

WCL/SEC/2023

August 30, 2023

To,

|  |  |
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| <b>BSE Ltd.</b><br>Department of Listing,<br>P. J. Towers, Dalal Street,<br>Mumbai - 400 001.<br><br><b>(Scrip Code:<br/>Equity - 532144),<br/>(NCD - 960468, 960491 and 973309)</b> | <b>National Stock Exchange of India Ltd.</b><br><b>(Symbol: WELCORP, Series EQ)</b><br>Exchange Plaza,<br>Bandra-Kurla Complex,<br>Bandra (E), Mumbai - 400 051. |
|--|--|

Dear Sir / Madam,

**Sub.: Business Responsibility and Sustainability Report (BRSR).**

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, we are enclosing herewith the Business Responsibility and Sustainability Report for the financial year 2022-23, which forms part of the Annual Report for the financial year 2022-23.

This is for your information and records.

**Thanking you.**

Yours Faithfully,  
For **Welspun Corp Limited**

**Pradeep Joshi**  
**Company Secretary**  
**FCS-4959**

**Welspun Corp Limited**

Welspun House, 5th Floor, Kamala City, Senapati Bapat Marg, Lower Parel (West), Mumbai 400 013, India.

T : +91 22 6613 6000 / 2490 8000 F : +91 22 2490 8020

E-mail : companysecretary\_wcl@welspun.com Website : www.welspuncorp.com

Registered Address: Welspun City, Village Versamedi, Taluka Anjar, District Kutch, Gujarat 370 110, India.

T : +91 2836 662222 F : +91 2836 279060

Corporate Identity Number: L27100GJ1995PLC025609

**17. Plant locations of the Company and its subsidiaries**

|  |  |
|--|--|
| Pipe Plants  | Village Versamedi, Tal-Anjar, Dist.-Kutch, Gujarat - 370110<br>Survey No. 228-229 Village Jamunia & Khejda, Dist. Raisen, Madhya Pradesh - 464551<br>KIADB Industrial Area, Gejjalagere, Taluka-Maddur, Dist.-Mandya, Karnataka -571428  |
| Pipe Coating, Double Jointing Plant                            | 9301 Frazier Pike, Little Rock, Arkansas 72205 (Subsidiary's plant in the US)  |
| Concrete Weight Coating Plant                                  | Village Versamedi, Tal-Anjar, Dist.-Kutch, Gujarat - 370110 (Subsidiary's Plant in India)  |
| Pig Iron   | Village Versamedi, Tal-Anjar, Dist.-Kutch, Gujarat - 370110 (Subsidiary's Plant in India)  |
| DI Pipes   | Village Versamedi, Tal-Anjar, Dist.-Kutch, Gujarat - 370110 (Subsidiary's Plant in India)  |
| TMT Plant  | Village Versamedi, Tal-Anjar, Dist.-Kutch, Gujarat - 370110 (Subsidiary's Plant in India)  |
| Sponge iron, TMT Plant   | Village Versamedi, Tal-Anjar, Dist.-Kutch, Gujarat - 370110  |
| Integrated facility for making steel and seamless pipes/ tubes | Plot No.1, G.I.D.C Industrial Estate, Valia Road, Jhagadia, Dist. Bharuch, Gujarat - 393110 (Subsidiary's Plant in India)  |
| Polymer Products   | Near Seven Garnala, Kalol - 382721, Dist. Gandhinagar<br>Village Bhatian, Chorisia Road, Near TVS Factory, Nalagarh - 174 101, Himachal Pradesh<br>Plot No. 40P & 41, Uluberia Industrial Growth Centre, Uluberia, Howrah, West Bengal-711316<br>J-11, MIDC, Village Mandwa, Butibori, Nagpur, Maharashtra-441122<br>B-124, MIDC, Village: Takalghat, Taluka: Hingna, Butibori, Nagpur 441122, Maharashtra.<br>SF No. 493/1, Navani Village, (VIA), Puduchatiram, Namakkal, Tamilnadu-637018<br>Gat No. 1225,Sanaswadi,Pune Nagar Road, Tal- Shirpur, District - Pune, Maharashtra -412208 |

**18. Address for correspondence**

| Registered Office   | Corporate Office  |
|---|---|
| Welspun Corp Limited<br>(CIN - L27100GJ1995PLC025609)<br>Welspun City,<br>Village Versamedi, Taluka Anjar,<br>District Kutch, Gujarat - 370110<br>Tel: +91-2836-662222, Fax: +91-2836-279060<br>Registered e-mail : CompanySecretary_WCL@welspun.com<br>Website - <a href="https://www.welspuncorp.com/">https://www.welspuncorp.com/</a> | Welspun Corp Limited<br>(CIN - L27100GJ1995PLC025609)<br>5 <sup>th</sup> Floor, Welspun House,<br>Kamala Mills Compound,<br>Senapati Bapat Marg, Lower Parel (W),<br>Mumbai - 400 013.<br>Tel: +91-22-66136000; +91-22-24908000,<br>Fax: +91-22-24908020 /21<br>Registered e-mail : CompanySecretary_WCL@welspun.com<br>Website - <a href="https://www.welspuncorp.com/">https://www.welspuncorp.com/</a> |

# Business Responsibility & Sustainability Report

**SECTION A: GENERAL DISCLOSURE****I. Details of the Listed Entity**

|   |   |
|---|---|
| <b>1 Corporate Identity Number (CIN) of the Listed Entity</b>   | L27100GJ1995PLC025609   |
| <b>2 Name of the Listed Entity</b>                              | Welspun Corp Limited  |
| <b>3 Year of incorporation</b>                                  | 1995  |
| <b>4 Registered office address</b>                              | Welspun City, Village Versamedi, Taluka Anjar, Dist. Kutch, Gujarat-370110  |
| <b>5 Corporate address</b>                                      | Welspun House, 5th Floor, Kamala Mills Compound, Senapati Bapat Marg, Lower Parel, Mumbai - 400 013   |
| <b>6 E-mail</b>   | CompanySecretary_WCL@welspun.com  |
| <b>7 Telephone</b>  | +91 22 6613 6000  |
| <b>8 Website</b>  | <a href="http://www.welspuncorp.com">www.welspuncorp.com</a>  |
| <b>9 Financial year for which reporting is being done</b>       | April 1, 2022 to March 31, 2023   |
| <b>10 Name of the Stock Exchange(s) where shares are listed</b> | National Stock Exchange of India & BSE Limited  |
| <b>11 Paid-up Capital</b>                                       | ₹ 130,76,46,975 divided in to 26,15,29,395 equity shares of ₹ 5 each fully paid up  |
| <b>12 Contact Person</b>  |   |
| <b>Name of the Person</b>                                       | Mr. Alok Mishra - Group Head - Sustainability   |
| <b>Telephone</b>  | + 91 22 6613 5936   |
| <b>Email address</b>  | <a href="mailto:alok_mishra@welspun.com">alok_mishra@welspun.com</a>  |
| <b>13 Reporting Boundary</b>                                    |   |
| <b>Type of Reporting</b>  | The report covers ESG performance of WCL Standalone business which includes 1) Line Pipe division and 2) Sponge Iron and Billets division. The operating locations of the company include Anjar, Bhopal, Mandya and Head office, Mumbai |
| <b>If selected consolidated:</b>                                | Not Applicable  |

**II. Product/Services**

| 14 Details of business activities       | S. No. | Description of Main Activity  | Description of Business Activity  | % Turnover of the Entity        |
|---|--------|---|---|---------------------------------|
|   | 1.     | Welspun Corp Ltd. is in the business of manufacturing of tubes, pipes and hollow profiles and of tube or pipe fittings of cast-iron/cast-steel, billets, direct reduced iron (sponge iron). | The products are industrial B2B products that are engineered to order and hence very specific to the project for which they are to be used. | 100%                            |
| 15 Products/Services sold by the entity | S. No. | Product/Service   | NIC Code  | % of Total Turnover contributed |
|   | 1.     | Line pipes  | 24311   | -                               |
|   | 2.     | Billets, Bloom and Pig Iron   | 24101   | -                               |
|   | 3.     | Direct Reduced Iron (Sponge Iron)   | 24102   | -                               |

Source: National Industrial Classification

## III. Operations

|    |  |  |   |                        |       |
|----|--|--|---|------------------------|-------|
| 16 | Number of locations where plants and/or operations/offices of the entity are situated:   | Location   | Number of plants                            | No. of Offices         | Total |
|    |  | National   | 3 - (Anjar, Mandya & Bhopal)                | 1 - Mumbai             | 4     |
|    |  | International  | 1 - Little Rock, USA                        | 2 - Houston, Mauritius | 3     |
| 17 | Market served by the entity  | Locations  | Numbers                                     |                        |       |
| a. | No. of Locations   | National (No. of States)   | Available across India (28 states)          |                        |       |
|    |  | International (No. of Countries)   | Australia, UAE, Iraq, Nepal, and Canada (5) |                        |       |
| b. | What is the contribution of exports as a percentage of the total turnover of the entity? | Exports contribute to 33% of the total turnover  |   |                        |       |
| c. | A brief on types of customers  | WCL trades its products in the B2B segment, and its customers comprises leaders of the oil and gas sector like Shell, Saudi Aramco, TOTAL, Chevron etc. WCL also supplies steel pipes for water sector projects to L&T, GVPR, NCC etc. |   |                        |       |

## IV. Employees

| 18. Details as at the end of Financial Year:           |   |           |         |         |         |         |
|--|---|-----------|---------|---------|---------|---------|
| S. No.   | Particulars                             | Total (A) | Male    |         | Female  |         |
|  |   |           | No. (B) | % (B/A) | No. (C) | % (C/A) |
| a. Employees and workers (including differently abled) |   |           |         |         |         |         |
| Employees  |   |           |         |         |         |         |
| 1  | Permanent Employees (A)                 | 895       | 846     | 95%     | 49      | 5%      |
| 2  | Other than Permanent Employees (B)      | 32        | 31      | 97%     | 1       | 3%      |
| 3  | Total Employees (A+B)                   | 927       | 877     | 95%     | 50      | 5%      |
| Workers  |   |           |         |         |         |         |
| 4  | Permanent (C)                           | 1183      | 1173    | 99%     | 10      | 1%      |
| 5  | Other than Permanent (D)                | 497       | 469     | 94%     | 28      | 6%      |
| 6  | Total Workers (C+D)                     | 1680      | 1642    | 98%     | 38      | 2%      |
| b. Differently abled employees and workers             |   |           |         |         |         |         |
| Employees  |   |           |         |         |         |         |
| 7  | Permanent Employees (E)                 | 3         | 3       | 100%    | 0       | 0%      |
| 8  | Other than Permanent Employees (F)      | 0         | 0       | 0%      | 0       | 0%      |
| 9  | Total Employees (E+F)                   | 3         | 3       | 100%    | 0       | 0%      |
| Workers  |   |           |         |         |         |         |
| 10   | Permanent (G)                           | 3         | 3       | 100%    | 0       | 0%      |
| 11   | Other than Permanent (H)                | 0         | 0       | 0%      | 0       | 0%      |
| 12   | Total Differently Abled Employees (G+H) | 3         | 3       | 100%    | 0       | 0%      |

Note: The above table excludes certain employees involved in supervision/monitoring of subsidiary companies and inactive employees/workers.

| 19. Participation/Inclusion/Representation of women |                          |           |                      |         |
|---|--------------------------|-----------|----------------------|---------|
| S.No.   | Category                 | Total (A) | No. and % of females |         |
|   |                          |           | No. (B)              | % (B/A) |
| 1   | Board of Directors       | 8         | 3                    | 38%     |
| 2   | Key Management Personnel | 3         | 0                    | 0%      |

