

Industrial Growth Center, Siltara  
Raipur (CG) 493111, India  
Tel: +91 771 2216100  
Fax : +91 771 2216198/99  
PAN No.: AAACR6149L  
CIN : L27100MH1973PLC 016617  
www.seml.co.in  
info@seml.co.in



2<sup>nd</sup> September 2024

BSE Ltd  
The Department of Corporate Services  
Phiroze Jeejeebhoy Towers  
Dalal Street – Mumbai 400 001

National Stock Exchange of India Ltd.  
Exchange Plaza, Bandra Kurla Complex  
Bandra (E), Mumbai – 400051  
Fax. No: 022-26598237/38, 022-26598347/48

Security Code No. :**504614**

Symbol: **SARDAEN**

Series: **EQ**

Dear Sir,

Sub.: **Business Responsibility and Sustainability Report for the Financial Year 2023-24**

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Business Responsibility and Sustainability Report (“BRSR”) for the Financial Year 2023-24, which forms an integral part of the Annual Report of the Company for the Financial Year 2023-24.

For BRSR please refer page number from 92 to 127 of the Annual Report FY 2023-24 updated on the website of the Company i.e. [www.seml.co.in](http://www.seml.co.in).

You are requested to take the information on record.

Thanking you,

Yours faithfully,  
For Sarada Energy & Minerals Ltd.

Company Secretary

Encl: As above

# Business Responsibility & Sustainability Report

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

1	Corporate Identity Number (CIN) of the Listed Entity	L27100MH1973PLC016617
2	Name of the Listed Entity	Sarda Energy & Minerals Limited
3	Year of Incorporation	1973
4	Registered office address	73/A, Central Avenue, Nagpur (MH)
5	Corporate address	Sarda Energy & Minerals Ltd. Industrial Growth Centre, Siltara, Raipur (Chhattisgarh) - 493111
6	E-mail	cs@seml.co.in
7	Telephone	+91 771-2216100
8	Website	www.seml.co.in
9	Financial year for which reporting is being done	2023-24
10	Name of the Stock Exchange(s) where shares are listed	1. BSE Limited 2. National Stock Exchange of India Limited
11	Paid-up Capital	₹ 35,23,81,270/-
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	BRSR Head Mr. Sanjeev Agarwal President (Plant Operations) sagrawal@seml.co.in +91 771-2216100
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).	Standalone Though the subsidiaries are not included in BRSR, they do strive to carry out their business in a sustainable manner.

### II. Products/services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacturing	Iron and steel	65.02%
		Ferro Alloys	22.68%
		Coal	9.20%

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

Sl. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Pellet	24109	17.54%
2	Sponge Iron	24102	10.15%
3	Steel Billets	24103	4.83%

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Sl. No.	Product/Service	NIC Code	% of total Turnover contributed
4	Wire Rod / HB Wire	24105	32.50%
5	Ferro Alloys	24104	22.68%
6	Coal	05101	9.20%

### 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	1	4	5
International	-	-	-

17. Markets served by the entity

a. Number of locations

Locations	Number
National	14
International	13

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

In 2023-24, exports contributed 4.58% of the total turnover of the Company.

c. A brief on types of customers

Iron ore pellet is supplied to sponge iron plants mostly located in nearby area. Our customers of Sponge Iron, Billets, Wire rods & HB Wires are mostly small and medium scale companies engaged in downstream products in vicinity. We supply ferro alloys mainly to large steel mills and some quantity to smaller steel mills also. In export market, we supply ferro alloys to large steel mills and multinational trading houses.

Coal is sold mainly to the customers for their captive power plant. Eco bricks are supplied to end use customers including corporates in real estate sector and individuals.

### 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)	1073	1063	99.07%	10	0.93%
2	Other than Permanent (E)	-	-	-	-	-
3	Total employees (D + E)	1073	1063	99.07%	10	0.93%
WORKERS						
4	Permanent (F)	434	434	100.00%	0	0
5	Other than Permanent (G)	2015	1940	96.28%	75	3.72%
6	Total workers (F + G)	2449	2374	96.94%	75	3.06%

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## b. Differently abled Employees and workers

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>EMPLOYEES</b>						
1	Permanent (D)	1	1	100.00%	-	-
2	Other than Permanent (E)	-	-	-	-	-
3	Total employees (D + E)	1	1	100.00%	-	-
<b>WORKERS</b>						
4	Permanent (F)	5	5	100.00%	-	-
5	Other than Permanent (G)	5	5	100.00%	-	-
6	Total workers (F + G)	10	10	100.00%	-	-

## 19. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	11	1	9.09%
Key Management Personnel	1	-	-

## 20. Turnover rate for permanent employees and workers

	FY 2023-24 (Turnover rate in current FY)			FY 2022-23 (Turnover rate in previous FY)			FY 2021-22 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	5.47%	1.00%	5.50%	5.73%	30.00%	5.96%	4.73%	-	4.73%
Permanent Workers	4.27%	-	4.27%	4.70%	-	4.70%	4.61%	-	4.61%

## 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	Sarda Energy & Minerals Hongkong Limited	Subsidiary	100.00%	No
2	Sarda Global Venture Pte. Limited	Subsidiary	100.00%	No
3	Sarda Global Trading DMCC	Subsidiary	100.00%	No
4	Sarda Metals & Alloys Limited	Subsidiary	100.00%	No

# Business Responsibility & Sustainability Report

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)
5	Sarda Energy Limited	Subsidiary	100.00%	No
6	Kalyani Coal Mining Private Limited <sup>#</sup>	Subsidiary	100.00%	No
7	Madhya Bharat Power Corporation Limited	Subsidiary	84.65%*	No
8	Parvatiya Power Limited	Subsidiary	51.00%	No
9	Sarda Hydro Power LLP	Subsidiary	60.00%	No
10	Chhattisgarh Hydro Power LLP	Subsidiary	100.00%*	No
11	Shriram Electricity LLP	Subsidiary	51.00%	No
12	Natural Resources Energy Private Limited	Subsidiary Joint Venture	51.00%	No
13	Raipur Infrastructure Company Limited	Joint Venture	33.33%	No
14	Madanpur South Coal Company Limited	Joint Venture	20.13%	No
15	Bartunga Coal Private Limited <sup>^</sup>	Joint Venture	67.00%	No

