



**STEEL STRIPS WHEELS LTD.**

**CIN: L27107PB1985PLC006159**

**Head Office :** ISO/TS16949 Certified  
SCO 49-50, Sector 26,  
Madhya Marg, Chandigarh 160 019 (INDIA)  
Tel : +91 172-2793112, 2790979, 2792385  
Fax : +91 172-2794834 / 2790887  
Website : www.sswlindia.com

Date: 05.09.2024

BSE Limited  
Department of Corporate Services,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai – 400 001

**BSE Code: 513262**

The National Stock Exchange of India  
Limited  
Exchange Plaza,  
Plot No. C/1, G Block,  
Bandra-Kurla Complex, Bandra (E),  
Mumbai – 400 051

**NSE Code: SSWL**

**Subject: Business Responsibility and Sustainability Report ("BRSR") for the Financial Year 2023-24**

Dear Sir/Madam,

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015 read with SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated July 12, 2024, please find enclosed the Business Responsibility and Sustainability Report ("BRSR") for the Financial Year 2023-24 along with Independent Reasonable Assurance Report on BRSR Core provided by Intertek India Private Limited.

Kindly take the same on your records

Thanking you.

Yours faithfully,

For **Steel Strips Wheels Limited**

(Shaman Jindal)  
Company Secretary  
M. No. A15397  
Encl: as above

**Regd. Office :** Village Somalheri/Lehli, P.O. Dappar, Tehsil Derabassi, Distt. Mohali, Punjab (India)  
Tel. : +91 (1762) 275249, 275872, 275173 Fax : +91 (1762) 275228  
Email : hrdho@sswlindia.com Website : www.sswlindia.com

# BUSINESS RESPONSIBILITY

## AND SUSTAINABILITY REPORT 2023-24

### SECTION A: GENERAL DISCLOSURES

#### I. Details of the listed entity

1.	<b>Corporate Identity Number (CIN) of the Company</b>	L27107PB1985PLC006159
2.	<b>Name of the Company</b>	Steel Strips Wheels Limited (SSWL)
3.	<b>Year of Incorporation</b>	28-02-1985
4.	<b>Registered Office Address</b>	Village Somalheri/Lehli, P.O. Dappar, Tehsil Derabassi, District S.A.S Nagar (Mohali), Punjab-140506
5.	<b>Corporate Address</b>	SCO 49-50, Madhya Marg, Sector-26, Chandigarh-160019
6.	<b>Email Address</b>	<a href="mailto:ssl_ssg@glide.net.in">ssl_ssg@glide.net.in</a>
7.	<b>Telephone</b>	0172-2793112
8.	<b>Website</b>	<a href="https://sswllindia.com/">https://sswllindia.com/</a>
9.	<b>Financial Year for which reporting is being done</b>	01.04.2023 to 31.03.2024
10.	<b>Name of the Stock Exchanges where shares are listed</b>	<ul style="list-style-type: none"> <li>National Stock Exchange of India Limited (NSE)</li> <li>BSE Limited (BSE)</li> </ul>
11.	<b>Paid-up Capital</b>	Rs. 15,69,29,325/-
12.	<b>Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR Report</b>	Sh. Mohan Joshi (0172-2793112, <a href="mailto:mohan@sswllindia.com">mohan@sswllindia.com</a> )
13.	<b>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).</b>	The disclosures under this report are made on a standalone basis for SSWL.
14.	<b>Name of assurance provider</b>	Intertek India Private Limited
15.	<b>Type of assurance obtained</b>	Reasonable Assurance on BRSR Core

#### II. Products/Services

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

S. No.	Description of Main Activity	Description of Business Activity	% of turnover of the Company
1.	Manufacture of Wheel Rims (Auto Parts and Equipment Industry)	Manufacturing of Steel Wheel Rims and Alloy Wheel Rims which are used in automotive vehicles	100%

##### 17. Products/Services sold by the Company (accounting for 90% of the Company's turnover):

S. No.	Product/Service	NIC Code	% of total turnover contributed
1.	Steel and Alloy Wheel Rims	29301	100%

#### III. Operations

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

Location	Number of plants	Number of offices	Total
National	05	21*	26
International	0	0	0

\* Includes 18 Warehouses.

##### 19. Markets served by the Company

###### a. Number of locations

Locations	Number
National (No. of States)	18 States and 4 Union Territories
International (No. of Countries)	19

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

14.55%

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

The Company is the leader in designing & manufacturing automotive wheel rims under both steel & alloy category. It sells its products to customers across the globe and the products of the Company caters to various customers engaged in manufacturing of automotive and auto components.

**IV. Employees**

**20. Details as at the end of the Financial Year i.e. 31.03.2024:**

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

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>EMPLOYEES</b>						
1.	Permanent (D)	2129	2081	97.75%	48	2.25%
2.	Other than Permanent (E)	52	50	96.15%	2	3.85%
3.	<b>Total employees (D+E)</b>	<b>2181</b>	<b>2131</b>	<b>97.71%</b>	<b>50</b>	<b>2.29%</b>
<b>WORKERS</b>						
4.	Permanent (F)	672	672	100.00%	0	0.00%
5.	Other than Permanent (G)	6310	6263	99.26%	47	0.74%
6.	<b>Total workers (F+G)</b>	<b>6982</b>	<b>6935</b>	<b>99.33%</b>	<b>47</b>	<b>0.67%</b>

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

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1.	Permanent (D)	2	2	100.00%	0	0.00%
2.	Other than Permanent (E)	0	0	0.00%	0	0.00%
3.	<b>Total differently abled employees (D+E)</b>	<b>2</b>	<b>2</b>	<b>100.00%</b>	<b>0</b>	<b>0.00%</b>
<b>DIFFERENTLY ABLED WORKERS</b>						
4.	Permanent (F)	6	6	100.00%	0	0.00%
5.	Other than Permanent (G)	0	0	0.00%	0	0.00%
6.	<b>Total differently abled workers (F+G)</b>	<b>6</b>	<b>6</b>	<b>100.00%</b>	<b>0</b>	<b>0.00%</b>

**21. Participation/Inclusion/Representation of Women**

	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	12	1	8.33%
Key Management Personnel (KMP) *	5	0	0.00%

\* KMP here includes CS, CFO & Executive Directors.

**22. Turnover rate for permanent employees and workers**

(Disclose trend for past 3 years)

	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
<b>Permanent Employees</b>	25%	13%	<b>25%</b>	20%	35%	<b>20%</b>	16%	19%	<b>16%</b>
<b>Permanent Workers</b>	1%	1%	<b>1%</b>	2%	0%	<b>2%</b>	4%	0%	<b>4%</b>

Note: This includes employees/workmen who have retired during the year.

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

**23. Name 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 the Company	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the Company (Yes/No)
1	Clean Max Astria Private Limited (CMAPL)	Associate	26.00%	No
2	AMW Autocomponent Limited (AACL)	Subsidiary	100.00%	No

# STEEL STRIPS WHEELS LIMITED

## VI. CSR Details

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

i. Turnover (in ₹) for the year ended March 31, 2024: Rs. 43,57,09,54,308.29

ii. Net worth (in ₹) for the year ended March 31, 2024: Rs.12,92,86,85,314.06

## VII. Transparency and Disclosure Compliances

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

Stakeholder group from whom complaints received	Grievance Redressal Mechanism in place (Yes/No) (If yes, then provide web-link for grievance redress policy)	FY 2023-24			FY 2022-23		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	Yes; <a href="https://sswllindia.com/wp-content/themes/sswl/assets/docs/code_of_conduct_for_business_partners.pdf">https://sswllindia.com/wp-content/themes/sswl/assets/docs/code_of_conduct_for_business_partners.pdf</a>	0	0	-	0	0	-
Investors (other than shareholders)	Yes; <a href="https://sswllindia.com/wp-content/themes/sswl/assets/docs/investor_grievance_policy.pdf">https://sswllindia.com/wp-content/themes/sswl/assets/docs/investor_grievance_policy.pdf</a>	0	0	-	0	0	-
Shareholders*	Yes; <a href="https://sswllindia.com/wp-content/themes/sswl/assets/docs/investor_grievance_policy.pdf">https://sswllindia.com/wp-content/themes/sswl/assets/docs/investor_grievance_policy.pdf</a>	9	0	-	16	1	The complaint pending for resolution at the close of the year, was resolved in the month of April 2023.
Employees and workers	Yes; <a href="https://sswllindia.com/wp-content/themes/sswl/assets/docs/whistleblower.pdf">https://sswllindia.com/wp-content/themes/sswl/assets/docs/whistleblower.pdf</a>	58	0	-	15	0	-
Customers	Yes; <a href="https://sswllindia.com/wp-content/themes/sswl/assets/docs/code_of_conduct_for_business_partners.pdf">https://sswllindia.com/wp-content/themes/sswl/assets/docs/code_of_conduct_for_business_partners.pdf</a>	41	0	-	36	0	-
Value Chain Partners	Yes; <a href="https://sswllindia.com/wp-content/themes/sswl/assets/docs/code_of_conduct_for_business_partners.pdf">https://sswllindia.com/wp-content/themes/sswl/assets/docs/code_of_conduct_for_business_partners.pdf</a>	0	0	-	0	0	-
Others (please specify)	Not Applicable						

\* The number of complaints reported above represent genuine and agreed complaints.

