

4<sup>th</sup> September, 2023

1] **The Secretary**  
**The Calcutta Stock Exchange Limited**  
7, Lyons Range,  
Kolkata- 700 001  
Scrip code: 10023915

2] **Listing Department**  
**National Stock Exchange of India Ltd.**  
Exchange Plaza, Bandra-Kurla Complex,  
Bandra (E), Mumbai - 400 051  
Scrip code: MAITHANALL

**Sub: Business Responsibility and Sustainability Report (BRSR) for the financial year 2022-2023**

Dear Sir/Madam,

We are enclosing herewith a copy of the Business Responsibility and Sustainability Report (BRSR) of the Company for the financial year 2022-2023. The BRSR forms part of the Company's Annual Report for the Financial Year 2022-2023 and is also available on the website of the Company at [www.maithanalloys.com](http://www.maithanalloys.com).

The information has been submitted in compliance with the provisions of Regulation 34 (2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015.

Thanking you,

Yours faithfully,

For **Maithan Alloys Limited**

Rajesh K. Shah  
**Company Secretary**

Encl.: a/a

c.c. **The Corporate Relationship Department**  
**BSE Limited**  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai- 400 001  
Scrip Code: 590078

## Annexure to The Directors' Report - 'H'

# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORTING FORMAT

### SECTION A: GENERAL DISCLOSURES

#### i. Details of the listed entity:

- Corporate Identity Number (CIN) of the Listed Entity:** L27101WB1985PLC039503
- Name of the Listed Entity:** MAITHAN ALLOYS LTD
- Year of incorporation:** 1985
- Registered office address:** 4th Floor, 9, A J C Bose Road, Kolkata-700017
- Corporate address:** 4th Floor, 9, A J C Bose Road, Kolkata-700017
- E-mail:** office@maithanalloys.com
- Telephone:** 033-4063-2393
- Website:** www.maithanalloys.com
- Financial year for which reporting is being done:** 2022-2023
- Name of the Stock Exchange(s) where shares are listed:**
  - The Calcutta Stock Exchange Ltd.
  - National Stock Exchange of India Ltd.
  - The Equity shares of the Company are traded at BSE Limited.
- Paid-up Capital:** ₹ 29.11 crore
- Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:**

**DIN:** 00339855  
**Name:** Mr. Subodh Agarwalla  
**Designation:** Whole-time Director and CEO  
**Telephone No:** 033-4063-2393  
**Email:** office@maithanalloys.com
- Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together):** Standalone basis

#### II. Products/services:

- Details of business activities (accounting for 90% of the turnover):**

| S.No. | Description of Main Activity | Description of Business Activity | % of Turnover of the entity |
|-------|------------------------------|----------------------------------|-----------------------------|
| 1.    | Manufacturing                | Metal and metal products         | 79.06%                      |
| 2.    | Trade                        | Whole sale trading               | 18.81%                      |

- Products /Services sold by the entity (accounting for 90% of the entity's turnover):**

| S.No. | Product/Service | NIC Code | % of total Turnover contributed |
|-------|-----------------|----------|---------------------------------|
| 1.    | Ferro Alloys    | 24104    | 95.30%                          |

#### III. Operations:

- Number of locations where plants and / or operations / offices of the entity are situated:**

| Location      | Number of plants | Number of offices | Total |
|---------------|------------------|-------------------|-------|
| National      | 5                | 2                 | 7     |
| International | 0                | 0                 | 0     |

**17. Markets served by the entity:**

**(a) Number of locations**

| Locations                        | Number |
|----------------------------------|--------|
| National (No. of States)         | 15     |
| International (No. of Countries) | 24     |

**(b) What is the contribution of exports as a percentage of the total turnover of the entity? : 71.52%**

**(c) A brief on types of customers:**

Manufacturers of Steel are the customers of the Company that requires manganese or silicon based Ferro Alloys and includes national & international suppliers of Ferro Alloys to steel manufactures.

**IV. Employees:**

**18. Details as at the end of Financial Year:**

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

| S.No.            | Particulars                                      | Total (A) | Male   |         | Female |        |
|------------------|--|-----------|--------|---------|--------|--------|
|                  |  |           | No.(B) | % (B/A) | No.(C) | %(C/A) |
| <b>EMPLOYEES</b> |  |           |        |         |        |        |
| 1.               | Permanent(D)                                     | 426       | 421    | 98.83   | 5      | 1.17   |
| 2.               | Other than Permanent(E)<br>Total Employees (D+E) | 27        | 27     | 100.00  | 0      | 0.00   |
| 3.               | <b>Total Employees (D+E)</b>                     | 453       | 448    | 98.90   | 5      | 1.10   |
| <b>WORKERS</b>   |  |           |        |         |        |        |
| 4.               | Permanent(F)                                     | 139       | 139    | 100.00  | 0      | 0.00   |
| 5.               | Other than Permanent(G)                          | 1207      | 1116   | 92.46   | 91     | 7.54   |
| 6.               | <b>Total Employees (F+G)</b>                     | 1346      | 1255   | 93.24   | 91     | 6.76   |

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

| S.No.                              | Particulars                  | Total (A) | Male   |         | Female |        |
|------------------------------------|------------------------------|-----------|--------|---------|--------|--------|
|                                    |                              |           | No.(B) | % (B/A) | No.(C) | %(C/A) |
| <b>DIFFERENTLY ABLED EMPLOYEES</b> |                              |           |        |         |        |        |
| 1.                                 | Permanent(D)                 | 0         | 0      | 0.00    | 00     | 0.00   |
| 2.                                 | Other than Permanent(E)      | 0         | 0      | 0.00    | 00     | 0.00   |
| 3.                                 | <b>Total Employees (D+E)</b> | 0         | 0      | 0.00    | 00     | 0.00   |
| <b>DIFFERENTLY ABLED WORKERS</b>   |                              |           |        |         |        |        |
| 4.                                 | Permanent(F)                 | 0         | 0      | 0.00    | 00     | 0.00   |
| 5.                                 | Other than Permanent(G)      | 0         | 0      | 0.00    | 00     | 0.00   |
| 6.                                 | <b>Total Employees (F+G)</b> | 0         | 0      | 0.00    | 00     | 0.00   |

**19. Participation/Inclusion/Representation of women:**

|                          | Total (A) | No. and percentage of Females |         |
|--------------------------|-----------|-------------------------------|---------|
|                          |           | No.(B)                        | % (B/A) |
| Board of Directors       | 8         | 1                             | 12.50   |
| Key Management Personnel | 4         | 0                             | 0.00    |

## Annexure to The Directors' Report - 'E'

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

|                     | FY 2022-2023<br>(Turnover rate in current FY) |        |       | FY 2021-2022<br>(Turnover rate in previous FY) |        |       | FY 2020-2021<br>(Turnover rate in the year prior to the previous FY) |        |       |
|---------------------|---|--------|-------|--|--------|-------|--|--------|-------|
|                     | Male  | Female | Total | Male   | Female | Total | Male   | Female | Total |
| Permanent Employees | 7.34  | 0.17   | 7.52  | 13.25  | 0.35   | 13.60 | 11.30  | 0.18   | 11.47 |
| Permanent Workers   | 3.50  | 0.00   | 3.50  | 6.36   | 0.00   | 6.36  | 6.18   | 0.00   | 6.18  |