\* Holding including holding by WOS

# Incorporated on 02.05.2023

<sup>^</sup> Incorporated on 02.03.2024

## VI. CSR Details

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: **Yes**

(ii) Turnover in ₹ crore 2,733.45

(iii) Net worth in ₹ crore 3,516.34

## 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:

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
	(If Yes, then provide web-link for grievance redress policy)						

# Business Responsibility & Sustainability Report

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
Communities	Yes, Whistle blower policy link <a href="https://seml.co.in/">https://seml.co.in/</a>	NIL	NIL	–	NIL	NIL	–
Investors (other than shareholders)	Corporate%20 Governance/ Vigil%20 Mechanism.pdf	NIL	NIL	–	NIL	NIL	–
Shareholders	SCORES Portal/ SMART ODR Portal	5	0	–	3	0	–
Employees and workers	Yes, Whistle blower policy link <a href="https://seml.co.in/">https://seml.co.in/</a>	NIL	NIL	–	NIL	NIL	–
Customers	Corporate%20 Governance/ Vigil%20 Mechanism.pdf	17	0	–	15	0	–
Value Chain Partners	Corporate%20 Governance/ Vigil%20 Mechanism.pdf	NIL	NIL	–	NIL	NIL	–
Other (please specify)	Corporate%20 Governance/ Vigil%20 Mechanism.pdf	NIL	NIL	–	NIL	NIL	–

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

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adaptor mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Occupational Health & Safety	R	In the shop floor or in field, workers are exposed to dust / gases/ heat / moving parts of machines which may be risky if not addressed.	Extensive training and awareness, use of protective equipment, creating safe working condition, extensive use of technology, safety audits	Negative implications
2	Energy consumption	R	Conventional Energy generation has adverse impact on environment.	Energy efficiency in operations and promoting usage of clean energy.	Negative implications
3	Waste Management	O	In the course of production, a lot of waste (including heat) is generated which, if utilized productively, will make the business sustainable and environment friendly	NA	Positive implications

# Business Responsibility & Sustainability Report

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adaptor mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
4	Emission control	R	Manufacturing processes generate hazardous substances adversely affecting environment	Installation of suitable pollution control equipment	Negative implications
5	Water & Effluent Management	R	Water is scarce commodity having impact on environment and society.	Optimize water usage and, treatment and recycling of used water and zero discharge of effluents	Negative implications
6	Responsible Investment	O	Investment approach that recognizes the generation of long-term sustainable returns and is dependent on stable, well-functioning and well-governed social, environmental and economic systems	NA	Positive implications
7	Local Considerations	O	Identification and mitigation of adverse impacts arising out of business operations on local communities, and creating opportunities for enhancing the positive community impacts	NA	Positive implications
8	Human Capital Development	O	Need for developing required calibre of resources to face challenges and providing opportunity to the surrounding communities to participate in growth	NA	Positive implications
9	Human Rights	R	This involves training of employees on human rights, assessment of effect of business operations on human rights	Whistle-blower Mechanism and compliance training covering human rights	Negative implications
10	Environmental Compliance	O	Compliance with local and national environmental regulations	NA	Positive implications
11	Materials	O	Enhancing resource efficiency and increasing the usage of recycled materials across operations	NA	Positive implications
12	Life cycle Management of Assets	O	Long-term management of assets for enhancing the reliability, product quality and operational eco-efficiency of assets.	NA	Positive implications

# Business Responsibility & Sustainability Report

## 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	P	P	P	P	P	P	P	P	P
	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)	Yes								
b. Has the policy been approved by the Board?(Yes/No)	Yes								
c. Web Link of the Policies, if available	Policies are available under the Investors' Section on the website of the Company - <a href="http://www.seml.co.in">www.seml.co.in</a>								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes								
3. Do the enlisted policies extend to your value chain partners?(Yes/No)	No								
4. Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	The policies are based on NGRBC								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>The Company has planned to reduce environment pollution and increase the use of green energy.</p> <ul style="list-style-type: none"> <li>• Target set under PAT scheme - 0.5802 TOE/Tonnes. Target to be achieved by FY- 2024-25.</li> <li>• Company has decided to install 50 MW (DC) solar power plant. Order has already been placed and tentative installation by end of FY25.</li> <li>• Company is planning to minimize use of Coal Gasifier and Reheating Furnace for Billet reheating before Wire Rod Mill by adopting direct hot charging process. This will help in reducing pollution. We are in process to stabilize production from direct charging route and able to eliminate RH route by FY 25.</li> <li>• The Company is adding additional bag filters at SID for capturing additional dust generated out of the process and will be taken in line by end of FY 25.</li> <li>• The Company adding additional gas cleaning and cooling system for ferro alloys furnaces and shall be commissioned by December 24.</li> </ul>								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Various related activities are ongoing. The Company expects to meet the deadlines fixed by it.								



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Disclosure Questions	P	P	P	P	P	P	P	P	P
	1	2	3	4	5	6	7	8	9
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)									
	<p>We have long recognized the importance of Environment, Social and Governance (ESG). We have worked upon bringing positive change, not just within the industry but also in the communities where we operate. We focus on waste recycling and run waste to wealth programmes to achieve 100% waste utilization. As the shift to a low-carbon economy is likely to unfold faster, the implications on steel sector shall be profound. We take cognisance of reduction in pollution to meet the evolving stakeholder expectations. We continue to seek innovative ways for this transition, through experimentation and investment. While the Company explores sustainable alternatives to traditional steel production methods, it is concurrently investing in new and efficient production methods. We also ensure to safeguard the flora and fauna in the course of our operations.</p> <p>We endeavour to improve health and safety, and community well-being along with workforce diversity and inclusion.</p> <p>We follow high governance practices in our operations. We recognize the criticality of governance challenges relating to business ethics, ever-evolving compliance landscape, and the imperative of improved disclosures. To effectively mitigate these challenges, we have in place Code of Conduct for promoting transparency and accountability.</p> <p>Our efforts towards ESG serves as a catalyst for our long-term success and resilience in the face of evolving market dynamics.</p>								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).									
	<p>The Board of Directors of the Company is the highest authority responsible for the oversight of the implementation of Business Responsibility policies. The Chairman &amp; Managing Director of the Company is the highest authority responsible for implementation of all policies in the Company.</p>								
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.									
	<p>No. The Board and the other Statutory Committees take care of sustainability related issues.</p>								

