

Corporate Office :

The First, A&B Wing, 9th Floor,
Behind Keshav Baug Party Plot,
Vastrapur, Ahmedabad - 380 015,
Gujarat, India
Phone : +91 79 2960 1200/ 1/ 2
Fax : +91 79 2960 1210
eMail : info@ratnamani.com



RMTL/SEC/BRSR 2022-23

July 7, 2023

BSE Ltd. Corporate Relationship Department 1 st Floor, New Trading Ring, Rotunda Building, P. J. Tower, Dalal Street, Fort, Mumbai – 400 001 Company Code : 520111	National Stock Exchange of India Ltd. “Exchange Plaza”, 5th Floor, Bandra – Kurla Complex, Bandra (E), Mumbai - 400 051 Company Code : RATNAMANI
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Sub.: Submission of the Business Responsibility and Sustainability Report for the FY 2022-23 of the Company.

Dear Sir/Madam,

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, please find enclosed herewith Business Responsibility and Sustainability Report ('BRSR') for the financial year ended on March 31, 2023, which also forms part of Annual Report for FY 2022-23.

The aforesaid document is also available on the website of the Company at www.ratnamani.com

Kindly take the above on your record.

Thanking you,

Yours faithfully,

For, RATNAMANI METALS & TUBES LIMITED

ANIL MALOO
COMPANY SECRETARY & COMPLIANCE OFFICER

Encl.: As above

ratnamani.com

info@ratnamani.com
CIN : L70109GJ1983PLC006460

Registered Office

17, Rajmugat Society, Naranpura Cross Roads,
Ahmedabad - 380 013, Gujarat, India
Phone: +91 79 2741 5504/2747 8700 | Fax: +91 79 2960 1210 | eMail: info@ratnamani.com

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1	Corporate Identity Number (CIN) of the Listed Entity	L70109GJ1983PLC006460
2	Name of the Listed Entity	Ratnamani Metals and Tubes Limited
3	Year of incorporation	1983
4	Registered office address	17, Rajmugat Society, Naranpura Cross Roads, Ahmedabad - 380 013, Gujarat, India
5	Corporate address	"The First", A&B Wing, 9 th Floor, Behind Keshav Baug Party Plot, The First Avenue Road, Off 132 Feet Ring Road, Vastrapur, Ahmedabad-380015
6	E-mail	info@ratnamani.com
7	Telephone	+91 79 2741 5501 and +91-79-29601200 / 1 / 2
8	Website	www.ratnamani.com
9	Financial year for which reporting is being done	2022-2023
10	Name of the Stock Exchange(s) where shares are listed	a) BSE Limited b) National Stock Exchange of India Limited
11	Paid-up Capital	₹ 1,401.84 Lakhs
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Jayesh Saluja, VP (Human Resources) jayesh.saluja@ratnamani.com +91 79 2741 5501 and +91-79-29601200 / 1 / 2
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	The Business Responsibility & Sustainability Reporting (BRSR) is prepared on a standalone basis for RMTL. It includes operations of its corporate office, three manufacturing plants and two branch offices in India.

II. Products/services

14. Details of business activities (accounting for 90.00% of the turnover) :

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacturing of tube and tube fittings of basic iron & steel	The company manufactures iron and steel tubes, tube fittings and pipes, including: Stainless Steel Seamless & Welded Tubes & Pipes, Nickel Alloy Seamless Tubes, Carbon Steel Welded Pipes, Alloy Steel Welded Pipes, Titanium Welded Tubes, Induction Bend, etc.	99.20%

15. Products/Services sold by the entity (accounting for 90.00% of the entity's Turnover):

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Tubes & Pipes made of metal (Iron and Steel)	24106	99.20%

III. Operations

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

Location	Number of plants	Number of offices	Total
National	3	4	7
International	-	1	1

17. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States and UTs)	28 States and 8 Union Territories
International (No. of Countries)	35+

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

19.30%

- c. A brief on types of customers

RMTL supplies iron and steel tubes and pipes to end-user companies in core industry sectors like Oil & Gas, Refinery & Petrochemical, Dairy, Chemical & Fertilizer, Thermal, Solar & Nuclear Power, LNG, Desalination, Defense, Aerospace, Chillers & Cooling system, Pulp & Paper Industry, Automobile, etc. It also exports products to customers in the Americas, Europe, Middle East and Asia.

IV. Employees

18. Details as at the end of Financial Year:

- a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	1,021	1,012	99.00%	9	1.00%
2.	Other than Permanent (E)	236	236	100.00%	-	0.00%
3.	Total employees (D + E)	1,257	1,248	99.00%	9	1.00%
WORKERS						
4.	Permanent (F)	1,616	1,616	100.00%	-	0.00%
5.	Other than Permanent (G)	2,032	2,023	100.00%	9	0.00%
6.	Total workers (F + G)	3,648	3,639	99.80%	9	0.20%

- b. Differently abled Employees and workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	12.00	12.00	100.00%	-	-
2.	Other than Permanent (E)	-	-	-	-	-
3.	Total differently abled employees (D + E)	12.00	12.00	100.00%	-	-
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	18.00	18.00	100.00%	-	-
5.	Other than permanent (G)	3.00	3.00	100.00%	-	-
6.	Total differently abled workers (F + G)	21.00	21.00	100.00%	-	-

19. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	10	1	10.00%
Key Management Personnel (Other than Directors)	2	-	0.00%

Note: All 3 Executive Board of Directors are also KMP, so they are captured as part of BoD.