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

| Category            | FY 2022-2023<br>(Turnover rate in current FY) |          |           | FY 2021-2022<br>(Turnover rate in previous FY) |          |           |
|---------------------|---|----------|-----------|--|----------|-----------|
|                     | Male  | Female   | Total     | Male   | Female   | Total     |
| Permanent Employees | 15% (126)                                     | 41% (19) | 16% (145) | 22%(252)                                       | 24% (16) | 23% (268) |
| Permanent Workers   | 10% (121)                                     | 0% (0)   | 10% (121) | 17%(210)                                       | 0% (0)   | 16% (210) |

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

| S. No. | Name of the holding / subsidiary / associate companies / joint ventures     | Indicate whether it is a holding / Subsidiary/ Associate/ or Joint Venture | % of shares held by the entity | Does the entity indicated in column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/ No) |
|--------|---|--|--------------------------------|---|
| 1      | Welspun Pipes Inc. (USA)  | Wholly Owned Subsidiary  | 100.00%                        | No, the subsidiaries manage and carry out their own BR initiatives in line with the legal requirements applicable to them.    |
| 2      | Welspun Tradings Limited, (India)   | Wholly Owned Subsidiary  | 100.00%                        |   |
| 3      | Welspun DI Pipes Limited, (India)   | Wholly Owned Subsidiary  | 100.00%                        |   |
| 4      | Welspun Metallics Limited, (India)  | Wholly Owned Subsidiary  | 100.00%                        |   |
| 5      | Welspun Mauritius Holdings Limited, (Mauritius)                             | Subsidiary   | 89.98%                         |   |
| 6      | Welspun Tubular LLC, (USA)  | Wholly Owned Subsidiary  | 100.00%                        |   |
| 7      | Welspun Global Trade LLC, (USA)   | Wholly Owned Subsidiary  | 100.00%                        |   |
| 8      | Mahatva Plastic Products and Building Materials Private Limited, (India)    | Wholly Owned Subsidiary  | 100.00%                        |   |
| 9      | Anjar TMT Steel Private Limited, (India)                                    | Wholly Owned Subsidiary  | 100.00%                        |   |
| 10     | Welspun Specialty Solutions Limited (India)                                 | Subsidiary   | 50.03%                         |   |
| 11     | Sintex Prefab & Infra Limited, (India)                                      | Wholly Owned Subsidiary  | 100.00%                        |   |
| 12     | Sintex-BAPL Limited, (India)  | Wholly Owned Subsidiary  | 100.00%                        |   |
| 13     | Nauyaan Shipyard Private Limited, (India)                                   | Wholly Owned Subsidiary  | 100.00%                        |   |
| 14     | Sintex Holdings B.V, (Netherlands)  | Wholly Owned Subsidiary  | 100.00%                        |   |
| 15     | Sintex Logistics LLC, (USA)   | Wholly Owned Subsidiary  | 100.00%                        |   |
| 16     | Welspun Wasco Coatings Private Limited, (India)                             | Joint Venture  | 51.00%                         |   |
| 17     | East Pipes Integrated Company for Industry (EPIC) (Kingdom of Saudi Arabia) | Associate  | 35.01%                         |   |
| 18     | Welspun Captive Power Generation Limited, (India)                           | Associate  | 21.20%                         |   |

Note: The above table includes list of Holding, Subsidiary and Associate companies as of 31st March 2023

## VI. CSR Details

|    |   |                   |
|----|---|-------------------|
| 22 | a. Whether CSR is applicable as per section 135 of Companies Act, 2013: | Yes               |
|    | Turnover (in ₹)   | 6916.67 INR Crore |
|    | Net worth (in ₹)  | 3472.35 INR Crore |

VII. Transparency and Disclosures Compliances

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

| Stakeholder group from whom the complaint is received | Grievance Redressal Mechanism in Place (Yes/No) | If Yes, then provide web-link for the grievance redress policy | FY 2022-23<br>Current Financial Year       |  | FY 2021-2022<br>Previous Financial Year    |  |
|---|---|--|--|--|--|--|
|   |   |  | Number of complaints filed during the year | Number of complaints pending resolution at the close of the year | Number of complaints filed during the year | Number of complaints pending resolution at the close of the year |
| Communities   | Yes   |  | 0  | 0  | -  | -  |
| Investors (other than shareholders)                   | Yes   | <a href="#">Grievance Redressal Policy</a>                     | 0  | 0  | -  | -  |
| Shareholders  | Yes   |  | 0  | 0  | 6  | 0  |
| Employees and workers                                 | Yes   |  | 0  | 0  | 0  | 0  |
| Customers   | Yes   |  | 0  | 0  | 6  | 4  |
| Value Chain Partners                                  | -   |  | 0  | 0  | -  | -  |
| Other (please specify)                                | -   |  | 0  | 0  | -  | -  |

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

| Material Issue Identified | Indicate whether risk or opportunity | The rationale for identifying the risk/opportunity  | In case of risk, approach to adapt or mitigate  | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|---------------------------|--------------------------------------|---|---|--|
| Climate Change            | Risk                                 | WCL's business objectives and principles have been mapped with various industry trends and global frameworks including Sustainability Accounting Standards Board (SASB), Global Reporting Initiative (GRI), ESG metrics, National Guidelines on Responsible Business Conduct (NGBRC). This analysis has enabled in identifying the risks and opportunities for WCL. | WCL has identified and assessed its physical and transition risks in line with recommendations provided by Task Force in Climate-Related Financial Disclosures (TCFD) | Negative implication   |

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

| Material Issue Identified          | Indicate whether risk or opportunity | The rationale for identifying the risk/opportunity | In case of risk, approach to adapt or mitigate  | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|------------------------------------|--------------------------------------|--|---|--|
| Energy and Carbon                  | Risk                                 |  | WCL has set a target to increase its renewable energy consumption to 20% by 2030 and be carbon neutral by 2040. The company has implemented various energy saving initiatives   | Negative implication   |
| Occupational Health & Safety       | Risk                                 |  | WCL has Safety Committees in its facilities that ensure adherence to WCL's Occupational Health, Safety and Environment (OHSE) policy, compliance with regulations and provide safety trainings to its employees and contract staff. Additionally, they access near-miss and other incidents at sites to identify the gaps in preventive risk mitigation, improving processes and procedures                 | Negative implication   |
| Community development & engagement | Opportunity                          |  | Not Applicable  |  |
| Water management                   | Risk                                 |  | WCL measures and monitors the quantity of water consumed across all its business locations and operations. WCL aims to ensure water stewardship by identifying operations where water conservation techniques can be implemented and using recycled water to limit water consumption. It also ensures proper treatment of wastewater from its facilities in line with applicable standards and regulations. | Negative implication   |
| Air emission                       | Risk                                 |  | By proper maintenance of power equipment and maintain air to fuel ratio to avoid NOx generation   | Negative implication   |
| Governance, ethics & transparency  | Opportunity                          |  | Not Applicable  |  |

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

| Material Issue Identified              | Indicate whether risk or opportunity | The rationale for identifying the risk/opportunity | In case of risk, approach to adapt or mitigate  | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--|--------------------------------------|--|---|--|
| Human rights                           | Risk                                 |  | Our Code of Conduct and Ethics Policy, Prevention of Sexual Harassment (PoSH) Policy, and HR practices covers aspects of human rights for WCL's operations and are extended to subsidiaries, suppliers and business partners  | Negative implication   |
| Product quality                        | Opportunity                          |  | Not Applicable  |  |
| Waste management                       | Risk                                 |  | WCL has undertaken initiatives towards reducing waste generation and effectively segregate, treat and dispose it based on the type of waste generated in line with guidelines from Pollution Control Boards. It has adopted the 3R approach (i.e., Reduce, Reuse, Recycle) to monitor the waste generated from its operations and identify areas for waste reduction, recycling and reuse. All the metal scrap and e-waste from its sites are sent to authorized vendors promoting recycling of waste | Negative implication   |
| Risk identification & management       | Risk                                 |  | The Company has established a risk management policy that defines the overall risk management framework covering guidelines for risk identification, assessment, prioritization, mitigation and monitoring. The risk management committee of the Board oversees and reviews the risk management framework as well as the assessment of risks, its management and mitigation procedures. The committee reports its findings and recommendations to the Board.  | Negative implication   |
| Economic performance & business growth | Opportunity                          |  | Not Applicable  |  |
| Customer centricity                    | Opportunity                          |  | Not Applicable  |  |

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

| Material Issue Identified                | Indicate whether risk or opportunity | The rationale for identifying the risk/opportunity | In case of risk, approach to adapt or mitigate  | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--|--------------------------------------|--|---|--|
| Compliance                               | Risk                                 |  | Risk registers are developed for each location and drilled down to each function which includes the compliance aspects of business. Plant head and functional heads are responsible to manage the risks and ensure compliance to the regulatory requirements.   | Negative implication   |
| Employee wellbeing                       | Opportunity                          |  | Not Applicable  |  |
| Innovation                               | Opportunity                          |  | Not Applicable  |  |
| Circular economy                         | Opportunity                          |  | Not Applicable  |  |
| Sustainable product (Green Steel)        | Opportunity                          |  | Not Applicable  |  |
| Supply chain sustainability/ value chain | Risk                                 |  | WCL has implemented its Supplier Code of Conduct based on ESG parameters for its suppliers to adhere and follow. It regularly evaluates its vendors on required quality standards to ensure the highest standards in material procurement. The assessment procedures include screening on ISO, EMS certifications, supply chain management, labour practices, safety, in addition to quality, delivery and service ratings. | Positive implication   |
| Biodiversity and ecology                 | Risk                                 |  | Plantation initiative through Welspun Foundation near all operation sites   | Positive implication   |

**SECTION B: MANAGEMENT AND PROCESS DISCLOSURES**

| Disclosure Questions   | P1   | P2  | P3  | P4  | P5  | P6  | P7 | P8  | P9  |
|--|--|-----|-----|-----|-----|-----|----|-----|-----|
| <b>Policy and Management Processes</b>   |  |     |     |     |     |     |    |     |     |
| <b>1 a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)</b>   | Yes  | Yes | Yes | Yes | Yes | Yes | No | Yes | Yes |
| <b>b. Has the policy been approved by the Board? (Yes/No)</b>  | Yes  | Yes | Yes | Yes | Yes | Yes | No | Yes | Yes |
| <b>c. Web Link of the Policies, if available</b>   | Welspun Corp   Company Policies  |     |     |     |     |     |    |     |     |
| <b>2 Whether the entity has translated the policy into procedures. (Yes / No)</b>  | Yes  |     |     |     |     |     |    |     |     |
| <b>3 Do the enlisted policies extend to your value chain partners? (Yes/No)</b>  | Yes  |     |     |     |     |     |    |     |     |
| <b>4 Name of the national and international codes/certifications/labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.</b> | The policies are based on prescribed principles, conformance to the spirit of international standards like ISO 9001, ISO 14001, ISO 45001, UNGC guidelines and ILO guidance.   |     |     |     |     |     |    |     |     |
| <b>5 Specific commitments, goals, and targets set by the entity with defined timelines, if any.</b>  | (i). Assess 100% of all suppliers as per ESG compliant Code of Conduct<br>(ii). Carbon Neutrality – 20% RE by 2030 or achieve carbon neutrality by 2040;<br>(iii). To achieve water neutrality by 2040;<br>(iv). To achieve zero Waste to Landfill by 2040;<br>(v). To Impact 20,00,000 lives through CSV by 2040                      |     |     |     |     |     |    |     |     |
| <b>6 Performance of the entity against the specific commitments, goal, and targets along with reasons in case the same are not met.</b>  | (i). 100% of critical suppliers assessed based on ESG compliant Code of Conduct<br>(ii). A 300KW solar park is planned for CAPEX in FY 24 to be setup at Anjar facility<br>(iii). Achieved water intensity of 0.57 KL/MT in FY23<br>(iv). Achieved Zero Waste to Landfill in FY23<br>(v). Impacted lives of 507,848 people through CSV |     |     |     |     |     |    |     |     |