# Business Responsibility & Sustainability Report

## 10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	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	Director									Annually								
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Director									Quarterly								
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	P	P	P	P	P	P	P	P
										1	2	3	4	5	6	7	8	9
										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	P	P	P	P	P	P	P	P
	1	2	3	4	5	6	7	8	9
The entity does not consider the Principles material to its business (Yes/No)	Not Applicable								
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

## SECTION C: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as "Essential" and "Leadership". While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

**PRINCIPLE 1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.**

### Essential Indicators

- Percentage coverage by training and awareness programmes on any of the Principles during the financial year

Segment	Total No of Training & 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	6	Management, Technical	75.00%
Key Managerial Personnel	8	Technical	100.00%
Employees other than BoD and KMPs	613	Managerial & Technical Behaviors & Motivational	68.00%
Workers	380		80.00%

- Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website)

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

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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	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.

Yes, all our major contracts contain anti bribery clauses and whistle blower policy contains processes to raise voice against corruption and bribery. Weblink is <https://seml.co.in/Corporate%20Governance/Vigil%20Mechanism.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 2023-24	FY 2022-23
Directors	0	0
KMPs	0	0
Employees	1	0
Workers	5	0

6. Details of complaints with regard to conflict of interest

	FY 2023-24		FY 2022-23	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	—	0	—
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	—	0	—

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

Not Applicable

8. Number of days of accounts payables  $[(\text{Accounts payable} \times 365) / \text{Cost of goods/services procured}]$  in the following format:

	FY 2023-24	FY 2022-23
Number of days of accounts payables	13 days	20 days

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## 9. Openness of business

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties alongwith loans and advances & investments, with related parties, in the following format:

Parameter	Metrics	FY 2023-24	FY 2022-23
Concentration of Purchases	a) Purchases from trading houses as % of total purchases	3.43%	0.11%
	b) Number of trading houses where purchases are made from	3	1
	c) Purchases from top 10 trading houses as % of total purchases from trading houses	100.00%	100.00%
Concentration of Sales	a) Sales to dealers/distributors as % of total sales	Dealers/Distributors not identified	
	b) Number of dealers/distributors to whom sales are made		
	c) Sales to top 10 dealers/distributors as % of total sales to dealers/distributors		
Share of RPTs in	a) Purchases (Purchases with related parties/Total Purchases)	3.23%	6.64%
	b) Sales (Sales to related parties/Total Sales)	2.86%	1.79%
	c) Loans & advances (Loans & advances given to related parties/Total loans & advances)	72.84%	63.45%
	d) Investments (Investments in related parties/Total Investments made)	70.33%	80.73%

## Leadership Indicators

- Awareness programmes conducted for value chain partners on any of the Principles during the financial year

Total number of awareness programmes held	Topics / principles covered under the training	% of value chain partners covered (by value of business done with such partners) under the awareness programmes
03	Awareness on Labour Laws & Principles	9.00%

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

Yes, the Company has a Code of Conduct for all members of the Board, which requires all Directors of the Company to always act in the interest of the Company and ensure that any other business or personal association which they may have does not involve any conflict of interest with the operations of the Company. In case of any actual or potential conflict of interest, the concerned Director is required to immediately report such conflicts and seek approvals as required by the applicable law and under Company's policies.

The Company receives an annual declaration from its Board of Directors and senior executives confirming adherence to the Code of Conduct, which includes the provisions on dealing with conflict of interest.

# Business Responsibility & Sustainability Report

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

### Essential Indicators

- 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 2023-24	FY 2022-23	Details of improvements in environmental and Social impacts
R&D	Not quantified	Not quantified	Internal team undertakes the R & D activities on a continuous basis, to recycle waste, reduce natural resource consumption including power, water and air, achieve efficiency in operations.
Capex	16.48%	29.49%	Reduction in environment pollution, efficiency in production, reduction in water consumption.

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

No. However, the Company expects its suppliers & transporters to abide by its ethical, social, safety, and security standards for transparent, hassle-free, and long-term business relationships. The Company takes effort to ensure that its suppliers & transporters are compliant in areas such as pollution control, child labour, forced or compulsory labour, health & safety & hospitality, and human rights etc.

- If yes, what percentages of inputs were sourced sustainably?

Not applicable.

- 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.

The plastic waste, E-waste and hazardous waste left over after reuse / recycle in production process is disposed of through authorized/registered recyclers/disposers. All non-hazardous waste is either recycled and reused in its own operations for brick making/road making or sold as co-products to other industries, with the largest customer being the cement industry.

- 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.

Yes. The waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Board.

### Leadership Indicators

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

No.

NIC Code	Name of Product /Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective /Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/ No) If yes, provide the web-link.
—	—	—	—	—	—

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

Name of Product /Description of the risk	Action taken service	Concern
The Company has not conducted LCA for its products.		

3. Percentage of recycled or reused input material to total material (by value) used in production.

Indicate input material	Recycled or re-used input material to total material	
	FY 2023-24	FY 2022-23
Fly Ash/Bed Ash	13.83%	16.40%
Char/Dolochar	0.45%	2.82%
Silico Slag	20.02%	20.60%
MNO Slag	10.00%	8.13%
Induction Slag	3.36%	3.70%
Mill Scale	0.18%	0.58%
End Cutting Scrap	0.81%	0.75%

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

	FY 2023-24			FY 2022-23		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Used oil / Greases	-	-	27.90	-	-	25.93
Spent iron exchange resin containing toxic metal	-	-	0.24	-	-	0.18
Exhaust Air or Gas cleaning residue (Coal tar from gasifier)	-	-	1,902.70	-	-	1,893.07
Residue or sludge Containing phenol (Phenolic water)	-	-	336.70	-	-	306.60
E - Waste	-	-	2.07	-	-	4.90
Battery Waste	-	-	3.06	-	-	21.46

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
Not Applicable	

# Business Responsibility & Sustainability Report

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

## Essential Indicators

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	1063	1063	100.00%	1063	100.00%	-	-	-	-	-	-
Female	10	10	100.00%	10	100.00%	10	100.00%	-	-	-	-
Total	1073	1073	100.00%	1073	100.00%	10	100.00%	-	-	-	-
Other than Permanent employees											
Male	-	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Total	-	-	-	-	-	-	-	-	-	-	-