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

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

| S. No | Name of the holding/ Subsidiary/Associate companies/ Joint Ventures (A) | Indicate whether holding/subsidiary/ Associate/Joint Venture | % of shares held by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No) |
|-------|---|--|-----------------------------------|--|
| 1.    | Ma Kalyaneshwari Holdings Private Limited                               | Holding Company  | 59.32                             | No   |
| 2.    | AXL-Exploration Private Limited   | Subsidiary Company   | 75                                | No   |
| 3.    | Anjaney Minerals Limited  | Subsidiary Company   | 100                               | No   |
| 4.    | Salanpur Sinters Private Limited  | Subsidiary Company   | 100                               | No   |
| 5.    | Maithan Ferrous Private Limited   | Subsidiary Company   | 80                                | No   |
| 6.    | Impex Metal & Ferro Alloys Ltd  | Subsidiary Company   | 100                               | No   |
| 7.    | Ramagiri Renewable Energy Limited                                       | Subsidiary Company   | 100                               | No   |

### VI. CSR Details:

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

(ii) Turnover (in Rs.): Rs. 2907.56 Crore

(iii) Net worth (in Rs.): Rs. 2730.69 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 complaint is received | Grievance Redressal Mechanism in Place (Yes/No)* | FY 2022-2023<br>Current Financial Year     |  |         | FY 2021-2022<br>Previous Financial Year    |  |         |
|---|--|--|--|---------|--|--|---------|
|   |  | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Communities                                       | Yes *  | -  | -  | -       | -  | -  | -       |
| Investors (other than shareholders)               | Yes*   | -  | -  | -       | -  | -  | -       |
| Shareholders                                      | Yes*   | 19   | -  | -       | 12   | -  | -       |
| Employees and workers                             | Yes*   | -  | -  | -       | -  | -  | -       |
| Customers   | Yes*   | -  | -  | -       | -  | -  | -       |
| Value chain Partners                              | Yes*   | -  | -  | -       | -  | -  | -       |
| Other (please specify)                            | Yes*   | -  | -  | -       | -  | -  | -       |

\*(If Yes, then provide web-link For grievance redress policy):

**Weblink:** For shareholders: <https://www.maithanalloys.com/grievance-redressal/>

For other than shareholders: <https://www.maithanalloys.com/contact/>

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

| S.No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/ opportunity  | In case of risk, Approach to adapt or mitigate  | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|-------|---------------------------|--|--|---|--|
| 1.    | Air Quality               | Risk                                       | Poor ambient air quality may attract penalties. It may also have a negative impact on the community .  | The company has installed adequate numbers of Air Pollution Control Devices such as Gas Cleaning, Dust Extraction Systems Mist Cannons, Rain Guns and Regular maintenance work is done on the equipment for optimum functionality. Ambient air quality is monitored in accordance with a schedule as per prescribed norm. | Negative   |
|       |                           | Risk                                       | The fumes generated during tapping and hot metal handling may have harmful impacts on the working crew | Furnaces are fitted with Fume Extraction Systems and Mist Cannons to suppress fumes and dust. Reasonable levels of air ambience are being maintained and no negative feedback has been received by the company.   | Negative   |

**SECTION B: MANAGEMENT AND PROCESS DISCLOSURES**

**SECTION B: MANAGEMENT AND PROCESS DISCLOSURES**

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

| Disclosure   | P  | P | P | P | P | P | P | P | P |
|--|--|---|---|---|---|---|---|---|---|
| Questions  | 1  | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| <b>Policy and management processes</b>   |  |   |   |   |   |   |   |   |   |
| 1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs.(Yes/No)  | Y  | Y | Y | Y | Y | Y | Y | Y | Y |
| b. Has the policy been approved by the Board? (Yes/No)   | Y  | Y | Y | Y | Y | Y | Y | Y | Y |
| c. Web link of the Policies, if available  | www.maithanalloys.com  |   |   |   |   |   |   |   |   |
| 2. Whether the entity has translated the policy into procedures. (Yes/No)  | Y  | Y | Y | Y | Y | Y | Y | Y | Y |
| 3. Do the enlisted policies extend to your value chain partners? (Yes/No)  | N  | N | N | N | N | N | N | N | N |
| 4. Name of the national and international codes/certifications/labels/standards(e.g .Forest Stewardship council, Fairtrade, Rainforest alliance, Trustea) standards(e.g SA 8000, OHSAS, ISO,BIS) adopted by your entity and mapped to each principle.  | ISO 9001:2015 related to quality management of the products – Principle 2 and 9.   |   |   |   |   |   |   |   |   |
| 5. Specific commitments, goals and targets set by the entity with defined timelines, if any.   | ESG performance is a continuous process and at present the company has not defined any timelines for any specific commitments, goals or target. However, the efforts are being made towards maintaining and improving ESG performance. |   |   |   |   |   |   |   |   |
| 6. Performance of the entity against the specific commitments, goals and targets along with reason in case the same are not met.   | Not Applicable   |   |   |   |   |   |   |   |   |
| <b>Governance, leadership and oversight</b>  |  |   |   |   |   |   |   |   |   |
| 7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure) We believe sustainability is a key pillar to development and growth. Environment protection, customer satisfaction, employee growth and community development are some of the many challenges the Company faces. Towards this end we have taken several responsible business measures to protect the environment, the communities we interact with, our customers, employees, value chain partners and other stakeholders, which are reviewed periodically for continuous improvements.<br><br>We strive towards organisational excellence through robust corporate governance measures and being a responsible business leader by integrating our processes and measures with the value chain. The Company is dedicated to conserve natural resources through process improvements, waste reduction and minimising pollution.<br><br>The Company is also committed to provide a safe and healthy work environment to all employees .<br><br>We have adopted proactive measures and comply with all applicable laws and regulations that contribute to overall holistic growth and development. The CSR team also undertakes various community projects after regular stakeholder consultations that deal with various local issues related to health, sanitation, livelihood etc. |  |   |   |   |   |   |   |   |   |
| 8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility Policy(ies)  | Mr. Subodh Agarwalla, Whole-time Director and CEO (DIN: 00339855)  |   |   |   |   |   |   |   |   |
| 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.  | N  | N | N | N | N | N | N | N | N |

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

| Subject for Review  | Indicate whether review was undertaken by Director/Committee of the Board/ Any other Committee |   |   |   |   |   |   |   |   | Frequency (Annually/Half yearly/Quarterly/ any other Please specify) |   |   |   |   |   |   |   |   |
|---|--|---|---|---|---|---|---|---|---|--|---|---|---|---|---|---|---|---|
|   | P  | P | P | P | P | P | P | P | P | P  | P | P | P | P | P | P | P | P |
|   | 1  | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 1  | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| Performance against above policies and follow up action   | Y  | Y | Y | Y | Y | Y | Y | Y | Y | Q  | Q | Q | Q | Q | Q | Q | Q | Q |
| Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances  | Y  | Y | Y | Y | Y | Y | Y | Y | Y | Q  | Q | Q | Q | Q | Q | Q | Q | Q |
|   | P  | P | P | P | P | P | P | P | P | P  | P | P | P | P | P | P | P | P |
|   | 1  | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |  |   |   |   |   |   |   |   |   |
| 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. | N  | N | N | N | N | N | N | N | N | N  | N | N | N | N | N | N | N | N |