**Governance, Leadership, and Oversight**

|   |  |
|---|--|
| <b>7 Statement by director responsible for the business responsibility report, highlighting ESG-related challenges, targets, and achievements</b> | Welspun Corporation, a socially responsible company has a long tradition of sustainable practices and is reflected in our commitment to achieve carbon neutrality by 2040 and 20% renewable energy in our energy mix by 2030. As part of our transition roadmap, we focus on identifying and mitigating environmental and social risks both in operations and value chain by adopting practices like renewable energy generation (Solar PV), energy efficiency program, water and waste reduction measures, retaining talents with professional development programs, Joining initiatives like Hydrogen Pipe Joint Industry Project etc., In doing so, our company views technology as a key enabler in ensuring maximum value creation for our people and customers (For examples, ESG compass is a digital tool that provides real time information for ESG governance). Our ESG performance is constantly reviewed to ensure that it meets statutory requirements and committed to submit all compliance reports to the appropriate authorities on a regular basis. Finally, it is our conviction that both business and society may strengthen by working together. Our Corporate social responsibility programs are designed to promote inclusive growth and development of under-served communities in areas like education, healthcare, environment, sports and farming etc., |
|---|--|

| Disclosure Questions   | P1   | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|--|--|----|----|----|----|----|----|----|----|
| <b>8 Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).</b>  | Mr. Vipul Mathur-Managing Director & CEO<br>+ 91 22 6613 6000<br>vipul_mathur@welspun.com  |    |    |    |    |    |    |    |    |
| <b>9 Does the entity have a specified Committee of the Board/ Director responsible for decision-making on sustainability-related issues? (Yes/ No). If yes, provide details.</b> | Yes, WCL have established an ESG committee at the Board level and have formulated plans for initiatives to be implemented across Environment, Social and Governance dimensions. Furthermore, WCL have redefined the governance of Environment and Social aspects across organizational levels and this is helping WCL to propel towards meeting our commitments on carbon, water, waste, supply chain and CSR. |    |    |    |    |    |    |    |    |

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

| Subject for Review  | Indicate whether the review was undertaken by the 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 |    |    |    |    |    |    |    |    |    |  |  |  |  |  |  |  |  |  |
| <b>Performance against the above policies and follow-up action</b>  | Board Committee  |    |    |    |    |    |    |    |    | Quarterly   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |  |  |  |  |  |  |  |  |  |
| <b>Compliance with statutory requirements of relevance to the principles, and the rectification of any non-compliances</b>  | Board Committee  |    |    |    |    |    |    |    |    | Quarterly   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |  |  |  |  |  |  |  |  |  |
| <b>11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency</b> |  |    |    |    |    |    |    |    |    | <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></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>No. We have a robust functional review mechanism complemented with a strong independent internal audit process that covers the working of all key policies. The internal audits are conducted by various external independent firms during the year.</p> |    |    |    |    |    |    |    |    | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |  |  |  |  |  |  |  |  |  |
| P1  | P2   | P3 | P4 | P5 | P6 | P7 | P8 | P9 |    |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |  |  |  |  |  |  |  |  |  |
|   |  |    |    |    |    |    |    |    |    |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |  |  |  |  |  |  |  |  |  |

**SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE**

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

| ESSENTIAL INDICATORS  |  |   |  |
|---|--|---|--|
| <b>1. Percentage coverage b/y training and awareness programmes on any of the principles during the financial year:</b> |  |   |  |
| 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 |
| <b>Board of Directors</b>   | The Board members were taken through familiarisation programs which included updates on:   |   |  |
| <b>Key Management Personnel</b>   | <ol style="list-style-type: none"> <li>Raw material (Principle 2)</li> <li>Brands and Marketing (Principle 9)</li> <li>Consumer Insights (Principle 9)</li> <li>Business specific updates operational updates (Principle 6)</li> <li>Different channels of customers (Principle 9)</li> <li>CSR activities (Principle 8)</li> <li>Code of conduct (Principle 1)</li> </ol> |   |  |
| <b>Employees other than BODs and KMPs</b>   | The employees and workers were given training on health and safety (Principle 3), skill upgradation (Principle 3) and human rights (Principle 5)   |   |  |
| <b>Workers</b>  |  |   |  |

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.

| a. Monetary     |                 |   |                   |                   |  |
|-----------------|-----------------|---|-------------------|-------------------|--|
| Type            | 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             | Nil   | Nil               |                   | Not Applicable                         |
| Settlement      | Nil             | Nil   | Nil               |                   | Not Applicable                         |
| Compounding fee | Nil             | Nil   | Nil               |                   | Not Applicable                         |
| b. non-Monetary |                 |   |                   |                   |  |
| Type            | NGRBC Principle | Name of the regulatory/ enforcement agencies/ judicial institutions | Brief of the case |                   | Has an appeal been preferred? (Yes/No) |
| Imprisonment    | Not Applicable  | Not Applicable  | Not Applicable    |                   | Not Applicable                         |
| Punishment      | Not Applicable  | Not Applicable  | Not Applicable    |                   | Not Applicable                         |

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.

Not Applicable

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

Yes, WCL does have an anti-corruption and anti-bribery policy. The policy is available publicly on the following weblink [Anti-Bribery and Anti-Corruption policy](#)

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

| Category  | FY 2022-2023 (Current Financial Year) | FY 2021-2022 (Previous Financial Year) |
|-----------|---------------------------------------|--|
| Directors | Nil                                   | Nil                                    |
| KMPs      | Nil                                   | Nil                                    |
| Employees | Nil                                   | Nil                                    |
| Workers   | Nil                                   | Nil                                    |

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

| Topic  | FY 2022-2023 (Current Financial Year) |                | FY 2021-2022 (Previous Financial Year) |                |
|--|---------------------------------------|----------------|--|----------------|
|  | Number                                | Remarks        | Number                                 | Remarks        |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | Nil                                   |                | Nil                                    |                |
| Number of complaints received in relation to issues of Conflict of Interest of KMPs          | Nil                                   | Not Applicable | Nil                                    | 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 conflicts of interest.

Not Applicable

LEADERSHIP INDICATORS

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

| Total number of training and awareness programmes held | Topics/principles covered under the training and its impact                                    | %age of persons in value chain covered by the awareness programmes |
|--|--|--|
| 1  | First Aid, QMS & SME courses with High Impact, Webinar on Environmental, Social and Governance | Anjar - 100%<br>Bhopal - 100%<br>Mandya - 100%                     |

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. Annual Disclosures of Interested Parties and Process to disclose Conflict, If any, during the Meeting held for Consideration of Proposal with Interested Party. The agenda on which they have an interest is not attended by interested directors.

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.

| Type                         | FY 2022-2023 (Current Financial Year) | FY 2021-2022 (Previous Financial Year) | Details of improvement in social and environmental aspects |
|------------------------------|---------------------------------------|--|--|
| Research & Development (R&D) | INR 4.09 crore                        | INR 2.52 crore                         |  |
| Capital Expenditure (CAPEX)  | NIL                                   | NIL                                    |  |

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

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

| Product                           | Process to safely reclaim the product   |
|-----------------------------------|---|
| a. Plastics (including packaging) | Not applicable as plastic is not being used in packaging of the products  |
| b. E-Waste                        | Sent to authorised recyclers  |
| c. Hazardous Waste                | Hazardous waste is produced during the pipe coating process and is transported to vendors designated by the pollution control board for co-processing.  |
| d. Other Waste                    | Non-Hazardous Polyethylene (PE) waste produced during the process of coating pipes is sent to nearby vendors for recycling and further processing. Any other types of waste are also sent to approved recycling facilities. |

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No).  
No

5. 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.

NA

**LEADERSHIP INDICATORS**

- 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.  
No
- If there are any significant social or environmental concerns and/or risks arising from the 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.  
NA
- Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).  
NA
- Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format:

|                                | FY 2022-2023<br>(Current Financial Year) |          |                 | FY 2021-2022<br>(Previous Financial Year) |          |                 |
|--------------------------------|--|----------|-----------------|---|----------|-----------------|
|                                | Reused                                   | Recycled | Safely Disposed | Reused                                    | Recycled | Safely Disposed |
| Plastics (including packaging) |  |          |                 |   |          |                 |
| E-waste                        |  |          |                 |   |          |                 |
| Hazardous waste                |  | NA       |                 |   | NA       |                 |
| Other waste                    |  |          |                 |   |          |                 |

- Reclaimed products and their packaging materials (as a 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 |
|---------------------------|---|
| NA                        |   |

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

**ESSENTIAL INDICATORS**

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

| Category                              | % of employees covered by |                  |         |                    |         |                    |         |                    |         |                     |         |
|---------------------------------------|---------------------------|------------------|---------|--------------------|---------|--------------------|---------|--------------------|---------|---------------------|---------|
|                                       | Total (A)                 | Health Insurance |         | Accident Insurance |         | Maternity Benefits |         | Paternity Benefits |         | Day Care Facilities |         |
|                                       |                           | No. (B)          | % (B/A) | No. (C)            | % (C/A) | No. (D)            | % (D/A) | No. (E)            | % (E/A) | No. (F)             | % (F/A) |
| <b>Permanent Employees</b>            |                           |                  |         |                    |         |                    |         |                    |         |                     |         |
| Male                                  | 846                       | 846              | 100%    | 846                | 100%    | 0                  | 0%      | 846                | 100%    | 0                   | 0%      |
| Female                                | 49                        | 49               | 100%    | 49                 | 100%    | 49                 | 100%    | 0                  | 0%      | 49                  | 100%    |
| <b>Total</b>                          | <b>895</b>                | <b>895</b>       |         | <b>895</b>         |         | <b>49</b>          |         | <b>846</b>         |         | <b>49</b>           |         |
| <b>Other than Permanent Employees</b> |                           |                  |         |                    |         |                    |         |                    |         |                     |         |
| Male                                  | 31                        | 31               | 100%    | 31                 | 100%    | 0                  | 0%      | 31                 | 100%    | 0                   | 0%      |
| Female                                | 1                         | 1                | 100%    | 1                  | 100%    | 1                  | 100%    | 0                  | 0%      | 1                   | 100%    |
| <b>Total</b>                          | <b>32</b>                 | <b>32</b>        |         | <b>32</b>          |         | <b>1</b>           |         | <b>31</b>          |         | <b>1</b>            |         |

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

| Category                            | % of employees covered by |                  |         |                    |         |                    |         |                    |         |                     |         |
|-------------------------------------|---------------------------|------------------|---------|--------------------|---------|--------------------|---------|--------------------|---------|---------------------|---------|
|                                     | Total (A)                 | Health Insurance |         | Accident Insurance |         | Maternity Benefits |         | Paternity Benefits |         | Day Care Facilities |         |
|                                     |                           | No. (B)          | % (B/A) | No. (C)            | % (C/A) | No. (D)            | % (D/A) | No. (E)            | % (E/A) | No. (F)             | % (F/A) |
| <b>Permanent Workers</b>            |                           |                  |         |                    |         |                    |         |                    |         |                     |         |
| Male                                | 1173                      | 1173             | 100%    | 1173               | 100%    | 0                  | 0.00%   | 1173               | 100.00% | 0                   | 0%      |
| Female                              | 10                        | 10               | 100%    | 10                 | 100%    | 10                 | 100.00% | 0                  | 0.00%   | 10                  | 100%    |
| <b>Total</b>                        | <b>1183</b>               | <b>1183</b>      |         | <b>1183</b>        |         | <b>10</b>          |         | <b>1173</b>        |         | <b>10</b>           |         |
| <b>Other than Permanent Workers</b> |                           |                  |         |                    |         |                    |         |                    |         |                     |         |
| Male                                | 469                       | 469              | 100%    | 469                | 100%    | 0                  | 0.00%   | 469                | 100.00% | 0                   | 0%      |
| Female                              | 28                        | 28               | 100%    | 28                 | 100%    | 28                 | 100.00% | 0                  | 0.00%   | 28                  | 100%    |
| <b>Total</b>                        | <b>497</b>                | <b>497</b>       |         | <b>497</b>         |         | <b>28</b>          |         | <b>469</b>         |         | <b>28</b>           |         |

