



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: 8th September 2022

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

Dear Sirs,

Sub : Business Responsibility and Sustainability Report

In view of the 'Guidance Note on use of digital signature certificate for announcements submitted by listed companies' dated 7th September 2022 issued by BSE, further to our earlier submission on 2nd September 2022, we hereby re-submit the said letter dated 2nd September 2022 along with the annexure thereof adhering to the requirements of use Digital Signature Certificate.

This is for your information and records.

Thanking You,

Yours faithfully,
For **Usha Martin Limited**

Dhrub Jyoti Basu
Whole Time Director

Encl: as above



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Date: 2nd September 2022

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

Dear Sirs,

Sub : Business Responsibility and Sustainability Report

Please find enclosed herewith the Business Responsibility and Sustainability Report ('Report') for FY 2021-22.

Kindly note that the Report was submitted to the Stock Exchanges as a part of the Annual Report submitted by the Company for FY 2021-22 on 2nd July 2022.

This is for your information and records.

Thanking You,

Yours faithfully,
For **Usha Martin Limited**


Shampa Ghosh Ray
Company Secretary

Encl: as above



Business Responsibility & Sustainability Report

The evolving regulatory landscape and summits have resulted in an increase in sustainability across governments and industry. Following the UN Climate Change Conference of the Parties ("COP26"), governments pledged to reduce Green House Gas ("GHG") emissions and achieve carbon neutrality by 2030 across all Environmental Social & Governance (ESG) metrics. India has also submitted its Intended Nationally Determined Contributions ("INDC") to the United Nations Framework Convention on Climate Change ("UNFCCC"), which includes reducing the emissions intensity of its GDP by 33 to 35 percent by 2030 and increasing the share of non-fossil fuel-based electricity to 40 percent by 2030. Securities and Exchange Board of India mandated top 1,000 listed companies to publish a Business Responsibility & Sustainability Report ("BRSR") based on National Guidelines on Responsible Business Conduct ("NGRBC") from Financial Year 2022-23. The objective of the new format is to ensure sustainability reporting being at par with financial reporting which helps companies make better sustainable investment choices based on quantifiable metrics. The Company has transitioned from Business Responsibility Report ("BRR") to Business Responsibility and Sustainability Report ("BRSR") on voluntary basis for the Financial Year 2021-22 to promote inclusive growth and sustainable development whilst disclosing its performance across key ESG norms. The Company constantly strives to take all possible initiatives to conduct its business in a responsible and sustainable manner to comply with environmental regulations and induce overall growth of its business and relevant stakeholders.

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, 2021 to March 31, 2022 (FY 2021-22) |
| 10. Name of the Stock Exchange(s) where shares are listed | <ul style="list-style-type: none"> • 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. Devadip Bhowmik Whole Time Director Tel. No. 033 - 7100 6300 Email ID: devadip_bhowmik@ushamartin.co.in |
| 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, Wire Rope, Strands including locked coil. | 93.40% |

15. Products/ Services sold by the entity:

(accounting for 90% of the entity's Turnover)

| Sr. No. | Product/Service | NIC Code | % of total Turnover contributed |
|---------|-----------------|----------|---------------------------------|
| 1. | Wire Rope | 3310 | 52.82% |
| 2. | LRPC Strand | 3310 | 27.43% |
| 3. | Wire | 3310 | 13.15% |

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 | 5 | 8 |

17. Markets served by the entity

a. Number of locations:

| Locations | Number |
|----------------------------------|--------------|
| National (No. of States) | More than 25 |
| International (No. of Countries) | More than 50 |

- b. What is the contribution of exports as a percentage of the total turnover of the entity?
30.63%

c. A brief on types of customers

Usha Martin caters to many of the industries pertaining their operations in the following sectors:

- Construction/ Infrastructure
- Elevator
- Crane
- Mining
- Material/ Passenger Transportation
- Oil & Gas
- Automobile
- Fishing
- Steel Plants
- Power Plant
- Shipping

Employees

18. Details as at the March 31, 2022:

a. Employees and workers (including differently abled):

| Sr. No. | Particulars | Total (A) | Male | | Female | |
|------------------|--------------------------------|--------------|--------------|------------|-----------|-----------|
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) |
| Employees | | | | | | |
| 1 | Permanent (D) | 520 | 513 | 99% | 7 | 1% |
| 2 | Other than Permanent (E) | 59 | 59 | 100% | - | - |
| 3 | Total employees (D + E) | 579 | 572 | 99% | 7 | 1% |
| Workers | | | | | | |
| 4 | Permanent (F) | 1,660 | 1,658 | 99.88% | 2 | 0.12% |
| 5 | Other than Permanent (G) | 2,046 | 2,025 | 99% | 21 | 1% |
| 6 | Total Workers (F + G) | 3,706 | 3,683 | 99% | 23 | 1% |

b. Differently abled Employees and workers:

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



Business Responsibility & Sustainability Report (contd.)

19. Participation/Inclusion/Representation of women:

| | Total (A) | No. and percentage of Females | |
|--------------------------------|--------------|-------------------------------|---------|
| | | 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 2021-22 | | | FY 2020-21 | | | FY 2019-20 | | |
|---------------------|------------|--------|-------|------------|--------|-------|------------|--------|-------|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent Employees | 4.50 | 14.29 | 18.79 | 6.12 | 21.05 | 27.17 | 7.91 | 32.00 | 39.91 |
| Permanent Workers | 8.99 | - | 8.99 | 6.73 | - | 6.73 | 6.66 | - | 6.66 |

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 Ruyter 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 | Subsidiary | 100 | No |
| 19 | European Management and Marine Corporation | 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 Wire Rope 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.