Note: N=NO, Y=Yes and Q= Quarterly

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

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

**SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURES**

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

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

| Essential Indicators  |  |  |  |
|---|--|--|--|
| 1. Percentage coverage by training and awareness programmes on any of the Principles during the financial year: |  |  |  |
| Segment   | Total Number of Training and awareness Programmes held | Topics/ principles covered under the training and its impact                       | %age of persons in respective category covered by the awareness programmes |
| Board of Directors  | 2  | Topics of awareness relating to BRSR policies                                      | 100%   |
| Key Managerial Personnel  | 8  | Topics of awareness relating to BRSR policies                                      | 100%   |
| Employees other than BoD and KMPs   | 4  | Topics covering skill development, Upgradation of knowledge,s Product improvements | 12%  |
| Workers   | 2  | Topics covering safety measures, Upgradation of knowledge and skill development.   | 30%  |

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

| Monetary        |                 |  |                 |                   |   |
|-----------------|-----------------|--|-----------------|-------------------|---|
|                 | NGRBC Principle | Name of the regulatory / Enforcement agencies/ judicial institutions | Amount (In INR) | Brief of the Case | Has an appeal been preferred? (Yes/ No) |
| Penalty/Fine    | Nil             |  |                 |                   |   |
| Settlement      |                 |  |                 |                   |   |
| Compounding fee |                 |  |                 |                   |   |
| Non-Monetary    |                 |  |                 |                   |   |
|                 | NGRBC Principle | Name of the regulatory / Enforcement agencies/ judicial institutions | Amount (In INR) | Brief of the Case | Has an appeal been preferred? (Yes/ No) |
| Imprisonment    | Not applicable  |  |                 |                   |   |
| Punishment      |                 |  |                 |                   |   |

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

| Case Details | Name of the regulatory/ enforcement agencies/judicial institutions |
|--------------|--|
| None         | 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, The company has “Code of Conduct for Directors and Senior Management” in place that presents them from carrying out activities in conflict with the interest of the Company. The weblink for the same is :<https://maithanalloys.com/wp-content/uploads/2017/07/policies/01.Code%20of%20Conduct%20for%20Directors%20and%20Senior%20Management.pdf>

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

|           | FY:2022-2023<br>(Current financial Year)  | FY: 2021-2022<br>(Previous financial Year)  |
|-----------|---|---|
| Directors | No disciplinary action was taken by any law enforcement agency for the charges of bribery/corruption. | No disciplinary action was taken by any law enforcement agency for the charges of bribery/corruption. |
| KMPs      |   |   |
| Employees |   |   |
| Workers   |   |   |

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

|  | FY 2022-2023<br>(Current Financial Year) |         | FY 2021-2022<br>(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 the KMPs      | Nil                                      | -       | Nil                                       | -       |



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 values chain partners on any of the Principles during the financial year:

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

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

Yes, The company has “Code of Conduct for Directors and Senior Management” in place that presents them from carrying out activities in conflict with the interest of the Company.

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

#### Essential Indicators

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

|       | Current Financial Year | Previous Financial Year | Details of improvements in environmental and social impacts |
|-------|------------------------|-------------------------|---|
| R&D   | NIL                    | NIL                     | N.A   |
| Capex | NIL                    | NIL                     | N.A   |

2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)  
b. If yes, what percentage of inputs were sourced sustainably?

The Management prefers to source its inputs from suppliers who are certified to be compliance with social and environment standards.

The entire Power consumption, which is around 25-30% of total input cost, requirements in the process of manufacturing of Ferro Alloys are sourced sustainably through long term “Power Purchase Agreements” who maintains high standards of social and environment standards.

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.

For packing purposes only tarpaulin are used for transportation of ferro alloys. Where ever possible the Company re-uses such tarpaulin. No e-waste are generated during the process of manufacturing of ferro alloys. The Company recycles its semi-finish products which are not usable by the end consumers. It also handles its other waste including by-products (slag) suitably. Slag is diverted either for land filling and/or for fly ash brick making.

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

### Leadership Indicators

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

| NIC Code  | Name of Product /Service | % of total Turnover contributed | Boundary for which the Life cycle Perspective / Assessment Was conducted | Whether conducted by independent external agency (Yes/No) | Results Communicated in public domain (Yes/No) If yes, provide the web-link |
|---|--------------------------|---------------------------------|--|---|---|
| Not applicable. Since the Ferro Alloys are used as raw-material for manufacturing of Steel. |                          |                                 |  |   |   |

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

| Name of Product/ Service | Description of the risk/ concern | Action Taken |
|--------------------------|----------------------------------|--------------|
| NIL                      | NIL                              | NIL          |

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

| Indicate input material   | Recycled or re-used input material to total material |                                      |
|---------------------------|--|--------------------------------------|
|                           | FY2022-23<br>Current Financial Year                  | FY2021-22<br>Previous Financial Year |
| Ferro Manganese Slag (MT) | 289683   | 78121                                |

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

|                                | FY2022-23<br>Current Financial Year |          |                 | FY2021-22<br>Previous Financial Year |          |                 |
|--------------------------------|-------------------------------------|----------|-----------------|--------------------------------------|----------|-----------------|
|                                | Re-Used                             | Recycled | Safely Disposed | Re-Used                              | Recycled | Safely Disposed |
| Plastics (including packaging) | NIL                                 |          |                 |                                      |          |                 |
| E-waste                        |                                     |          |                 |                                      |          |                 |
| Hazardous waste (Used Oil)     | NIL                                 | NIL      | 1000 LTS        | NIL                                  | NIL      | NIL             |
| Other waste                    | NIL                                 |          |                 |                                      |          |                 |

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

| Indicate product category | Reclaimed products and their packaging materials as % of total products sold in respective category |
|---------------------------|---|
|                           | NA  |