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

| Sr. Benefits No.        | FY 2022-2023 (Current FY)                          |   |  | FY 2021-2022 (Previous FY)                         |   |  |
|-------------------------|--|---|--|--|---|--|
|                         | No. of employees covered as a % of total employees | No. of workers covered as a % of total worker | 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 worker | Deducted and deposited with the authority (Y/N/N.A.) |
| 1 PF                    | 100%   | 100%  | Yes  | 100%   | 100%  | Yes  |
| 2 Gratuity              | 100%   | 100%  | Yes  | 100%   | 100%  | Yes  |
| 3 ESI                   | 100%   | 100%  | Yes  | 4%   | 70%   | Yes  |
| 4 Others-Please Specify | N/A  | N/A   | N/A  | N/A  | N/A   | N/A  |

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

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, WCL does have an equal opportunity policy. The policy is available publicly on the following weblink- [Equal opportunity policy](#)

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

| Gender                     | Total number of people returned after parental leave in FY | Total Number of people who took parental leave in FY | Return to work rate | Total Number of people retained for 12 months after returning from parental leave | Total number of people returned from parental leave in prior FY | Retention Rate |
|----------------------------|--|--|---------------------|---|---|----------------|
| <b>Permanent Employees</b> |  |  |                     |   |   |                |
| Male                       | 6  | 6  | 100%                | 4   | 4   | 100%           |
| Female                     | 2  | 2  | 100%                | 0   | 0   | -              |
| Others                     | 0  | 0  | -                   | 0   | 0   | -              |
| <b>Total</b>               | <b>8</b>   | <b>8</b>   | <b>100%</b>         | <b>4</b>  | <b>4</b>  | <b>100%</b>    |



| Gender                   | Total number of people returned after parental leave in FY | Total Number of people who took parental leave in FY | Return to work rate | Total Number of people retained for 12 months after returning from parental leave | Total number of people returned from parental leave in prior FY | Retention Rate |
|--------------------------|--|--|---------------------|---|---|----------------|
| <b>Permanent Workers</b> |  |  |                     |   |   |                |
| Male                     | 0  | 0  | -                   | 0   | 0   | -              |
| Female                   | 0  | 0  | -                   | 0   | 0   | -              |
| Others                   | 0  | 0  | -                   | 0   | 0   | -              |
| <b>Total</b>             | <b>0</b>   | <b>0</b>   | <b>-</b>            | <b>0</b>  | <b>0</b>  | <b>-</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.**

| Category                       | Yes/No (details of mechanism)   |
|--------------------------------|---|
| Permanent Workers              | Yes. SA 8000 certified unit so system as per certification's requirement is implemented       |
| Other than Permanent Workers   | Yes   |
| Permanent Employees            | Yes. Anjar - SPT (Social Performance Team) is there which captures/discusses such grievances. |
| Other than Permanent Employees | Yes. At Bhopal, we maintain Grievance Register.   |

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

| Category                   | FY 2022-2023 (Current FY)                            |  |          | FY 2021-2022 (Previous FY)                           |  |          |
|----------------------------|--|--|----------|--|--|----------|
|                            | Total employees / workers in respective category (A) | No. of employees / workers in respective category, who are part of association(s) or Union (B) | % (B/A)  | Total employees / workers in respective category (C) | No. of employees / workers in respective category, who are part of association(s) or Union (D) | %(D/C)   |
| <b>Permanent Employees</b> |  |  |          |  |  |          |
| Male                       | -  | -  | -        | 1123   | 0  | 0        |
| Female                     | -  | -  | -        | 68   | 0  | 0        |
| Others                     | -  | -  | -        | -  | 0  | 0        |
| <b>Total</b>               | <b>-</b>   | <b>-</b>   | <b>-</b> | <b>1191</b>  | <b>0</b>   | <b>0</b> |
| <b>Permanent Workers</b>   |  |  |          |  |  |          |
| Male                       | -  | -  | -        | 1278   | 414  | 33%      |
| Female                     | -  | -  | -        | 1268   | 414  | 33%      |
| Others                     | -  | -  | -        | -  | -  | -        |
| <b>Total</b>               | <b>-</b>   | <b>-</b>   | <b>-</b> | <b>10</b>  | <b>0</b>   | <b>0</b> |

**8. Details of training given to employees and workers:**

| a. Details of Skill training given to employees and workers.                       | Category   | FY 2022-2023 (Current FY)   |  |  | FY 2021-2022 (Previous FY)  |  |            |
|--|--|---|--|--|---|--|------------|
|  |  | Total employees / workers in respective category (A)  | No. of employees / workers in respective category, who received Skill Training (B) | % (B/A)  | Total employees / workers in respective category (C)  | No. of employees / workers in respective category, who received Skill Training (D) | %(D/C)     |
| <b>Permanent Employees</b>   |  |   |  |  |   |  |            |
| Male   |  | 877   | 877  | 100.00%  | 1123  | 951  | 85%        |
| Female   |  | 50  | 50   | 100.00%  | 68  | 60   | 88%        |
| Others   |  | -   | -  | -  | 262   | 1  | 50%        |
| <b>Total</b>   |  | <b>927</b>  | <b>927</b>   | <b>100.00%</b>                                       | <b>1453</b>   | <b>1070</b>  | <b>74%</b> |
| <b>Workers</b>   |  |   |  |  |   |  |            |
| Male   |  | 1642  | 1642   | 100.00%  | 1217  | 998  | 82%        |
| Female   |  | 38  | 38   | 100.00%  | 10  | 8  | 80%        |
| Others   |  | -   | -  | -  | 291   | 0  | 0%         |
| <b>Total</b>   |  | <b>1680</b>   | <b>1680</b>  | <b>100.00%</b>                                       | <b>1518</b>   | <b>1006</b>  | <b>66%</b> |
| <b>b. Details of training on Health and Safety given to employees and workers.</b> |  |   |  |  |   |  |            |
| Category   | FY 2022-2023 (Current FY)                            |   |  | FY 2021-2022 (Previous FY)                           |   |  |            |
|  | Total employees / workers in respective category (A) | No. of employees / workers in respective category, who received training on Health and Safety (B) | % (B/A)  | Total employees / workers in respective category (C) | No. of employees / workers in respective category, who received training on Health and Safety (D) | %(D/C)   |            |
| <b>Permanent Employees</b>   |  |   |  |  |   |  |            |
| Male   | 877  | 380   | 43%  | 1123   | 729   | 65%  |            |
| Female   | 50   | 17  | 34%  | 68   | 41  | 60%  |            |
| Others   | -  | -   | -  | 262  | 2   | 1%   |            |
| <b>Total</b>   | <b>927</b>   | <b>397</b>  | <b>43%</b>   | <b>1453</b>  | <b>772</b>  | <b>53%</b>   |            |
| <b>Workers</b>   |  |   |  |  |   |  |            |
| Male   | 1642   | 1033  | 63%  | 1217   | 1086  | 89%  |            |
| Female   | 38   | 10  | 26%  | 10   | 10  | 100%   |            |
| Others   | -  | -   | -  | 291  | 291   | 100%   |            |
| <b>Total</b>   | <b>1680</b>  | <b>1043</b>   | <b>62%</b>   | <b>1518</b>  | <b>1387</b>   | <b>91%</b>   |            |

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

| Category                   | FY 2022-2023 (Current FY)                            |  |            | FY 2021-2022 (Previous FY)                           |  |            |
|----------------------------|--|--|------------|--|--|------------|
|                            | Total employees / workers in respective category (A) | No. of employees / workers in respective category, who had a career review (B) | % (B/A)    | Total employees / workers in respective category (C) | No. of employees / workers in respective category, who had a career review (D) | %(D/C)     |
| <b>Permanent Employees</b> |  |  |            |  |  |            |
| Male                       | 877  | 770  | 88%        | 1350   | 1122   | 83%        |
| Female                     | 50   | 33   | 66%        | 99   | 99   | 100%       |
| Others                     | -  | -  | -          | 2  | 2  | 100%       |
| <b>Total</b>               | <b>927</b>   | <b>803</b>   | <b>87%</b> | <b>1451</b>  | <b>1223</b>  | <b>84%</b> |

| Category                 | FY 2022-2023 (Current FY)                            |  |            | FY 2021-2022 (Previous FY)                           |  |            |
|--------------------------|--|--|------------|--|--|------------|
|                          | Total employees / workers in respective category (A) | No. of employees / workers in respective category, who had a career review (B) | %(B/A)     | Total employees / workers in respective category (C) | No. of employees / workers in respective category, who had a career review (D) | %(D/C)     |
| <b>Permanent Workers</b> |  |  |            |  |  |            |
| Male                     | 1642   | 1109   | 68%        | 2052   | 1268   | 62%        |
| Female                   | 38   | 10   | 26%        | 27   | 0  | 0%         |
| Others                   | -  | -  | -          | 291  | 0  | 0%         |
| <b>Total</b>             | <b>1680</b>  | <b>1119</b>  | <b>67%</b> | <b>2370</b>  | <b>1268</b>  | <b>54%</b> |

**10. Health and safety management system:**

|   |  |
|---|--|
| <b>a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/No)</b>                        | <p>Yes, Our HSE Management System is designed using an integrated approach in which all three HSE aspects are effectively managed. Its main goal is to offer a systematic management strategy for reducing safety and environmental concerns.</p> <p>The HSE management system has the following four levels of documents:</p> <p>Level 1: Document: Health, Safety &amp; Environmental Management System Manual</p> <p>Level 2: HSE Procedure Manual</p> <p>Level 3: Operational Control Procedures</p> <p>Level 4: HSE Document List</p> |
| <b>a. 1What is the coverage of such system?</b>   | 100%, We have implemented HSE management system across all of our plants (Anjar, Mandya, Bhopal)   |
| <b>b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?</b> | <ul style="list-style-type: none"> <li>Step 1: Collect Existing Information about Workplace Hazards.</li> <li>Step 2: Inspect the Workplace for Safety Hazards.</li> <li>Step 3: Identify Health &amp; Work-Related Hazards.</li> <li>Step 4: Conduct Incident Investigations.</li> <li>Step 5: Identify Hazards Associated with Emergency Situations</li> </ul>   |
| <b>c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/No)</b>    | Yes  |
| <b>d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)</b>               | Yes  |

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

| Safety Incident/Number   | Category  | FY 2022-2023 Current Financial Year | FY 2020-2021 Previous Financial Year |
|--|-----------|-------------------------------------|--------------------------------------|
| <b>Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)</b> | Employees | 0.20                                | 0.11                                 |
|  | Workers   | 0.40                                | 0                                    |
| <b>Total recordable work-related injuries</b>  | Employees | 2                                   | 3                                    |
|  | Workers   | 3                                   | 0                                    |
| <b>No. of fatalities</b>   | Employees | 2                                   | 1                                    |
|  | Workers   | 1                                   | 0                                    |
| <b>High consequence work-related injury or ill-health (excluding fatalities)</b>     | Employees | 0                                   | 0                                    |
|  | Workers   | 0                                   | 0                                    |

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

Safety is important aspect of our organization. At WCL, we take various measures to ensure health & Safety across organization which is described below:

- Safety training to employees and workers
- Establishment of safety committee and appointment of site managers to increase the responsibility of our teams
- Development of mechanisms to prevent and reduce injuries
- Reviewing workplace HSE inspections performance
- Review employee complaints regarding safety and health hazards
- Regular safety inspections and audits