- 20 Turnover rate for permanent employees and workers
(Disclose trends for the past 3 years)

	FY 23			FY 22			FY 21		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	10.53%	23.53%	34.06%	9.34%	23.53%	32.87%	5.61%	20.00%	25.61%
Permanent Workers	7.18%	0.00%	7.18%	6.15%	0.00%	6.15%	7.49%	0.00%	7.49%

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

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

S.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	Ratnamani Inc	Subsidiary	100.00%	No
2	Ravi Technoforge Private Limited	Subsidiary	53.00%	No

VI. CSR Details

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013 - (Yes/No) : Yes

(ii) Turnover (in ₹) : 4,37,003.38 Lakhs

(iii) Net worth (in ₹) : 2,74,856.91 Lakhs

VII. Transparency and Disclosures Compliances

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

Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 23			FY 22		
	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	-	-	-	-	-
Investors (other than shareholders)	Yes	-	-	-	-	-
Shareholders	Yes	-	-	-	-	-
Employees and workers	Yes	-	-	-	-	-
Customers	Yes	-	-	-	-	-
Value Chain Partners	Yes	-	-	-	-	-
Other (please specify)	-	-	-	-	-	-

The Company has a grievance redressal mechanism in place for all internal and external stakeholders of the business. The link to the policy is at https://www.ratnamani.com/investors_relations.html#left-tab2.

During the year, there have been no complaints/grievances on any of the 9 principles of NGRBC from any of the business stakeholders.



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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Increased temperature and heat waves	Risk	Increase in temperature and prolonged heat waves may create unsafe environment and cause health & safety risks for the workforce	The company is implementing newer technology & devices to maintain cooler temperatures around machineries like furnace, etc. The company is also looking at building sheds and planting more trees on the plant premises to reduce surface temperatures and provide more resting places to the workforce	Negative
2	Water scarcity	Risk	Water scarcity & less rainfall/droughts might impact the production processes as water is one of the main resources consumed by the company.	However, across all three locations, the company is implementing water storing facilities to maintain reserves upto a weeks' worth of water requirement in case of extreme emergency.	Negative
		Opportunity	Steel pipes and tubes are an important element of water supply/storage infrastructure. Increasing water scarcity & droughts will lead to increase in demand for developing better and additional infrastructure to store and/or transport water across multiple locations. The demand for pipes/tubes will therefore increase.	The Company works with some of the largest infrastructure developers in India and globally, acting as their trusted supplier for steel pipes & tubes. The company will continue to leverage its strong track record and relationships to cater to such growing need for increasing water storage/transport infrastructure.	Positive
3	Extreme weather events	Risk	The company operations may be impacted/disrupted by extreme weather events like storms/cyclones. In addition to supply chain disruption (due to production stoppage), storms/cyclones may also cause physical damage to the plant infrastructure. As possibility and frequency of such extreme weather increase, particularly near some of the areas where the company has manufacturing facilities, the risks of impact on business also increase.	The company is looking at insurance cover to mitigate financial risks arising from such extreme weather events. The company is also considering creating additional infrastructure around plant premises to minimise/mitigate impact from storms/cyclones.	Negative

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
4	Resource scarcity	Opportunity	Due to growing resource scarcity, industries are looking at recycling/reusing existing materials available. Demand for products from recycled/reused steel will also increase due to this.	The company procures from some of the largest steel manufacturers which in-turn have their own sustainability targets and are looking to increase proportion of recycled/reused steel in the final products they supply. The company is well placed to take advantage of increasing trend and market demand for recycled steel products.	Positive
5	Net-zero transition	Opportunity	To mitigate climate change, there is a growing demand for alternative sources of energy like hydrogen, wind, solar, etc.	Company products are an important part of such alternative energy infrastructure, particularly the use of hydrogen as a source to drive the net-zero transition. The company looks to increase focus towards building new products to cater to the need of newer energy sectors like hydrogen, etc. to help accelerate wider decarbonisation journey in India and globally.	Positive

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

Disclosure Questions	Policy and management processes									
	P1	P2	P3	P4	P5	P6	P7	P8	P9	
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	All statutory policies, codes, and guidelines are adopted in line with prevailing legal requirements. All policies are ultimately signed-off by the Managing Director ('MD'). Depending on the requirements, they are also approved by the relevant body, including the board of directors, various functional committees, and the senior management.									
c. Web Link of the Policies, if available	All Company policies in relation to the NGRBC principles and core elements of the BRSR are available on the website at: https://www.ratnamani.com/investors_relations.html#left-tab2									
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes



Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
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.	All policies in place within the Company are in compliance with applicable laws. The company always endeavors to incorporate industry best practices and latest technological advances. The Company has accreditations per international frameworks and standards like ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007. Various components of each of these accreditations align with the 9 NGRBC principles.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	NO	NO	NO	NO	NO	NO	NO	NO	NO
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	NA	NA	NA	NA	NA	NA	NA	NA	NA

Governance, leadership and oversight

7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)	An overview of ESG aspects of our business operations is covered as part of Joint MD's statement on page 28 of the Annual Report.								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	The MD and Risk Management Committee are responsible for overall governance and oversight in relation to sustainability related issues and implementation of the Business Responsibility policies.								
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.	Responsibility for the day-to-day decision making on ESG & wider sustainability related issues is with respective Department/ Functional heads.								
10. Details of Review of NGRBCs by the Company:									

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other –please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action. Compliance with statutory requirements of relevances to the principles, and, rectification of any non-compliances.	All statutory policies are approved by the Board of Directors, whereas other operational policies are approved & signed by the MD or the Senior Management, including respective Department/Functional heads. The MD & Risk Management Committee review the business responsibility performance on an ongoing basis.																	
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)	NA	NA	NA	NA	NA	NA	NA	NA	NA
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
It is planned to be done in the next financial year (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
Any other reason (please specify)	NA	NA	NA	NA	NA	NA	NA	NA	NA

Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transarent 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	1	A preliminary understanding of the nine	100.00%
Key Managerial Personnel	1	principles of NGRBC	
Employees other than BoD and KMPs	12	Environmental, health & safety related trainings and an overview of the nine	100.00%
Workers	12	principles of NGRBC	100.00%

The table above includes data for the larger trainings organised for all employees/workers of the Company. One-off/ad-hoc training sessions on health, safety, environmental and wider sustainability aspects organised for individual teams are not included in the above data.