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 Workers											
Male	434	434	100.00%	434	100.00%	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Total	434	434	100.00%	434	100.00%	-	-	-	-	-	-
Other than Permanent Workers											
Male	2015	2015	100.00%	2015	100.00%	-	-	-	-	-	-
Female	75	75	100.00%	75	100.00%	-	-	-	-	-	-
Total	2090	2090	100.00%	2090	100.00%	-	-	-	-	-	-

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format:

	FY 2023-24	FY 2022-23
Cost incurred on well- being measures as a % of total revenue of the Company	0.07%	0.04%



# Business Responsibility & Sustainability Report

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

Benefits	FY 2023-24			FY 2022-23		
	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	97.67%	100.00%	Y	99.40%	100.00%	Y
Gratuity	100.00%	100.00%	Y	100.00%	100.00%	Y
Others, please specify						
NPS	6.70%	-	Y	5.74 %	-	Y
Superannuation	1.72%	-	Y	1.67 %	-	Y

## 3. Accessibility of workplaces

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

Yes. Additional places are being covered, depending upon requirement.

## 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.

No.

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

	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	NA	NA	NA	NA
Female	NA	NA	NA	NA
Total	NA	NA	NA	NA

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

The Company has grievance redressal mechanism for employees. There is also a grievance redressal procedure which includes subjects such as discharge / dismissal, misconducts, fines etc. The Employees have the facility to raise their complaints at appropriate level and if not satisfied with the resolution may raise it to higher level and in appropriate cases, to the Audit Committee.

Chairman & Managing Director / Jt. Managing Director of the Company also interacts with the employees to assess and resolve their grievances/issues.

# Business Responsibility & Sustainability Report

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

Category	FY 2023-24			FY 2022-23		
	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						
Male						
Female						
Total Permanent Workers						
Male						
Female						

Not Applicable

## 8. Details of training given to employees and workers

Category	FY 2023-24					FY 2022-23				
	Total (A)	On Health and safety measures		On Skill Up gradation		Total (D)	On Health and safety measures		On Skill Up gradation	
		No. (B)	% (B / A)	No. (C)	% (C/A)		No. (E)	% (E / D)	No. (F)	% (F/D)
Employees										
Male	1063	780	73.37%	-	-	1063	772	72.62%	772	72.62%
Female	10	6	60.00%	-	-	10	6	60.00%	6	60.00%
Total	1073	786	73.25%	-	-	1073	778	72.51%	778	72.51%
Workers										
Male	434	434	100.00%	-	-	425	425	100.00%	227	53.41%
Female	-	-	-	-	-	-	-	-	-	-
Total	434	434	100.00%	-	-	425	425	100.00%	227	53.41%

## 9. Details of performance and career development reviews of employees and Worker

	FY 2023-24			FY 2022-23		
	Total	No	%	Total	No	%
Employees						
Male	1063	816	76.76%	1063	806	75.82%
Female	10	7	70.00%	10	6	60.00%
Total	1073	823	76.70%	1073	812	75.68%

# Business Responsibility & Sustainability Report

	FY 2023-24			FY 2022-23		
	Total	No	%	Total	No	%
Workers						
Male	434	434	100.00%	429	429	100.00%
Female	-	-	-	-	-	-
Total	434	434	100.00%	429	429	100.00%

## 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. Occupational health and safety management system has been implemented by the Company. The Coverage of the system is as per ISO 45001:2018. The Company endeavors to prevent all injuries and work-related illnesses. It recognizes health and safety as an integral part of its operations by promoting "Zero Incidents" in its operations. It aspires to set the highest standards required to comply and exceed applicable statutory health and safety requirements. It provides appropriate trainings to employees, associates, contractors and suppliers to help them work safely. The system helps in assessing risks and provides controls on health and safety hazards in operations and activities. Regular assurance programs are conducted and timely actions are taken. The systems ensure that incidents are reported timely, investigated for root causes and deployment of lessons learnt across the division.

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

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

- Hazard Identification & Risk Assessment
- Quantitative Risk Assessment
- Job Safety Analysis
- Inspections
- Audits
- Safety Observation System

Safety is reviewed by the Risk Management Committee and by the Board as an important part of the operations review. The safety performance with all locations is reviewed on a continuous basis.

Each activity has been defined through associated hazards and risks on various parameters - i.e. occurrence, severity, legal concern, likelihood of detection, etc. The control measure has been put in place for each such activity.

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

Yes. The workers can report incidents and near-misses to their immediate reporting officers / Head of HSE and can also raise their safety concerns. The Company has an established Hazard Identification and Risk Assessment (HIRA) process for both routine and non-routine jobs. Routine trainings on HIRA and Job Safety Assessment (JSA) are being provided to operation, maintenance and service engineers.

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

Yes

# Business Responsibility & Sustainability Report

## 11. Details of safety related incidents

Safety Incident/Number	Category	FY 2023-24	FY 2022-23
Lost Time Injury Frequency Rate (LTIFR)(per one million-person hours worked)	Employees	0	0
	Workers	0	0
Total recordable work-related injuries	Employees	0	0
	Workers	1	2
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

- Hazard identification, Risk Assessment and Management is done in accordance with Hazard Identification and Risk Assessment (HIRA) Procedure and Job Safety Analysis (JSA) Procedure.
- Hierarchy of controls is followed for application of risk control measures, Control Plans commensurate to risk are deployed before execution of job. No job is executed until risks are brought down to acceptable range.
- Safety Committees are in place at various levels to review the adequacy of resources for safety and to provide support for safety management system deployment.
- Deployment of Safe and Healthy work system is assured through periodic safety audits and inspections across sites.
- We have carried out Medical Examination as per Form-21 of all the workers/employees through authorized diagnostic center and we also organize health camps on BP/Sugar, Eye checkup, physical fitness at regular intervals.