**22. CSR Details**

- (i) Whether CSR is applicable as per Section 135 of Companies Act, 2013: Yes
- (ii) Turnover (Rs. in Lakh) : 1,81,005.28
- (iii) Net worth (Rs. in Lakh) : 92,751.53

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 three financial years. Hence the Company has not made any CSR spending as required under Section 135 of the Companies Act, 2013. However, the Company has been involved in voluntary CSR activities in and around the manufacturing facility located in the State of Jharkhand and continues to do so through its CSR arm - Usha Martin Foundation.

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 2021-22 | | | FY 2020-21 | | |
|---|--|--|--|---------|--|--|---------|
| | | 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 highlighting their grievances. | - | - | - | - | - | - |
| Shareholders | Yes, the Company attends shareholders grievances / correspondences expeditiously and has in place a grievance redressal mechanism. A dedicated email ID "investor@ushamartin.co.in" is available to all the shareholders to share their grievances / complaints. The website of the Company also has an exclusive section for Shareholders where all the 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. | 55 | - | - | 25 | - | - |
| 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. | - | - | - | - | - | - |
| Employee & Workers* | Yes, we have Vigil Mechanism and Whistle Blower policy to cater the grievance raised by our employees and workers. | - | - | - | - | - | - |
| Customers | Yes, we have Customer Complaint Management System (CCMS) in place, where product complaints are logged by our marketing team for its analysis and redressal. | 119 | 20 [^] | - | 123 | - | - |
| Value Chain Partners | No, we are in the process to develop a systematic grievance handling mechanism for our value chain partners. | - | - | - | - | - | - |
| Others (Please specify) | - | - | - | - | - | - | - |

*https://ushamartin.com/upload/investorrelations/DetailsofEstablishmentofVigilMechanismWhistleBlowerPolicy_20211020071249.pdf

[^] Complaints pending as at financial year end, but subsequently resolved.



Business Responsibility & Sustainability Report (contd.)

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 working procedures implemented by organization based on statutory norms and national/international framework. | Implemented robust occupational health and safety management system. In addition, a well defined onsite and offsite emergency plan is in place. i) Access to PPE tools wherever required for all employees and workers. ii) Training all employees and workers on safe work practices. iii) Investigation of each reported case and preparation of remedial plan. iv) Ensuring elimination, substitution and engineering control in place, wherever required. | Any failure in the occupational health & safety management system may cause loss in man-days and also impact productivity of operations. Further, it has an intangible effect of demoralizing employees and workers. |
| 2. | Water Stewardship | Risk | Shortage of surface water during summer can impact productivity. Additionally, poor management of wastewater can lead to legal complications. | Optimum water consumption is ensured by 3R's approach (Reduce, Recycle and Reuse). Rainwater harvesting reservoirs constructed to reduce the dependability on surface water. | Unavailability of water can affect productivity of the organization and non-compliance with regulatory norms on wastewater discharge can lead to fines and penalties. |
| 3. | Employee Wellbeing | Risk and Opportunity | Opportunity: Enhancing employee relationship by undertaking several measures and providing material/ non-material benefits to employees and workers. Risk: Non-compliance with the statutory guidelines can affect business activity. | For enhancement of employee relationship, the organization has integrated robust mechanism to evaluate employee performance and to provide skill development trainings to all employees and workers. Ensuring fair and transparent communication with all stakeholders as well as maintaining compliance with statutory guidelines. | Strengthening the employee relationship and fair and transparent engagement with them can result in increase in productivity and lower attrition rate. Any instance of non-compliance with statutory norms and guidelines can attract legal implications and loss of reputation. |
| 4. | Human Rights | Risk | Any instances of violation of human rights policy can lead to non-compliance of statutory norms and can lead to adverse implications | Comprehensive policies and procedures are in place and trainings provided on human rights awareness and compliance with statutory norms. | Instances of non-compliance can have an adverse impact on industrial relations and company's reputation. |
| 5. | Energy | Opportunity | Enhancing and utilizing green energy to reduce carbon footprint of the organization. | We are in process of developing renewable energy strategy by implementing solar projects of low capacity at captive power plant. | Self-reliance on sustainable and green energy. |
| 6. | Risk Management | Opportunity | Robust risk management system can identify risk areas and accordingly implement corrective actions by establishing a governance system. | The organization has in place a risk management committee (RMC) as well as a risk management policy. Studying industry-best internal controls and systems, RMC oversees the risk management and governance process. 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. | Strengthening the risk management system of the organization can result in sustainable development by identifying upcoming roadblocks and implementing necessary actions to mitigate the same, eventually strengthening business activity and operations. |