2 Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine					
Settlement			Nil		
Compounding fee					
Non-Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions		Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment					
Punishment			Nil		

During the FY, there have been no incidences of fines/penalties against the company.

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
	Not applicable

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

The Company has 'zero tolerance' to any form of corruption or bribery. The company is committed to do business with ethical business practices. The Company has a Code of Business Conduct and a Whistle Blower Policy that are approved by the Board of Directors. These are applicable to all the Board Members and Senior Management.

The company also has a standalone Anti-Bribery and Anti-Corruption policy which covers risk assessment procedures, internal controls, mechanism to deal with instances of corruption as well as the training schedule. The policy applies to all employees and associated persons for ensuring compliance with applicable anti-bribery laws, rules and regulations in India and overseas jurisdictions where the company operates. This highlights Ratnamani's commitment to ethical and transparent corporate governance practices. The Anti-Bribery and Anti-Corruption policy is available on the company website at: https://www.ratnamani.com/download/Code_and_Policy/anti-bribery-and-anti-corruption-policy.pdf

5 Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:

	FY 2022-23	FY 2021-22
Directors	-	-
KMPs	-	-
Employees	-	-
Workers	-	-

During the FY, no disciplinary action has been taken by any law enforcement agency or the charges of bribery/ corruption against any Directors/KMPs/employees/workers.

6 Details of complaints with regard to conflict of interest:

	FY 2022-23		FY 2021-22	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	-	-	-	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	-	-	-	-

During the FY, no complaints have been received in relation to any instances of conflict of interest for Directors or KMPs.

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

During the FY, there have been no cases of corruption or conflicts of interest and no fines/penalties have been levied by any regulatory/law enforcement agencies or judicial institutions, so no corrective actions are required.

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

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

	FY 2022-23	FY 2021-22	Details of Improvement in environmental & social impacts
R&D	NA	NA	Not applicable (Refer note below)
Capex	34.70%	0.70%	Investment in solar power plant and energy conservation technology

Given the B2B focus, specifications of the products manufactured are driven by the end-client requirements so the company does not engage in any standalone R&D activity.

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

Yes, the company has a procedure for sustainable sourcing. All new supply chain partners are mandatorily evaluated on environment, health & safety and sustainability parameters before onboarding.

The Company has a Supplier Code of Conduct agreed with key suppliers which mandates the suppliers to consider various environmental, social and wider sustainable aspects like resource usage, waste, minimum wages, child labour, etc. In addition to this, the company ensures that majority of its suppliers have got one of the international or domestic accreditation/certification, e.g. ISO, etc.

All key raw materials like steel sheets, steel bars, etc. are procured from Indian and global multinationals with their own sustainability targets & initiatives thereby contributing to the Company's own sustainable sourcing process. The Company has considered various sustainability parameters while approving vendors for procuring other ancillary raw materials and packaging materials. The Company engages in periodic engagement with the vendors to ensure compliance with the Supplier Code of Conduct.

Preference is given to suppliers from nearby locations/districts to reduce carbon footprint from the logistics activity. Only government accredited suppliers are chosen for waste management activities to ensure strictest level of compliance.

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

Almost 100.00% of the inputs are sourced sustainably from the suppliers. The Company has a standalone Supplier Code of Conduct to promote sustainability across the value chain and supplier network. The Company engages in ongoing interactions with the Suppliers to align them with the Company's vision and aspirations on ESG goals.

- 3 Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for**
- (a) **Plastics (including packaging)**
 - (b) **E-waste**
 - (c) **Hazardous waste and**
 - (d) **Other waste**

Yes, focus on effective waste management is an important aspect of the company operations. The Company ensures sustainability of resources by reducing, reusing, recycling and effectively managing waste. It has embraced the “3-R” (Reduce, Reuse and Recycle) philosophy for all types of wastes leading to minimisation of raw materials, air emissions, liquid effluents, and other solid waste, in line with legal requirements and industry best practice.

The Company has implemented a ZLD policy in all 3 manufacturing facilities. All waste water and hazardous waste from the process is treated before reusing or disposing. Strict protocols are in place to ensure that the hazardous waste generated as part of the production process is disposed as per the guidelines of respective State Pollution Control Boards (SPCB). In line with requirements of EPR regulations, the company works with accredited third-party plastic collection and recycling organisations to minimise plastic waste. Detailed logs and records are maintained for traceability and tracking.

The Company operations do not generate any significant e-waste or any other liquid waste. The Company has an internal waste management policy as a guiding principles for e-waste and old machinery/equipment. The internal guidance mandates disposal of the generated e-waste and machinery/equipment waste through authorised dealers only. The functional/departmental head identifies the assets which have reached their end of useful life for disposal. The procurement department enlists certified waste dealer(s) through whom all wastes are managed. The company only works with designated/accredited waste recyclers to help with collection, recycling, and disposal.

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

The Company falls under the category of brand owner using plastics for product wrapping and packaging. As a result EPR regulation applies to the Company. The company is responsible for collecting and disposing of the plastic waste generated in the market as a result of its products. For this purposes, the Company proactively collaborates with accredited third-parties to minimise plastic waste. It works very closely with such third-parties to develop waste collection plans in order to meet prescribed targets for plastic collection and recycling. The required waste collection plan has been developed and followed in line with the submissions made to state and central Pollution Control Boards. The Company also purchases EPR credits from CPCB authorised recyclers, in line with regulatory guidelines.

Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains

Essential Indicators

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
	Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)	
Permanent employees											
Male	1,012	1,012	100.00%	1,012	100.00%	-	-	1,012	100.00%	-	-
Female	9	9	100.00%	9	100.00%	9	100.00%	NA	-	NA	-
Total	1,021	1,021	100.00%	1,021	100.00%	9	100.00%	1,012	100.00%	-	0.00%
Other than Permanent employees											
Male	236	-	0.00%	236	100.00%	NA	-	-	-	-	-
Female	-	-	0.00%	-	-	-	-	NA	-	NA	-
Total	236	-	0.00%	236	100.00%	-	0.00%	-	0.00%	-	0.00%

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

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	1,616	100.00%	1,616	100.00%	NA	-	-	-	-	-	-	
Female	-	-	-	-	-	-	NA	-	NA	-	-	
Total	1,616	100.00%	1,616	100.00%	-	0.00%	-	0.00%	-	0.00%	-	
Other than Permanent employees												
Male	2,023	NA	2,023	100.00%	NA	-	NA	-	-	-	-	
Female	9	NA	9	100.00%	-	-	-	-	NA	-	-	
Total	2,032	0.00%	2,032	100.00%	-	0.00%	-	0.00%	-	0.00%	-	

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

Benefits	FY 2022-23			FY 2021-22		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100.00%	100.00%	Y	100.00%	100.00%	Y
Gratuity	100.00%	100.00%	Y	100.00%	100.00%	Y
ESI	100.00%	100.00%	Y	100.00%	100.00%	Y
Others – please specify						

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.

Due to the nature of the operations, it is extremely difficult for the company to employ differently abled individuals in the plants and manufacturing activities which involve dealing with heavy raw materials like steel and iron and other chemicals substances. However, the Company endeavours to employ them in HQ and management functions.

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.

Providing equal opportunities to everyone is one of the key themes of the internal Employee Code of Conduct and various HR policies in place within the organisation. The company does not discriminate based on race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law. The Company also has a standalone Equal Opportunity Policy in place which reinforces its commitment to providing equal opportunities to everyone. The Equal Opportunity Policy is available on the company website at: https://www.ratnamani.com/download/Code_and_Policy/equal-employment-opportunity-policy.pdf

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100.00%	100.00%	100.00%	100.00%
Female	100.00%	100.00%	100.00%	100.00%
Total	100.00%	100.00%	100.00%	100.00%

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.

Category	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes. All employees and workers of the Company have access to grievance redressal mechanism.
Other than Permanent Workers	As part of periodic team/department meetings, an opportunity is provided for employees/workers to voice any concerns and issues.
Permanent Employees	
Other than Permanent Employees	Any compliant/grievance is first discussed with the immediate superior, then with the Department Head. If required, the issue is escalated to the Functional Head and lastly to the Senior management. Plant related complaints (e.g., related to canteen, safety, etc.) are managed by the local plant leadership.

Formally, there is a dedicated physical drop box at various locations, which all company employees/workers have access to and to which they can use to raise any compliants/grievances. Necessary actions are taken by the HR/stakeholder contact point to resolve the issues as quickly as possible. The HR team also involves various Department Heads as appropriate while resolving the complaints. The resolution is then discussed with the employee/worker who has raised the complaint.

If any worker/employee is unhappy with the resolution, the issue(s) can be escalated to Senior Management/VP (Human Resources) for further resolution and/or for mediation/arbitration.

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

Currently no employees or workers are covered under any associations or unions, recognised by the Company.

Category	FY 2022-23			FY 2021-22		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	1021	207	20.27%	953	181	18.99%
- Male	1012	205	20.26%	945	178	18.84%
- Female	9	2	22.22%	8	3	37.50%
Total Permanent Workers	1616	610	37.75%	1422	469	32.98%
- Male	1616	610	37.75%	1422	469	32.98%
- Female	0	0	-	0	0	-

Employees and workers of the Company are part of an external Union called Akhil Gujarat General Mazdoor Sangh.

8 Details of training given to employees and workers:

Category	FY 2022-23					FY 2021-22				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	1,248	1,248	100.00%	1,198	95.99%	1,165	1,165	100.00%	978	83.95%
Female	9	9	100.00%	9	100.00%	8	8	100.00%	8	100.00%
Total	1,257	1,257	100.00%	1,207	96.02%	1,173	1,173	100.00%	986	84.06%
Workers										
Male	3,639	3,639	100.00%	2,620	72.00%	3,339	3,339	100.00%	1,536	46.00%
Female	9	9	100.00%	9	100.00%	8	8	100.00%	8	100.00%
Total	3,648	3,648	100.00%	2,629	72.07%	3,347	3,347	100.00%	1,544	46.13%

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	1,248	1,012	81.09%	1,165	945	81.12%
Female	9	9	100.00%	8	8	100.00%
Total	1,257	1,021	81.23%	1,173	953	81.24%
Workers						
Male	3,639	1,616	44.41%	3,339	1,422	42.59%
Female	9	-	0.00%	8	-	0.00%
Total	3,648	1,616	44.30%	3,347	1,422	42.49%

The Company's annual performance and career development review process is applicable to all full-time employees 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 is an Integrated Management System Certified Company meeting the requirements specified in ISO 9001:2015 Quality Management System, ISO 14001:2015 Environment Management System and ISO 45001:2018 Occupational Health and Safety Management System.