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

**Essential Indicators**

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

| <b>% of employees covered by</b>      |            |                  |             |                    |            |                    |         |                    |         |                     |         |
|---------------------------------------|------------|------------------|-------------|--------------------|------------|--------------------|---------|--------------------|---------|---------------------|---------|
| Category                              | Total (A)  | Health Insurance |             | Accident Insurance |            | Maternity Benefits |         | Paternity Benefits |         | Day Care Facilities |         |
|                                       |            | Number (B)       | % (B/A)     | Number (C)         | % (C/A)    | Number (D)         | % (D/A) | Number (D)         | % (D/A) | Number (E)          | % (E/A) |
| <b>Permanent employees</b>            |            |                  |             |                    |            |                    |         |                    |         |                     |         |
| Male                                  | 421        | 421              | 100%        | 172                | 41%        | -                  | -       | -                  | -       | -                   | -       |
| Female                                | 5          | 5                | 100%        | 5                  | 100%       | -                  | -       | -                  | -       | -                   | -       |
| <b>Total</b>                          | <b>426</b> | <b>426</b>       | <b>100%</b> | <b>177</b>         | <b>42%</b> | -                  | -       | -                  | -       | -                   | -       |
| <b>Other than Permanent employees</b> |            |                  |             |                    |            |                    |         |                    |         |                     |         |
| Male                                  | 27         | -                | -           | -                  | -          | -                  | -       | -                  | -       | -                   | -       |
| Female                                | 0          | -                | -           | -                  | -          | -                  | -       | -                  | -       | -                   | -       |
| <b>Total</b>                          | <b>27</b>  | -                | -           | -                  | -          | -                  | -       | -                  | -       | -                   | -       |

b. Details of measures for well-being of employees:

| <b>% of workers covered by</b>      |            |                  |            |                    |         |                    |         |                    |         |                     |         |
|-------------------------------------|------------|------------------|------------|--------------------|---------|--------------------|---------|--------------------|---------|---------------------|---------|
| Category                            | Total (A)  | Health Insurance |            | Accident Insurance |         | Maternity Benefits |         | Paternity Benefits |         | Day Care Facilities |         |
|                                     |            | Number (B)       | % (B/A)    | Number (C)         | % (C/A) | Number (D)         | % (D/A) | Number (D)         | % (D/A) | Number (E)          | % (E/A) |
| <b>Permanent workers</b>            |            |                  |            |                    |         |                    |         |                    |         |                     |         |
| Male                                | 139        | 117              | 84%        | -                  | -       | -                  | -       | -                  | -       | -                   | -       |
| Female                              | 0          | 0                | 0          | -                  | -       | -                  | -       | -                  | -       | -                   | -       |
| <b>Total</b>                        | <b>139</b> | <b>117</b>       | <b>84%</b> | -                  | -       | -                  | -       | -                  | -       | -                   | -       |
| <b>Other than Permanent workers</b> |            |                  |            |                    |         |                    |         |                    |         |                     |         |
| Male                                | -          | -                | -          | -                  | -       | -                  | -       | -                  | -       | -                   | -       |
| Female                              | -          | -                | -          | -                  | -       | -                  | -       | -                  | -       | -                   | -       |
| <b>Total</b>                        | -          | -                | -          | -                  | -       | -                  | -       | -                  | -       | -                   | -       |

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

| Benefits               | FY2022-23<br>Current Financial Year                  |  |  | FY2021-22<br>Previous Financial Year                |   |  |
|------------------------|--|--|--|---|---|--|
|                        | No. of employees covered as a % of total employees * | No. of workers covered As a % of total workers * | Deducted and deposited with the authority (Y/N/N.A)* | No. of employees covered as a % of total employees* | No. of workers covered As a % of total workers* | Deducted and deposited with the authority (Y/N/N.A)* |
| PF                     | 100  | 100  | Y  | 100   | 100   | Y  |
| Gratuity               | 100  | 100  | N.A  | 100   | 100   | N.A  |
| ESI                    | 100  | 100  | Y  | 100   | 100   | Y  |
| Others- Please specify |  |  |  |   |   | N.A  |

\*As per statutory requirements, all entitled employees / workers are covered under PF / ESI & Gratuity

**3. Accessibility to workplaces**

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

Yes, the premises/offices (except Corporate Head Quarter & Branches) of the entity are accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016. Wheelchairs and ramps are available at our locations for access.

**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.**

As a practice MAL does not discriminate against persons with disabilities, however, the Company does not have a written equal opportunity policy in place at the moment

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

We have policy only for maternity leave and none of the employee has availed the said leave during last financial year.

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

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

The Company has a “Grievance Redressal Policy” applicable to all permanent employees. It seeks to promote practices and procedures that ensure creation and sustenance of healthy relationships and expeditious settlement of employee grievance, thereby improving productivity and overall efficiency of the organisation.

As per the policy there are three stages to addressing an employee grievance:

**Stage I:** The grievance must be submitted with requisite documents to the aggrieved employee's immediate supervisor (“relevant authority” at this stage). On receipt, the supervisor will discuss the matter with the aggrieved employee and redress the grievance if it is within their power to do so. A formal response has to be communicated to the employee within ten days of receipt of the grievance with a copy to the HR department.

**Stage II:** If at Stage I the aggrieved employee is not satisfied with the outcome, they can approach the Department/ Functional/Business Unit Head (“relevant authority” at this stage) the grievance to the next stage have to be indicated clearly in the prescribed form. The relevant authority will also meet the aggrieved employee to discuss the grievance in detail. Within ten days of receipt of the grievance the relevant authority has to communicate their response to the employee with a copy to the HR department.

**Stage III:** If dissatisfied with the outcome at Stage II, the employee can approach the Grievance Redressal Committee within seven working days of receipt of formal communication of the outcome, clearly stating the reasons. This Committee will further discuss the matter in detail with the employee. The Committee has to respond within thirty working days of receipt of the grievance with a copy to the HR department.

The decision of the Committee in Stage III is final, and no further appeal can be entertained against their decision. However, unresolved grievances recorded in the monthly reports have to be referred to the CEO for a final decision.

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

| Category                  | FY2022-2023<br>(Current Financial Year)            |   |         | FY2021-2022<br>(Previous Financial Year)           |   |         |
|---------------------------|--|---|---------|--|---|---------|
|                           | Total employees/workers in respective category (A) | No. of employees/workers in respective category, who are part of associations(s) or Union (B) | % (B/A) | Total employees/workers in respective category (A) | No. of employees/workers in respective category, who are part of associations(s) or Union (B) | % (B/A) |
| Total Permanent Employees | 0  | 0   | 0       | 0  | 0   | 0       |
| -Male                     | 0  | 0   | 0       | 0  | 0   | 0       |
| -Female                   | 0  | 0   | 0       | 0  | 0   | 0       |
| Total Permanent Workers   | 0  | 0   | 0       | 0  | 0   | 0       |
| -Male                     | 0  | 0   | 0       | 0  | 0   | 0       |
| -Female                   | 0  | 0   | 0       | 0  | 0   | 0       |