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

	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	Nil	—	Nil	Nil	—
Health & Safety	Nil	Nil	—	Nil	Nil	—

## 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*	100.00
Working Conditions <sup>#</sup>	100.00

\* Assessment has been done by Mr. Ramesh Kumar Patel (Competent Person under CG Labor Department)

# Assessment has been done by M/s Arvind Industrial Hygiene (Competent Person under C.G. Labour Department)

## 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.

## Business Responsibility & Sustainability Report

- All safety related accidents are investigated and learning's from investigation reports are shared across organization for deployment of corrective actions to stop recurrence of such incidents. Effectiveness of corrective action deployment is checked during Safety Audits.
- Significant risks/concerns arising from assessment of Health and Safety Practices are addressed through elimination of manual job through use of Technology/Digitization, Safety Capability Building, Monitoring and supervision, etc.
- Based on the reports of health check-up camps, counseling of workers/employee is done from time to time and in required cases, suitable/proper medical check-up of the worker/employee is done.

### Leadership Indicators

- 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).
  - Employees - Yes
  - Workers - Yes
- Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

The contracts / work orders issued by the Company incorporates statutory provisions including payment and deduction of statutory dues such as Goods and Services Tax, Provident Fund, Employee State Insurance, etc. The suppliers / contractors are responsible for adherence to various statutes required for their operations, whilst the Company is responsible as a principal employer. Non-compliance attracts actions required under law and penalties as per the Company's own policies. In case of contractors, we insist for providing proof of statutory payments being done by them.

- Provide the number of employees / workers having suffered high consequence work- related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been /are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-24	FY 2022-23	FY 2023-24	FY 2022-23
Employees	Nil	Nil	Nil	Nil
Workers	Nil	Nil	Nil	Nil

- 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. We support the retired employee for advisory roles and also support other employees to get suitable job, except in case of serious disciplinary action.

- Details on assessment of value chain partners:

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

The company assesses its value chain partners who work within the premises of the Company.

# Business Responsibility & Sustainability Report

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.

Please refer point 15 of this principal

## 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 play an important role to maintain sustainable operations of the organization. The Company maintains a dynamic and strategic stakeholder engagement process where it identifies key stakeholder groups from the larger universe of all possible stakeholders. This is done after considering the material influence each group has on the Company's ability to create value (and vice-versa).

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

Key Stake holders	Whether identified as Vulnerable & Marginalised Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others	Frequency of engagement (Annually/ Half Yearly/ Quarterly/ Others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Government and Regulatory Authorities	No	Regular filings, submissions, meetings, Regulatory audits/ inspections	As and when required	Discussions with regard to various regulations, tax matters, inspections, approvals, assessments and compliances.
Investors / Shareholders	No	Analyst meets, conference calls, Annual General Meeting, Official communication channels: Advertisements, publications, website, plant visits by analysts	Quarterly/ Annually/as and when required	Equitable reach to the information and developments with transparency to enable them to take a considered call.
Employees	No	Intranet portal, Emails and meetings, Training programs, Performance appraisal, Grievance redressal mechanisms, Notice boards	Intranet - Daily / event based Emails - As and when required	To keep employees abreast of key developments happening in the company and also addressing their grievances
Customers	No	Customer meets, Official communication channels: Advertisements, publications, website, conferences events, Phone calls, emails and meetings.	Frequent and as and when required	To acquire new customers and service the existing ones. Grievance redressal.

# Business Responsibility & Sustainability Report

Key Stake holders	Whether identified as Vulnerable & Marginalised Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others	Frequency of engagement (Annually/ Half Yearly/ Quarterly/Others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Institutions & Industry Bodies	No	Networking through meetings, brainstorming sessions, discussions, etc.	As and when required	To discuss points of common interest and to interact with Regulators
Communities and Civil Society	No	Need assessment, meetings and briefings, Partnerships in community development projects, Training and workshops, Impact assessment surveys, Official communication channels: Advertisements, publications, website, Complaints and grievance mechanism	Frequent and as and when required	Community development through CSR projects. Impact assessment of our business. Upliftment of downtrodden.
Suppliers	No	Vendor assessment and review, seminars, Official communication channels, Exhibitions Advertisements, publications, website	As and when required	To make that part of our growth journey, new vendor / product development, Technical support. Grievance redressal

## 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 has delegated the consultation between the stakeholders and the Board on economic, environmental, and social topics to the Jt. Managing Director (JMD) of the Company. The JMD and the senior management team of the Company regularly updates the Chairman & Managing Director, Board and various Board Committees on relevant issues. These updates are provided during the Board meetings and separate meetings of various Board Committees.

The Company has put in place processes which ensure that feedback from key stakeholders are received by the management and presented to the Board and Board committees in their meetings.

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 engages with various stakeholders in helping to ensure that every group's expectations are heard. Social development activities are carried out which provides opportunities to communities for their holistic and inclusive development. The CSR activities of the Company focus on healthcare and quality education. Through continuous and purposeful engagement with the local communities, we work towards creating a value-based and empowered society. The CSR activities also collaborate with communities to facilitate them overcome various livelihood challenges and skill development opportunities. The various evolving aspects of ESG makes it a learning phase and hence stakeholder interactions remain vital for the Company.

# Business Responsibility & Sustainability Report

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

The villagers in remote and non-approachable areas are deprived of basic healthcare and basic education facility. Our company has supported NGOs for 50 schools operating in such areas. We are also operating mobile hospitals with free medicines for such deprived / marginalized groups. We also support such groups for livelihood / alternate source of income through micro businesses such as tailoring, dairy farming, home-made food product through training and financial support.

## PRINCIPLE 5 Businesses should respect and promote human rights

### Essential Indicators

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. of employees/ workers covered (B)	% (B / A)	Total (A)	No. of employees/ workers covered (B)	% (B / A)
<b>EMPLOYEES</b>						
Permanent	Nil	Nil	Nil	Nil	Nil	Nil
Other than Permanent	Nil	Nil	Nil	Nil	Nil	Nil
Total Employees	Nil	Nil	Nil	Nil	Nil	Nil
<b>WORKERS</b>						
Permanent	Nil	Nil	Nil	Nil	Nil	Nil
Other than Permanent	Nil	Nil	Nil	Nil	Nil	Nil
Total Workers	Nil	Nil	Nil	Nil	Nil	Nil

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

Category	FY 2023-24					FY 2022-23				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No (C)	% (C/A)		No. (E)	% (E / D)	No (F)	% (F/D)
<b>Employees</b>										
Male	1063	-	-	1063	100.00%	1063	-	-	1063	100.00%
Female	10	-	-	10	100.00%	10	-	-	10	100.00%
Other Than Permanent						-	-	-	-	-
<b>Workers</b>										
Male	434	-	-	434	100.00%	425	-	-	425	100.00%
Female	-	-	-	-	-	1	-	-	1	100.00%
Other Than Permanent										
Male	1940	1875	96.65%	65	3.35%	1925	1843	95.74%	82	4.26%
Female	75	75	100.00%	-	-	-	-	-	-	-



## Business Responsibility & Sustainability Report

### 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)	10	13,65,000/-	1	13,80,000/-
Key Managerial Personnel	1	26,89,992/-	-	-
Employees other than BoD and KMP	1,415	4,54,934/-	9	3,69,113/-
Workers	425	3,01,109/-	-	-

### 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. Human rights is a sensitive issue and the Company has zero tolerance to Human Rights violation. Human Rights is one of the key focus areas for the Company. Any case of Human Rights violation, whenever reported, shall be investigated by Head HR reporting directly to Jt. Managing Director.