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

Material responsible business conduct and sustainability issues pertaining to environment and social matters that present a risk or an opportunity to the business of the Company, rationale for identifying the same approach to adapt or mitigate the risk along with its financial implications are given below:

S. No	Material Issue Identified	Indicate whether Risk/ Opportunity (R/O)	Rationale for identifying the material issue as risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Ethics and Compliance	Risk	The Company expects all its employees to adhere to the Code of Conduct Policy of SSWL and practice Ethical behaviour. The Company follows zero tolerance for any non-compliance as this will have an adverse impact on the Company. Due to the dynamic nature of laws, rules and regulations, it has become imperative for the company to ensure their compliance. Any failure to comply with the same may impact on the reputation of the Company adversely.	SSWL's Code of Conduct, Whistle Blower Policy, Code of Conduct for prevention of insider trading, code of practices and procedures for fair disclosure of unpublished price sensitive information, Policy on materiality of Related Party Transaction and Grievance Redressal across stakeholders ensures ethical behavior and compliance with applicable laws and regulations. The said Codes and policies provide for a framework for employees and other stakeholders to ensure that business is governed only by ethical practices. Further, any amendments to the laws, rules and regulations are checked on a regular basis. The said policies and code of conduct alongwith any changes thereon are duly communicated to the concerned stakeholder groups.	Negative
2	Health and Safety	Risk	Managing safety and health is a top priority at SSWL. Safe places and the good health of employees at work contribute to better productivity. Risk Assessment is a continuous process followed by measures to effectively control them to ensure safety and good health of our employees at work.	To mitigate the risk, we strictly follow the rules and procedures laid down by our stringent health and safety management systems. We regularly conduct trainings to create awareness of safe working conditions and building confidence of the employees. Further, the Company conducts routine health check-ups and maintains internal health centers to monitor the well-being of our employees.	Negative
3	Employees Productivity and Retention	Opportunity and Risk	Employees' engagement and productivity contribute to the growth of the Company. To meet the organization goals and customer expectations, employees with creativity, innovative ideas and expertise in different areas are an asset to the Company. Attrition of talent has a negative impact on the growth of the company.	Focused approach on employee engagement and retention of talent through multiple initiatives includes providing cross functional access, training opportunities, recognitions and skill development. The Company continuously makes efforts to promote diversity and offer equal opportunities to all irrespective of their age, gender, colour or religion etc.	Both
4	Competition	Risk and Opportunity	Competition in the business has increased significantly causing a serious adverse impact on the margins of the auto component manufacturers. Customer dissatisfaction with price, quality, delivery performance and design could lead to a loss of market share.	The Company continues to strive to improve its operational performance, strict quality controls and develop new components, which are technologically superior and have an edge over its competitors. The Company works closely with its key customers on product development and remains ahead on the technology curve.	Both

## STEEL STRIPS WHEELS LIMITED

S. No	Material Issue Identified	Indicate whether Risk/ Opportunity (R/O)	Rationale for identifying the material issue as risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
			In contrary to above, shift of the un-organized market to brand based product offerings and developing new components turn the competition into opportunity.		
5	Social costs	Risk	SSWL's assumptions while estimating social costs like gratuity funding are subject to capital market and actuarial risks and any shortfall could put pressure on financial performance of the Company.	A framework to manage social cost risks has been deployed to ensure that obligations remain affordable and sustainable.	Negative
6	Community Well-being	Opportunity	The Company believes in corporate excellence and social welfare. This corporate philosophy is the force for integrating Corporate Social Responsibility (CSR) into Company's values, culture, operation and business decisions at all levels of the organization. Being a responsible corporate citizen, the Company has a value system of giving back to society and improving the quality of life of communities and the surrounding environment. The company is committed to its social responsibility by taking various initiatives in the fields of education, public health, environment and community welfare, etc. which would benefit society at large.	-	Positive
7	Climate and Environment	Risk and opportunity	Manufacturing sectors are generally associated with high pollution during the manufacturing processes. Growing environmental concerns have made the Companies to focus its investments on renewable sources of energy and controlling & modifying of various manufacturing processes having adverse impacts on the environment.	SSWL is working on alternate sources of energy, water recycling and enhanced use of returnable packaging to minimize waste and maximize reuse. The company is constantly striving ahead in converting its fossil fuel based power consumption to renewable resources. The Company has invested in Clean Max Astria Pvt. Ltd. (CMAPL), a special purpose vehicle engaged in the business of production, generation, supply and distribution of wind, solar and/or hybrid power in order to off-take Electricity generated by it under captive consumption. The Company has installed rooftop solar facilities at all its plants. The implementation of which has resulted in substantial conversion of fossil fuel power consumption to renewable sources. All plants have moved completely on fresh polycarbonate sheets to improve lux levels and save power consumption.	Both

S. No	Material Issue Identified	Indicate whether Risk/ Opportunity (R/O)	Rationale for identifying the material issue as risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
8.	Water security	Risk	Fresh water is an important input for both manufacturing processes and domestic purposes of the Company. Processes such as paint booths are water intensive processes in automotive industry. It is important to use quality water to maintain the paint quality. Water scarcity is India's silent crisis and unpredictable rainfall across India makes the manufacturing plants more vulnerable for water shortages. Hence, insulating against water risk is one of the identified business risks and priorities.	The Company strives to mitigate the water risk by adopting following methods: <ul style="list-style-type: none"> <li>• Optimum usage of water in all operations through various water efficiency measures adopted such as low volume water taps, arresting leakages in pipelines, amongst others.</li> <li>• Rainwater harvesting: By increasing rainwater storage capacity.</li> <li>• Recycling: By installing ETP/STP and RO plants, we strive to increase our water recycling capacity.</li> <li>• Ground water recharge: By installing specially designed deep aquifer pits for improving ground water table to ensure the availability of water for the community.</li> </ul>	Negative
9	Supply Chain Management	Risk	The complexity and global span of automotive industry supply chains expose companies to significant sustainability and disruption risks, impacting operational continuity and leading to decline in sales and margins.	SSWL aims to develop a resilient supply chain framework by diversifying suppliers and integrating sustainability criteria into supplier selection. At SSWL we have implemented transparent supply chain practices to ensure compliance with environmental and social standards, thereby reducing potential risks.	Negative
10	Energy Management	Risk and opportunity	The use of energy is an inevitable part of the Company's operations. However, efficient use and the implementation of our own renewable energy sources will help in improving the Company's operations. In the short-term, there may be a negative impact from investing in renewable sources of energy, however, in the long-term there would be a positive impact from methodical use of these energy sources and aligning with industry expectations.	SSWL is constantly striving ahead in converting its fossil fuel power consumption to renewable resources. The Company is actively engaged in energy management. The Company has invested in Clean Max Astria Pvt. Ltd. (CMAPL), a special purpose vehicle engaged in the business of production, generation, supply and distribution of wind, solar and/or hybrid power to off-take Electricity generated by it under captive consumption. The Company has installed rooftop solar facilities at all its plants. All plants have moved completely on fresh polycarbonate sheets to improve working conditions and save power consumption.	Both
11	Information/ Cyber security	Risk	The fast pace at which the auto sector is growing at present, it is bound to face concerns relating to Internet Protocols, data privacy and risk-shifting for warranty issues that would need to be addressed to settle uncertainties amongst stakeholders. Further, threats of external cyber-attacks, hacking and internal leakage, modification of information, failure to protect information are other concern issues.	The Company focuses on continuous protection of confidential information across the IT landscape to prevent loss/theft of confidential data through installation and regular updations of various antivirus and malware protection softwares, firewalls, etc. Periodic audits are conducted to ensure adherence to the processes. Additionally, the company has obtained ISO- 27001 certification to comply best in class IT norms.	Negative



# STEEL STRIPS WHEELS LIMITED

## 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.

NGRBC PRINCIPLES	
PRINCIPLE 1 (P1)	Businesses should conduct and govern themselves with integrity and in a manner that is Ethical, Transparent, and Accountable.
PRINCIPLE 2 (P2)	Businesses should provide goods and services in a manner that is sustainable and safe.
PRINCIPLE 3 (P3)	Businesses should respect and promote the well-being of all employees, including those in their value chains
PRINCIPLE 4 (P4)	Businesses should respect the interests of and be responsive to all its stakeholders.
PRINCIPLE 5 (P5)	Businesses should respect and promote human rights.
PRINCIPLE 6 (P6)	Businesses should respect and make efforts to protect and restore the environment.
PRINCIPLE 7 (P7)	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
PRINCIPLE 8 (P8)	Businesses should promote inclusive growth and equitable development.
PRINCIPLE 9 (P9)	Businesses should engage with and provide value to their consumers in a responsible manner.

Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>										
1.	a. Whether the Company's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes*	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Web-link of the policies, if available	Yes The requisite policies are available on SSWL's Website under Investors head. <a href="https://sswlandia.com/investor/">https://sswlandia.com/investor/</a>								
2.	Whether the Company has translated the policy into procedures. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.	Do the enlisted policies extend to the Company's value chain partners? (Yes/No)	Yes, the Code of Conduct for business partners extends to value chain partners.								
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 the Company and mapped to each principle.	The policies are based on prescribed principles, conformance to the spirit of International Standards, including, ISO 9001, ISO 14001, ISO 27001, ISO 45001, ISO 50001, GRI standards and ILO principles.								
5.	Specific commitments, goals and targets set by the Company with defined timelines, if any.	The Company has set targets for ESG commitments for years to come, inter alia, related to Products stewardship, Water neutrality, Energy conservation, Nature positive, Safe workplace, Energizing, equitable & inclusive workplace, Good Governance, Ethics, transparency, quality and accountability, and Sustainable supply chain management. The Company monitors the performance against the specific commitments on an ongoing basis.								
6.	Performance of the Company against the specific commitments, goals and targets along with reasons, in case the same are not met.	The Company constantly monitors its performance towards ESG commitment. The company has been able to achieve majority of its ESG targets and goals taken last year.								
* Considering the nature of the Company's business, this principle has limited applicability. The Company complies with Regulations governing its operations and has taken initiatives to promote inclusive growth and environmental sustainability.										
<b>Governance, leadership and oversight</b>										
7.	<b>Statement by Director, responsible for the Business Responsibility Report, highlighting ESG related challenges, targets, and achievements:</b> <b>Environment</b> The Company is putting its efforts towards conserving natural resources, reducing pollution and sustaining the environment. The Company is taking various initiatives for reducing carbon footprints, water conservation, usage of alternate sources of energy etc. The Company continues to promote sustainable development through its business decisions and actions.									