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

| Topic                      | FY 2022-2023 (Current FY) |                                       |         | FY 2021-2022 (Previous FY) |                                       |         |
|----------------------------|---------------------------|---------------------------------------|---------|----------------------------|---------------------------------------|---------|
|                            | Filed during the year     | Pending resolution at the end of year | Remarks | Filed during the year      | Pending resolution at the end of year | Remarks |
| <b>Working Conditions</b>  | 0                         | 0                                     | 0       | 0                          | 0                                     | 0       |
| <b>Health &amp; Safety</b> | 0                         | 0                                     | 0       | 0                          | 0                                     | 0       |

**14. Assessments for the year:**

| Topic                              | % of your plants and offices that were assessed (by entity or statutory authorities or third parties)   |
|------------------------------------|---|
| <b>Health and safety practices</b> | <p>To ensure a comprehensive assessment of our workplace, we have implemented multiple evaluation methods for the fiscal year FY '23, including:</p> <p>Internal Audits: Certified Internal Auditors conduct internal audits every six months to assess our adherence to safety standards and protocols.</p> <p>External Audit: Accredited 3rd party audit firm M/s LRQA successfully completed Focus Audits and Certificate Renewal Audits, providing an external perspective on our workplace safety practices.</p> <p>Monthly Management Audit: Each month, a thorough safety audit is conducted by the respective Plant Head, HSE Head, other functional Heads, Safety Champions, and the Plant team. This monthly review allows for consistent monitoring and identification of any areas that require improvement.</p> <p>Apex Committee Member's Plant Visit: Members of the Apex Committee visit our plants with the specific objective of identifying any gaps in workplace management. This helps in addressing potential issues and implementing necessary measures to enhance safety protocols.</p> <p>By conducting these diverse assessments, we strive to maintain a proactive approach to workplace safety, continuously improve our safety measures, and provide a secure working environment for all employees.</p> |

| Topic                     | % of your plants and offices that were assessed (by entity or statutory authorities or third parties)   |
|---------------------------|---|
| <b>Working Conditions</b> | The assessment of working conditions encompasses the entire premises, which includes all operational and production activities, health and hygiene facilities, administrative and office buildings, the canteen, Gurukul building, and the store. This comprehensive evaluation ensures that all aspects of our facilities are thoroughly examined to promote a safe and conducive working environment for our employees. |

**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.**

We have established an Environmental, Health, and Safety (EHS) team that is dedicated to ensuring a safe and secure working environment. This team plays a crucial role in proactively identifying potential safety-related risks and hazards within our operations. They conduct regular assessments, inspections, and evaluations to identify areas of concern and take necessary measures to address them promptly.

The EHS team works closely with various departments and employees at all levels of the organization to gather information and feedback regarding safety issues. They analyze data, conduct risk assessments, and develop appropriate strategies to mitigate risks and enhance safety measures. They also provide guidance and training to employees on best practices, safety protocols, and the proper use of safety equipment.

Additionally, the EHS team stays updated on relevant regulations, industry standards, and emerging safety practices to ensure our organization remains compliant and adopts the most effective safety measures. Their efforts are vital in creating a safety-conscious culture and promoting a work environment where every individual feels safe, protected, and empowered to raise any safety concerns.

By appointing an EHS team, we demonstrate our commitment to maintaining a high standard of safety and risk management throughout our operations, prioritizing the well-being of our employees and stakeholders.

**LEADERSHIP INDICATORS**

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

- a. Employees (Yes/No): Yes
- b. Workers (Yes/No): Yes

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

The Social Security Insurance Schemes and Medi-claim Insurance are available to all employees. In the event of a death or disability, the employee's nominee (or the employee themselves in the event of a disability) is entitled to compensation in line with the terms of the Employees' Compensation Act. Additionally, the employee or his or her nominee is eligible for compensation under the "Associate Welfare Scheme" and the "Employees' Deposit Linked Insurance Scheme."

**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:**

| Category         | 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 2022-2023 (Current FY)                | FY 2021-2022 (Previous FY) | FY 2022-2023 (Current FY)   | FY 2021-2022 (Previous FY) |
| <b>Employees</b> | 0  | 0                          | 0   | 0                          |
| <b>Workers</b>   | 3  | 2                          | 3   | 2                          |

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

Yes, for identified roles in reference to business requirement.

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

| Topic                              | % of value chain partners (by value of business done with such partners) that were assessed |
|------------------------------------|---|
| <b>Health and safety practices</b> | 94% of the critical suppliers   |
| <b>Working Conditions</b>          | 94% of the critical suppliers   |

**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.**

Suppliers are given an approximate time period to close the findings with root-cause analysis and additional corrective and corrective actions, depending on the severity of the results of the suppliers' assessment. To accomplish the bigger goal of building a sustainable value chain, we want our suppliers to participate and enhance their sustainability performance. A follow-up evaluation is conducted in the event of a serious or significant violation of our code of conduct on the basis of or within the mutually-agreed target date for the conclusion of identified findings.

**PRINCIPLE 4 Businesses should respect the interests of and be responsive to all their stakeholders**

**ESSENTIAL INDICATORS**

**1. Describe the processes for identifying key stakeholder groups of the entity:**

Welspun routinely interacts with its internal and external stakeholders through organised procedures such meetings, workshops, and one-on-one conversations. It also identifies the most important stakeholder groups by prompt input from these groups.

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

| Stakeholder Group         | Whether identified as Vulnerable & Marginalized Group (Yes/ No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other   | Frequency of engagement (Annually/ Half yearly/ Quarterly /others - please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement   |
|---------------------------|---|---|---|---|
| Investors                 | No  | Quarterly results calls, Participation in investor conferences, Media releases and investor presentations   | Quarterly   | Financial performance, Capital allocation, Risk management  |
| Government and regulators | No  | Engagement on a need basis, Participation in industry level consultation groups, Participation in forums  | Continuous  | Compliance, Sustainable practices, Inclusive growth   |
| Employees                 | No  | Employee surveys, Team building workshop, Capacity building and training, Annual appraisals, Employee newsletters, Rewards and recognitions, Volunteering opportunities | Continuous  | Professional growth, Diversity at the workplace, Leadership Connect sessions, Workplace safety, Equal opportunities, Worklife balance, Wages and benefits |

| Stakeholder Group                             | Whether identified as Vulnerable & Marginalized Group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other   | Frequency of engagement (Annually/ Half yearly/ Quarterly /others - please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement                                   |
|---|--|---|---|---|
| Business partners / suppliers and contractors | No   | Contract agreements, Direct interactions, Supplier meets, Membership in industry associations   | Continuous  | Payment processing cycles, Business ethics, Transparency, Compliance  |
| Communities & NGOs                            | Yes  | Direct engagement, Dedicated CSR team, CSR projects and initiatives, Visits and camps, Community need assessments   | Continuous  | Infrastructure development, Education & healthcare, Environmental protection, Employment opportunities, Human rights              |
| Customers                                     | No   | Active Participation in Pre-qualification Processes, Business Development Visits and Presentations, Participation in Product Development Programs for Specific Projects and Applications, Multi-level Relationship Management, Promoting Ethical Business Practices | Continuous  | Increasing customer base, winning over competition, Providing Customized Solutions, Enhancing Collaboration, Ethical Transparency |

**LEADERSHIP INDICATORS**

- 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.**  
There is no system in place for direct stakeholder and board consultation. The stakeholder relationship committee, which provides the essential feedback from stakeholders through the various business activities, informs the board.
- Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.**  
Yes, through stakeholder consultations, the initiatives of Wel-Shiksha, which address social issues, Wel-Netrutva, which address health issues, and healthy life through organic green vegetables, which address environmental issues, were incorporated.
- Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.**  
To address the problems of vulnerable groups like children and women in the community, WCL has created programmes like Wel-Shiksha and Wel-Netrutva.

**PRINCIPLE 5: Businesses should respect and promote human rights**

**ESSENTIAL INDICATORS**

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

| Category               | FY 2022-2023 (Current FY) |  |            | FY 2021-2022 (Previous FY) |  |           |
|------------------------|---------------------------|--|------------|----------------------------|--|-----------|
|                        | Total (A)                 | No. of employees / workers covered (B) | % (B / A)  | Total (C)                  | No. of employees / workers covered (D) | % (D / C) |
| <b>Employees</b>       |                           |  |            |                            |  |           |
| Permanent              | 895                       | 456                                    | 51%        | 846                        | 21                                     | 2%        |
| Other than permanent   | 32                        | 7                                      | 22%        | 253                        | 0                                      | 0%        |
| <b>Total Employees</b> | <b>927</b>                | <b>463</b>                             | <b>50%</b> | <b>1099</b>                | <b>0</b>                               | <b>0%</b> |
| <b>Workers</b>         |                           |  |            |                            |  |           |
| Permanent              | 1183                      | 218                                    | 18%        | 997                        | 0                                      | 0%        |
| Other than permanent   | 497                       | 35                                     | 7%         | 510                        | 0                                      | 0%        |
| <b>Total Workers</b>   | <b>1680</b>               | <b>253</b>                             | <b>15%</b> | <b>1507</b>                | <b>0</b>                               | <b>0%</b> |

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

| Category                    | FY 2022-2023 (Current FY) |                       |         |                        | FY 2021-2022 (Previous FY) |           |                       |         |                        |         |
|-----------------------------|---------------------------|-----------------------|---------|------------------------|----------------------------|-----------|-----------------------|---------|------------------------|---------|
|                             | Total (A)                 | Equal to Minimum Wage |         | More than Minimum Wage |                            | Total (A) | Equal to Minimum Wage |         | More than Minimum Wage |         |
|                             |                           | No. (B)               | % (B/A) | No. (C)                | % (C/A)                    |           | No. (B)               | % (B/A) | % (C/A)                | % (F/D) |
| <b>Employees</b>            |                           |                       |         |                        |                            |           |                       |         |                        |         |
| <b>Permanent</b>            |                           |                       |         |                        |                            |           |                       |         |                        |         |
| Male                        | 846                       | 846                   | 100%    | -                      | -                          | 1122      | -                     | 0%      | 1122                   | 100%    |
| Female                      | 49                        | 49                    | 100%    | -                      | -                          | 68        | -                     | 0%      | 68                     | 100%    |
| <b>Other than Permanent</b> |                           |                       |         |                        |                            |           |                       |         |                        |         |
| Male                        | 31                        | 31                    | 100%    | -                      | -                          | 238       | -                     | 0%      | 238                    | 100%    |
| Female                      | 1                         | 1                     | 100%    | -                      | -                          | 31        | -                     | 0%      | 31                     | 100%    |
| <b>Workers</b>              |                           |                       |         |                        |                            |           |                       |         |                        |         |
| <b>Permanent</b>            |                           |                       |         |                        |                            |           |                       |         |                        |         |
| Male                        | 1173                      | 1173                  | 100%    | -                      | -                          | 1268      | 61                    | 5%      | 898                    | 71%     |
| Female                      | 10                        | 10                    | 100%    | -                      | -                          | 10        | 0                     | 0%      | 10                     | 100%    |
| <b>Other than Permanent</b> |                           |                       |         |                        |                            |           |                       |         |                        |         |
| Male                        | 469                       | 469                   | 100%    | -                      | -                          | 784       | -                     | 0%      | 784                    | 100%    |
| Female                      | 28                        | 28                    | 100%    | -                      | -                          | 0         | 0                     | 0%      | 0                      | 0%      |

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

|                                  | Male   |  | Female |  |
|----------------------------------|--------|--|--------|--|
|                                  | Number | Median remuneration/salary/wages of respective category  | Number | Median remuneration/salary/wages of respective category  |
| Board of Directors (BoD)         | 5      | No fixed remuneration is paid to the non-executive / independent directors. They are paid fees for attending meetings of the Board/ Committees of the Board. (Remuneration is paid to the MD&CEO and Commission on Net Profit is paid to the Chairman (Non-Executive | 3      | No fixed remuneration is paid to the non-executive / independent directors. They are paid fees for attending meetings of the Board/ Committees of the Board. |
| Key Managerial Personnel         | 3      | 1,90,81,010  | 0      | 0  |
| Employees other than BoD and KMP | 876    | 5,72,460   | 49     | 3,31,018   |
| Workers                          | 1189   | 2,93,404   | 10     | 2,34,767   |

**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, HR team responds to any issues raised on human rights.

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

The site representatives can bring up any human rights concerns, and they will then forward those concerns to the local HR and sustainability teams, who will endeavour to resolve them.