The company has a formal health and safety policy and framework across the end-to-end operations and covers the entire workplace.

There are dedicated safety managers on all 3 plant sites who are responsible for day-to-day implementation of the H&S policies and for proactively identifying improvements opportunities. The safety managers also engage in various H&S initiatives to encourage best practice and ensure a very safe work environment across the company. There is a compulsory requirements for all workforce to wear protective gear in the plant premises, particularly while handling machinery/equipment and PPE while handling oils/chemicals used as part of the manufacturing process.

Induction & refresher trainings are provided to new joiners & workers on general H&S aspects, use of tool kits, machinery, etc. Yearly health check-ups are offered to all employees/workers. The company has tie-ups with nearby hospitals to take care of any medical emergencies. Periodic safety assessments & quality checks are undertaken by third parties to ensure compliance with applicable regulations and to maintain an effective health & safety policies. Various safety programs are conducted at all sites to ensure safety of all the laborers/workers. Latest technology (e.g. scrubbing system) is used to monitor air emissions & possible gas leakages to ensure it is within permissible limits and does not pose any threat to the workforce.

All health & safety initiatives are applicable across the end-to-end company operations.

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

The company adopts the Hazard Identification and Risk Assessment (HIRA) process wherein the Safety manager and other functional/technical teams work together to identify the hazards associated with the company activities and evaluate the risks vis-a-vis the control measures in place. This is done for all routine and non-routine activities.

The company also has dedicated Safety manager on site to regularly keep a check on the activities carried out. A regular safety check/maintenance is also carried out for safety of all equipment/machinery in place.

Through ongoing trainings, safety related messaging is continuously communicated to all workforce to remind of various safety protocols, policies and initiatives in place to reduce any safety related risks.

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

Yes, various forums and regular Safety Review Meetings are made available for workers to express their safety concerns and work related hazards. Appropriate proactive action is undertaken to mitigate all work related hazards based on worker inputs and any adverse findings or gaps identified as part of proactive hazard assessments. The company also adheres to all other health & safety related requirements specified in ISO 45001:2018 Occupational Health and Safety Management Standard.

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

All full-time employees have access to non-occupational medical and accident insurance and life insurance cover. All contract workers have access to non-occupational accident insurance as well.

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

Safety Incident/Number	Category	FY 2022-23	FY 2021-22
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	2	2
	Workers	21	15
Total recordable work-related injuries	Employees	2	1
	Workers	47	34
No. of fatalities	Employees	-	-
	Workers	1	-
High consequence work-related injury or ill-health (excluding fatalities)	Employees	1	-
	Workers	17	19

The injuries during the FY have been higher primarily in relation to new CAPEX commissioning and plant expansion activities. Significant corrective measures have been undertaken in relation to the activity which involved the unfortunate fatality during the current FY.

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

The Company regularly provides health and safety trainings to the workforce to ensure they understand various hazards related to their day-to-day operations and how to work safely. Regular workplace health and safety inspections are undertaken to proactively identify unsafe conditions and take rectifying actions immediately. Regular monitoring of work practices is also undertaken to ensure that employees are following safe practices as per standards. Wearing of PPE is mandated in designated areas and regular tool box talk meetings are organised to create a safe workspace. Ongoing air monitoring is also undertaken to ensure air emissions are within prescribed limits. Additional signage and messaging is displayed across the factory to reinforce health and safety focused messages. These measures are undertaken at all company manufacturing facilities.

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

Category	FY 2022-23			FY 2021-22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	-	-	-	-	-	-
Health & Safety	-	-	-	-	-	-

Any health & safety and working conditions related concerns of the employees and workers are addressed during the periodic review meetings. These are documented as part of the minutes of the meetings. No other formal complaints have been received from the employees or workers during the year.

14 Assessments for the year:

Category	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100.00%
Working Conditions	100.00%

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.

During the FY, safety related incidents and their causes were assessed in great detail and the following corrective actions have been undertaken by the company to prevent occurrence of any accidents in the future:

- i) Barricades installed to avoid entry of workers who are unfamiliar with the process/equipment.
- ii) Automated stoppage mechanism deployed for machine/equipment on entry of any employees in the designated zone.
- iii) Instruction to all employees to not enter designated areas and areas with non-familiar processes/activities without adequate PPE and supervision.
- iv) Additional safety trainings organised for all the workers/employees involved in handling of the identified equipment and processes.
- v) Additional oversight introduced to ensure operators are carrying out work as per applicable instructions and only working in identified/designated areas.
- vi) Assessment conducted by external safety contractors to ensure all inter-locking mechanisms are working effectively.
- vii) CAPA analysis undertaken to ensure robust safety policies in relation to the identified equipment and processes going forward.
- viii) Display of additional messages across facilities to warn employees from entering unknown/unfamiliar areas.

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.

Stakeholders are critical to the Company's business operations and their interests are key enablers for our business strategy. The main stakeholders are those who directly and indirectly benefit from the business operations and activities as well as those with whom we regularly communicate for the purpose of reporting, establishing relationships, conducting business, etc. There are both internal and external groups of stakeholders.

The key internal and external stakeholder groups that have an immediate impact on the company's operations and functioning are the following: Employees/Workers, Shareholders, Customers, Communities, Suppliers /Vendors, and Business Partners.

The above stakeholders are identified based on the material influence they have over the company and/or the degree to which the company's corporate choices and their results have a material impact on them.

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

Methods of stakeholder engagement includes surveys (such as supplier, customer, employee surveys), workshops, online video calls, regular interactions with the CSR teams and impact assessments, periodic updates, investors meetings & calls and interactions with team members. The table below provides a more detailed overview in relation to how we engage with both our internal and external stakeholder groups.