	<p><b>Social</b></p> <p>The Company is socially responsible towards its employees and the community at large. The Company encourages to create and maintain a diverse, inclusive and vibrant work environment that nurtures and motivates its employees. For the community, the Company's CSR policy intends to focus its efforts on socio-economic backward groups of the society by innovatively supporting them through programmes designed in the domains of education, health and environment.</p> <p><b>Governance</b></p> <p>The Company's philosophy in relation to Corporate Governance is to ensure transparent disclosures and reporting that conforms fully to laws, regulations and guidelines and to promote ethical conduct throughout the organization with the primary objective of enhancing stakeholders' value while being a responsible corporate citizen. The Company has always thrived towards building trust with shareholders, employees, customers, suppliers, regulators and other stakeholders based on the principles of good Corporate Governance.</p>																																																																												
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).	Corporate Social Responsibility & Sustainability Committee (CSRSC)																																																																											
9.	Does the Company have a specified Committee of the Board/ Director responsible for decision-making on sustainability-related issues? (Yes/No). If yes, provide details.	The Board of Directors has empowered the Corporate Social Responsibility and Sustainability Committee (CSRSC) to exercise oversight on the implementation of targets under ESG as well as to assess the BRSR performance. The committee is led by Sh. Surinder Singh Viridi, Independent Director, with members Sh. Virander Kumar Arya, Independent Director, Sh. Andra Veetil Unnikrishnan*, Deputy Managing Director and Sh. Manohar Lal Jain, Executive Director, of the Company. *Sh. Andra Veetil Unnikrishnan, ceased to be member of the CSRSC w.e.f. 10.06.2024, post his resignation from the Directorship of the company.																																																																											
10.	Details of review of NGRBCs by the Company:																																																																												
	<table border="1"> <thead> <tr> <th rowspan="2">Subject for review</th> <th colspan="9">Indicate whether review was undertaken by Director/ Committee of the Board/any other Committee</th> <th colspan="9">Frequency (Annually/Half yearly/ Quarterly/ Any other please specify)</th> </tr> <tr> <th>P1</th><th>P2</th><th>P3</th><th>P4</th><th>P5</th><th>P6</th><th>P7</th><th>P8</th><th>P9</th> <th>P1</th><th>P2</th><th>P3</th><th>P4</th><th>P5</th><th>P6</th><th>P7</th><th>P8</th><th>P9</th> </tr> </thead> <tbody> <tr> <td>Performance against above policies and follow up action</td> <td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td> <td colspan="9">Quarterly</td> </tr> <tr> <td>Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances</td> <td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td> <td colspan="9">Quarterly</td> </tr> </tbody> </table>	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	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Quarterly									Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Quarterly									
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	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Quarterly																																																																			
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Quarterly																																																																			
	The Managing Director & the Deputy Managing and Director reviews the performance of the systems and processes in place for NGRBC related principles. The Audit Committee reviews the performance and grievance redressal mechanisms as per the Code of Conduct of the Company.																																																																												
11.	Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.	<table border="1"> <thead> <tr> <th>P1</th><th>P2</th><th>P3</th><th>P4</th><th>P5</th><th>P6</th><th>P7</th><th>P8</th><th>P9</th> </tr> </thead> <tbody> <tr> <td colspan="9">No</td> </tr> </tbody> </table>	P1	P2	P3	P4	P5	P6	P7	P8	P9	No																																																																	
P1	P2	P3	P4	P5	P6	P7	P8	P9																																																																					
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	P1	P2	P3	P4	P5	P6	P7	P8	P9
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)									

### Section C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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.

# STEEL STRIPS WHEELS LIMITED

## PRINCIPLE 1: BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH INTEGRITY AND IN A MANNER THAT IS ETHICAL, TRANSPARENT, AND ACCOUNTABLE.

### Essential Indicator

#### 1. Percentage coverage by training and awareness programmes on any of the principles during the financial year:

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	5	Business & Financial performance, Corporate Social Responsibility (CSR), assessments of Risks associated with Business, Evaluation of internal financial controls, Digitization initiatives, compliance, and governance parameters, Companies Act, 2013, SEBI Regulations as applicable to the Company, Code of Conduct for Employees and Prevention of Sexual Harassment at Workplace (POSH) etc.	100%
Key Managerial Personnel	5		100%
Employees other than Board of Directors and KMPs	5722	POSH, water and energy conservation, IT security, incident investigation, productivity, environment protection, digitization, health and safety-related sessions, and sensitization of compliances under Code of Conduct to regulate, monitor, regulatory compliances and report trading by Designated Persons	100%
Workers	15405	Awareness Programmes on Health and Safety, Wellness sessions, digitization, POSH and On-skill Development Programmes	100%

#### 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 :

(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)

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	NIL				
Settlement					
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	NIL			
Punishment				

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

Yes, the Company has an Anti-Bribery and Corruption Policy, which is available on the Company's website at [https://sswllindia.com/wp-content/themes/sswl/assets/docs/anti\\_bribery&corruption\\_policy.pdf](https://sswllindia.com/wp-content/themes/sswl/assets/docs/anti_bribery&corruption_policy.pdf). The purpose of the policy is to ensure the conduct of all our business in an honest and ethical manner. We take a zero-tolerance approach to Bribery and Corruption and are committed to act professionally,

fairly and with integrity in all our business dealings and relationships wherever we operate as well as implementing and enforcing effective systems to counter bribery. The Policy is mandatory for all the Company's employees and other business partners working on behalf of the Company from anywhere in the world.

**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		
Employees		
Workers		

**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	Not Applicable	0	Not Applicable
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	Not Applicable	0	Not Applicable

**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 conflict of interest.**

Not applicable.

**8. Number of days of accounts payables ((Accounts payable \*365) / Cost of goods/services procured) in the following format:**

	FY 2023-24	FY 2022-23
Number of days of account payables	67	75

**9. Open-ness of business**

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

Parameters	Metrics	FY 2023-24	FY 2022-23
<b>Concentration of Purchases</b>	a. Purchases from trading houses as % of total purchases	0.83%	0.69%
	b. Number of trading houses where purchases are made from	170	320
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	64.74%	41.52%
<b>Concentration of Sales</b>	a. Sales to dealers/ distributors as % of total sales	-	-
	b. Number of dealers/ distributors to whom sales are made	-	-
	c. Sales to top 10 dealers/ distributors as % of total sales to dealers/ distributors	-	-
<b>Share of RPTs in</b>	a. Purchases (Purchases with related parties/ Total Purchases)	0.00%	0.00%
	b. Sales (Sales to related parties / Total Sales)	0.00%	0.00%
	c. Loans & advances (Loans & advances given to related parties/Total loans & advances)	100.00%	0.00%
	d. Investments (Investments in related parties/Total Investments made)	97.88%	95.33%

**Leadership Indicators**

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

Total number of awareness programmes held	Topics/principles covered under the training	%age of value chain partners covered (by the value of business done with such partners) under the awareness programmes
0		

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

Yes, the Company has a Code of conduct for Employees, Senior Management and Directors, which requires the Employees, Senior Management and Directors of the Company to take utmost care when participating in any transaction directly or indirectly in which they have a direct or indirect interest that conflicts, or may conflict, with the interests of the Company. They are expected to:

# STEEL STRIPS WHEELS LIMITED

- i. Avoid conflicts of interest
- ii. Refrain from accepting benefits from third parties
- iii. Disclose interest in a proposed transaction or arrangement (transactional conflicts)
- iv. Declare interest in an existing transaction or arrangement.

Every member of the Board and Senior Management is required to submit an affirmation of compliance with the provisions of the Code of Conduct annually. Further, the company also receives disclosures of interest at regular intervals from the Board of the Company.

## 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 2023-24	FY 2022-23	Details of improvements in environmental and social impacts
<b>R&amp;D</b>	5.39%	2.37%	<ul style="list-style-type: none"> <li>• Developed processes that are safe, non-infringing, cost-effective, scalable and have low Environmental Factors.</li> <li>• Improvement of existing processes by adopting the latest technology to reduce waste and generate value-added products.</li> <li>• Developed lighter wheels to reduce environmental impacts.</li> </ul>
<b>Capex Including R&amp;D Exp</b>	5.73%	2.61%	The capital spends includes investments in renewable energy, installation of environment monitoring systems, expenditure on energy-efficient equipment, waste reduction & treatment infrastructure and automation of laborious activities among others.