| 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) |
|---------|---|--------------------------------------|--|--|--|
| 7. | Community Development | Opportunity | Promoting inclusive and equitable growth of the communities by empowering local communities to become self-reliant, enhance employability of local youth, and livelihood opportunities. | The organization has undertaken several voluntary CSR initiatives for overall development of the community in the areas of resource management, health and sanitation, education, women empowerment and sustainable livelihood. More information is available in corporate social responsibility section of our Annual Report FY 2021-22 | Enhancing brand goodwill as a responsible corporate citizen 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. | A strong mechanism is in place to assess its suppliers on Quality Management System (QMS) & Occupational Health and Safety Assessment Series (OHSAS) certifications. The procured material specifications are assessed and in case of any deviation, the 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 | Poor waste management can lead to legal implications | Robust waste management system is in place to ensure proper collection, segregation and disposal of waste. This also ensures compliance to statutory requirements. | Non-compliance with regulatory norms on waste management can lead to fines and penalties. |
| 10. | Supply Chain Management | Opportunity | Maintaining all required information of incoming products in a systematic and sustainable manner across the supply chain. | SAP (enterprise software) enhances traceability of products in an efficient and comprehensive manner. Further, SAP helps in storing and retaining records for a longer period of time. | All records and required information are maintained properly which can be remotely accessed and available for a longer period of time. |
| 11. | Sustainable Product Design & Innovation (R&D) | Opportunity | Investing in development of sustainable products, technologies and solutions to enhance business sustainability. | Integrated comprehensive procedure is in place for analyzing market requirement, understanding environmental implications and conducting product awareness programs. | Analyzing market requirements and strategizing sustainable product development resulting in performance enhancement. |

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 to all its stakeholders**
- P5 Businesses should respect and promote human rights**
- P6 Businesses should respect and make efforts to protect and restore the environment**
- P7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent**
- P8 Businesses should promote inclusive growth and equitable development**
- P9 Businesses should engage with and provide value to their consumers in a responsible manner**



Business Responsibility & Sustainability Report (contd.)

| 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/upload/investorrelations/BusinessResponsibilityandSustainabilityPolicy_20220214102513.pdf | | | | | | | | |
| 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, Trustea) 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. American Petroleum Institute (API) Monogram Usage Authority 4. Recognition for BV Mode II Scheme - Bureau Veritas Marine & Offshore 5. China Classification Society - Works Approval 6. Nippon Kaiji Kyokai - Manufacturing process approval - HYFLEX 4 7. DCL - Product Conformity 8. DNV - GL - Approval of manufacturer 9. ISO 9001:2015 10. Lloyd - Approved manufacturer 11. NABL Accreditation 12. ISO 14001:2015 | | | | | | | | |
| 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
"Dear Stakeholders,
 We are pleased to share our first Business Responsibility and Sustainability Report (BRSR) with you. Usha Martin's vision is to become a global leader in the wire rope industry by delivering substantial solutions, adopting modern technology and ensuring sustainable, inclusive growth for all its stakeholders. With a multi-unit and multi-product portfolio, we have evolved to establish ourselves as a market leader. We have increased our focus on ESG parameters and accelerated our sustainability efforts by incorporating Environmental, Social, and Governance aspects into our business practices, along with integrating the National Guidelines of Responsible Business Conduct (NGRBC) issued by the Ministry of Corporate Affairs into our governance framework.
 A year since the onset of the pandemic, Usha Martin has prioritized employee health by implementing various initiatives such as vaccination camps, strict adherence to safety protocols issued by the regulatory bodies, maintenance of health records, financial assistance and support for hospitalization, among others. We consider ethical governance principles as a tool to create long-term value and promote sustainability for all stakeholders. Furthermore, we have incorporated stakeholder centric approach in our business activities by conducting comprehensive stakeholder engagement exercise and identifying key material issues for the business. We strive to implement best practices in response to the identified material issues and ensure that any negative impacts on business operations are mitigated appropriately.
 Adapting and reducing the effects of climate change, inclusive growth, and the transition to a sustainable economy have all become key concerns in recent years. We acknowledge the material issues that have been found, and we have been working to reduce their impact by improving due diligence on environmental and social factors, and taking appropriate actions accordingly, raising employee awareness, and enhancing sustainable activities. In addition, we continue to engage in a variety of CSR initiatives in and around the manufacturing facility located in Jharkhand, through Usha Martin Foundation, an entity established for contributing to a positive societal impact through diverse community engagement initiatives and taking forward our vision of inclusiveness."



| Disclosure | P | P | P | P | P | P | P | P | P |
|--|---|---|---|---|---|---|---|---|---|
| Questions | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| 8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies). | Mr. Devadip Bhowmik Whole Time Director Usha Martin Limited Tel. No. 033 - 7100 6300 Email ID: devadip_bhowmik@ushamartin.co.in | | | | | | | | |
| 9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details. | The sustainability related issues are reviewed by the Risk Management Committee of the Board of Directors of the Company periodically. The Committee consists of four Independent and two Whole time Directors. | | | | | | | | |

10. Details of review of NGRBCs by the Company:

| Subject for Review | Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee | | | | | | | | | Frequency (Annually/ Half yearly/ Quarterly/ Any other - please specify) | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|--|---|---|---|---|---|---|---|---|
| | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P |
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| Performance against above policies and follow up action | The organization has developed BRSR policy towards the end of financial year 2021-22, based on the NGRBC guidelines. The Risk Management Committee (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. The RMC meets on a periodical basis and reviews the risk management review report which includes review of various initiatives being taken under NGRBC and advises on the corrective actions to be undertaken and processes to be put in place for effective mitigation. | | | | | | | | | | | | | | | | | |

| 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. | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 |
|---|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| | No | No | No | No | No | No | No | No | No |

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

| Questions | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 |
|---|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| The entity does not consider the principles material to its business (Yes/No) | - | - | - | - | - | - | - | - | - |
| The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No) | - | - | - | - | - | - | - | - | - |
| The entity does not have the financial or/human and technical resources available for the task (Yes/No) | - | - | - | - | - | - | - | - | - |
| It is planned to be done in the next financial year (Yes/No) | - | - | - | - | - | - | - | - | - |
| Any other reason (please specify) | - | - | - | - | - | - | - | - | - |



Business Responsibility & Sustainability Report (contd.)