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
Suppliers / Vendors	No	<ul style="list-style-type: none"> Feedback Surveys On-boarding process Meetings 	Ongoing basis	<ul style="list-style-type: none"> Supplier development Promoting local suppliers Promoting shared growth
Customers	No	<ul style="list-style-type: none"> Websites Product catalogues Digital marketing Customer meets and visits Corporate profile in portable drives Corporate films News releases Social media platforms 	Ongoing basis	<ul style="list-style-type: none"> Ensuring availability of products Explaining newer technology & emerging products Understanding of existing and emerging customer requirements Understanding emerging market needs Customer satisfaction & feedback Customer complaints (if any)
Shareholders	No	<ul style="list-style-type: none"> Website Investors/ Analyst meetings or calls Stock Exchange Announcements Press Releases Quarterly results announcements Timely disclosures Notice of the Annual General Meeting of Shareholders Corporate profile Annual Report Social media platforms 	Annually / Quarterly / Ongoing basis	<ul style="list-style-type: none"> Enhancing enterprise value Performance and finance results, strategy, and business operations of company Corporate governance Transparency in disclosure Investor complaints (if any)

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
Employees/ Workers	No	<ul style="list-style-type: none"> Internal employee portal/ Intranet Surveys/feedbacks Training and performance management Employee engagement events Annual Report Corporate films Regular updates through email communication from HR 	Ongoing basis	<ul style="list-style-type: none"> Employee health, safety and wellbeing initiatives Providing development platforms for behavioral and skill development Employee engagement and satisfaction Updates and communication on policies, processes, systems Employee complaints & grievance management
Communities	Yes	<ul style="list-style-type: none"> Website Site reports Corporate profile Annual Report Media releases Social Media Platforms 	Ongoing basis	<ul style="list-style-type: none"> Increasing awareness and understanding of Company activities Providing access to basis social infrastructure like school, healthcare, etc. to the less privileged communities Reducing wider environmental impact around plant vicinity and surroundings Contributing to improving biodiversity & natural ecosystems for long-term positive societal impact
Business Partners	No	<ul style="list-style-type: none"> Product catalogues Meetings and visits Emails Corporate films 	Ongoing basis	<ul style="list-style-type: none"> Ensuring availability of products Explaining newer technology & emerging products Supply chain matters, including sustainable sourcing Regulatory compliance Customer satisfaction & feedback

Principle 5: Businesses should respect and promote human rights

Essential Indicators

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	1,021	1,021	100.00%	953	953	100.00%
Other than Permanent	236	-	0.00%	220	-	0.00%
Total Employees	1,257	1,021	81.00%	1,173	953	81.00%
Workers						
Permanent	1,616	1,616	100.00%	1,422	1,422	100.00%
Other than Permanent	2,032	-	0.00%	1,925	-	0.00%
Total Workers	3,648	1,616	44.00%	3,347	1,422	42.00%

During the FY, all permanent employees and workers have been provided a training on all aspects of Human Rights. This is in addition to what is required as part of the POSH regulation. Going forward, the Company is looking to roll out awareness sessions on Human rights to the contract/non-permanent employees and workers as well.

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

Category	FY 2022-23					FY 2021-22				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	1,021	NA	-	1,021	100.00%	953	NA	-	953	100.00%
Male	1,012	NA	-	1,012	100.00%	945	NA	-	945	100.00%
Female	9	NA	-	9	100.00%	8	NA	-	8	100.00%
Other than Permanent	236	NA	-	236	100.00%	220	NA	-	220	100.00%
Male	236	NA	-	236	100.00%	220	NA	-	220	100.00%
Female	-	-	-	-	-	-	-	-	-	-
Workers										
Permanent	1,616	NA	-	1,616	100.00%	1,422	NA	-	1,422	100.00%
Male	1,616	NA	-	1,616	100.00%	1,422	NA	-	1,422	100.00%
Female	-	-	-	-	-	-	-	-	-	-
Other than Permanent	2,032	NA	-	2,032	100.00%	1,925	NA	-	1,925	100.00%
Male	2,023	NA	-	2,023	100.00%	1,917	NA	-	1,917	100.00%
Female	9	NA	-	9	100.00%	8	NA	-	8	100.00%

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

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD) - Executive Directors	3	16,27,57,000	-	-
Board of Directors (BoD) - Non-Executive Directors	3	20,20,000	1	14,00,000
Key Managerial Personnel	2	73,33,000	-	0
Employees (other than BoD and KMP) and Workers	2,623	3,13,152	9	4,50,000

Note:

1) Executive Board of Directors are also KMP and are paid Remuneration, Perquisites, Retirement benefits & Commission

2) Non-Executive Directors are paid Sitting fees and Commission

3) KMP includes CFO and Company Secretary, who are paid Remuneration, Perquisites and Retirement benefits

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)

The HR Head acts as the focal point of contact and are responsible for addressing any human rights issues or impacts arising as part of the Company operations.

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

The Company has a standalone Human Rights policy in place as a sign of its commitment to human rights and to ensure that its operations are conducted in accordance with all applicable labour laws in India and in line with global best practices. The Policy also outlines mechanism available to the employees and external stakeholders to address any issues related to human rights.