8. Details of training given to employees and workers:

| Category         | FY2022-2023<br>Current Financial Year |                               |           |                      |           | FY2021-2022<br>Previous Financial Year |                               |           |                      |           |
|------------------|---------------------------------------|-------------------------------|-----------|----------------------|-----------|--|-------------------------------|-----------|----------------------|-----------|
|                  | Total (A)                             | On health and Safety measures |           | On Skill upgradation |           | Total (D)                              | On health and Safety measures |           | On Skill upgradation |           |
|                  |                                       | No. (B)                       | % (B/A)   | No. (C)              | % (C/A)   |  | No. (E)                       | % (E/D)   | No. (F)              | % (F/D)   |
| <b>Employees</b> |                                       |                               |           |                      |           |  |                               |           |                      |           |
| Male             | 453                                   | 134                           | 30        | 134                  | 30        | 494                                    | 140                           | 28        | 140                  | 28        |
| Female           | 5                                     | 0                             | 0         | 0                    | 0         | 5                                      | 0                             | 0         | 0                    | 0         |
| <b>Total</b>     | <b>458</b>                            | <b>134</b>                    | <b>29</b> | <b>134</b>           | <b>29</b> | <b>499</b>                             | <b>140</b>                    | <b>30</b> | <b>140</b>           | <b>28</b> |
| <b>Workers</b>   |                                       |                               |           |                      |           |  |                               |           |                      |           |
| Male             | 1255                                  | 264                           | 21        | 264                  | 21        | 1134                                   | 275                           | 24        | 275                  | 24        |
| Female           | 91                                    | 0                             | 0         | 0                    | 0         | 95                                     | 0                             | 0         | 0                    | 0         |
| <b>Total</b>     | <b>1346</b>                           | <b>264</b>                    | <b>20</b> | <b>264</b>           | <b>20</b> | <b>1229</b>                            | <b>275</b>                    | <b>22</b> | <b>275</b>           | <b>22</b> |

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

| Category         | FY2022-2023<br>Current Financial Year |            |           | FY2021-2022<br>Previous Financial Year |            |           |
|------------------|---------------------------------------|------------|-----------|--|------------|-----------|
|                  | Total (A)                             | No. (B)    | % (B/A)   | Total (C)                              | No. (D)    | % (D/C)   |
| <b>Employees</b> |                                       |            |           |  |            |           |
| Male             | 453                                   | 421        | 93        | 494                                    | 462        | 94        |
| Female           | 5                                     | 5          | 100       | 5                                      | 5          | 100       |
| <b>Total</b>     | <b>458</b>                            | <b>426</b> | <b>93</b> | <b>499</b>                             | <b>467</b> | <b>94</b> |
| <b>Workers</b>   |                                       |            |           |  |            |           |
| Male             | 1255                                  | 139        | 11        | 1134                                   | 117        | 10        |
| Female           | 91                                    | 0          | 0         | 95                                     | 0          | 0         |
| <b>Total</b>     | <b>1346</b>                           | <b>139</b> | <b>10</b> | <b>1229</b>                            | <b>117</b> | <b>10</b> |

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

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

Yes, the system relating to occupational health and safety management is in place and covers all the three manufacturing units of the company.

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

Operating procedure of manufacturing of goods are observed by the Production head of each unit at a regular interval apart from routine inspections that are also being carried out to identify the work related hazards and to assess the risk thereof.

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

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

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

| Safety Incident/Number   | Category  | FY2022-2023<br>Current Financial<br>Year | FY2021-2022<br>Previous Financial<br>Year |
|--|-----------|--|---|
| Lost Time Injury Frequency Rate<br>(LTIFR) (per one million-person hours worked) | Employees | NIL                                      | NIL                                       |
|  | Workers   |  |   |
| Total recordable work-related injuries   | Employees |  |   |
|  | Workers   |  |   |
| Number of fatalities   | Employees |  |   |
|  | Workers   |  |   |
| High consequence work-related injury or ill-health (excluding fatalities)        | Employees |  |   |
|  | Workers   |  |   |

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

- Use of safety gears is mandatory during working activities for all workers
- No worker is allowed to work in double shifts
- Sufficient lighting, Cleanliness, proper Ventilation at and around work place
- Only trained adult workers with proper safety wear are allowed to operate machineries.
- To avoid accidents, proper precautions are be taken while working with machines.
- In the case of emergencies where power cut is required, suitable arrangements are made.
- Maintenance of an Ambulance within factory premise.

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

|                       | FY2022-2023<br>(Current Financial Year) |  |         | FY2021-2022<br>(Previous Financial Year) |  |         |
|-----------------------|---|--|---------|--|--|---------|
|                       | Filed during<br>the year                | Pending resolution<br>at the end of year | Remarks | Filed during<br>the year                 | Pending resolution<br>at the end of year | Remarks |
| Working<br>Conditions | Nil                                     | Nil                                      | -       | Nil                                      | Nil                                      | Nil     |
| Health &<br>Safety    | Nil                                     | Nil                                      | -       | Nil                                      | Nil                                      | Nil     |

**14. Assessments for the year:**

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

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

- Skill assessments of new as well as existing workman is being carried out
- Motorised two wheeler use have been restricted inside the plant
- Fall protection provided at floor edges
- Periodic checks of heavy earth moving machineries
- Welding machines and temporary cables lying on the ground are barricaded with a cautioned board
- Electrical installations and equipments are handled only by experienced workers only
- Awareness on proper use of safety gears
- Sprinkling of water at a regular interval to minimize air circulation with dust in and around factory premise
- Electrical installation including switches and electrical board and generators are suitably protected from water and other elements.

**Leadership Indicators**

- 1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).**  
Yes to both employees and workers.
- 2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.** None
- 3. Provide the number of employees /workers having suffered high consequence work-related injury/ ill-health/fatalities (as reported in Q11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:**

|           | Total no. of affected employees/workers |  | No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment |   |
|-----------|---|--|---|---|
|           | FY2022-2023<br>(Current Financial Year) | FY2021-2022<br>(Previous Financial Year) | FY2022-2023<br>(Current Financial Year)   | FY FY2021-2022<br>(Previous Financial Year) |
| Employees | Nil                                     | Nil                                      | Nil   | Nil   |
| Workers   | Nil                                     | Nil                                      | Nil   | Nil   |

- 4. Does the entity provide transition assistance programs to facilities continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/No):** Yes
- 5. Details on assessment of value chain partners**

|                             | % of value chain partners (by value of business done with such partners) that were assessed |
|-----------------------------|---|
| Health and safety practices | Nil   |
| Working conditions          | Nil   |

- 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.** NIL

**PRINCIPLE 4 Businesses should respect the interest of and be responsive to all its stakeholders**

**Essential Indicators**

- 1. Describe the processes for identifying key stakeholder groups of the entity.**  
The key internal and external stakeholders of the Company have been identified based on an assessment of all stakeholders in consultation with the management. These stakeholder groups add value to the organisation and also have an immediate impact on the operations and workings of the Company.

Given this, we constantly engage with our stakeholders to meet their expectations, identify and manage risks, thus contributing to sustainable decisions.