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 | % of persons in respective category covered by the awareness programmes |
|-----------------------------------|--|--|---|
| Board of Directors | 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 the 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% |
| Key Managerial Personnel | | | |
| Employees other than BOD and KMPs | 57 | 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, interpersonal skills and roleplay. Additionally, several awareness programs are conducted on work ethics, legal compliances, prevention of sexual harassment (POSH), HR practices and safety. | 77.88% |
| Workers | 98 | 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. | 30.84% |

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.

The Company has incorporated Ethical Business Conduct as a qualitative pillar in all its policies and business practices. The organization has continuous endeavor to comply with all regulatory requirements and disclose relevant information to all shareholders in fair and transparent manner. In the current financial year there were no cases of non-compliance and fine/ penalties/ punishment/ award/ compounding fees/ settlement amount paid by the organization.

| 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 | Brief of the Case | Has an appeal been preferred? (Yes/No) | |
| Imprisonment | - | - | - | - | |
| Punishment | - | - | - | - | |
| Of the instances disclosed in above Question, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed | | | Case Details | Name of the Regulatory/ Enforcement Agencies/ Judicial Institutions | |
| | | | - | - | |

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.

Yes, the Company forbids all its employees from engaging in unethical business practices, while also committed to corporate integrity across its operations and adhering to all anti-bribery legislation. The Company has created a complete framework to educate, enforce and stress on ethical business practices and ensures that it adheres to BRSR policy framed in accordance with NGRBC principles in all its business operations.

(https://ushamartin.com/upload/investorrelations/BusinessResponsibilityandSustainabilityPolicy_20220214102513.pdf)

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 2021-22 | FY 2020-21 |
|-----------|------------|------------|
| Directors | NIL | NIL |
| KMPs | NIL | NIL |
| Employees | NIL | NIL |
| Workers | NIL | NIL |

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

| | FY 2021-22 | FY 2020-21 |
|---|------------|------------|
| Number of complaints received in relation to issues of conflict of interest of the Directors. | 1* | 1* |
| Number of complaints received in relation to issues of conflict of interest of the KMPs | - | - |

* 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:

The Company has extended Business Responsibility and Sustainability Policy to all its value chain partners and other business partners, further encouraging their alignment with stated policy and statements. Awareness sessions will be organized for its value chain partners during the current financial year.

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 a Financial Year. Accordingly, a comprehensive list of related parties is prepared and shared with Accounts, Treasury and Sales Team.

The Audit Committee of the Board grants an 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 has developed a robust mechanism and comprehensive action plan to achieve environmental and social objective and to comply with all stakeholder requirements. The Company continuously strives to integrate latest innovation and technology along with digital intervention within its working model. The Company has streamlined its business activities with current trends with the help of market analysis and surveys to understand the environmental implications of its product and customer requirements.

The Organization has undertaken multiple initiatives to enhance its product design and processes to mitigate the environmental and social impact of the products. Some of the initiative includes installation of shell and additional wall insulation on furnace to reduce heat waste,



Business Responsibility & Sustainability Report (contd.)

using trolley for zinc dross shifting to mitigate the land contamination and have substituted core of the rope with natural fiber in order to enhance its life cycle perspective of the product and make it eco-friendlier. 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 reduction the environmental impact of the product.

| | FY 2021-22 (Rs. In Lakhs) | FY 2020-21 (Rs. In Lakhs) | Details of improvements in environmental and social impacts |
|-------|------------------------------|------------------------------|--|
| Capex | 37.15 | 24.95 | The Company has made investments in various energy saving appliances and equipments which has lowered electrical energy consumption. |

Note: While the Company continues to work towards making its products sustainable and environment friendly, presently specific allocation of R&D expenditure in this regard is not recorded.

- Does the entity have procedures in place for sustainable sourcing? If yes, what percentage of inputs were sourced sustainably?**

Yes, the Company being a responsible corporate citizen, sources majority of its input materials locally or nationally. The organization has wide spectrum of vendors/suppliers, from which 90% are the indigenous vendors while only 10% are the import vendors. Additionally, the Company conducts monthly assessments for all its supplier base to scrutinize their adherence to environmental and social parameters including product stewardship, waste management, human rights compliance, among others.
- Describe the processes in place to safely reclaim your products for reusing, recycling, and disposing at the end of life, for the produced products.**

The Company works in the specialty steel and wire rope industries, and its goods are sold all over the world. To improve market dynamics, the Company incorporates modern technologies. Most of the Company's goods are made of steel or specialty steel, which can be easily recycled by local vendors and has a high resale value after it has reached the end of its lifespan. However, due to the nature of its business, the company's utilization of recycled materials as processed inputs is limited.

- 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 is not applicable to the organization.

Leadership Indicators

- 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?**

Presently, no products are subjected to a life cycle assessment. The Company is developing a comprehensive framework to examine the lifecycle of its goods, as well as their influence on the environment and society and to incorporate different interventions at various phases of the product lifecycle to mitigate any anticipated impact.
- 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.
- 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 2021-22 | FY 2020-21 |
| Soap* | 14% | 14% |
| Reclaimed Oil & Rope Lubricant* | 2.14% | 0.02% |

* Ranchi Plant only.