2. a. *Does the entity have procedures in place for sustainable sourcing? (Yes/No)*  
Yes, the company's policies and procedures focus on sustainability. The Company considers Social, Ethical and Environmental performance factors in the process of selecting suppliers. Further, we clearly discuss all expectations with the suppliers & service providers and ensure sustainable development throughout.
- b. *If yes, what percentage of inputs were sourced sustainably?*  
Approximately 85%
3. **Describe the processes in place to safely reclaim your products for reuse, recycling, and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste, and (d) other waste.**

Type of waste	Processes in place to safely reclaim your products for reuse, recycling, and disposing at the end of life
Plastics (including packaging)	At the end of the lifecycle, plastics are given to the authorized waste vendor where some quantities of the plastics are reused. The company has always prioritized to find innovative ways to convert single-use packaging methods into reusable packaging methods.
E-waste	At the end of the lifecycle, e-waste is given to the authorized waste vendor where the e- waste is disposed.
Hazardous waste	At the end of the lifecycle, hazardous waste is given to the authorized waste vendor where the hazardous waste is disposed
Other waste	At the end of the lifecycle, all other waste is given to the authorized waste vendor and carton boxes are reused while the rest is given to the authorized waste vendor for recycling and reclamation.

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.**  
Not Applicable.

### Leadership Indicators

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

NIC Code	Name of Product/ Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by an independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web link.
Not Applicable					

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

Name of Product / Service	Description of the risk/concern	Action Taken
Not Applicable		

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

Indicate input material	Recycled or re-used input material to total material	
	FY 2023-24	FY 2022-23
Do not record, may do so in the future.		

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tons) 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
Plastics (Including Packaging) (MT)	-	443	-	286	-	-
E-waste (MT)	-	-	6	-	5.09	-
Hazardous Waste (MT)	-	-	3047	3134	209	554
Other Waste (MT)	-	79,843	-	-	89,210.50*	-

\*Previous year value re-stated.

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	

**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:

% of Employees Covered By											
Category	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
<b>Permanent Employees</b>											
Male	2081	2081	100%	2081	100%	0	0%	2081	100%	0	0%
Female	48	48	100%	48	100%	48	100%	0	0%	0	0%
<b>Total</b>	<b>2129</b>	<b>2129</b>	<b>100%</b>	<b>2129</b>	<b>100%</b>	<b>48</b>	<b>2.25%</b>	<b>2081</b>	<b>97.75%</b>	<b>0</b>	<b>0%</b>
<b>Other than Permanent Employees</b>											
Male	50	50	100%	50	100%	0	0%	0	0%	0	0%
Female	2	2	100%	2	100%	0	0%	0	0%	0	0%
<b>Total</b>	<b>52</b>	<b>52</b>	<b>100%</b>	<b>52</b>	<b>100%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

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

% of Workers Covered By											
Category	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
<b>Permanent Workers</b>											
Male	672	672	100%	672	100%	0	0%	0	0%	0	0%
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%
<b>Total</b>	<b>672</b>	<b>672</b>	<b>100%</b>	<b>672</b>	<b>100%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>
<b>Other than Permanent Workers</b>											
Male	6263	0	0%	6263	100%	0	0%	0	0%	0	0%
Female	47	0	0%	47	100%	0	0%	0	0%	0	0%
<b>Total</b>	<b>6310</b>	<b>0</b>	<b>0%</b>	<b>6310</b>	<b>100%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

## STEEL STRIPS WHEELS LIMITED

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 the total revenue of the company	0.06%	0.06%

**2. Details of retirement benefits, for the 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.)
<b>PF</b>	100 %	100 %	Y	100 %	100 %	Y
<b>Gratuity</b>	100 %	100 %	Y	100%	100 %	Y
<b>ESI</b>	9.10 %	18.60 %	Y	9.20%	28.81%	Y
<b>Other Please Specify</b>	NA	NA	NA	NA	NA	NA

**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, the appropriate infrastructural facilities and amenities are provided to employees and workers with disabilities to enable them to discharge their duties safely and effectively in the establishment.

**4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.**

Yes, the Company has adopted Equal Employment Opportunities Policy which is available on its website at [https://sswfindia.com/wp-content/themes/sswl/assets/docs/equal\\_employment\\_opportunities\\_policy.pdf](https://sswfindia.com/wp-content/themes/sswl/assets/docs/equal_employment_opportunities_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%	100%	Not Applicable	
Female	100%	100%		
<b>Total</b>	<b>100%</b>	<b>100%</b>		

**6. Is there a mechanism available to receive and redress grievances for the following categories of employees and workers? 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	Yes
Permanent Employees	Yes
Other than Permanent Employees	Yes

SSWL's policies provide opportunities for employees and workers to freely communicate their concerns. Grievances received from workers are duly recorded in the appropriate registers maintained at the plant premises. The Company also conducts programmes that allow employees/workers to communicate their concerns with team members and the top management. It also enables quick resolution of various issues. To improve the working environment, various committees - canteen committee, safety committee, Town hall committees, etc. have been formed. The grievances are addressed periodically. Further, in accordance with the Vigil Mechanism and Whistle-Blower Policy, any employee/worker can approach to the Ethics Counsellor or in exceptional circumstances direct access to the Chairman of the Audit Committee of the Company.

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

Category	FY 2023-24			FY 2022-23		
	Total employees/Workers in the respective category (A)	No. of employees/workers in the respective category, who are part of the association(s) or Union (B)	% (B/A)	Total employees/Workers in the respective category (C)	No. of employees/workers in the respective category, who are part of the association (s) or Union (D)	% (D/C)
<b>Total Permanent Employees</b>						
Male	2081	0	0%	1586	0	0%
Female	48	0	0%	21	0	0%
<b>Total Permanent Workers</b>						
Male	672	672	100%	694	681	98%
Female	0	0	0%	0	0	0%

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 upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No (B)	% (B/A)	No (C)	% (C/A)		No (E)	% (E/D)	No (F)	% (F/D)
<b>Employees</b>										
Male	2131	1983	93.05%	1969	92.40%	1761	1761	100%	1761	100%
Female	50	24	48.00%	24	48.00%	31	31	100%	31	100%
<b>Total</b>	<b>2181</b>	<b>2007</b>	<b>92.02%</b>	<b>1993</b>	<b>91.38%</b>	<b>1792</b>	<b>1792</b>	<b>100%</b>	<b>1792</b>	<b>100%</b>
<b>Workers</b>										
Male	6935	6935	100%	6935	100%	5134	5134	100%	5134	100%
Female	47	47	100%	47	100%	2	2	100%	2	100%
<b>Total</b>	<b>6982</b>	<b>6982</b>	<b>100%</b>	<b>6982</b>	<b>100%</b>	<b>5136</b>	<b>5136</b>	<b>100%</b>	<b>5136</b>	<b>100%</b>

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	2131	2131	100%	1761	1761	100%
Female	50	50	100%	31	31	100%
<b>Total</b>	<b>2181</b>	<b>2181</b>	<b>100%</b>	<b>1792</b>	<b>1792</b>	<b>100%</b>
<b>Workers</b>						
Male	6935	6935	100%	5134	5134	100%
Female	47	47	100%	2	2	100%
<b>Total</b>	<b>6982</b>	<b>6982</b>	<b>100%</b>	<b>5136</b>	<b>5136</b>	<b>100%</b>

10. Health and safety management system:

a. Whether an occupational health and safety management system has been implanted in the entity? (Yes/ No). If yes, the coverage of such a system?

Yes, all plants of SSWL have implemented ISO 45001 – Occupational, Health and Safety management systems.

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

To ensure adherence to prescribed safety norms, teams visit workplaces/locations to carry out inspections and assessments of potential hazards that could harm workers. They also interact with the workmen and explain hazards and risks involved in allocated activities through toolbox talks. The Company also has a HIRA (Hazard Identification and Risk Assessment) process that involves the identification of existing as well as potential workplace hazards, assessing risks and determining & implementing controls to review hazards periodically. Hazards related to working at heights, working in confined spaces, hot areas, conveyor belts, heat stress, inadequate guarding, etc. are covered under the HIRA policies.

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

Yes

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

Yes



# STEEL STRIPS WHEELS LIMITED

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

Safety Incident/Number	Category	FY 2023-24	FY 2022-23
Lost Time Injury Frequency Rate (LTIFR) (per one million-person-hours worked)	Employees	0.2	8
	Workers	0.85	6
Total recordable work-related injuries	Employees	1	1
	Workers	2	4
No. of fatalities	Employees	0	0
	Workers	1	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.**

The company has taken following measures to ensure a safe and healthy workplace:-

- i. Various safety training and awareness programmes like HIRA (Hazard Identification & Risk Assessment), Emergency Preparedness Mock Drills and Fire safety drills are carried out. Along with it, MSDS, works in confined spaces within plants Health and Safety at Workplace is also provided by the Company.
- ii. The Company has designated team members to continuously monitor activities and safety permits are issued by safety officers for high-risk working conditions including working at heights, in confined locations, hot areas, on moving machinery and other critical activities.
- iii. Across the plants of SSWL, an applause system is followed, wherein employees and workmen are felicitated for sharing the best ideas, the highest number of near-miss incidents, initiatives for environmental improvement and energy efficiency.
- iv. Daily safety patrolling by the Plant Head, Maintenance Head and Safety Officers to identify unsafe acts and conditions.
- v. The Medical rooms are equipped with basic emergency care equipment and medicines.
- vi. Safety audit process by plant safety officers
- vii. Regular checks of the critical equipment and machinery

**13. 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
Working Conditions	48	0	-	0	0	-
Health & Safety	10	0	-	15	0	-

**14. Assessments for the year:**

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

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

As a proactive measure, several activities such as free medical treatment, organization of medical camps and awareness programmes on various aspects (preventive health care, plastic waste, sanitation, AIDs, and so on) are undertaken by the Company. The Company continuously monitors and assesses its health & safety practices and working conditions. Investigation is conducted in case any incident is reported using various methodologies to identify the root cause. The investigation team presents corrective and preventive measures which is reviewed at various levels by management. Various safety protocols/SOPs are in place to ensure workplace safety and the safety of the team members. All leading and lagging indicators are captured and accordingly, corrective & preventive actions are planned & implemented across all operations.