The identified internal and external stakeholder groups are listed in response to Question 2 and broadly include – Employees, Shareholders, Customers, Communities, Suppliers, Partners, and Vendors

**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 & Marginalised 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   |
|-------------------------------------|--|---|---|---|
| Community                           | No   | Community Meetings  | Other – Continuous  | The purpose of engaging with the local community is to provide them the opportunity to discuss local issues such as health, sanitation, livelihood, and infrastructure development, with CSR team of the company. |
| Investors (Other than Shareholders) | No   | Other – Press Release, , In-person Meetings, Conference Calls   | Other – Continuous  | To educate investors about values and business and long-term business strategy of the company.  |
| Shareholders                        | No   | Other – E-mails, Press Release, Website Disclosure, Advertisements  | Other – Continuous  | To educate shareholders about values and business and long-term business strategy of the company.   |
| Employees and Workers               | No   | Other – Company’s Open House Meetings etc   | Other – Continuous  | For career management and growth. To identify learning opportunities.   |
| Customers                           | No   | E-mails, In-person Meetings, Conferences  | Quarterly   | The purpose of interacting with customers is to identify opportunities to improve our product and also to understand our customers’ needs and identify industry and business challenges.                          |
| Value Chain Partners                | No   | E-mails, Meetings   | Other – Continuous  | To ensure compliance with statutory requirements and to build long lasting sustainable relationships.   |

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

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

| Category               | FY2022-23<br>Current Financial Year |                                       |            | FY2021-22<br>Previous Financial Year |                                       |            |
|------------------------|-------------------------------------|---------------------------------------|------------|--------------------------------------|---------------------------------------|------------|
|                        | Total (A)                           | No. of employees/ workers covered (B) | % (B/A)    | Total (C)                            | No. of employees/ workers covered (D) | % (D/C)    |
| <b>Employees</b>       |                                     |                                       |            |                                      |                                       |            |
| Permanent              | 426                                 | 64                                    | 15%        | 467                                  | 79                                    | 17%        |
| Other than Permanent   | 27                                  | 1                                     | 4%         | 22                                   | 1                                     | 5%         |
| <b>Total Employees</b> | <b>453</b>                          | <b>65</b>                             | <b>14%</b> | <b>489</b>                           | <b>80</b>                             | <b>16%</b> |
| <b>Workers</b>         |                                     |                                       |            |                                      |                                       |            |
| Permanent              | 139                                 | 17                                    | 12%        | 117                                  | 18                                    | 15%        |
| Other than Permanent   | 1207                                | 121                                   | 10%        | 1122                                 | 135                                   | 12%        |
| <b>Total Workers</b>   | <b>1346</b>                         | <b>138</b>                            | <b>10%</b> | <b>1239</b>                          | <b>153</b>                            | <b>12%</b> |



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

| Category                        | FY2022-23<br>Current Financial Year |                          |            |                           |            | FY2021-22<br>Previous Financial Year |                          |            |                           |            |
|---------------------------------|-------------------------------------|--------------------------|------------|---------------------------|------------|--------------------------------------|--------------------------|------------|---------------------------|------------|
|                                 | Total<br>(A)                        | Equal to<br>Minimum Wage |            | More than<br>Minimum Wage |            | Total<br>(D)                         | Equal to<br>Minimum Wage |            | More than<br>Minimum Wage |            |
|                                 |                                     | No.<br>(B)               | %<br>(B/A) | No.<br>(C)                | %<br>(C/A) |                                      | No.<br>(E)               | %<br>(E/D) | No.<br>(F)                | %<br>(F/D) |
| <b>Employees</b>                |                                     |                          |            |                           |            |                                      |                          |            |                           |            |
| <b>Permanent</b>                |                                     |                          |            |                           |            |                                      |                          |            |                           |            |
| Male                            | 421                                 |                          |            | 421                       | 100        | 462                                  |                          |            | 462                       | 100        |
| Female                          | 5                                   |                          |            | 5                         | 100        | 5                                    |                          |            | 5                         | 100        |
| <b>Other than<br/>Permanent</b> |                                     |                          |            |                           |            |                                      |                          |            |                           |            |
| Male                            | 27                                  |                          |            | 27                        | 100        | 32                                   |                          |            | 32                        | 100        |
| Female                          | 0                                   |                          |            | 0                         | 100        | 0                                    |                          |            | 0                         | 100        |
| <b>Workers</b>                  |                                     |                          |            |                           |            |                                      |                          |            |                           |            |
| <b>Permanent</b>                |                                     |                          |            |                           |            |                                      |                          |            |                           |            |
| Male                            | 139                                 |                          |            | 139                       | 100        | 117                                  |                          |            | 117                       | 100        |
| Female                          | 0                                   |                          |            | 0                         | 100        | 0                                    |                          |            | 0                         | 100        |
| <b>Other than<br/>Permanent</b> |                                     |                          |            |                           |            |                                      |                          |            |                           |            |
| Male                            | 1116                                |                          |            | 1116                      | 100        | 1017                                 |                          |            | 1017                      | 100        |
| Female                          | 91                                  |                          |            | 91                        | 100        | 95                                   |                          |            | 95                        | 100        |

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

|                                     | Male   |   | Female |  |
|-------------------------------------|--------|---|--------|--|
|                                     | Number | Median remuneration/salary/<br>Wages of respective<br>category* | Number | Median<br>remuneration/salary/<br>Wages of respective<br>category* |
| Board of Directors<br>(BoD)         | 8      | NA*   | 1      | NA*  |
| Key Managerial<br>Personnel         | 4      | 11,64,66,706 (Annually)   | 0      | -  |
| Employees other than BoD and<br>KMP | 419    | 18,625 (Per Month)  | 5      | 18,625 (Per Month)   |
| Workers                             | 139    | 11,100 (Per Month)  | 0      | 11,100 (Per Month)   |

\*The Directors are entitled to sitting fee only

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

The Company has established committees under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Policy and Grievance Redressal Policy to address various issues. The Grievance Redressal Policy addresses grievances relating to bias, favouritism, victimisation, and humiliation

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

The organisation has various policies such as "Whistleblower Policy," "Grievance Redressal Policy," "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Policy," that address various human rights issues. Written complaints received from aggrieved persons are addressed in accordance with the procedures laid down in these policies.

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

|                                   | FY2022-2023<br>Current Financial Year |                                       |         | FY2021-2022<br>Current Financial Year |                                       |         |
|-----------------------------------|---------------------------------------|---------------------------------------|---------|---------------------------------------|---------------------------------------|---------|
|                                   | Filed during the year                 | Pending resolution at the end of year | Remarks | Filed during the year                 | Pending resolution at the end of year | Remarks |
| Sexual Harassment                 | Nil                                   | Nil                                   | -       | Nil                                   | Nil                                   | -       |
| Discrimination at workplace       | Nil                                   | Nil                                   | -       | Nil                                   | Nil                                   | -       |
| Child Labour                      | Nil                                   | Nil                                   | -       | Nil                                   | Nil                                   | -       |
| Forced Labour/ Involuntary Labour | Nil                                   | Nil                                   | -       | Nil                                   | Nil                                   | -       |
| Wages                             | Nil                                   | Nil                                   | -       | Nil                                   | Nil                                   | -       |
| Other human rights related issues | Nil                                   | Nil                                   | -       | Nil                                   | Nil                                   | -       |

7. **Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases. The Company has a zero tolerance policy towards harassment of any kind, including sexual harassment.**

As per the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Policy (the policy), in order to conduct a free and fair enquiry and avoid adverse consequences to the complainant the Internal Committee constituted under this policy may recommend any of the following to the management:

- Transfer the aggrieved woman (complainant) or respondent to any other workplace.  
In addition:
- During the enquiry proceedings the complainant and/or their witnesses shall be called separately to ensure an atmosphere free of intimidation.  
In case of redressal of other grievances (related to supervision, viz bias, favouritism, etc. or victimisation, humiliation and disputes with other employees, covered under the Company's "Grievance Redressal Policy"), the policy strictly stipulates that an "aggrieved employee" shall not be victimised for raising a grievance.