- 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:**

Not Applicable
- 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 –

Being a responsible organization, employee wellbeing forms the core of all its business activities. Fitness of employees and workers is of utmost importance for successful operations at its production facilities. The Company regularly organizes medical checkups and health camps for the benefit of its employees and workers. Additionally, during the pandemic, the Company organized in-house vaccination drives to provide Covid vaccine to all its employees and workers as well as their family members. The Company also helped in setting up a Covid care ward in a local hospital for emergencies.

a. Details of measures for the well-being of employees:

| Category | % of employees covered by | | | | | | | | | | |
|---------------------------------------|---------------------------|------------------|-----------|--------------------|-----------|--------------------|-----------|--------------------|-----------|---------------------|-----------|
| | Total (A) | Health insurance | | Accident insurance | | Maternity benefits | | Paternity Benefits | | Day Care facilities | |
| | | Number (B) | % (B / A) | Number (C) | % (C / A) | Number (D) | % (D / A) | Number (E) | % (E / A) | Number (F) | % (F / A) |
| Permanent employees | | | | | | | | | | | |
| Male | 513 | 513 | 100 | 513 | 100 | - | - | - | - | - | - |
| Female | 7 | 7 | 100 | 7 | 100 | 7 | 100 | - | - | - | - |
| Total | 520 | 520 | - | 520 | - | 7 | - | - | - | - | - |
| Other than Permanent employees | | | | | | | | | | | |
| Male | 59 | - | - | 59 | 100 | - | - | - | - | - | - |
| Female | - | - | - | - | - | - | - | - | - | - | - |
| Total | 59 | - | - | 59 | - | - | - | - | - | - | - |

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

| Category | % of Workers covered by | | | | | | | | | | |
|-------------------------------------|-------------------------|------------------|-----------|--------------------|-----------|--------------------|-----------|--------------------|-----------|---------------------|-----------|
| | Total (A) | Health insurance | | Accident insurance | | Maternity benefits | | Paternity Benefits | | Day Care facilities | |
| | | Number (B) | % (B / A) | Number (C) | % (C / A) | Number (D) | % (D / A) | Number (E) | % (E / A) | Number (F) | % (F / A) |
| Permanent Workers | | | | | | | | | | | |
| Male | 1,658 | 1,658 | 100 | 1,658 | 100 | - | - | - | - | - | - |
| Female | 2 | 2 | 100 | 2 | 100 | 2 | 100 | - | - | - | - |
| Total | 1,660 | 1,660 | - | 1,660 | - | 2 | - | - | - | - | - |
| Other than Permanent Workers | | | | | | | | | | | |
| Male | 2,025 | 2,016 | 99.56 | 2,025 | 100 | - | - | - | - | - | - |
| Female | 21 | 20 | 95.24 | 21 | 100 | 21 | 100 | - | - | - | - |
| Total | 2,046 | 2,036 | - | 2,046 | - | 21 | - | - | - | - | - |

2. Details of retirement benefits, for FY 2021-22 and FY 2020-21

| Benefits | FY 2021-22 | | | FY 2020-21 | | |
|------------------------|--|--|--|--|--|--|
| | 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 (Please specify) | - | - | - | - | - | - |



Business Responsibility & Sustainability Report (contd.)

3. Accessibility of workplaces:

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

Presently, the Company does not have any differently abled employee as per the Rights of Persons with Disabilities Act, 2016.

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.

Being a responsible employer, the Company, maintains strict adherence to equal employment opportunity for all its employees across its organization. The relevant policy aims to provide practical guidance to stakeholders and is available on the Company's official website, please refer the below link for further detailed information.

https://ushamartin.com/upload/investorrelations/BusinessResponsibilityandSustainabilityPolicy_20220214102513.pdf

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 materiality benefits for all its female employees. Zero parental leaves were availed for FY 2021-22 and FY 2020-21.

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

| | Yes/No (If yes, then give details of the mechanism in brief) |
|--------------------------------|--|
| Permanent Workers | The Company encourages open and transparent communication with all its employees/workers and addresses all their concerns and grievances. |
| Other than Permanent Workers | 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. |
| Permanent Employees | Grievances and concerns are addressed and resolved through discussions and necessary interventions of senior management. The Company has also established a Vigil Mechanism and Whistle Blower policy which operates as a formal platform for reporting complaints and grievances. |
| Other than Permanent Employees | |

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

| Category | FY 2021-22 | | | FY 2020-21 | | |
|----------------------------------|--|--|---------|--|--|---------|
| | 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) |
| Male | 513 | - | - | 516 | - | - |
| Female | 7 | - | - | 7 | - | - |
| Total Permanent Employees | 520 | - | - | 523 | - | - |
| Male | 1658 | 1322 | 79.73 | 1746 | 1399 | 80.13 |
| Female | 2 | - | - | 2 | - | - |
| Total Permanent Workers | 1660 | 1322 | - | 1748 | 1399 | - |