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

|                                   | FY 2022-2023 (Current FY) |                                       |               | FY 2021-2022 (Previous FY) |                                       |               |
|-----------------------------------|---------------------------|---------------------------------------|---------------|----------------------------|---------------------------------------|---------------|
|                                   | Filed during the year     | Pending resolution at the end of year | Remarks       | Filed during the year      | Pending resolution at the end of year | Remarks       |
| Sexual Harassment                 | 0                         | 0                                     | No Complaints | 0                          | 0                                     | No Complaints |
| Discrimination at workplace       | 0                         | 0                                     | No Complaints | 0                          | 0                                     | No Complaints |
| Child Labour                      | 0                         | 0                                     | No Complaints | 0                          | 0                                     | No Complaints |
| Forced Labour/ Involuntary Labour | 0                         | 0                                     | No Complaints | 0                          | 0                                     | No Complaints |
| Wages                             | 0                         | 0                                     | No Complaints | 0                          | 0                                     | No Complaints |
| Other human rights related issues | 0                         | 0                                     | No Complaints | 0                          | 0                                     | No Complaints |

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

Internal Complaint Committee for POSH

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

At WCL, we have supplier code of conduct in place to address human rights-related issues, suppliers are required to sign and affirm their commitment to it.

**Assessments for the year:**

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

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

There were no corrective actions taken as no concerns were registered during the year.

**LEADERSHIP INDICATORS**

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

No business procedures have been altered or added as a result of resolving human rights complaints or grievances.

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

SA 8000 certified Anjar, Dahej units

**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, the Admin Block in Anjar has facilities for visitors with disabilities.

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

|                             | % of value chain partners (by value of business done with such partners) that were assessed |
|-----------------------------|---|
| Child labour                | 94% of the critical suppliers   |
| Forced/involuntary labour   | 94% of the critical suppliers   |
| Sexual harassment           | 94% of the critical suppliers   |
| Discrimination at workplace | 94% of the critical suppliers   |
| Wages                       | 94% of the critical suppliers   |
| Others - please specify     |   |

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

NA

**PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment****ESSENTIAL INDICATORS****1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:**

| Parameter   | FY 2022-2023 (Current FY)   | FY 2021-2022 (Previous FY) |
|---|---|----------------------------|
| Total electricity consumption (A) (GJ)  | 6,64,537  | 2,57,493                   |
| Total fuel consumption (B) (GJ)   | 27,359  | 51,927                     |
| Energy consumption through other sources (C) (GJ)   | -   | -                          |
| <b>Total energy consumption (A+B+C) (GJ)</b>  | <b>6,91,896</b>   | <b>3,09,421</b>            |
| Energy intensity per rupee of turnover (Total energy consumption/turnover in rupees) (GJ per ₹ crore) | 100 GJ per ₹ crore*<br>*The increase in intensity is due to inclusion of sponge iron and billet division operations | 47.5 GJ per ₹ crore.       |
| Energy intensity (optional) - the relevant metric may be selected by the entity                       | -   | -                          |

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.** Yes, for energy consumption by Price Waterhouse Chartered Accountants LLP.

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

Yes, the following plants is registered as designated consumers under PAT scheme of Government of India: WCL Anjar (PAT Cycle II)

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

| Parameter  | FY 2022-2023 (Current FY)  | FY 2021-2022 (Previous FY) |
|--|--|----------------------------|
| <b>Water withdrawal by source (in kilolitres)</b>  |  |                            |
| (i) Surface water  | 5,962  | -                          |
| (ii) Groundwater   | -  | -                          |
| (iii) Third party water  | 4,89,707   | 3,11,118                   |
| (iv) Seawater / desalinated water  | -  | -                          |
| (v) Others (Rainwater storage)   | -  | -                          |
| <b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>                        | <b>4,95,669</b>  | <b>3,11,118</b>            |
| <b>Total volume of water consumption (in kilolitres)</b>   | <b>3,90,919</b>  | <b>3,11,118</b>            |
| <b>Water intensity per rupee of turnover</b> (Water consumed / turnover) (kl per crore INR of revenue) | 56.5 kl per ₹ crore*<br>*The increase in intensity is due to inclusion of sponge iron and billet division operations | 47.8 kl per ₹ crore        |
| <b>Water intensity</b> (optional) - the relevant metric may be selected by the entity                  | -  | -                          |

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.** Yes, for total volume of water withdrawal and consumption by Price Waterhouse Chartered Accountants LLP.

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

No

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

| Parameter                                  | Please specify unit | FY 2022-2023 (Current FY) | FY 2021-2022 (Previous FY) |
|--|---------------------|---------------------------|----------------------------|
| <b>NOx</b>                                 | <b>MT</b>           | 3 <sup>#</sup>            | 10 <sup>#</sup>            |
| <b>SOx</b>                                 | <b>MT</b>           | 2 <sup>#</sup>            | 6 <sup>#</sup>             |
| <b>Particulate matter (PM)</b>             | <b>MT</b>           | 32 <sup>#</sup>           | 77 <sup>#</sup>            |
| <b>Persistent organic pollutants (POP)</b> | <b>NA</b>           | -                         | -                          |
| <b>Volatile organic compounds (VOC)</b>    | <b>NA</b>           | -                         | -                          |
| <b>Hazardous air pollutants (HAP)</b>      | <b>mg/m3</b>        | -                         | -                          |
| <b>Others - please specify</b>             | <b>PPM</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, for NOx, SOx and PM emissions by Price Waterhouse Chartered Accountants LLP.

<sup>#</sup>Emission from sponge iron and billet division operations is unaccounted

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

| Parameter  | Unit                        | FY 2022-2023 (Current FY)   | FY 2021-2022 (Previous FY)          |
|--|-----------------------------|---|-------------------------------------|
| <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) | <b>tCO<sub>2</sub>e</b>     | 2,545   | 3,365                               |
| <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) | <b>tCO<sub>2</sub>e</b>     | 2,57,839  | 92,435                              |
| <b>Total Scope 1 and Scope 2 emissions per rupee of turnover (in ₹)</b>  | <b>tCO<sub>2</sub>e</b>     | 37.32 tCO <sub>2</sub> e per ₹ crore*<br>*The increase in intensity is due to inclusion of sponge iron and billet division operations | 14.7 tCO <sub>2</sub> e per ₹ crore |
| <b>Total Scope 1 and Scope 2 emission intensity</b> (optional)- the relevant metric may be selected by the entity  | <b>tCO<sub>2</sub>e/INR</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, for Scope 1 & Scope 2 emissions by Price Waterhouse Chartered Accountants LLP.

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

A solar park of 300KW is being planned to be setup at Anjar facility. WCL has also taken several energy conservation measures like installing variable frequency Drives, digital temperature controllers, retrofitting LED lights, replacing the use of furnace oil and LPG with natural gas, switching to efficient pumps and improvements in the HVAC system.

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

| Parameter  | FY 2022-2023 (Current FY)   | FY 2021-2022 (Previous FY)   |
|--|---|--|
| <b>Total Waste generated (in metric tonnes)</b>  |   |  |
| Plastic waste (A)  | 671 MT  | 691 MT   |
| E-waste (B)  | 4.34 MT   | -  |
| Bio-medical waste (C)  | -   | -  |
| Construction and demolition waste (D)  | -   | -  |
| Battery waste (E)  | -   | 1.3 MT   |
| Radioactive waste (F)  | -   | -  |
| Other Hazardous waste. Please specify, if any. (G)   | 1. ETP Sludge: 94 MT<br>2. Expander Sludge: 73 MT<br>3. Paint waste cutback tape: 24 MT<br>4. Paint Cake: 250 MT<br>5. Used waste oil: 8 MT<br>6. Empty barrels/containers contaminated with hazardous chemicals /waste: 66 MT<br>7. Cotton Waste: 1 MT | 1. ETP Sludge: 14 MT<br>2. Expander Sludge: 48 MT<br>3. Paint waste cutback tape: 45 MT<br>4. Paint Cake: 205 MT<br>5. Used waste oil: 5 MT<br>6. Empty barrels/containers contaminated with hazardous chemicals /waste: 81 MT<br>7. Cotton Waste: 0.2 MT<br>8. Process Waste: 20 MT |
| Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector) | 1. MS Scrap: 16,355 MT<br>2. Other than MS scrap: 1,298 MT<br>3. Wooden pallets: 319 MT   | 1. MS Scrap: 12,955 MT<br>2. Other than MS scrap: 1,382 MT<br>3. Wooden pallets: 153 MT  |
| <b>Total (A+B + C + D + E + F + G+ H)</b>  | 19163 MT*   | 15,600 MT  |
|  | *The increase in intensity is due to inclusion of sponge iron and billets division operations   |  |

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

| Category of waste               | FY 2022-2023 (Current FY) | FY 2021-2022 (Previous FY) |
|---------------------------------|---------------------------|----------------------------|
| (i) Recycled                    | MS Scrap: 18,402 MT       | MS Scrap: 12,955 MT        |
| (ii) Re-used                    | Wooden Pallets: 319 MT    | Wooden Pallets: 153 MT     |
| (iii) Other recovery operations |                           |                            |
| <b>Total</b>                    | <b>18,721 MT</b>          | <b>13,108 MT</b>           |

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

| Category of waste               | FY 2022-2023 (Current FY) | FY 2021-2022 (Previous FY)             |
|---------------------------------|---------------------------|--|
| (i) Incineration                | 442 MT                    | 332 MT                                 |
| (ii) Landfilling                |                           |  |
| (iii) Other disposal operations |                           | 2,160 MT (Sold to authorized recycler) |
| <b>Total</b>                    | <b>442 MT</b>             | <b>2,492 MT</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, for waste management by Price Waterhouse Chartered Accountants LLP.

**9. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.**

- (i). All generated different types of waste have been managed and handled as per their characteristic i.e., Non-hazardous & Hazardous.
- (ii). Collection of different types of wastes into the waste bins, temporary Storage yard at each plant level and designated Waste Storage Yard are identified.
- (iii). Standard Operating Procedure (SOP) has been developed for smooth operation, handling, and transportation.
- (iv). Wastes are transported to the Vendor or Recycler authorized by Pollution Control Boards.
- (v). Opted co-processing disposal practice for major hazardous waste class over to incineration for superior environmental performance.
- (vi). 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.  
(Reduction of Paint waste; Reduction in Hose length of Mixed Paint from 1500 mm to 1250 mm; Optimizing Flushing time by Timer based automation)

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

| S.No. | Location of operations/offices                                       | Type of operations | Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any. |
|-------|--|--------------------|---|
|       | Not applicable as there are no operations near above-mentioned zones |                    |   |

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

| 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. |
|-------|--------------------------------|--------------------|---|
|       | Not applicable                 |                    |   |

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

| S.No. | Specify the law/ regulation/ guidelines which was not complied with   | Provide details of the non-compliance | Any fines/ penalties/ action taken by regulatory agency such as pollution control boards or by courts | Corrective action taken, if any |
|-------|---|---------------------------------------|---|---------------------------------|
|       | Yes, the company is compliant with all the applicable environmental laws defined by the state and central regulatory authorities. |                                       |   |                                 |

## LEADERSHIP INDICATORS

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

| Parameter   | FY 2022-2023 (Current FY)  | FY 2021-2022 (Previous FY) |
|---|--|----------------------------|
| <b>From renewable sources</b>                                   |  |                            |
| Total electricity consumption (A)                               | -  | -                          |
| Total fuel consumption (B)                                      | -  | -                          |
| Energy consumption through other sources (C)                    | -  | -                          |
| <b>Total energy consumed from renewable sources (A+B+C)</b>     | -  | -                          |
| <b>From non-renewable sources</b>                               |  |                            |
| Total electricity consumption (D)                               | 6,64,537 GJ  | 2,57,493 GJ                |
| Total fuel consumption (E)                                      | 27,539 GJ  | 51,927 GJ                  |
| Energy consumption through other sources (F)                    | -  | -                          |
| <b>Total energy consumed from non-renewable sources (D+E+F)</b> | 6,91,896 GJ*   | 3,09,421 GJ                |
|   | *The increase in intensity is due to inclusion of sponge iron and billet division operations |                            |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No.

