment – please specify level of treatment	31,032.80	26,985
ii) Groundwater		
- No treatment	-	-
- With treatment – please specify level of treatment	14,967.30	13,015
iii) 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 (Used for gardening purposes)	-	-
- With treatment – please specify level of treatment	-	-
<b>Total water discharged (in kiloliters)</b>	<b>46,000.10</b>	<b>40,000</b>

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



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

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 2023	FY 2022
<b>Water withdrawal by source (in kiloliters)</b>		
(i) To Surface water	-	-
(ii) Groundwater	199,302	173,306
(iii) Third party water	38,187	33,206
(iv) Seawater/desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kiloliters)</b>	<b>237,489</b>	<b>206,512</b>
<b>Total volume of water consumption (in kiloliters)</b>	<b>237,489</b>	<b>206,512</b>
<b>Water intensity per rupee of turnover</b> (Water consumed/turnover)	0.01	0.02
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity	-	-
<b>Water discharge by destination and level of treatment (in kiloliters)</b>		
(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) Into Seawater		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iv) Sent to Third party		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(v) Others		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
<b>Total water discharged (in kiloliters)</b>	<b>-</b>	<b>-</b>

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

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

Parameter	Unit	FY 2023	FY 2022
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	47,535	42,661
<b>Total Scope 3 emissions per rupee of turnover</b>	Metric tonnes of CO2 equivalent/INR Crore	2.94	3.27
<b>Total Scope 3 emission intensity</b> (optional) – the relevant metric may be selected by the entity		NA	NA

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

Not applicable

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

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

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

Yes, APL Apollo has "Onsite Emergency plan & Disaster Control" measure in place, focusing on business continuity to address disruptive events like explosions, fire, cyber-attacks, acts of terror, etc. The practices have been developed through benchmarking against best practices at other organisations.

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?

There has been no significant adverse impact arising from the value chain of APL Apollo.

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

The Company is under process of developing a mechanism to assess the environment impact due to value chain partners under Scope-3 assessment of GHG

## 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: 2
- b. List the top 10 trade and industry chambers / associations (determined based on the total members of such a 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	CII (Confederation of Indian Industry)	National
2	FIFO (Federation of Indian Export Organisation)	National

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

Name of Authority	Brief of the case	Corrective action taken
N/A	N/A	N/A
N/A	N/A	N/A
N/A	N/A	N/A

### LEADERSHIP INDICATORS

1. 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 (Annually/Half yearly/Quarterly/ Others – please specify)	Web Link, if available
1	NIL				
2	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 FY 23

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web link
NIL					
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

S. No.	Name of project for which R&R is ongoing	State	District	No. of project affected families (PAFs)	% Of PAFs covered by R&R	Amounts paid to PAFs in the FY (in INR)
1	NIL					
2	NIL					

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

Grievance redressal mechanisms are customized based on specific requirements of each of its locations, so as to be most effective.

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

Category of waste	FY 2023	FY 2022
Directly sourced from MSMEs/ small producers	2%	2%
Sourced directly from within the district and neighboring districts	1%	1%

### 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
N/A	
N/A	

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 District	Amount Spent (in INR)
NIL			

3.
  - a. Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)  
No
  - b. From which marginalized /vulnerable groups do you procure?  
No
  - c. What percentage of total procurement (by value) does it constitute?  
N/A

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 share
1	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 the Case	Corrective action taken
NIL		

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% Of beneficiaries from vulnerable and marginalized groups
1	Education of underprivileged children through Vishwa Prakash Mission	10	100%
2	Rehabilitation of refugees, medical aid and education	291	100%
3	Set up of borewell, cowshed, sound system in school etc. in Kesda and Ringni villages of Raipur	4000	80%
4	Har Ghar Tiranga Campaign	700	60%
5	Providing Higher Education Through Plakha University	60	75%
6	Eye care campaign through Vardan Sewa Sansthan	147	100%

## 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

Our consumer centric approach views consumer complaint as an opportunity for raising the bar of consumer expectations for value creation with each subsequent supply. To achieve consumer expectations, APL Apollo's complaint management process has evolved over the years, thereby remaining agile to changing consumers expectations with respect to complaint acknowledgement and resolution. Dissatisfaction expressed by consumers related to APL Apollo's product and services is regarded as a complaint and is managed through SAP based consumer complaint management system.

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

State	As a percentage to total turnover
Environmental and social parameters relevant to the product	
Safe and responsible usage	~ 3% of the total revenue is coming from recycled materials
Recycling and/or safe disposal	

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

	FY 2023			FY 2022		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	-	-	-	-	-	-
Cyber-security	-	-	-	-	-	-
Delivery of essential services	54	-	-	34	-	-
Restrictive trade practices	-	-	-	-	-	-
Unfair trade practices	-	-	-	-	-	-
Others	-	-	-	-	-	-

4. Details of instances of product recalls on accounts of safety issues

	Number	Reason for recall
Voluntary recalls	Nil	
Forced recalls	Nil	

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, we have a cyber security policy in place which is available on the internal network of the company.

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

Not Applicable

LEADERSHIP INDICATORS

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

<https://aplapollo.com/>

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

Different brands of the Company also have periodic programmes to educate customers about effective usage, details of some select initiatives are provided.

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

APL Apollo has put in place effective communication protocols, both formal and informal, to inform its customers on any supply disruptions.

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)

No

5. Provide the following information relating to data breaches:

a. Number of instances of data breaches along-with impact: NIL

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