**Leadership Indicators**

**1. Does the entity extend any life insurance or any compensatory package in the event of the death of (A) Employees (Y/N) (B) Workers (Y/N).**

**Employees:** Yes

**Workers:** Yes

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

Every contract issued by SSWL has "Standard Terms and Conditions" which needs to be followed by the value chain partners. The Purchase/ Service Order is binding for adherence to the payment of statutory dues by the value chain partners. The provisions include but are not limited to – payment of "Taxes & Duties," "Audit Provisions", "Compliance with Laws", "Compliance with Statutory Obligations", "Intellectual Property Rights", "Data Privacy", "Indemnification" etc.

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

	Total no. of affected employees / workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-24	FY 2022-23	FY 2023-24	FY 2022-23
Employees	0	0	0	0
Workers	0	0	0	0

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

No

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

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	0
Working Conditions	0

**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.**

No such assessments were undertaken during the year under review.

**PRINCIPLE 4: BUSINESS 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 Company.**

Stakeholder mapping is undertaken at various levels, covering the Company's plant level and corporate level. SSWL identified the key stakeholder groups by considering the individuals or entities that have a significant interest or influence on our activities, operations or success. The list of identified stakeholders includes the Employees, Communities, Suppliers / Service Providers, Opinion Leaders / Experts / Academic Institutions, Media, Customers, Investors, Shareholders and Regulators / Government Authorities.

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

Stakeholder Group	Whether identified as vulnerable & marginalized group (Yes/No)	Channels of communication (Emails, SMS, Newspapers, Pamphlets, Advertisements, 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
Regulatory bodies/ Government/ Industry Associations	No	Emails, Conferences, Representations, One-to-one meetings, Meetings in Industry Forum	Need-based	Compliance-related requirements such as the filing of periodic returns, reports, payment of taxes, etc.
Opinion Leaders / Experts / Academic Institutions	No	Emails, One-to-one meetings	Need-based	Compliance to legal requirements, and advice on business, legal, tax, and environment related issues.

## STEEL STRIPS WHEELS LIMITED

Stakeholder Group	Whether identified as vulnerable & marginalized group (Yes/No)	Channels of communication (Emails, SMS, Newspapers, Pamphlets, Advertisements, 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
Investors/ Funders/ Shareholders	No	Annual General Meetings, Notices, Advertisements, Annual report, Regulatory filings, Website, Investor presentations, Investor Meets, Investor Calls, Shareholder/ Investors , Emails, Grievance Forum	Annual, Quarterly, Monthly, Weekly, Daily	Regulatory compliances, financial performance and business updates
Vendors/ Suppliers/ Contractors/ Sellers	No	Emails, Supplier meets, one-to-one interaction	Annual, Quarterly, Monthly, Weekly, Daily	To share and understand mutual needs and expectations including for quality, cost & delivery, growth in business avenues. Also, to ensure compliance to ethical practices.
Customers	No	Customer Meets, Feedback calls, Training Forums, Direct Visits	Need-based	Promote and grow business by educating them about the product, services, and new initiatives (if any). Understanding their expectations about products and services and ways to improve them. Fulfil transactions involved in doing business.
Local communities	Yes	Meeting with Local Community, Public Hearing, CSR Initiatives	Annual, Quarterly, Monthly, Weekly, Daily	SSWL has identified the disadvantaged, vulnerable and marginalized stakeholders in its areas of operation. Based on their needs, the Company engages in initiatives related to healthcare, education, infrastructure development, provision for safe drinking water, fighting hunger and sustainable livelihoods, etc. These objectives are achieved through the Company's CSR initiatives.
Employees	No	Sunrise and sunset meeting, weekly/monthly reviews, HR forum, Meetings town halls, focused group discussions meetings, E-mails	Annual, Quarterly, Monthly, Weekly, Daily	Employee well-being, enhancing efficiency and productivity, Imparting training through regular programmes; increasing awareness of all aspects of the business (codes, values, etc.), Health and safety, Rewards and recognition.
Media/NGOs	No	Community Meeting	Ongoing	Maintaining quality standards, health, well-being and inclusive growth in the community. Interaction is done with NGOs to do need analysis for the CSR project related to Local Community and communication to local media for awareness.

### 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's senior management engages in regular dialogues with key stakeholders, including customers, investors, employees, suppliers and government authorities. Senior management engages in informed discussions and offers feedback to the Managing Director and Deputy Managing Director of the Company on continuous basis.

Further, the company has also established a CSRSC (Corporate Social Responsibility and Sustainability Committee) at the Board Level. The Committee is responsible for keeping the Board informed about various economic, environmental and social developments and seeking inputs from the directors.

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 input received from stakeholders on these topics were incorporated into the policies and activities of the entity.**

Yes. Based on the consultation SSWL has adopted policies which include the CSR Policy, Environmental Policy as well as SSWL's Code of Conduct.

SSWL has implemented various CSR projects, energy and water efficiency projects, adopted principles of circular economy and continuously improved on the HR practices. We take this feedback from the stakeholders to improve our performance.

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

The Company has identified avenues to be meaningfully engaged with the communities through structured projects for improving their livelihood through education, skill-based training as well as health awareness programs. Under CSR, the Company has been driving various activities to uplift the marginalized and vulnerable community. Details of CSR initiatives are available at the Company's website <https://sswlandia.com/investors/csr/>.

### PRINCIPLE 5: BUSINESS SHOULD RESPECT AND PROMOTE HUMAN RIGHTS.

#### Essential Indicators

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	2129	2129	100%	1607	1607	100%
Other than Permanent	52	52	100%	185	185	100%
<b>Total Employees</b>	<b>2181</b>	<b>2181</b>	<b>100%</b>	<b>1792</b>	<b>1792</b>	<b>100%</b>

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
<b>Workers</b>						
Permanent	672	672	100%	694	694	100%
Other than Permanent	6310	6310	100%	4442	4442	100%
<b>Total Workers</b>	<b>6982</b>	<b>6982</b>	<b>100%</b>	<b>5136</b>	<b>5136</b>	<b>100%</b>

2. **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>										
<b>Permanent</b>										
Male	2081	0	0%	2081	100%	1586	485	31%	1101	69%
Female	48	0	0%	48	100%	21	10	48%	11	52%
<b>Other than Permanent</b>										
Male	50	0	0%	50	100%	175	18	10%	157	90%
Female	2	0	0%	2	100%	10	5	50%	5	50%

## STEEL STRIPS WHEELS LIMITED

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>Workers</b>										
Permanent										
Male	672	0	0%	672	100%	694	522	75%	172	25%
Female	0	0	0%	0	100%	0	0	0%	0	0%
Other than Permanent										
Male	6263	0	0	6263	100%	4440	3434	77%	1006	23%
Female	47	41	87%	6	13%	2	1	50%	1	50%

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

**a. Median remuneration/ wages:**

	Male		Female	
	Number	Median remuneration/salary/wages (Per Annum) of the respective category (Rs. In Lakhs)	Number	Median remuneration/salary/wages (Per Annum) of the respective category (Rs. In Lakhs)
Board of Directors (BoD)	3	158.42	0	Not Applicable
Key Managerial Personnel(KMP)	5	81.16	0	
Employees other than BoD and KMP	2076	4.52	48	5.06
Workers	672	4.02	0	0

**b. Gross wages paid to females as % of total wages paid by the entity, in the following format:**

	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages	1.57%	1.35%

**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. The HR Head at the plant level is the focal point responsible for addressing human rights related issues. However, the Company employs stringent measures to ensure that there are no human rights violations in its area of influence. The Company has complied with provisions relating to the constitution of Internal Complaints Committee (ICC) under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, which is active throughout the organization including the plants and monitors activities, conduct trainings and carries out investigations to minimize irregularities. Employees are also allowed the opportunity to lodge complaints or grievances via email as per the Vigil Mechanism and Whistle Blower policy of the Company. Human rights concerns within the organization are addressed at the level of the Plant Head, Chief Human Resource Officer (CHRO), the Ethics Counsellor, the Chairman of the Audit Committee, the Deputy Managing Director and the Managing Director. At the corporate level the CHRO, Ethics Counsellor, Chairman of the Audit Committee, Deputy Managing Director and the Managing Director shoulder the responsibility.

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

As stated above, employees have the freedom to lodge complaints or express their concerns and grievances via email as per the Vigil Mechanism and Whistle Blower policy and the Human Rights Policy of the Company. Human rights concerns within the organization are addressed by the Plant head, CHRO, Ethics Counsellor, Chairman of the Audit Committee, Deputy Managing Director and the Managing Director.

The detailed mechanism of the Company's Vigil Mechanism and Whistle Blower Policy is available at - <https://sswllindia.com/wp-content/themes/sswl/assets/docs/whistleblower.pdf>. And the Human Rights Policy of the company is available at [https://sswllindia.com/wp-content/themes/sswl/assets/docs/human\\_rights\\_policy.pdf](https://sswllindia.com/wp-content/themes/sswl/assets/docs/human_rights_policy.pdf)

Further, as per the SSWL's POSH Policy, each complaint of sexual harassment is dealt with utmost confidentiality and on a priority basis by the ICC. ICC maintains a register to endorse the complaint received by it and keeps the contents confidential if so desired, except to use the same for discreet investigation.