8. Details of training given to employees and workers:

| Category | FY 2021-22 | | | | | FY 2020-21 | | | | |
|------------------|------------|------------------|---------|----------------------|---------|------------|------------------|---------|----------------------|---------|
| | 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 | 572 | 262 | 45.80 | 145 | 25.35 | 549 | 44 | 8.01 | 81 | 14.75 |
| Female | 7 | 1 | 14.29 | 1 | 14.29 | 7 | - | - | 3 | 42.86 |
| Total | 579 | 263 | - | 146 | - | 556 | 44 | - | 84 | - |



| Category | FY 2021-22 | | | | | FY 2020-21 | | | | |
|----------------|--------------|------------------|----------|----------------------|----------|--------------|------------------|----------|----------------------|----------|
| | 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) |
| Workers | | | | | | | | | | |
| Male | 3,683 | 1,028 | 27.91 | 1,684 | 45.72 | 3,606 | 1,738 | 48.20 | 232 | 6.43 |
| Female | 23 | 12 | 52.17 | - | - | 37 | - | - | - | - |
| Total | 3,706 | 1,040 | - | 1,684 | - | 3,643 | 1,738 | - | 232 | - |

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

| Benefits | FY 2021-22 | | | FY 2020-21 | | |
|------------------|--------------|--------------|----------|--------------|--------------|----------|
| | Total (A) | No. (B) | % (B/A) | Total (C) | No. (D) | % (D/C) |
| Employees | | | | | | |
| Male | 513 | 513 | 100 | 516 | 516 | 100 |
| Female | 7 | 7 | 100 | 7 | 7 | 100 |
| Total* | 520 | 520 | - | 523 | 523 | - |
| Workers | | | | | | |
| Male | 1,658 | 1,658 | 100 | 1,746 | 1,746 | 100 |
| Female | 2 | 2 | 100 | 2 | 2 | 100 |
| Total* | 1,660 | 1,660 | - | 1,748 | 1,748 | - |

* Performance and career development reviews are provided to permanent employee and workers.

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). Usha Martin 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 ISO 45001 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.

- 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. 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. (Yes/No)

Yes, the Company has developed a standard operating procedure (SOP) 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, Usha Martin being a responsible company, 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.



Business Responsibility & Sustainability Report (contd.)

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

| Safety Incident/Number | Category | FY 2021-22 | FY 2020-21 |
|---|-----------|------------|------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | - | - |
| | Workers | 5 | 6 |
| Total recordable work-related injuries | Employees | - | - |
| | Workers | 17 | 17 |
| No. of fatalities | Employees | - | - |
| | Workers | 1 | - |
| High consequence work-related injury or ill-health (excluding fatalities) | Employees | - | - |
| | Workers | - | - |

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

The Company emphasizes the importance of providing a safe and healthy working environment for all of its employees and workers. To that end, 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.

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

| | FY 2021-22 | | | FY 2020-21 | | |
|--------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
| | 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 | - | - | - | - | - | - |
| 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% |
| Working Conditions | 100% |

The Organization conducts health and safety assessment across its plants/offices and ensures stringent measures to avoid the spread of Covid. The Company attempts to adhere to government-mandated safety measures, assuring the same on all of its properties. The Company undergoes inspection, testing & certification of all its lifting tools & tackles, pressure vessels inside plants. There is also 100% compliance to external safety audits conducted periodically.

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 key measures are enlisted below:

- Periodic checking of all lifting machines at plants.
- Repairs and rectifications wherever required.
- 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.

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 any adverse event occurs such as death or fatal accidents 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 Company ensures sustainable sourcing and assess their value chain partners on various parameters. There is continuous focus on ethical business practices and transparent disclosures with all its value chain partners. The Company 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 2021-22 | FY 2020-21 | FY 2021-22 | FY 2020-21 |
| Employees | - | - | - | - |
| Workers | 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)

No

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, and validating health and safety points 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. Usha Martin Limited 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.



Business Responsibility & Sustainability Report (contd.)

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 | |
| 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 | 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. |

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 organization has developed a stakeholder engagement mechanism to conduct market study and identify risk areas/concerns, communicate strategies and performances, identify risk areas and to build trust among all stakeholders. A comprehensive study has been undertaken and a summary document is developed and shared with all board members in order to implement appropriate action plans and sustainable strategies.
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's stakeholder engagement mechanism aims to foster inclusivity, accountability, and responsibility. The Company 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 2021-22 | | | FY 2020-21 | | |
|------------------------|--------------|------------------------------------|-------------|--------------|------------------------------------|----------|
| | Total (A) | No. employees' workers covered (B) | % (B/A) | Total (C) | No. employees' workers covered (D) | % (D/C) |
| Employees | | | | | | |
| Permanent | 520 | 32 | 6.15 | 523* | - | - |
| Other than permanent | 59 | - | - | 33 | - | - |
| Total Employees | 579 | 32 | 5.53 | 556 | - | - |
| Workers | | | | | | |
| Permanent | 1,660 | 122 | 7.35 | 1,748* | - | - |
| Other than permanent | 2,046 | 143 | 6.99 | 1,895 | - | - |
| Total Workers | 3,706 | 265 | 7.15 | 3,643 | - | - |

* Wire mill – Jamshedpur business is transferred to Tata Steel Long Products Limited w.e.f. 1st July 2021. 33 (7 employees + 26 workers) are not considered as workforce for financial year 2021-22.