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

The Company has put in place a grievance redressal process for investigation of employee concerns and has in place various rules which clearly mentions employee responsibilities and acceptable employee conduct. All employees can register their grievances with the HR department. The issue once registered is duly addressed by the HR department.

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

	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	Nil	Nil	-	Nil	Nil	-
Discrimination at workplace	Nil	Nil	-	Nil	Nil	-
Child Labour	Nil	Nil	-	Nil	Nil	-
Forced Labour/Involuntary Labour	Nil	Nil	-	Nil	Nil	-
Wages	Nil	Nil	-	Nil	Nil	-
Other Human Rights related issues	Nil	Nil	-	Nil	Nil	-

### 7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

	FY 2023-24	FY 2022-23
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	-	-
Complaints on POSH as a% of female employees / workers	-	-
Complaints on POSH upheld	-	-

# Business Responsibility & Sustainability Report

8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.  
The company has formed a Whistle Blower Policy which contains sufficient safeguards to prevent adverse consequences to the complainant.

9. Do human rights requirements form part of your business agreements and contracts?(Yes/No)  
Yes. The business agreements and contracts do include Company’s expectations to promote sustainability, fair competition and respect for human rights.

10. Assessments for the year:

	<b>% of your plants and offices that were assessed (by entity or statutory authorities or third parties)</b>
Child labour	100.00%
Forced/involuntary labour	Company’s plant and offices are assessed for compliance on human rights issues by internal team.
Sexual harassment	
Discrimination at workplace	
Wages	
Others - please specify	
Child labour	

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

No significant risks or concerns arose from the Assessments

### Leadership Indicators

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

Not required.

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

None

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes. Additional places are being covered, depending upon requirement.

4. Details on assessment of value chain partners:

	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
Child labour	We ensure human rights compliance on all the tabulated parameters in case of value chain partners working inside our premises. No assessment done for other value chain partners. As such % coverage would be insignificant.
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others - please specify	

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

No significant risks or concerns arose from the Assessments

# Business Responsibility & Sustainability Report

## 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 2023-24	FY 2022-23
Total electricity consumption (A)**	192280.32 GJ	192300.48GJ
Total fuel consumption (B)**	16191934.18 GJ	16514445.95 GJ
Energy consumption through other sources (C)	0	0
Total energy consumption (A+B+C)	16384214.50 GJ	16706746.43 GJ
Energy intensity per rupee of turnover (Total energy consumption / turnover in rupees)	0.00060 GJ/₹	0.00055 GJ/₹
Energy intensity (optional) - the relevant metric may be selected by the entity	NA	NA

\*\* Total Electricity consumption means Total Electrical Energy (Import - Export), considering grid energy input as 860 Kcal / KWH

\*\*\* All the captive power generation and its use in plant has been counted in energy received from burning of coal.

**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 independent assessment has been carried out by external agency w.r.t. energy consumption.

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.

Yes, our manufacturing facility is identified as DC for PAT CYCLE - VII A. Target set under PAT scheme - 0.5802 TOE/Tonne.

Assessment Year - FY- 2024-25

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

Parameter	FY 2023-24	FY 2022-23
Water withdrawal by source (in kilolitres)		
(i) Surface water	26,31,673	28,47,594
(ii) Ground water	27,112	1,28,919
(iii) Third party water	25,370	61,204
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres)(i + ii + iii + iv + v)	26,84,155	30,37,717
Total volume of water consumption (in kilolitres)	26,84,155	30,37,717
Water intensity per rupee of Turnover (Water consumed / turnover)	0.098	0.101
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.

# Business Responsibility & Sustainability Report

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

Yes. The Company recognizes the need for the efficient management of water resources within and outside its operating sites. Efforts are made to increase water use efficiency, while also ensuring its availability for all stakeholders. All plants are based on the principle of 'ZERO LIQUID DISCHARGE'. Waste water is treated and re-cycled in the water use cycle or diverted for horticulture / dust suppression use.

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

Parameter	Please specify unit	FY 2023-24	FY 2022-23
NOx	Tonnes/day	1.85	1.96
SOx	Tonnes/day	2.96	3.53
Particulate matter (PM)	Tonnes/day	0.46	0.62
Persistent organic pollutants (POP)	NA	NA	NA
Volatile organic compounds (VOC)	NA	NA	NA
Hazardous air pollutants (HAP)	NA	NA	NA
Others-please specify	NA	NA	NA

**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 independent assessment has been carried out by external agency w.r.t. air emissions.

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

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 1 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Not yet assessed		
Total Scope 2 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)			
Total Scope 1 and Scope 2 emissions per rupee of turnover			
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity			

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

No independent assessment has been carried out by external agency w.r.t. greenhouse gas emissions.

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

Yes. The Company has done extensive plantation in and around the plant premises and takes every possible efforts/step to reduce emissions. The Company is using e-vehicles for movement of personnel. The Company is also installing a solar power plant for energy consumption. It is also proposed to use e-trucks for internal movement of material. The company is replacing conventional lighting system with LED lights and all new lighting systems are LED only. All new motors for drive operations being installed are energy efficient motors (IEEE). The reciprocating compressors have been replaced with Screw Compressors to save energy.