**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 the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual Harassment	0	0	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Child Labour	0	0	NA	0	0	NA
Forced Labour/Involuntary Labour	0	0	NA	0	0	NA
Wages	0	0	NA	0	0	NA
Other human related issues	0	0	NA	0	0	NA

**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)	0	0
Complaints on POSH as a % of female employees / workers	0	0
Complaints on POSH upheld	0	0

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

Please see the answer to question number 5 above. Further, the company has established Human Rights and Equal Employment Opportunities Policies which help in creating a non-discriminatory and harassment free workplace. And, if any complaint related to discrimination and harassment arises, they are dealt with utmost confidentiality in compliance to these policies.

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

Yes

**10. Assessment for the year:**

	% of the Company's plants and offices that were assessed (By the Company or statutory authorities or third parties)
Child Labour	100%
Forced Labour/Involuntary Labour	100 %
Sexual Harassment	100 %
Discrimination at workplace	100 %
Wages	100 %
Other- please specify	NA

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

Since no risks were identified during assessments, no corrective actions were required to be undertaken.

**Leadership Indicators**

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

The company has not received any grievances/complaints on human rights issues. Hence, no business modifications were required.

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

The company has not received any grievances/complaints on human rights issues. Hence, no due diligence was required.

**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

# STEEL STRIPS WHEELS LIMITED

## 4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	0%*
Discrimination at workplace	
Child Labour	
Forced Labour/Involuntary Labour	
Wages	
Others – please specify	

\*In accordance with the Company's policy on Code of Conduct for Business Partners, all business partners must treat all employees with respect & dignity and exhibit zero tolerance towards sexual harassment, and workplace discrimination, and must not engage in Child Labour, Forced Labour/Involuntary Labour, etc. They must provide a safe and healthy workplace for their employees and contractors. Business Partners must be compliant with local and national laws and regulations on Minimum wages, Occupational Health & Safety, and have the required permits, licenses, and permissions granted by local and national statutory authorities. They must also provide their employees with safe and humane working conditions.

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

Not Applicable.

## PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

### Essential Indicators

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

Parameter	FY 2023-24	FY 2022-23
<b>From renewable sources</b>		
Total electricity consumption (A)	1,25,325	82,867
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
<b>Total energy consumption from renewable sources (A+B+C)</b>	<b>1,25,325</b>	<b>82,867</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D)	4,60,481	4,08,017
Total fuel consumption(E)	5,74,833	5,30,579
Energy consumption through other sources (F)	0	-
<b>Total energy consumption from non-renewable sources (D+E+F)</b>	<b>10,35,314</b>	<b>9,38,596</b>
<b>Total energy consumed (A+B+C+D+E+F)</b>	<b>11,60,639</b>	<b>10,21,463</b>
Energy intensity per rupee of turnover (Total energy consumption/turnover in GJ/ Lakhs rupees)	2.66	2.53
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed / Revenue from operations adjusted for PPP) *	59.67	56.05
<b>Energy intensity in terms of physical output</b> (Total energy consumed / Total Production in GJ/MT)	3.24	4.22
Energy intensity (optional)	NA	NA

\*For India, PPP conversion factor is 22.4 and 22.17 for the years 2024 and 2023 respectively as per the Implied PPP conversion rate available at <https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND>

**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.

Yes, Intertek India Pvt. Ltd.

#### 2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any

Not applicable, as the company does not fall in the category of industries mandated under the PAT Scheme.



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 kiloliters)		
(i) Surface water	1,73,188	3,22,117
(ii) Groundwater	1,02,635	1,66,500
(iii) Third party water	91,459	73,263*
(iv) Seawater / desalinated water	-	-
(v) Others	39,806	27,962*
Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)	4,07,088	5,89,842
Total volume of water consumption (in kiloliters)	4,07,088	5,89,842
Water intensity per rupee of turnover (Water consumed / turnover) in KL/ Lakhs Rupees.	0.93	1.46
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)**</b> (Total water consumption / Revenue from operations adjusted for PPP)	20.93	32.36
<b>Water intensity in terms of physical output</b>		
Water intensity in terms of physical output (KL/Tonnes)	1.14	2.44
Water intensity (optional) – the relevant metric may be selected by the entity	NA	NA

\*Previous year values restated.

\*\*For India, PPP conversion factor is 22.4 and 22.17 for the years 2024 and 2023 respectively as per the Implied PPP conversion rate available at <https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND>

**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.**

Yes, Intertek India Pvt. Ltd.

4. Provide details of the following disclosures related to water discharged:

Parameter	FY 2023-24	FY 2022-23
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water	None of the plants of the company discharges water outside the plant	None of the plants of the company discharges water outside the plant
No treatment		
With treatment – please specify level of treatment		
(ii) To Groundwater		
No treatment		
With treatment – please specify level of treatment		
(iii) To Seawater		
No treatment		
With treatment – please specify level of treatment		
(iv) Sent to third parties		
No treatment		
With treatment – please specify level of treatment		
(v) Others		
No treatment		
With treatment – please specify level of treatment		
<b>Total water discharged (in kilolitres)</b>		

**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.**

Yes, Intertek India Pvt. Ltd.

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

SSWL has implemented robust Zero Liquid Discharge (ZLD) systems comprising ETP (Effluent Treatment Plant) and STP (Sewage Treatment Plant) at its facilities. The treated water is effectively recycled for on-site use, minimizing our overall water consumption and environmental impact.

# STEEL STRIPS WHEELS LIMITED

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

Parameter	Unit	FY 2023-24	FY 2022-23
NOx	kg	9,787	10,350*
SOx	kg	10,747	5,253*
Particulate matter (PM)	kg	19,439	13,290*
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

\* Previous year values re-stated

**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.**

Yes, Intertek India Pvt. Ltd.

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

Parameter	Unit	FY 2023-24	FY 2022-23
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	<i>Metric tonnes of CO<sub>2</sub> equivalent</i>	41,126	36,944
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	<i>Metric tonnes of CO<sub>2</sub> equivalent</i>	91,585	85,440
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	<i>Metric tonnes of CO<sub>2</sub> Equivalent per Lakhs Indian rupees</i>	0.31	0.30
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Scope 1 and Scope 2 GHG emissions/ Revenue from operations adjusted for PPP)		6.82	6.71
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>	<i>Metric tonnes of CO<sub>2</sub> equivalent per Metric Tonnes of production</i>	0.37	0.51
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional)– the relevant metric may be selected by the entity	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.**

Yes, Intertek India Pvt. Ltd.

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

Yes, SSWL has undertaken several initiatives to reduce greenhouse gas emissions. Our focus areas include energy efficiency improvements in manufacturing processes, waste reduction and the adoption of cleaner technologies. We have successfully reduced our carbon footprints through these initiatives. A few of the initiatives taken by the company to reduce Green House Gas emission includes the following:

- Adoption of Renewable energy through solar and windmills
- Adoption of clean energy i.e., through switching over from HSD to PNG/Propane
- Replacement of conventional air circulators with BLDC technology air circulators
- Radiant cooling system to optimize the HVAC operating load
- Replacement of old conventional lights with LEDs
- Installation of energy efficient air compressor
- Replacement of old motors with premium efficiency IE3 motors
- Switching from diesel operated fork-lift to battery operated fork-lifts
- Installation of Energy efficient inverter split ACs
- Installation of auto shut off valves for compressed air
- Waste heat recovery from air compressors/ melting furnace/ heat treatment furnace
- Plantation drives across all our locations

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

Parameter	FY 2023-24	FY 2022-23
<b>Total waste generated (in metric tonnes)</b>		
Plastic waste (A)	443	286
E-Waste (B)	5.72	5.09
Bio-Medical Waste (C)	0.09	0.25
Construction and demolition waste (D)	54	344
Battery Waste (E)	-	-
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any. (G) – Lube Oil from DG Sets	3,047	4,241
Other Non-hazardous waste generated (H). Please specify, if any. - Dry and Wet Waste	2,39,292	92,907
<b>Total (A+B+C+D+E+F+G+H)*</b>	<b>2,42,842</b>	<b>97,783</b>
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations) Tonnes per Lakhs Rupees	0.56	0.24
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	12.48	5.37
Waste intensity in terms of physical output (Waste per production in Waste Tonnes per Tonnes)	0.68	0.40
Waste intensity (optional) – the relevant metric may be selected by the entity	NA	NA
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
Recycled	2,39,522	214
Re-used	-	94,954
Other recovery operations (safely disposed) *	3,320	-
<b>Total</b>	<b>2,42,842</b>	<b>95,168</b>
<b>For each category of waste generated, total waste disposed by type of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
Incineration	137	554
Landfilling	-	2,062
Other disposal operations*	3,183	-
<b>Total</b>	<b>3,320</b>	<b>2,616</b>

\*We have a contract with an authorized waste management vendor. All waste is segregated and handed over to them for proper and safe disposal, in accordance with local regulatory guidelines.

**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.**

Yes, Intertek India Pvt. Ltd.

10. 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.

SSWL is committed to environmental stewardship and sustainable waste management. Our approach encompasses waste minimization, recovery and responsible disposal.

**Waste Minimization:**

- Continuous evaluation of production processes to identify and eliminate waste generation.
- Implementation of lean manufacturing principles to optimize resource utilization.
- Substitution of hazardous materials with environment friendly alternatives wherever feasible.

**Waste Recovery and Recycling:**

- Segregation of waste at source to facilitate recycling and recovery.
- Collaboration with certified recyclers for metal scrap and other recyclable materials.
- Recovery of reusable materials for internal use or sale.