As part of the policy, all internal employees and workers and any external stakeholders (partners, customers, etc.) can raise any human rights issues with the HR team in the first instance. In addition to this, company employees/workers can also raise complaints in line with the Vigil Mechanism and Whistle Blower Policy in place. Necessary actions will be taken by the HR/ stakeholder contact point in consultation with the HR Head and any other functional heads as required. If any worker/employee/ stakeholder is not satisfied with the resolution, the issue(s) can be escalated to Senior Management for further resolution and/ or for mediation/arbitration. The Human Rights policy is available on the company website at: https://www.ratnamani.com/download/Code_and_Policy/human-rights-policy.pdf

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

	FY 2022-23			FY 2021-22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	-	-	-	-	-	-
Discrimination at workplace	-	-	-	-	-	-
Child Labour	-	-	-	-	-	-
Forced Labour / Involuntary Labour	-	-	-	-	-	-
Wages	-	-	-	-	-	-
Other human rights related issues	-	-	-	-	-	-

During the FY, there have been no complaints made by workers or employees on any human rights issues

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

The Company has a standalone Human Rights Policy and a Whistle Blower Policy through which the employees can report, without fear of retaliation, any wrong practices or unethical behaviour on discrimination or harassment which may have a detrimental effect on the organisation, including financial damage and impact on brand image.

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

No, human rights requirements do not explicitly form a specific part of the business agreement & contracts. However, the company has a zero tolerance policy for any human rights violations and adopts best practices while engaging with the employees and workers of the company as well as external customers, suppliers and other value chain partners.

9 Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100.00%
Forced/involuntary labour	100.00%
Sexual harassment	100.00%
Discrimination at workplace	100.00%
Wages	100.00%
Others – please specify	-

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

There were no significant risks/ concerns arising from the above assessments.

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

Essential Indicators

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

Parameter	FY 2022-23	FY 2021-22
Total electricity consumption (A)	272	225
Total fuel consumption (B)	22	19
Energy consumption through other sources (C)	116	111
Total energy consumption (A+B+C) in Tera Joules	410	355
Turnover (INR lakhs)	4,37,003	3,13,878
Energy intensity per rupee of turnover	0.0009	0.0011
(Total energy consumption/ turnover in rupees)		TJ/ INR Lakh revenue
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

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

No, the company has not undertaken any independent assessment/assurance of the environmental data disclosed in the report.

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.

The Company does not have sites / facilities identified as designated consumers under PAT.

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

Parameter	FY 2022-23	FY 2021-22
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Ground water	46,302	70,733
(iii) Third party water	-	-
(iv) Seawater / desalinated water	-	-
(v) Others	2,96,840	2,27,301
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	3,43,142	2,98,034
Total volume of water consumption (in kilolitres)	3,43,142	2,98,034
Water intensity per rupee of turnover (Water consumed / turnover)	0.79	0.95
		KL/ INR Lakh revenue
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

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

No, the company has not undertaken any independent assessment/assurance of the environmental data disclosed in the report.

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

The company has a Zero Liquid Discharge (ZLD) mechanism in place at all 3 manufacturing facilities. It covers the end to end plant operations. Water from STP is used for gardening purposes on the plant premises. Water from ETP is reused in the production processes. Any solid waste generated is disposed off using approved third party agencies.

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

Parameter	Please specify unit	FY 2022-23	FY 2021-22
NOx			
SOx			
Particulate matter (PM)			
Persistent organic pollutants (POP)			
Volatile organic compounds (VOC)			
Hazardous air pollutants (HAP)			
Others – please specify			

Please refer to the below note

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

Through government accredited third party agencies, the Company regularly monitors air emissions from its operations at all three manufacturing facilities in line with requirements of ISO standards and local pollution control regulations. Across all locations, all air emissions during the FY are within the permissible limits. The company has implemented various environmental control measures and technology to reduce its air emissions. It also uses natural gas in its operations which have low air emissions compared to traditional fuels like petrol and diesel.

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

Parameter	Unit	FY 2022-23	FY 2021-22
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	8,952.54	8,427.93
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	40,011.22	30,459.58
Total Scope 1 and Scope 2 emissions per rupee of turnover		0.11	0.12 MT CO ₂ e/ INR Lakh revenue
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		-	-

The Scope 1 and Scope 2 calculations are from the energy, electricity and fuel usage at the corporate office, three manufacturing facilities and the branch offices in India. Scope 1 calculations are undertaken using guidelines and emissions factors prescribed by IPCC (2006 version). Latest GWP factors published as part of AR5 are used for the calculations. Scope 2 calculations are undertaken using the emission factors prescribed by Central Electricity Authority (version 18).

The company activities do not involve any process or fugitive emissions.

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

No, the company has not undertaken any independent assessment/assurance of the environmental data disclosed in the report.

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

The company engages in various initiatives wherever possible in order to reduce its green house gas emissions. One of the key areas of GHG emissions for the company is use of electricity and fuel as part of energy consumption to power machinery/equipment as well as vehicles on the plant premises. For this, the company has installed a captive solar and wind plant with a combined capacity of 42 MWh. During the year, the company has also moved towards using CNG and electric powered vehicles on plant premises to reduced GHG emissions. Additionally, the company is also committed to the reduction of overall GHG emissions by use of low-emission materials (e.g. paints, adhesives, etc), sustainable building materials, solar panels and net metering technology, energy efficient machinery/equipment which reduces fuel & energy consumption, etc.