## 2. Provide the following details related to water discharged:

| Parameter  | FY 2022-2023 (Current FY)           | FY 2021-2022 (Previous FY)                    |
|--|-------------------------------------|---|
| <b>Water discharge by destination and level of treatment (in kiloliters)</b> |                                     |   |
| (i) To Surface water   |                                     |   |
| - No treatment   |                                     |   |
| - With treatment - please specify level of Treatment                         |                                     | Treatment - STP & ETP<br>Quantity - 5,622 KL  |
| (ii) To Groundwater  |                                     |   |
| - No treatment   |                                     |   |
| - With treatment - please specify level of Treatment                         |                                     |   |
| (iii) To Seawater  |                                     |   |
| - No treatment   |                                     |   |
| - With treatment - please specify level of Treatment                         |                                     | Treatment - STP & ETP<br>Quantity - 94,290 KL |
| (iv) Sent to third-parties   |                                     |   |
| - No treatment   | 1,04,750 KL<br>(Sent for Treatment) |   |
| - With treatment - please specify level of Treatment                         |                                     |   |
| (v) Others   |                                     |   |
| - No treatment   |                                     |   |
| - With treatment - please specify level of Treatment                         |                                     |   |
| <b>Total water discharged (in kiloliters)</b>                                | 1,04,750 KL<br>(Sent for Treatment) | 99,912 KL                                     |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No.

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

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

- Name of the area: Anjar
- Nature of operations: Steel Pipe Manufacturing
- Water withdrawal, consumption and discharge in the following format: WCL's Anjar facility falls under a water stress area. We have setup a 30 MLD Sewage Treatment plant at our Anjar factory, which recycles sewage wastewater from the neighbouring areas, leading to zero intake of freshwater for manufacturing processes.

| Parameter  | FY 2022-2023 (Current FY)  | FY 2021-2022 (Previous FY) |
|--|--|----------------------------|
| <b>Water withdrawal by source (in kiloliters)</b>                        |  |                            |
| (i) Surface water  | 0  | 0                          |
| (ii) Groundwater   | 0  | 0                          |
| (iii) Third party water  | 4,09,131 KL  | 0                          |
| (iv) Seawater / desalinated water  | 0  | 0                          |
| (v) Others (Domestic waste water from municipality)                      | 0  | 0                          |
| <b>Total volume of water withdrawal (in kiloliters)</b>                  | 4,09,131 KL  | 2,28,324 KL                |
| <b>Total volume of water consumption (in kiloliters)</b>                 | 3,04,381 KL  | 2,28,324 KL                |
| <b>Water intensity per rupee of turnover (Water consumed / turnover)</b> | 44.0 KL per ₹ crore*   | 35.1 KL per ₹ crore        |
|  | *The increase in intensity is due to inclusion of sponge iron and billet division operations |                            |

Water intensity (optional) - therelevant metric may be selected by the entity

**Water discharge by destination and level of treatment (in kiloliters)**

|  |            |           |
|--|------------|-----------|
| (i) Into Surface water                               |            |           |
| - 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 |            |           |
| <b>Total water discharged (in Kiloliters)</b>        | 104,750 KL | 94,290 KL |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No.



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

| Parameter   | Unit                    | FY 2022-2023 (Current FY)  | FY 2021-2022 (Previous FY)   |
|---|-------------------------|--|--|
| <b>Total Scope 3 emissions</b><br>(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) | tCO <sub>2</sub> e      | 12,02,951 <sup>#</sup>   | 5,02,453   |
|   |                         | (The emission inventory includes 3 out of 12 applicable categories of Scope 3. Remaining categories are being computed and to be reported next fiscal year. The reported categories are:<br>1. Downstream Transportation & Distribution<br>2. Upstream Transportation & Distribution<br>3. Purchase goods & Services<br><sup>#</sup> Scope 3 emissions from sponge iron and billets division operations is unaccounted | (The emission inventory includes 7 out of 12 applicable categories of Scope 3. Remaining 5 categories are being computed and to be reported next fiscal year. The reported categories are:<br>1. Downstream Transportation & Distribution<br>2. Upstream Transportation & Distribution<br>3. Purchase goods & Services<br>4. Capital Goods<br>5. Investments<br>6. Waste generated from operations<br>7. End of Life |
| <b>Total Scope 3 emissions per rupee of turnover</b>  | tCO <sub>2</sub> e/ INR | 174 tCO <sub>2</sub> e per ₹ crore   | 77.2 tCO <sub>2</sub> e per ₹ crore  |
| <b>Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity</b>  | tCO <sub>2</sub> e/ INR | -  | -  |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

5. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.  
Not Applicable

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

| Sr. No | Initiative undertaken  | Details of the initiative (Web-link, if any, may be provided along-with summary)   | Outcome of the initiative                                     |
|--------|--|--|---|
| 1      | Installed STP of 30 MLD to recycle wastewater and reuse within the manufacturing process at WCL Anjar. | This process ensures recycling and treatment of sewage water generations. 100% of water requirement is met through the recycled water thus ensuring zero freshwater usage. | 100% recycled water usage in our entire production activities |
| 2      | Solar dried bio-sludge (used a fuel in boiler)   | The sludge generated from the operating facility has an equivalent calorific value as coal. Therefore, it is dried and used as an alternative fuel in boilers.             | It reduces the coal consumption in the boiler                 |
| 3      | Briquettes   | Biomass briquettes are a biofuel substitute to coal and charcoal and is used in boiler operations  | It reduces the coal consumption in the boiler                 |

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

Yes, WCL have implemented Disaster management plant for occurrence of a sudden calamity of chain of events, which affect normal working within the factory area and/or may Cause Serious injuries, loss of life, extensive damage to the Properties etc. It may also result from Natural phenomena like flood, earthquakes, cyclones, forest fires in Which the day-to-day Patterns of life are, in many instances, suddenly disturbed and people are plugged in to helplessness and Suffering and as a Result needs Protection, clothing, shelter, Medical and necessity of life.

Aim of this Disaster Plan is to familiarize employees in the Factory to: (a) Control Disaster (b) Combat Fire (c) Rescue People (d) Save life not only inside the Factory but also in neighbouring area in Case of an Accident.

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

There is no significant adverse impact to the environment, arising from the value chain of WCL.

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

100% of critical suppliers assessed based on suppliers' code of conduct consisting of ESG aspects including environmental compliance.

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

**LEADERSHIP INDICATORS**

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

Welspun Corp Limited is a part of 18 associations.

b) List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

| Sr. No. | Name of the trade and industry chambers/ associations       | Reach of trade and industry chambers/ associations (State National) |
|---------|---|---|
| 1       | Welspun Corp Limited is a part of 18 associations.          | National  |
| 2       | The Associated Chambers of Commerce and Industry (ASSOCHAM) | National  |
| 3       | Indian Merchants Chamber (IMC)                              | National  |
| 4       | Indian Pipe Manufacturers Association (IPMA)                | National  |
| 5       | Federation of Kutch Industries Associations, (FOKIA)        | National  |
| 6       | International Tube Association, India Chapter (ITA)         | National  |
| 7       | Pipeline Research Council International (PRCI)              | National  |
| 8       | National Association of Corrosion Engineers (NACE)          | National  |
| 9       | American Society of Mechanical Engineers (ASME)             | International   |
| 10      | Engineering Export Promotion Council (EEPC)                 | National  |
| 11      | Federation of Indian Exporters Organization (FIEO)          | National  |
| 12      | Interstate Natural Gas Association of America (INGAA)       | International   |
| 13      | Southern Gas Association (SGA)                              | International   |
| 14      | North American Steel Pipe Distributors (NASPD)              | International   |
| 15      | Pipeliners Association of Houston                           | International   |
| 16      | San Antonio Pipeliners Association (SAPA)                   | International   |
| 17      | American Line Pipe Association (ALPA)                       | International   |
| 18      | US-India Business Council (USIBC)                           | International   |

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

| Name of Authority | Brief of the case | Corrective action taken |
|-------------------|-------------------|-------------------------|
| NIL               | NIL               | NIL                     |

LEADERSHIP INDICATORS

1. Details of public policy positions advocated by the entity

| S.no | Public policy advocated | Method resort for such advocacy | Whether the information is available in public domain? (Yes/No) | Frequency of review by board (Annually/ Half yearly/ Quarterly/ Other-please specify) | Web Link, if available |
|------|-------------------------|---------------------------------|---|---|------------------------|
|      |                         |                                 |   |   | Not Applicable         |

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

ESSENTIAL INDICATORS

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

Not Applicable

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

Not Applicable

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

Community complaints are initially brought to the CSR team's attention, if any. The issue is discussed with the appropriate department depending on the type of grievance. After that, the community is informed of the recommendations or alternatives to mitigate the issue. The action plan is carried out in accordance with mutual agreement.

4. Percentage of input material (inputs to total inputs by value) sourced from local or small-scale suppliers:

|  | FY 2022-2023 (Current FY) | FY 2021-2022 (Previous FY) |
|--|---------------------------|----------------------------|
| Directly sourced from MSMEs/ Small producers                         | -                         | -                          |
| Sourced directly from within the district and neighbouring districts | -                         | -                          |

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):

No negative social impact identified

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

| State | Aspirational District information | Amount spent in INR   |
|-------|-----------------------------------|---|
|       |                                   | CSR activities are executed in villages around the manufacturing sites. No aspirational districts are taken up currently under CSR. |

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

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

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.

Not Applicable

6. Details of beneficiaries of CSR Projects.

| S.no | CSR Project                | No of persons benefited from CSR Projects | % of beneficiaries from vulnerable and marginalized group |
|------|----------------------------|---|---|
| 1    | WelShiksha                 | 1,00,000                                  | 100%  |
| 2    | WelNetrutva                | 41,000                                    | 100%  |
| 3    | Welspun Super Sports Women | 32  | -   |
| 4    | We-Volunteer               | 4,499                                     | -   |
| 5    | WelSwasthya                | 1,50,000                                  | -   |
| 6    | WelKrishi                  | 1,01,000                                  | 100%  |
| 7    | WelSuraksha                | 74,000 +                                  | 5%  |

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

ESSENTIAL INDICATORS

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

In case any product supplied to the client is found to not conform to the specifications, then the Clients can raise a formal customer complaint. Upon receiving the complaint, we review the same, refer the data of the testing done at our mills and if need arises, we mobilise our inspector to the site to verify the complaint. Once the complaint is verified as genuine, a root cause analysis is done to identify the root cause/s and a corrective and preventive actions (CAPA) is prepared and presented to the customer. Any commercial issues, costs for repair/ rectification, rectification plan schedule etc is negotiated with the customer and the rectification/ repairs are completed. As a preventive action, any lessons learnt from the project are discussed at Quarterly review meetings and any modifications needed to the SOP's/ Quality Assurance Plans are made. These lessons learnt are taken into consideration while negotiating any future project contracts.