# Business Responsibility & Sustainability Report

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

Parameter	FY 2023-24	FY 2022-23
Total Waste generated (in metric tonnes)		
Plastic waste (A)	1.00	1.29
E-waste (B)	2.07	4.90
Bio-medical waste (C)	0.011	0.00816
Construction and demolition waste (D)	NA	NA
Battery waste (E)	3.06	21.5
Radioactive waste (F)	0	0
Other Hazardous waste. Please Specify, if any. (G)		
1. Used Oil / Greases	27.90	25.93
2. Spent iron exchange resin containing toxic metal	0.24	0.18
3. Exhaust Air or Gas cleaning residue (Coal tar from gasifier)	1902.70	1893.07
4. Residue or sludge Containing phenol (Phenolic water)	336.70	306.66
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	517195.29	519969.76
Total (A+B + C + D + E + F + G + H)	519468.97	522223.30
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	152747.20	6742.00
(ii) Re-used	51748.92	292934.38
(iii) Other recovery operations	0	0
Total	204496.12	299676.38
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0	0
(ii) Land filling	0	0
(iii) Other disposal operations	314972.85	222546.92
Total	314972.85	222546.92

**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 independent assessment has been carried out by external agency.

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 promoted waste management practices aimed to achieve maximum waste utilization / recycling for sustainable and responsible business operation. The major waste stream at Power Plant is ash (fly ash +bottom ash) and the Company has achieved 100% fly ash utilization in FY24. The slag generated in production of steel and ferro alloys is also used in brick making and road construction.

# Business Responsibility & Sustainability Report

<b>Hazardous waste</b>	
Tarry residues waste	Sold to Authorized Vender/Recycler & Co-processing in cement kiln
Used / Spent Oil	Sold to Authorized Vender/Recycler
Spent iron exchange resin containing toxic metal	Utilization for energy recovery in boiler for steam or power generation.
<b>Non Hazardous waste</b>	
Char & Dolochar	The Dolochar is used as fuel in our power plant for power generation. The balance amount of Dolochar is sold to the various parties for utilization as fuel.  Char is also sold to the various parties. No dumping or storage of Char/Dolochar is practiced.
Dust collected from Pollution Control Units / Equipments	ESP dust of WHRB is mixed with fly ash and utilized for Bricks manufacturing in our bricks plant. Dust generated from various bag houses in the plant is also being used for making of bricks, tiles, blocks, etc. within the plant premises. The dust collected in bag house of ferro alloys plant is recycled by making sinter for recovery of manganese.
Fly ash and bottom ash	The fly ash is being utilized for bricks, tiles, blocks etc. and is also sold to cement plants.
Slag from process Ferro Manganese Silico-Manganese;	We are producing both Ferro Manganese and Silico-Manganese; the Ferro Manganese slag is being utilized as raw material for production of Silico-Manganese in the Ferro Alloys Plant. The silico slag is granulized and used as raw material in brick making.  The iron slag is crushed and magnetic slag is separated for recycling in steel making. Residue is used in bricks, blocks and tiles making as replacement of sand / sold in the market. Slag is also regularly lifted by local road contractor.
Mill Scale	Recycled for recovery of iron in manufacturing process.
End Cutting / Miss-role (Cobble)	Used as a raw material for small rolling mills or fed into our Induction Furnaces for remelting.
Hot Out	Reused in the Rolling Mill

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:

Not Applicable.

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
1.8 MTPA Gare Palma, IV/7 Coal Mine Project, Raigarh (C.G.)	EIA notification 2006 and as amended	S.O. 1533 (E) 14th September 2006 and various amendments	Yes	Yes	<a href="https://parivesh.nic.in">https://parivesh.nic.in</a>

# Business Responsibility & Sustainability Report

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
Enhancement in capacity of existing Coal Washery Plant from 0.96 MTPA to 5.2 MTPA in two Phases (Phase - I : 0.96 MTPA to 1.8 MTPA and Phase -II : 1.8 MTPA to 5.2 MTPA at Tehsil-Tamnar, Dist - Raigarh (C.G.)	EIA notification 2006 and as amended	S.O. 1533 (E) 14th September 2006 and various amendments	Yes	Yes	<a href="https://parivesh.nic.in">https://parivesh.nic.in</a>

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

Yes, all plants of SEML are compliant with applicable environmental laws/ regulations and guidelines. All relevant clearances/permissions are in place for all the plants.

## Leadership Indicators

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Parameter	FY 2023-24	FY 2022-23
From renewable sources		
Total electricity consumption (A)	0.565 GJ	0.585 GJ
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C)	0.565 GJ	0.585 GJ
From non-renewable sources		
Total electricity consumption (D) <sup>S</sup>	192280.32 GJ	192300.48 GJ
Total fuel consumption (E) <sup>^</sup>	16191934.18 GJ	16514445.95 GJ
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F)	16384214.50 GJ	16706746.43 GJ

<sup>S</sup> Total Electricity consumption means Total Electrical Energy (Import - Export), considering grid energy input as 860 Kcal / KWH

<sup>^</sup> All the captive power generation and its use in plant has been counted in energy received from burning of coal.

**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 independent assessment has been carried out by external agency.

# Business Responsibility & Sustainability Report

2. Provide the following details related to water discharged:

Parameter	FY 2023-24	FY 2022-23
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	NA	NA
- No treatment		
- With treatment - please specify level of treatment		
(ii) To Groundwater	NA	NA
- No treatment		
- With treatment - please specify level of treatment		
(iii) To Seawater	NA	NA
- No treatment		
- With treatment - please specify level of treatment		
(iv) Sent to third-parties	NA	NA
- No treatment		
- With treatment - please specify level of treatment		
(v) Others	NA	NA
- No treatment		
- With treatment - please specify level of treatment		
Total water discharged (in kilolitres)	-	-

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

No.

3. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres): For each facility / plant located in areas of water stress, provide the following information:

The plant of the Company is not located in water stress area.

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

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 3 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Not yet assessed		
Total Scope 3 emissions per rupee of turnover			
Total Scope 3 emission intensity (optional) - the relevant metric may be selected by the entity			

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

No independent assessment has been carried out by external agency w.r.t. greenhouse gas emissions.

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

Not Applicable.

6. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the



# Business Responsibility & Sustainability Report

same as well as outcome of such initiatives, as per the following format

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
01	New Gas cleaning plant (GCP) for Ferro alloys Furnace – A.	We had common GCP for Furnace A&B. We are installing one more GCP to have separate GCP for both furnaces Dust level shall be reduced to < 30mg/Nm <sup>3</sup> . All new types of controllers and instrument systems will be installed for better performance.	Reduction in dust emission levels. Further improvement expected.
02	Centralized bag filter at Sponge Iron plant.	Pollution control system installation is in progress with a capacity of 100000 CMH, in which dust getting spread through conveyor handling and other system shall be extracted to pass through bag filter and get stored in silo. Dust level shall be reduced to <30mg/Nm <sup>3</sup> . All new types of controllers and instrument systems will be installed for better performance.	Reduction in dust emission levels. Further improvement expected

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

Yes, the Company has business continuity and disaster management plan having well-defined parameters to ensure Business continuity. Those parameters are tested at frequent intervals and upgraded wherever required. The company has also taken suitable insurance cover to safeguard its interest in exigent cases. The main objective of business continuity parameters is to ensure business continuity under disruptive incidents with an aim to minimize impact on continuity of business, human life and other living beings, environment, stakeholders and economic loss.

8. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.

A substantial part of grid power is generated using thermal coal. We are installing 50 MW solar power plant to reduce adverse impact to environment arising from consumption of grid power.

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

Not evaluated

**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.

19

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.

# Business Responsibility & Sustainability Report

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Entrepreneurs Organization (EO)	International
2	Confederation of Indian Industries (CII)	National
3	Federation of Indian Chamber of Commerce & Industries (FICCI)	National
4	ASSOCHAM	National
5	Pellet Manufacturer's Association of India (PMAI)	National
6	Sponge Iron Manufacturer Association (SIMA)	National
7	Indian Ferro Alloys Producers' Association (IFAPA)	National
8	Chhattisgarh Sponge Iron Manufacturer Association	State
9	Chhattisgarh Steel Re-Rollers Association	State
10	Urla Industrial Association (UIA)	State

- 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.

No adverse orders received from regulatory authorities for anti-competitive conduct.

## Leadership Indicators

- Details of public policy positions advocated by the entity

SI No	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (yes/no)	Frequency of review by Board (annually /Half yearly/ Quarterly/ other please specify)	Wen link, if available
			None		

## PRINCIPLE 8 Businesses should promote inclusive growth and equitable development

### Essential Indicators

- 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

NIL

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

Not applicable

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

The grievance could be mailed or delivered to surendra.kl@seml.co.in. The grievance could also be sent to plant in-charge who will handle the same. The grievances received are escalated to the appropriate level depending on the nature of the grievance, its complexity and impact. The grievances so received with solution is reviewed by the management at the highest level.

## Business Responsibility & Sustainability Report

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

	FY 2023-24	FY 2022-23
Directly sourced from MSMEs/ small producers	5.56	4.22
Sourced directly from within the district and neighboring districts	37.19	44.73

5. Job creation in smaller towns - Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost

	FY 2023-24	FY 2022-23
Rural	100%	100%
Semi-urban	-	-
Urban	-	-
Metropolitan	-	-

(Place to be categorized as per RBI Classification System - rural/semi-urban/urban/metropolitan)

### Leadership Indicators

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

Not applicable.

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

S. No.	State	Aspirational District	Amount spent (₹)
1.	CG	Rajnandgaon & Narayanpur (CG)	2,87,97,619/-

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

No, we do not have a policy on this as yet. However, we give preference to procure from suppliers comprising marginalised/ vulnerable groups.

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

Jagruti SHG Group

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

Negligible

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

S. No.	Intellectual Property based on traditional knowledge	Owned/Acquired (Yes/ No)	Benefit shared (Yes/ No)	Basis of calculating benefit share
1	NIL	-	-	-

# Business Responsibility & Sustainability Report

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Name of authority	Brief of the Case	Corrective action taken
	Not Applicable	

6. Details of beneficiaries of CSR Projects

S. No.	CSR Project	No. of persons benefitted from CSR Project	% of beneficiaries from vulnerable and marginalized group
1	Education Project	1235	46.00
2	Health Care Project	26332	49.00
3	Infrastructure Project	82359	74.00
4	Art, Culture & Sport	28932	45.00
5	Livelihood Projects	435	21.00

## PRINCIPLE 9 Businesses should engage with and provide value to their consumers in a responsible manner

### Essential Indicators

- Describe the mechanisms in place to receive and respond to consumer complaints and feedback.  
All grievances could be submitted to the Marketing Head. The marketing team handles the grievances in a timely and appropriate manner. All such complaints and redressal are reviewed by the management at the highest level.
- Turnover of products and/services as a percentage of turnover from all products/service that carry information about:

	As a percentage of turn over
Environmental and social parameters relevant to the product	The Company's products do not have any mandatory labelling requirements. As such the products do not carry this information.
Safe and responsible usage	
Recycling and/or safe disposal	

- Number of consumer complaints in respect of the following:

Category	FY 2023-24			FY 2022-23		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	There have been no consumer complaints received in respect of these practices.			There have been no consumer complaints received in respect of these practices.		
Advertising						
Cyber-security						
Delivery of essential services						
Restrictive Trade Practices						
Unfair Trade Practices						
Other						

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

Category	Number	Reasons for Recall
Voluntary Recall	NIL	Not Applicable
Forced Recall	NIL	Not Applicable

## Business Responsibility & Sustainability Report

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

Yes. Risk Management Policy of the Company covers cyber security aspects. The policy can be accessed at the following link – <https://seml.co.in/Corporate%20Governance/SEML%20-%20Risk%20Management%20Policy.pdf>

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.

No action required.

### Leadership Indicators

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

All information regarding business of the Company can be accessed through the Company's website [www.seml.co.in](http://www.seml.co.in) and in its periodic disclosures such as the annual report. – Link – <https://seml.co.in/products.php>

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

Not Applicable

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

The Company is not dealing in essential services.

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)

The Company's products do not have any mandatory labelling requirements. However, while supplying Ferro Alloys to large OEM customers, we supply in 1mt jumbo bags which have the Company name embossed on it and also Company provides test certificates issued by in house testing lab and sometimes from the certified third parties containing quality parameters, as well as the chemical and physical properties of the product. The above information is also available in product brochures that are given to customers.

Feedback is a continuous process at our operations, and we leverage feedback for continual improvement in product and service quality, for benchmarking ourselves with industry.

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 – **Not Applicable**