**Waste Disposal:**

- Adherence to all applicable environmental regulations and permits.
- Safe and responsible disposal of non-recyclable waste in authorized facilities.
- Minimization of hazardous waste generation and proper disposal in accordance with regulations.

By adopting a circular economy approach, SSWL aims to reduce its environmental footprints and contribute to a sustainable future.

# STEEL STRIPS WHEELS LIMITED

11. 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.
SSWL does not have any operational facilities located within or adjacent to ecologically sensitive areas such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, or coastal regulation zones. As such, no environmental approvals or clearances are required for our operations in these areas.			

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

Name & 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
SSWL operates in a controlled manufacturing environment with minimal environmental impact. As such, comprehensive environmental impact assessments (EIAs) are not required for our operations. However, we adhere to all applicable environmental laws and regulations, including conducting regular environmental audits and assessments to identify and mitigate potential impacts. While we do not conduct formal EIAs, we maintain a robust environmental management system to ensure sustainable practices across our operations.					

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

Yes, we comply with all regulations and compliances applicable to us.

S. No.	Specify the law / regulation / guidelines was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards / by courts	Corrective action taken
NA				

## Leadership Indicators

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

For each facility / plant located in areas of water stress, provide the following information:

- (i) **Name of the area:** Not Applicable as none of the plant of the company is situated in water stress region  
(ii) **Nature of operations:** Designing & Manufacturing Automotive Wheels  
(iii) **Water withdrawal, consumption and discharge in the following format:**

Parameter	FY 2023-24	FY 2022-23
<b>Water withdrawal by source (in kiloliters)</b>		
(i) Surface water	None of the plant of the company is situated in water stress region	None of the plant of the company is situated in water stress region
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		
(v) Others		
Total volume of water withdrawal (in kiloliters)		
Total volume of water consumption (in kiloliters)		
Water intensity per rupee of turnover (Water consumed / turnover)		
Water intensity – the relevant metric may be selected by the entity		

Parameter	FY 2023-24	FY 2022-23
<b>Water discharge by destination and level of treatment (in kiloliters)</b>		
(i) Into Surface water	None of the plant of the company is situated in water stressregion	None of the plant of the company is situated in water stressregion
- No treatment		
- With treatment please specify level of treatment		
(ii) Into Groundwater		
- No treatment		
- With treatment please specify level of treatment		
(iii) Into Seawater		
- No treatment		
- With treatment please specify level of treatment		
(iv) Sent to third parties		
- No treatment		
- With treatment please specify level of treatment		
(v) Others		
- No treatment		
- With treatment please specify level of treatment		
Total water discharged (in kiloliters)	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.**

Yes, Intertek India Pvt. Ltd.

**2. 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 CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	<i>Metric tonnes of CO2 equivalent</i>	19,47,155	15,60,301
Total Scope 3 emissions per lakhs rupee of turnover	<i>Metric tonnes of CO2 equivalent per Lakhs Indian rupees</i>	4.47	3.86
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	<i>Metric tonnes of CO2 equivalent per tonnes production</i>	5.44	6.45

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

Yes, Intertek India Pvt. Ltd.

**3. With respect to the ecologically sensitive areas reported at Question 11 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.**

SSWL operates exclusively in industrial areas, maintaining a safe distance from ecologically sensitive zones. Our operations do not intersect with national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests or coastal regulation zones. As such, there is no direct or indirect impact on biodiversity from our activities.

SSWL remains committed to environmental protection and adheres to all applicable regulations to prevent any potential harm to the environment.

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

S. No	Initiative undertaken	Details of the initiative (Web-link, may be provided along-with summary)	Outcome of the initiative
1	Use of Wind Energy	SSWL Chennai Plant is utilizing Wind Energy	Reduces the use of Grid Electricity which results in reduction of GHG Emissions caused using Grid Electricity.
2	Installation of 2.08 MW Solar Plant	SSWL Dappar Plant has installed 2.08 MW Solar Plant.	Reduces the use of Grid Electricity which results in reduction of GHG Emissions caused using Grid Electricity.

# STEEL STRIPS WHEELS LIMITED

S. No	Initiative undertaken	Details of the initiative (Web-link, may be provided along-with summary)	Outcome of the initiative
3	Various Energy Efficiency Projects at all sites of SSWL	There are several projects.	Reduces the use of Grid Electricity which results in reduction of GHG Emissions caused using Grid Electricity.
4	Use of hybrid power under captive consumption	The Company has invested in Clean Max Astria Private Limited, a special purpose vehicle, in order to procure power generated by it through solar/wind/hybrid energy for usage at the company's Mehsana plant.	This investment has resulted in substantial conversion of fossil fuel power consumption to renewable sources.

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

Yes, SSWL has a robust Onsite Emergency Plan (OEP) in place, aligned with ISO 14001:2015 and ISO 45001:2018 standards. This plan outlines emergency response procedures, roles and responsibilities, and resource allocation to minimize potential impacts from various emergencies.

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

SSWL is committed to minimizing its environmental impact throughout the value chain. We have implemented rigorous supplier assessment and selection processes to ensure that our partners share our commitment to sustainability. While we have not identified any significant adverse environmental impacts from our value chain to date, we maintain ongoing monitoring and evaluation to proactively address potential issues.

By adhering to strict environmental standards and collaborating with our suppliers, we strive to create a positive environmental footprints.

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

100%.

**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.*  
One (1)
- b. *List the top 10 trade and industry chambers/associations (determined based on the total members of such bodies) the Company 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.	Automotive Component Manufacturing Association (ACMA)	National

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

Name of the authority	Brief of the case	Corrective action taken
Nil		

**Leadership Indicators**

**1. Details of public policy positions advocated by the Company:**

S. No.	Public Policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/ No)	Frequency of Review by Board (Annually/Half yearly/Quarterly/ Others- please specify)	Web Link, if available
Nil					

**PRINCIPLE 8: BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT.**

**Essential Indicators**

1. **Details of Social Impact Assessments (SIA) of projects undertaken by the Company, 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
Not Applicable					

2. **Provide information on the project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by the Company, 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)
Not Applicable						

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

The Company works closely with the community in the identified areas of contribution in the thrust areas for carrying out the Corporate Social Responsibility initiatives. Within the area of work, the employees of the Company work with the communities to understand the impact of the initiatives on the intended beneficiaries. These interactions provide the people with ample opportunities to gauge and address community concerns. Based on these interactions, we have not encountered any specific grievances from the community at present.

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	6.00%	0.04%
Sourced directly from within India	49.77%	47.10%

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

Location	FY 2023-24	FY 2022-23
Rural	53%	44%
Semi-Urban	33%	28%
Urban	12%	26%
Metropolitan	2%	2%

**Leadership Indicators**

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

Details of negative social impact identified	Corrective action taken
Not applicable as no social impact assessment was carried out during FY 2023-24	

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

S. No.	State	Aspirational District	Amount spent (In INR)
1.	Jharkhand	East Singhbhum	19,53,509/-
		Lohardaga	6,64,838/-

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

No

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

Not applicable

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

Not applicable



## STEEL STRIPS WHEELS LIMITED

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by the Company (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
Not applicable				

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:

The Company actively interacts with the community and performs need-based assessments for the implementation of CSR activities. The details of all CSR activities undertaken by the Company during the financial year 2023-24 can be accessed in the Annual Report on CSR forming part of the Directors' Report.

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Gyan Setu Program for migrant Children Brick Kilns and Slum Area	675	100%
2	Education Support to Covid Orphaned Children	6	100%
3	Education Support Program Differently abled	3	100%
4	Special Education Program for Underprivileged Children	35	100%
5	Annual Scholarship For Needy Children	136	100%
6	Construction of New Anganwadi Centre	28	100%
7	School Infrastructure Development Project	385	100%
8	School for underprivileged Non-School going tribal children, Jamshedpur	105	100%
9	School Development Project, Moonak	2488	100%
10	Ensuring Environment Sustainability through Awareness Generation & Cleanliness activities	800	100%
11	Construction of Rural Health Centre Building, Jeoli	7200	100%
12	Agriculture Development Program	120	100%
13	Promote nationally Recognized Sports of India By Supporting Needy Sports Player Preferably from rural, remote and other needy community.	23	100%
14	Renovation of multi skill center building	50	100%
15	Green Area Development and Cleanliness of village streets	10000	100%
16	Rural Health Clinic	745	100%
17	Restoration of Old Natural Ponds	450	100%
18	Emergency Medical Support	1	100%

### PRINCIPLE 9: BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER

#### Essential indicators

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

SSWL has a comprehensive mechanism in place to receive and respond to consumer feedback and complaints. SSWL is B to B company and we are in direct contact with the OEMs. We have various channels, such as direct feedback, email address as well as meetings. All customer complaints are jointly handled by the Quality and Marketing & Research and Development Departments of the Company, whose primary responsibility is to address customer grievances and arrive at prompt and workable resolution. Each complaint is documented using a complaint form that captures important details about the kind and scope of the concern. The said departments promptly resolve each complaint by performing the root cause analysis and escalating the matter to the appropriate officials (as applicable). The entire process is closely monitored and tracked until a satisfactory resolution is provided to the customer.