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

| Type  | As a percentage to total turnover   |
|---|---|
| Environment and Social parameters relevant to product | 0% as this is not relevant to the nature of our business activity at this point of time |
| Safe and responsible usage                            | 0% as this is not relevant to the nature of our business activity at this point of time |
| Recycling and/or safe disposal                        | 0% as this is not relevant to the nature of our business activity at this point of time |

**3. Number of consumer complaints**

|                                | FY 2022-2023 Current Financial Year |                                       |         | FY 2021-2022 Previous Financial Year |                                       |         |
|--------------------------------|-------------------------------------|---------------------------------------|---------|--------------------------------------|---------------------------------------|---------|
|                                | Received during the year            | Pending resolution at the end of year | Remarks | Received during the year             | Pending resolution at the end of year | Remarks |
| Data privacy                   | 0                                   | 0                                     | Nil     | 0                                    | 0                                     | Nil     |
| Advertising                    | 0                                   | 0                                     | Nil     | 0                                    | 0                                     | Nil     |
| Cyber-security                 | 0                                   | 0                                     | Nil     | 0                                    | 0                                     | Nil     |
| Delivery of essential services | 0                                   | 0                                     | Nil     | 0                                    | 0                                     | Nil     |
| Restrictive Trade Practices    | 0                                   | 0                                     | Nil     | 0                                    | 0                                     | Nil     |
| Unfair Trade Practices         | 0                                   | 0                                     | Nil     | 0                                    | 0                                     | Nil     |
| Other (Product related)        | 0                                   | 0                                     | Nil     | 0                                    | 0                                     | Nil     |

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

|                   | Number | Reason for recall |
|-------------------|--------|-------------------|
| Voluntary recalls | Nil    | Not Applicable    |
| Forced recalls    | Nil    | Not Applicable    |

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

No, the entity has not got a framework/policy on cyber security and risks related to data privacy

**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.**

Cyber Security and Data privacy of customers: We have a project specific server/ share point for each project where the data pertaining to that project is stored. The access to this is controlled and provided to only select persons handling the project. Generally, project contracts have a secrecy/ non-disclosure clause wherein a specific period is mentioned up to which we must store the project data with us. If not, then the project data is stored for a period of 5 years. Re-occurrence of instances of product recalls: In case even after taking the preventive actions and modifications to SOP's Quality plans as mentioned above, there is an instance of a re-occurrence of defects, then a re-assessment of the root cause analysis is done any parameters that were previously overlooked are identified. A new CAPA is made and accordingly actions taken, and any further necessary changes made to the SOP's and Quality plans Penalty/ action taken by regulatory authorities: Since our products are engineered by the client, the question does not apply to us. Regarding any manufacturing related activity, we have not received any penalty/ action on safety of our products. We are certified as per ISO 45001 and SA 8000 and continue to conform to the same.

**LEADERSHIP INDICATORS**

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

We manufacture and supply to the customer's specification. Our product range is available at our website [Welspun Corp | Products](#)

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

We manufacture and supply to the customer's specification. Hence generally the customer is more knowledgeable than us on the usage of our supplied pipes into their pipelines, the operating pressures of their pipelines, the maintenance pigging intervals for pipelines etc. A safe handling procedure to efficiently handle the pipes without damage and a pipe preservation procedure to safely store the pipes for a long term are provided to the customer as and when required against the specific project.

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

Any forced major events or other delays in delivery/ project progress, in a project are immediately informed to the client as soon as they come to our knowledge.

**4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable)? If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)**

Yes, to conform to API 5L requirements the API monogram and minimum required information is always marked on each pipe. In addition to this depending on project requirements, specific additional information can be marked and is covered under a separate document titled "marking map." Depending on customer requirements 1D or 2D bar codes can also be applied to the pipes at specified locations. Upon the completion of the Final delivery of every project, a customer feedback form is sent to the customer. Their responses and ratings are noted and circulated to the plant, quality team and all relevant departments for their continuous improvement. The customer satisfaction scores across various projects are compiled into a final CSAT (Customer Satisfaction) score. This score must satisfy the CSAT target for the year. If not, then a root cause analysis and CAPA (Corrective and Preventive Actions) is performed.

**5. Provide the following information relating to data breaches:**

- a. Number of instances of data breaches along-with impact - NIL
- b. Percentage of data breaches involving personally identifiable information of customers - NIL

## Independent practitioner's limited assurance report on Identified Sustainability Indicators in Welspun Corp Limited's Business Responsibility and Sustainability Report

### To the Board of Directors of Welspun Corp Limited

We have undertaken to perform a limited assurance engagement for Welspun Corp Limited ('WCL') (the 'Company') vide our Engagement Letter dated May 16, 2023, in respect of the agreed indicators /parameters listed below (the "Identified Sustainability Indicators"). These parameters are as included in the Business Responsibility and Sustainability Report (BRSR) of the Company for the year ended March 31, 2023. The reporting boundary for BRSR is as disclosed in Question 13 of Section A of the BRSR, with exceptions, if any, been disclosed as a note under the respective questions under BRSR.

### IDENTIFIED SUSTAINABILITY INDICATORS

The Identified Sustainability Indicators for the year ended March 31, 2023 are summarised in Appendix 1 to this report.

Our limited assurance engagement was with respect to the year ended March 31, 2023 information only and we have not performed any procedures with respect to comparative previous year information i.e. year ended March 31, 2022 reported in the Business Responsibility and Sustainability Report for the year ended March 31, 2023 and, therefore, do not express any conclusion thereon.

### CRITERIA

The criteria used by Welspun Corp Limited is Guidance note for BRSR format.

### MANAGEMENT'S RESPONSIBILITY

The Company's Management is responsible for engagement with stakeholders, content and presentation of the Business Responsibility and Sustainability Report in accordance with the Criteria mentioned above. This responsibility includes the design, implementation and maintenance of internal control relevant to the preparation of the Business Responsibility and Sustainability Report and measurement of Identified Sustainability Indicators, which are free from material misstatement, whether due to fraud or error.

### INHERENT LIMITATIONS

The absence of a significant body of established practice on which to draw to evaluate and measure non-financial indicators allows for different, but acceptable, measures and measurement techniques and can affect comparability between entities. In addition, Greenhouse gas ("GHG") quantification is subject to inherent uncertainty because of incomplete scientific knowledge used to determine emissions factors and the values needed to combine emissions of different gases.

### OUR INDEPENDENCE AND QUALITY MANAGEMENT

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code) and Code of Ethics issued by the Institute of Chartered Accountants of India (ICAI), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Management 1 "Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements" and accordingly maintains a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

### OUR RESPONSIBILITY

Our responsibility is to express a limited assurance conclusion on the Identified Sustainability Indicators based on the procedures we have performed and evidence we have obtained. We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised) 'Assurance

Engagements other than Audits or Reviews of Historical Financial Information', International Standard on Assurance Engagements 3410 'Assurance Engagements on Greenhouse Gas Statements', issued by the International Auditing and Assurance Standards Board. These standards require that we plan and perform this engagement to obtain limited assurance about whether the Identified Sustainability Indicators are free from material misstatement.

A limited assurance engagement involves assessing the suitability in the circumstances of the Company's use of the Criteria as the basis for the preparation of the Identified Sustainability Indicators, assessing the risks of material misstatement of the Identified Sustainability Indicators whether due to fraud or error, responding to the assessed risks as necessary in the circumstances, and evaluating the overall presentation of the Identified Sustainability Indicators.

A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks.

The procedures we performed were based on our professional judgement and included inquiries, observation of processes performed, inspection of documents, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling with underlying records.

Given the circumstances of the engagement, in performing the procedures listed above, we:

- Obtained an understanding of the identified sustainability indicators and related disclosures.
- Obtained an understanding of the assessment criteria and their suitability for the evaluation and /or measurements of the identified sustainability indicators.
- Made enquiries of Company's Management, including those responsible for Sustainability, Environment Social Governance (ESG), Corporate Social Responsibility (CSR), etc., and those with responsibility for managing the Company's BRSR.
- Obtained an understanding and performed an evaluation of the design of the key structures, systems, processes, and controls for managing, recording and reporting on the Identified Sustainability Indicators including at the sites/ offices covered.
- Based on above understanding and the risks that the identified sustainability indicators may be materially misstated, determined the nature, timing and extent of further procedures.
- Checked the consolidation for various sites and corporate office under the reporting boundary (as mentioned in the BRSR) for ensuring the completeness of data being reported.
- Performed limited substantive testing on a sample basis of the Identified Sustainability Indicators at the corporate office and in relation of the samples of the sites visited (Anjar - 2 sites) , to verify that data had been appropriately measured with underlying documents recorded, collated and reported.
- Assessed records and performed testing including recalculation of sample data.
- Assessed the level of adherence to the 'Guidance note for BRSR format' issued by the Securities and Exchange Board of India (SEBI) and followed by the Company in preparing the BRSR.
- Assessed the BRSR for detecting, on a test basis, any major anomalies between the information reported in the BRSR on performance with respect to agreed parameters / Indicators and relevant source data/information.
- Obtained representations from Company's Management.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement. Accordingly, we do not express a reasonable assurance opinion

about whether the Identified Sustainability Indicators have been prepared, in all material respects, in accordance with the Criteria.

### EXCLUSIONS

Our limited assurance scope excludes the following and therefore we do not express a conclusion on the same:

- Testing the operating effectiveness of management systems and controls;
- Performing any procedures over other information/operations of the company/aspects of the report and data (qualitative or quantitative) included in the BRSR not agreed under our engagement letter/ Scope of Assurance
- The statements that describe expression of opinion, belief, aspiration, expectation, aim or future intentions provided by the Company and testing or assessing any forward-looking assertions and/or data.

### LIMITED ASSURANCE CONCLUSION

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that Welspun Corp Limited's Identified Sustainability Indicators included in the Business Responsibility and Sustainability Report (BRSR) for the year ended March 31, 2023 are not prepared, in all material respects, in accordance with the criteria.

### RESTRICTION ON USE

Our limited assurance report including the conclusion has been prepared and addressed to the Board of Directors of the Welspun Corp Limited at the request of the Company solely to assist the Company in reporting on the Company's Sustainability performance and activities. Accordingly, we accept no liability to anyone, other than the Company. Our deliverables should not be used for any other purpose or by any person other than the addressees of our deliverables. The Firm neither accepts nor assumes any duty of care or liability for any other purpose or to any other party to whom our Deliverables are shown or into whose hands it may come without our prior consent in writing.

For **Price Waterhouse Chartered Accountants LLP**  
Firm Registration Number: 012754N/N500016

**Neeraj Sharma**  
Partner

Membership Number: 108391  
UDIN: 23108391BGTBWY1325

Place: Pune  
Date: July 21, 2023

### Identified Sustainability Indicators

#### BRSR Indicators Reference

| S. No | Indicator Number              | Description of the indicator   |
|-------|-------------------------------|--|
| 1     | Section C - Principle 6 - E1  | Details of total energy consumption  |
| 2     | Section C - Principle 6 - E3  | Water withdrawal and water consumption   |
| 3     | Section C - Principle 6 - E5  | Emissions other than GHG emissions Air emissions [excluding Steel division plant (Sponge Iron and Billets division)] |
| 4     | Section C - Principle 6 - E6  | GHG emissions (Scope 1 and Scope 2)  |
| 5     | Section C - Principle 6 - E8  | Total waste generated, recovered and disposed  |
| 6     | Section A - 18a               | Total number of employees and workers  |
| 7     | Section A - 18b               | Total no. of differently -abled employees and workers  |
| 8     | Section A - 19                | Representation of women in Board of Directors and KMP  |
| 9     | Section A - 20                | Turnover rate for permanent employees and workers  |
| 10    | Section C - Principle 3 - E1  | Details of measures for the well-being for employees and workers (excluding day care facilities)                     |
| 11    | Section C - Principle 3 - E5  | Return to work and Retention Rate  |
| 12    | Section C - Principle 3 - E8  | Details of training given to employees and workers (excluding training on skill upgradation)                         |
| 13    | Section C - Principle 3 - E9  | Details of performance and career development reviews of employees and worker  |
| 14    | Section C - Principle 3 - E11 | Safety Incidents (excluding LTIFR)   |
| 15    | Section C - Principle 5 - E1  | Employees and workers who have been provided training on human rights issues and policy(ies) of the entity           |