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

| Category | FY 2021-22 | | | | | FY 2020-21 | | | | |
|-----------------------------|------------|------------------------|---------|-------------------------|---------|------------|------------------------|---------|-------------------------|---------|
| | Total (A) | Equal to minimum wages | | More than minimum wages | | Total (D) | Equal to minimum wages | | More than minimum wages | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |
| EMPLOYEES | | | | | | | | | | |
| Permanent | | | | | | | | | | |
| Male | 513 | 1 | 0.19 | 512 | 99.81 | 516 | 3 | 0.58 | 513 | 99.42 |
| Female | 7 | - | - | 7 | 100 | 7 | - | - | 7 | 100 |
| Other than Permanent | | | | | | | | | | |
| Male | 59 | - | - | 59 | 100 | 33 | - | - | 33 | 100 |
| Female | - | - | - | - | - | - | - | - | - | - |
| WORKERS | | | | | | | | | | |
| Permanent | | | | | | | | | | |
| Male | 1,658 | - | - | 1,658 | 100 | 1,746 | - | - | 1,746 | 100 |
| Female | 2 | - | - | 2 | 100 | 2 | - | - | 2 | 100 |
| Other than Permanent | | | | | | | | | | |
| Male | 2,025 | 66 | 3.26 | 1,959 | 96.74 | 1,860 | 50 | 2.68 | 1,810 | 97.31 |
| Female | 21 | - | - | 21 | 100 | 35 | - | - | 35 | 100 |



Business Responsibility & Sustainability Report (contd.)

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 (BoD) | 6 | 40,03,449 | 1 | 12,75,000 |
| Key Managerial Personnel (KMP) | 4* | 81,99,633.48 | 1 | 49,14,419.04 |
| Employees other than BOD and KMP | 509 | 7,32,296.28 | 6 | 6,65,005.56 |
| Workers | 1,658 | 3,87,153.96 | 2 | 3,82,805.34 |

* 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 the complaints regarding human rights issues are taken directly to Human Resource department (HR) 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 Whistle Blower 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 an open channel of communication between the workforce and the HR department for redressal of those grievances which are not covered under the Vigil Mechanism and Whistle Blower policy.

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

| | FY 2021-22 | | | FY 2020-21 | | |
|-----------------------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
| | 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 | - | - | - | - | - | - |
| Discrimination at workplace | - | - | - | - | - | - |
| Child Labour | - | - | - | - | - | - |
| Forced Labour/Involuntary Labour | - | - | - | - | - | - |
| Wages | - | - | - | - | - | - |
| Other human rights related issues | - | - | - | - | - | - |

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/worker can escalate their issues to labour unions/association representative/Human Resource department.

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

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.



9. Assessments for the year:

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

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 2021-22.
- Details of the scope and coverage of any Human rights due diligence conducted.
No due diligence by any external agency was conducted in FY 2021-22.
- 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?
Presently, the Company does not have any differently abled employee as per the Rights of Persons with Disabilities Act, 2016
- Details on assessment of value chain partners:
No such assessments were carried out for our value chain partners in FY 2021-22.
- 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, in the following format:

| Parameter | FY 2021-22 | FY 2020-21 |
|---|------------------------|------------------------|
| Total electricity consumption (A) | 50,252.4 GJ | 49,069.8 GJ |
| Total fuel consumption (B) | 3,631,407.94 GJ | 3,124,028.63 GJ |
| Energy consumption through other sources (C) | - | - |
| Total energy consumption (A+B+C) | 3,681,660.34 GJ | 3,173,098.43 GJ |
| Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees) | 0.0002034 | 0.000235813 |
| Energy intensity (optional) – the relevant metric may be selected by the entity. | - | - |

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



Business Responsibility & Sustainability Report (contd.)

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

| Parameter | FY 2021-22 | FY 2020-21 |
|--|--------------------|--------------------|
| Water Withdrawal by source (KL) | | |
| Surface Water | 699,308 | 693,940 |
| Ground Water | 203,735 | 191,019 |
| 3 rd Party Water | 29,943 | 21,498 |
| Seawater/ desalinated water | - | - |
| Other sources | - | - |
| Total Vol of Water Withdrawal (KL) | 932,986 | 906,457 |
| Total Vol of Water Consumed (KL)* | 834,311 | 808,482 |
| Water intensity per rupee of turnover (Water consumed/turnover) | 0.000046093 | 0.000060083 |
| 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. At Ranchi, the Company is in process to install water meters to monitor its discharge quantity.

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

The Company recognized water stress as an imminent environmental risk and has identified water stewardship as one the key material topic. The organization has been stringently implementing several projects and initiatives in order to minimize its water consumption and reduce its reliability on fresh water. The Company has taken initiatives to develop an efficient mechanism to treat all its effluents, ensure efficient water usage and zero liquid discharge site in coming years.

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

| Parameter | Unit | FY 2021-22 | FY 2020-21 |
|-------------------------------------|---------------------|------------|------------|
| NOx | Total tonnes of NOx | 272.30 | 200.76 |
| SOx | Total tonnes of SOx | 414.01 | 358.72 |
| Particulate matter (PM) | Total tonnes of PM | 76.43 | 62.39 |
| Persistent organic pollutants (POP) | - | - | - |
| Volatile organic compounds (VOC) | - | - | - |
| Hazardous air pollutants (HAP) | - | - | - |
| Others – please specify | - | - | - |

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

| Parameter | Unit | FY 2021-22 | FY 2020-21 |
|--|---|------------|------------|
| Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | Metric tonnes of CO ₂ equivalent | 342,884.26 | 294,936.85 |
| Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | Metric tonnes of CO ₂ equivalent | 11,027.61 | 11,313.315 |
| Total Scope 1 and Scope 2 emissions per rupee of turnover | - | 0.00001955 | 0.0000228 |
| Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity | - | - | - |

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

The Company continuously strives to track all 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. The Hoshiarpur plant of



the organization has replaced its conventional furnace oil fired burners with the Propane Gas fired burners in order to reduce 16.687 MT CO₂/month of greenhouse gas emissions. Additionally, the specified initiative has potential to save Rs. 1,68,285 monthly by using propane gas as fuel.