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

Parameter	FY 2022-23	FY 2021-22
Total Waste generated (in metric tonnes)		
Plastic waste (A)	203	170
E-waste (B)	0.51	1.01
Bio-medical waste (C)	0.045	0.029
Construction and demolition waste (D)	-	-
Battery waste (E)	0.03	0.03
Other waste (F) Cotton rages & cleaning materials	1.92	0.60
Other waste (F): X-ray films	3.2	0.58
Other Hazardous waste. Please specify, if any. (G) Process waste + ETP Sludge + Fixer	787	595
Other Hazardous waste. Please specify, if any. (H) Used oil	1.38	3
Other Non-hazardous waste generated (I) Discarded barrels	5	7
Total (A+B + C + D + E + F + G+ H+I)	1,001.99	777.37



Parameter	FY 2022-23	FY 2021-22
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled (Plastic waste + E-waste)	132.51	155.01
(ii) Re-used (STP waste)	-	-
(iii) Battery waste	0.03	0.03
(iv) Cotton rages & cleaning materials	1.92	0.60
(v) X-ray films	3.20	0.58
(vi) Used oil	1.38	3.00
(vii) Discarded barrels	5.00	7.00
(viii) Other recovery operations	-	-
Total	144.04	166.23
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration (Biomedical waste)	0.045	0.029
(ii) Landfilling (ETP sludge)	6,08,430	3,63,820
(iii) Other disposal operations	-	-
Total	608	364

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

No, the company has not undertaken any independent assessment/assurance of the environmental data disclosed in the report.

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.

We have robust waste management practices in place and continuously strive to reduce the amount of waste to landfill or incineration. All of our facilities have Zero Liquid Discharge mechanisms. STP treated water is reused on plant premises for gardening purposes. ETP treated water of is reused for the production process. Waste like used oil, discarded drums, containers, plastic waste, contaminated cotton rags and other cleaning materials, used X-ray films etc., are sent for recycling through accredited third parties. ETP sludge generated is treated and disposed off responsibly as per GPCB guidelines. During the FY, additional measures have been undertaken to provide ETP sludge as a raw material to other industry sectors like cement manufacturing, etc. to reduce the waste going to landfill.

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:

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N)
If no, the reasons thereof and corrective action taken, if any.			
Please refer to the note below			

None of the plants/offices of the company fall in/around ecologically sensitive areas.

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Please refer to the note below					

During the year, no environmental impact assessment has been undertaken by the company

12 Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

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

During the year, there have been no instances of non-compliance with any prevailing or applicable environmental law/regulations/ guidelines in India.

Principle 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.

Essential Indicators

1 a. Number of affiliations with trade and industry chambers/ associations.

The company has affiliations with 7 (Seven) national and state level trade and industry associations/ 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.

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Gujarat Chamber of Commerce & Industry	State
2	Bomaby Chamber of Commerce & Industry	State
3	Ahmedabad Management Association	State
4	Federation of Kutch Industries Association	State
5	Process Plant & Machinery Assosication of India	National
6	Indian Stainless Seamless Pipes Manufacturers Association (ISSMA)	National
7	Indian Stainless Steel Development Association (ISSDA)	National

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

Name of authority	Brief of the case	Corrective action taken
	Please refer to the note below	

During the FY, no adverse orders from any regulatory authorities have been received in relation anti-competitive conduct.

Principle 8: Businesses should promote inclusive growth and equitable development

Essential Indicators

1 Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

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

During the FY, there has been no requirement for the company to conduct any SIA.

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

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
Please refer to the note below						

During the FY, there has been no projects undertaken by the company which has required any Rehabilitation & Resettlement of any local communities.

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

The company treats the communities around its plant operations as equal partners in development. The Company engages with the communities on an ongoing basis. The communities have access to greivance redressal in case of any issues/complaints using the mechanism prescribed under the Whistle-Blower policy. Necessary actions will be taken by the stakeholder point of contact. In case if the community member is not satisfied with the resolution provided, there is provision to esclate the issue to the VP HR and MD and engage in mediation/arbitration.

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

	FY 2022-23	FY 2021-22
Directly sourced from MSMEs/ small producers		
Sourced directly from within the district and neighbouring districts	Refer Note	

The business operations of the Company are such that majority of the key inputs/ raw material is required to be sourced from large suppliers, who are spread across India and overseas. It sources ancillary products, equipment and other services required as part of its operations from MSMEs/small producers and from suppliers within the same or neighbouring districts.

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

Essential Indicators

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

The company has well established customer complaint handling standard operating procedures. Given the B2B focus, all customer complaints & feedback are initially received by the sales teams. Depending on the nature of the complaints/feedback, they are escalated to the relevant functional teams. The company strives to resolve customer complaints within the time bound manner as per the defined technical and quality procedures.

All complaints are recorded and proactive efforts are made to ensure any issues identified as part of the customer complaints/feedback are addressed to avoid similar issues arising in the future.

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

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

Given the nature of the B2B products, this is not applicable to the Company.

3 Number of consumer complaints in respect of the following:

	FY 2022-23		Remarks	FY 2021-22		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	-	-	-	-	-	-
Advertising	-	-	-	-	-	-
Cyber-security	-	-	-	-	-	-
Delivery of essential services	-	-	-	-	-	-
Restrictive Trade Practices	-	-	-	-	-	-
Unfair Trade Practices	-	-	-	-	-	-
Other	-	-	-	-	-	-

During the FY, there have been no complaints from customers across any parameters.

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

	Number	Reasons for recall
Voluntary recalls	-	-
Forced recalls	-	-

During the FY, there have been no instances of product recalls on account of safety/quality issues.

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

Yes, the company has a robust framework and established processes for cyber security and data privacy. A dedicated IT team is responsible for implementation and assessment of the end-to-end operations for any vulnerabilities. Continuous back-up of all company data is undertaken to avoid any disruption from cyber security risks. Through ongoing monitoring and robust IT controls, the company proactively implements measures to mitigate any cyber security and data privacy risks.

The Company has ensured that all critical business applications are hosted on Tier IV data centre, which is managed by industry experts. In addition, it has set up Disaster Recovery sites in different seismic zones. The Company has institutionalised various preventive measures including cyber security assessment from time to time, by a third party of repute.

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.

During the FY, there have been no issues to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls. No penalty/action have been taken by any regulatory authorities on these matters.