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

Yes, human rights requirements do form a part of our business agreements and contracts. Contracts with service providers and material suppliers mandate that the vendor must not engage child labour while providing services/ material. The Company also ensures that all contractual workers are paid a minimum wage

9. **Assessments for the year: FY 2022-2023**

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

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

There were no significant risks/concerns arising from the assessment

## Leadership Indicator

- Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.**  
Majority of our employees are provided with human rights training. There is a policy on Human Rights of the Company available on intranet and website of the Company. For all new employees who are on boarded, Human Rights awareness is part of the induction session. For workers category, face to face/ classroom session on the code of conduct is done which includes aspects of Human Rights.
- Details of the scope and coverage of any Human rights due-diligence conducted.** NA
- 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?** No
- Details on assessment of value chain partners:**

|                                   | % of value chain partners (by value of business done with such partners) that were assessed |
|-----------------------------------|---|
| Sexual Harassment                 | 0.00%   |
| Discrimination at workplace       | 0.00%   |
| Child Labour                      | 0.00%   |
| Forced Labour/ Involuntary Labour | 0.00%   |
| Wages                             | 0.00%   |
| Others-please specify             | 0.00%   |

- 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

- Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:

| Parameter   | FY 2022-2023<br>(Current Financial Year) | FY2021-2022<br>(Previous Financial Year) |
|---|--|--|
| Total electricity consumption (A) Mw/hr   | 768,363                                  | 839,073                                  |
| Total fuel consumption (B)  | NIL                                      | NIL                                      |
| Energy consumption through other sources (C)  | NIL                                      | NIL                                      |
| <b>Total energy consumption(A+B+C)</b>  | 768,363                                  | 839,073                                  |
| Energy intensity per rupee of turnover<br>(Total energy consumption/ turnover in rupees) kj/rupee | 95.135                                   | 98.792                                   |
| Energy intensity (optional)- the relevant metric may be selected by the entity                    | Nil                                      | Nil                                      |

**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**

- 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. NO**

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

| Parameter   | FY 2022-2023<br>(Current Financial Year) | FY2021-2022<br>(Previous Financial Year) |
|---|--|--|
| <b>Water withdrawal by source (in kiloliters)</b>                                       |  |  |
| (i) Surface water   | 434,305                                  | 442,631                                  |
| (ii) Groundwater  | -  | -  |
| (iii) Third party water   | -  | -  |
| (iv) Seawater/desalinated water   | -  | -  |
| (v) Others  | -  | -  |
| <b>Total volume of water withdrawal (in kiloliters)<br/>(i+ii+iii+iv+v)</b>             | 434,305                                  | 442,631                                  |
| <b>Total volume of water consumption (in kiloliters)</b>                                | 434,305                                  | 442,631                                  |
| <b>Water intensity per rupee of turnover</b><br>(water consumed/turnover)litres/ rupee  | 0.0149                                   | 0.0145                                   |
| <b>Water intensity (optional)-</b><br>The relevant metric may be selected by the entity | NIL                                      | NIL                                      |

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.

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 2022-23<br>(Current Financial Year) | FY 2021-22<br>(Previous Financial Year) |
|---------------------------------------|---------------------|--|---|
| NOx MICROGRAM/CUM                     |                     | 58.84                                  | 57.88                                   |
| Sox MICROGRAM/CUM                     |                     | 64.77                                  | 64.00                                   |
| Particulate matter (PM) MICROGRAM/CUM |                     | 70.12                                  | 66.47                                   |
| Persistent organic pollutants (POP)   | NA                  | NA                                     | NA                                      |
| Volatile organic compounds (VOC)      | NA                  | NA                                     | NA                                      |
| Hazardous air pollutants (HAP)        | NA                  | NA                                     | NA                                      |
| Others-please specify                 | NA                  | NA                                     | NA                                      |

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

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

| Parameter  | Unit                            | FY 2022-2023<br>(Current Financial Year) | FY2021-2022<br>(Previous Financial Year) |
|--|---------------------------------|--|--|
| <b>Total Scope 1 emissions</b><br>(Break-up of GHG into CO2, CH4,N2O,HFCs,PFCs,SF6,NF3, if available)                | Metric tonnes of CO2 equivalent | NA                                       | NA                                       |
| <b>Total Scope 2 emissions</b><br>(Break-up of GHG into CO2, CH4,N2O,HFCs,PFCs,SF6,NF3, if available)                | Metric tonnes of CO2 equivalent | NA                                       | NA                                       |
| <b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b>   |                                 | NA                                       | NA                                       |
| <b>Total Scope 1 and Scope 2 emission intensity (optional)</b><br>-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.

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

The Company continuously plants saplings on the over burden dump, safety zones, haulage road barriers, public road barriers. etc. at the mines, with good survival rates

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

| Parameter  | FY2022-23<br>(Current financial Year) | FY2021-22<br>(Previous Financial Year) |
|--|---------------------------------------|--|
| <b>Total Waste generated (in metric tonnes)</b>  |                                       |  |
| Plastic waste (A)  | NIL                                   |  |
| E-waste (B)  |                                       |  |
| Bio-medical waste (C)  |                                       |  |
| Construction and demolition waste (D)  |                                       |  |
| Battery waste (E)  |                                       |  |
| Radioactive waste (F)  |                                       |  |
| Other Hazardous waste. Please specify, If any. (G) <b>Used Oil</b>   | 1000 Litres                           | NIL                                    |
| Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials Relevant to the sector)            | NIL                                   | NIL                                    |
| <b>Total (A+B+C+D+E+F+G+H)</b>   |                                       |  |
| <b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b> |                                       |  |
| <b>Category of waste</b>   |                                       |  |
| (i) Recycled   | NO                                    | NO                                     |
| (ii) Re-used   | NO                                    | NO                                     |
| (iii) Other recovery operations  | SOLD TO AUTHORISED RECYCLES           | SOLD TO AUTHORISED RECYCLES            |
| <b>Total</b>   |                                       |  |
| <b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>                              |                                       |  |
| <b>Category of waste</b>   |                                       |  |
| (i) Incineration   | NA                                    | NA                                     |
| (ii) Landfilling   | 53339 MT                              | 58900 MT                               |
| (iii) Other disposal operations(For Fly Ash brick)   | 65627 MT                              | 79233 MT                               |
| <b>Total</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.NO

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

The company has a well-established waste management system in place. Slag generated is used for land filling. Fly Ask generated is utilized in the brick industry.

**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.**

No.