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

| Parameter | FY 2021-22 | FY 2020-21 |
|--|-------------------|-------------------|
| Total Waste generated (in metric tonnes) | | |
| Plastic waste (A) | - | - |
| E-waste (B) | 2.01 | 5.06 |
| Bio-medical waste (C) | 0.05 | 0.09 |
| Construction and demolition waste (D) | 890 | 650 |
| Battery waste (E) | - | - |
| Radioactive waste (F) | - | - |
| Other Hazardous waste. Please specify, if any. (G) | 2256.78 | 2593.30 |
| 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) | 3148.84 | 3248.45 |
| 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 | 658.23 | 493.19 |
| (ii) Re-used | - | - |
| (iii) Other recovery operations | - | - |
| Total | 658.23 | 493.19 |
| 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 [^] | 0.09 [^] |
| (ii) Landfilling | 1821.20 | 1948.53 |
| (iii) Other disposal operations* | 669.36 | 806.60 |
| Total | 2490.61 | 2755.22 |

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 Control Board authorised party.

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 implemented comprehensive procedures to reduce waste generated throughout the product lifecycle, and several interventions are in the planning stages to implement practices for waste minimization, segregation, and safe disposal in compliance with all standards and regulatory norms. Waste generated by the organization is categorized into hazardous and non-hazardous waste. Non-hazardous waste is sold to authorized recyclers for further processing. Disposal of hazardous waste is as per statutory norms.

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

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.



Business Responsibility & Sustainability Report (contd.)

| 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. |
|---------------------------------|-------------------------|--|
| 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 |

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

Usha Martin 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.

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:

Yes, the Company is compliant with the applicable environmental law / regulations / guidelines in India.

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 2021-22 | FY 2020-21 |
|---|---------------|---------------|
| 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)# | 98,675 | 97,975 |
| (iii) To Seawater* | | |
| - No treatment | - | - |
| - With treatment (please specify level of treatment) | - | - |
| (iv) Sent to third parties* | | |
| - No treatment | - | - |
| - With treatment (please specify level of treatment) | - | - |
| (v) Others* | | |
| - No treatment | - | - |
| - With treatment (please specify level of treatment) | - | - |
| Total Water discharged (KL) | 98,675 | 97,975 |

* Not Applicable to the Company.

Primary Treatment.

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:

Not Applicable

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

(Protection) Rules, 1986 is in place. The Company has in place 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 the 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.
Not Any.

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. Public Policy Advocacy
 - 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 |

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 2021-22.

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.

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 three financial years and hence the Company has not made any CSR spending as required under Section 135 of the Companies Act, 2013. However, the Company has been involved in voluntary CSR activities in and around the manufacturing facility located in the State of Jharkhand and continues to do so through its CSR arm - Usha Martin Foundation.

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

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.



Business Responsibility & Sustainability Report (contd.)

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 the 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 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 2021-22 | FY 2020-21 |
|---|------------|------------|
| Directly sourced from MSMEs/ small producers | 3% | 1.92% |
| Sourced directly from within the district and neighboring districts | 80% | 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 | 71.56 Lakh * |

* This is a voluntary spending by the Company through Usha Martin Foundation

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 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. | More than 3000 persons have benefitted from the various CSR initiatives undertaken by the Company during the FY 2021-22 through their CSR arm, Usha Martin Foundation. | 61% beneficiaries are from vulnerable and marginalized groups |
| Arranging and sponsoring of remedial classes to help weaker students and managing and maintaining Gurukul School | | |
| Arrangement of health camps for free eye testing; and awareness programs with respect to HIV / AIDs | | |
| Development of Sport, infrastructural facilities for village health centres, aganwadis, Jal minars and drainage systems. | | |
| Skill and Livelihood enhancement projects such as establishment of (i) sewing centres, (ii) cultivation of mushrooms and food items, (iii) livestock cultivation and rearing | | |

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 product and social parameters relevant to the Product | 100% |
| Safe and responsible usage | 100% |
| Recycling and/or safe disposal | 100% |

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 endeavors to provide them with exceptional product, services and knowledge. With each of its products, the Company shares guidelines 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.

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

| | FY 2021-22 | | | FY 2020-21 | | |
|--------------------------------|--------------------------|-----------------------------------|---------|--------------------------|-----------------------------------|---------|
| | Received during the year | Pending resolution at end of year | Remarks | Received during the year | Pending resolution at end of year | Remarks |
| Data privacy | - | - | - | - | - | - |
| Advertising | - | - | - | - | - | - |
| Cyber-security | - | - | - | - | - | - |
| Delivery of essential services | - | - | - | - | - | - |
| Restrictive Trade Practices | - | - | - | - | - | - |
| Unfair Trade Practices | - | - | - | - | - | - |
| Other | - | - | - | - | - | - |

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

| | Number | Reason for Recall |
|------------------|--------|-------------------|
| Voluntary Recall | - | - |
| Forced Recall | - | - |

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 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.



Business Responsibility & Sustainability Report (contd.)

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: <https://www.ushamartin.com>

Product brochures:

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

LinkedIn: <https://www.linkedin.com/company/ushamartin-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