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	Not applicable as the wheel is a part of automobile. SSWL is a B-to-B company, and the customer furnishes necessary information as per applicable requirement.
Safe and responsible usage	
Recycling and/or safe disposal	

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

	FY 2023-24		Remarks	FY 2022-23		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	0	NA	0	0	NA
Advertising	0	0	NA	0	0	NA
Cyber- security	0	0	NA	0	0	NA
Delivery of essential services	Not Applicable			Not Applicable		
Restrictive Trade Practices	0	0	NA	0	0	NA
Unfair Trade Practices	0	0	NA	0	0	NA
Other (product related)	41	0	-	36	0	-

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

	Number	Reasons for recall
Voluntary recalls	0	NA
Forced recalls	0	NA

5. Does the Company 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, SSWL has a framework on cyber security and data privacy. The same is available on the website of the company at [https://sswlandia.com/wp-content/themes/sswl/assets/docs/information\\_security\\_policy.pdf](https://sswlandia.com/wp-content/themes/sswl/assets/docs/information_security_policy.pdf). The Company has also been certified for the Information Security Management System Standard: ISO/IEC 27001.

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

Not applicable

7. Provide the following information relating to data breaches:

- Number of instances of data breaches, along with impact  
Nil
- Percentage of data breaches involving personally identifiable information of customers  
Not applicable
- Impact, if any, of the data breaches  
Not applicable

**Leadership Indicators**

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

The adequate information regarding products of the company is available on the website of the company at [https://sswlandia.com/steel\\_wheels/](https://sswlandia.com/steel_wheels/).

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

We adopt globally recognized standards like IT- TAC (Indian Technical Tyre Advisory Committee) and ETRTO (European Tyre Rim Technical Organization), TRA (Tyre Rim Association) and other National and International good practices. Product Responsibility aspects are considered from product concept and development stages until delivery in accordance with RoHS/ REACH/ GADCL or customer-specific requirements. We declare the material and upload the data on the IMDS platform for specific customer requirements. We label the wheels as per the IS Standards (IS 9436:2018, IS 9438:2018, IS 16192:2014 Part 2) and applicable statutory requirements (for example, BIS for India, SNI for Indonesia, Inmetro for Brazil, DOT for the USA, etc.) and customer-specific requirements (as applicable). SSWL manufactures the wheels which are fitted on cars, MUV, tractors, commercial vehicles, two wheelers, OTR vehicles etc. SSWL leverages digital media to educate customers and other stakeholders by sharing information related to its product through catalogues, which eventually leads to the selection of the right wheel category.

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

Not Applicable

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.

No

Did your entity carry out any survey with regard to consumer satisfaction relating to the major products/services of the entity, significant locations of operation of the entity, or the entity as a whole? (Yes/No)

No

# STEEL STRIPS WHEELS LIMITED

---

## Independent Reasonable Assurance Statement to Steel Strips Wheels Limited on their Business Responsibility & Sustainability Report (BRSR) - FY 2023-24

To,  
The Management,  
Steel Strips Wheels Limited

### Introduction

Intertek India Private Limited ("Intertek") was engaged by Steel Strips Wheels Limited ("SSWL") to provide an independent reasonable assurance on its Business Responsibility & Sustainability Report (BRSR) for FY 2023-24 ("the Report"). The scope of the Report comprises the reporting periods of FY 2023-24. The Report is prepared by SSWL based on BRSR guidelines issued by the Securities and Exchange Board of India (SEBI). The assurance was performed in accordance with the requirements of International Federation of Accountants (IFAC) International Standard on Assurance Engagement (ISAE) 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information.

### Objective

The objectives of this reasonable assurance exercise were, by review of objective evidence, to confirm whether any evidence existed that the sustainability related disclosures in alignment with BRSR requirements, as declared in the Report, were not accurate, complete, consistent, transparent and free of material error or omission in accordance with the criteria outlined below.

### Intended Users

This Assurance Statement is intended to be a part of the Annual Report of Steel Strips Wheels Limited.

### Responsibilities

The management of SSWL is solely responsible for the development of the Report and its presentation. Management is also responsible for the design, implementation and maintenance of internal controls relevant to the preparation of the Report so that it is free from material misstatement, whether due to fraud or error.

Intertek's responsibility, as agreed with the management of SSWL, is to provide assurance and express an opinion on the data and assertions in the Report based on our verification following the assurance scope and criteria given below. Intertek does not accept or assume any responsibility for any other purpose or to any other person or organization. This document represents Intertek's independent and balanced opinion on the content and accuracy of the information and data held within.

### Assurance Scope

The assurance has been provided for BRSR core disclosures with reference to SEBI's "BRSR Core - Framework for assurance and ESG disclosures for value chain" vide circular no. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated 12 July 2023, presented by SSWL in its Report. The assurance boundary included data and information for the projects and operations of SSWL in its 5 Plants and Corporate Office located in different states in India, in accordance with SEBI's BRSR guidelines.

Our scope of assurance included verification of internal control systems, data and information on core disclosures reported, as summarized below:

### BRSR-Core Disclosures

- Total scope 1 and scope 2 emissions.
- GHG emissions intensity (scope 1 and 2).
- Water consumption, water consumption Intensity and water discharge by destination and levels of treatment.
- Total energy consumed, percentage of energy consumed from renewable sources and energy intensity.
- Waste Generation (category wise), Disposal, Recovered, Disposed and Intensity.
- Cost incurred on well-being measures as a percentage of total revenue of the company.
- Safety related incidents (LTIFR + Fatality + Permanent Disabilities) including contractual workforce.
- Gross wages paid to females as percentage of wages paid.
- Complaints on POSH.
- Input material sourced (from MSMEs/ small producers and from within India).
- Enabling inclusive development (Job creation in smaller towns and wages paid).
- Instances involving loss / breach of data of customers and Number of days of accounts payable.
- Loans and advances & investments with related parties.

### Assurance Criteria

Intertek conducted the assurance work in accordance with requirements of 'Reasonable Assurance' procedures as per the following standard:

- International Standard on Assurance Engagements (ISAE) 3000 (revised) for 'Assurance Engagements other than Audits or Reviews of Historical Financial Information'.
- International Standard on Assurance Engagements (ISAE) 3410 for 'Assurance Engagements on Greenhouse Gas Statement

A reasonable assurance engagement involved assessing the risks of material misstatement of the agreed indicators/parameters whether due to fraud or error, responding to the assessed risks as necessary in the circumstances. A materiality threshold level of 5% was applied. Assessment of compliance and materiality was undertaken against the stated calculation methodology and criteria.

### Limitations

We have relied on the information, documents, records, data, and explanations provided to us by SSWL for the purpose of our review.

The assurance scope excludes:

- Any disclosures beyond those specified in the Scope section above.
- Data and information falling outside the defined reporting period.
- Data pertaining to the Company's financial performance, strategy, and associated linkages articulated in the Report.
- Assertions made by the Company encompassing expressions of opinion, belief, aspiration, expectation, forward-looking statements, and claims related to Intellectual Property Rights and other competitive issues.

While we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls.

The procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within software/IT systems.

### Methodology

Intertek performed assurance work using risk-based approach to obtain the information, explanations and evidence that was considered necessary to provide a reasonable level of assurance. The assurance was conducted by desk reviews, visit to SSWL's site in Dappar considering a sampling rate of 10% of the total operational sites of SSWL in India and stakeholder interviews with regards to the reporting and supporting records for the FY 2023-24. Our assurance task was planned and carried out during May-June 2024. The assessment included the following:

- Review of the Report that was prepared in accordance with the SEBI's BRSR guidelines.
- Review of processes and systems used to gather and consolidate data.
- Examined and reviewed documents, data and other information with respect to all operational sites of SSWL made available in both physical and digital form at selected SSWL's operational site in Dappar, Punjab
- Conducted physical and online interviews with key personnel responsible for data management pertaining to all operational sites of SSWL at the selected SSWL's operational site.
- Assessment of appropriateness of various assumptions, estimations and thresholds used by SSWL for data analysis.
- Review of BRSR core disclosures for the duration from 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024 for SSWL was carried out onsite at SSWL's Dappar plant.

### Conclusions

Intertek reviewed BRSR core disclosures provided by SSWL in its Report. Based on the procedures performed as above, evidences obtained and the information and explanations given to us along with the representation provided by the management and subject to inherent limitations outlined elsewhere in this report, in our opinion, SSWL's data and information on BRSR core disclosures for the period of 01 April 2023 to 31 March 2024 included in the Report, is, in all material respects, in accordance with the SEBI's BRSR guidelines.

### Intertek's Competence and Independence

Intertek is a global provider of assurance services with a presence in more than 100 countries employing approximately 43,500 people. The Intertek assurance team included competent sustainability assurance professionals, who were not involved in the collection and collation of any data except for this assurance opinion. Intertek maintains complete impartiality towards any people interviewed.

### For Intertek India Pvt. Ltd.

#### Poonam Sinha

Verifier  
Intertek India  
29<sup>th</sup> August 2024

#### Shilpa Naryal

Head of Sustainability  
Intertek South Asia & MENAP  
29<sup>th</sup> August 2024

#### Sandeep Vig

Director-Business Assurance  
Intertek India & MENAP  
29<sup>th</sup> August 2024

*No member of the verification team (stated above) has a business relationship with Steel Strips Wheels Ltd. stakeholders beyond that is required of this assignment. No form of bribe has been accepted before, throughout and after performing the verification. The verification team has not been intimidated to agree to do this work, change and/or alter the results of the verification. The verification team has not participated in any form of nepotism, self-dealing and/or tampering. If any concerns or conflicts were identified, appropriate mitigation measures were put in place, documented and presented with the final report. The process followed during the verification is based on the principles of impartiality, evidence, fair presentation and documentation. The documentation received and reviewed supports the conclusion reached and stated in this opinion.*