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

| Name and brief details of project | EIA Notification No. | Date | Whether conducted by independent external agency (Yes/No) | Results communicated in public domain (Yes/No) | Relevant Web link |
|-----------------------------------|----------------------|------|---|--|-------------------|
| NA                                |                      |      |   |  |                   |

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

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

### 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   | FY2022-23<br>(Current Financial Year) | FY2021-22<br>(Previous Financial Year) |
|---|---------------------------------------|--|
| <b>From renewable sources</b>                                   |                                       |  |
| Total electricity consumption(A)                                |                                       |  |
| Total fuel consumption(B)                                       | NIL                                   | NIL                                    |
| Energy consumption through other Sources (C)                    | NIL                                   | NIL                                    |
| <b>Total energy consumed from renewable sources (A+B+C)</b>     | NIL                                   | NIL                                    |
| <b>From non-renewable sources</b>                               |                                       |  |
| Total electricity consumption (D) MW/hr                         | 768,363                               | 839,073                                |
| Total fuel consumption (E)                                      | Nil                                   | Nil                                    |
| Energy consumption through other sources                        | Nil                                   | Nil                                    |
| <b>Total energy consumed from non-renewable sources (D+E+F)</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.  
No.

2. Provide the following details related to water discharged:

| Parameter   | FY2022-23<br>(Current Financial Year)          | FY2021-22<br>(Previous Financial Year)         |
|---|--|--|
| <b>Water discharged by destination and level of treatment (in kiloliters)</b> |  |  |
| (i) To Surface water  | NA   | NA   |
| - No treatment  |  |  |
| - With treatment -please specify level of treatment                           | 7300KL   | 7300KL   |
| (ii) To Groundwater   | NA   | NA   |
| - No treatment  |  |  |
| - With treatment -please specify level of treatment                           | Cooling water softner(backwash)- PH neutralise | Cooling water softner(backwash)- PH neutralise |
| (iii) To Seawater   | NA   | NA   |
| - No treatment  |  |  |
| - With treatment -please specify level of treatment                           |  |  |
| (iv) Sent to third-parties  | NA   | NA   |
| - No treatment  |  |  |
| - With treatment -please specify level of treatment                           |  |  |
| (v) Others  |  |  |
| - No treatment  |  |  |
| - With treatment -please specify level of treatment                           |  |  |
| <b>Total water discharged (in kiloliters)</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. No

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

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

| Parameter   | Unit  | FY2022-23<br>(Current Financial Year) | FY2021-22<br>(Previous Financial Year) |
|---|---|---------------------------------------|--|
| <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) | Metric tonnes of CO <sub>2</sub> equivalent | NA                                    | NA                                     |
| <b>Total Scope 3 emissions per rupee of turnover</b>  |   |                                       |  |
| <b>Total Scope 3 emission intensity (optional) –</b><br>The relevant metric may be selected by the entity   |   |                                       |  |

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

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. NA

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 : No

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

The Company and all the locations have a business continuity and a disaster management plan in place. The Main objective of BCP is to maintain business continuity under disruptive incidents with an aim to minimize impact on-

- Human Life and other living beings
- Environment and related eco systems
- Economic losses
- All stakeholders(such as investors,employees)
- To make this BCP more robust, Company plans training and awareness sessions across the plant locations. Apart from training,BCP testing is done periodically to check its efficacy and improving it further based on the gaps observed during testing.

**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 has been no significant adverse impact to the environment arising from our value chain partners.

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

Although informal and formal awareness programs are being conducted for the value chain partners, we are yet to collect and collate the data and information in the required format.

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

**Essential Indicators**

1. a. Number of affiliations with trade and industry chambers/associations. 4
- b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of /affiliated to.

| S.No. | Name of the trade and industry chambers/associations | Reach of trade and industry chambers/ associations (State/National) |
|-------|--|---|
| 1.    | Confederation of Indian Industry                     | National  |
| 2.    | Indian Chamber of Commerce                           | National  |
| 3.    | FOSBECCI Association                                 | State   |
| 4.    | Damodar Valley Power Consumers' Association          | State   |

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 |
|-------------------|-------------------|-------------------------|
| None              |                   |                         |

**Leadership Indicators**

1. Details of public policy positions advocated by the entity:



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

| S.No. | Public Policy advocated | Method resorted for such advocacy | Whether information available in public domain? (Yes/No) | Frequency of review by Board (Annually/ Half yearly/ Quarterly/Others-please specify) | Web-link, if available |
|-------|-------------------------|-----------------------------------|--|---|------------------------|
| None  |                         |                                   |  |   |                        |

**PRINCIPLE 8 Businesses should promote inclusive growth and equitable development**  
**Essential Indicators**

- 1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.**  
 The Company has not undertaken any Social Impact Assessments in the current financial year.
- 2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:**  
 The Company currently does not have any project for which rehabilitation and resettlement is required.
- 3. Describe the mechanisms to receive and redress grievances of the community. Grievances of the community are reported to concerned officers at respective locations,.**  
 These grievances are escalated to senior management, who provide resolution after careful deliberations.

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

|   | FY2022-23<br>Current Financial Year | FY2021-2022<br>Previous Financial |
|---|-------------------------------------|-----------------------------------|
| Directly sourced from MSME/Small producers                          | 0.20%                               | 0.12%                             |
| Sourced directly from within the district and neighboring districts | 28%                                 | 27%                               |

**Leadership Indicators**

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

| Details of negative social impact identified | Corrective action taken |
|--|-------------------------|
| NA   | NA                      |

- 2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies: No**
- 3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? No**
- 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: NA**

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.** NA

6. **Details of beneficiaries of CSR Projects:**

The company prefers to carry out its CSR Project and programmes through divers means. The Company has setup its own Trust namely BMA Foundation, to carry out CSR Project and programs. The Company also support Government / Non-Government structures / setup and encourages. In – house team to initiate CSR programmes.

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

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

**Customer complaints:** The mechanisms in place to receive and respond to customer complaints on export and domestic sales are described below:

**Export Sales:** Customers notify the Sales and Marketing Department (S&M) of any non-conformity. The S&M Department analyses the complaint and:

(a) if it pertains to quality (chemical and size of the product), it is forwarded to the Head of Manufacturing, Production in-charge, Quality Control (QC) in-charge at the plant for investigation.

(b) Other complaints are investigated by the S&M department.

If the issue (related to size deviation) can be resolved as per the provisions of the contract at the destination, the Head of S&M shall try to do so with the customer after consultation with the Ferro Alloys Business Unit Head. If required, a Company representative(s) may visit the customer to assess and determine the cause of the non-conformity. The Company representative's report is submitted to the Head of Sales & Marketing, who in turn in consultation with the Ferro Alloys Business Unit Head, takes suitable corrective and preventive actions.

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

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

No Complaints have been received in any of the given categories in the current or previous financials year.

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

Product recalls are not applicable to the company.

MALs product Ferro Alloys is a non-hazardous, non-toxic item used as a raw material in the steel industry. It does not pose any threat to the customer, i.e. steel manufacturers and therefore, there are no product recalls on account of safety issues.

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

Yes, the entity has a policy on cyber security and risks related to data privacy. The policy is available with the IT department.

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

During the year, there are no reported 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.