

#### VARDHMAN SPECIAL STEELS LIMITED

LUDHIANA-141010, PUNJAB T: +91-161-2228943-48 F: +91-161-2601048, 2222616, 2601040 El secretarial Jud Deanthrain com

#### Ref. VSSL:SCY:SEP:2023-24

#### Dated: 5-Sep-2023

| BSE Limited,                   | The National Stock Exchange of India Ltd |
|--------------------------------|--|
| New Trading Ring,              | Exchange Plaza, Bandra-Kurla Complex,    |
| Rotunda Building, P.J. Towers, | Bandra (East),                           |
| Dalal Street, MUMBAI-400001.   | MUMBAI-400 051                           |
| Scrip Code: 534392             | Scrip Code: VSSL                         |

#### SUB: BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

Dear Sir.

Pursuant to Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Business Responsibility and Sustainability Report for the Financial Year 2022-23, which also forms part of the 13<sup>th</sup> Annual Report of the Company.

Please take the same on records

Thanking you,

Yours faithfully,

For VARDHMAN SPECIAL STEELS LIMITED

(SONAM TANEJA) COMPANY SECRETARY



# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

#### **SECTION A: GENERAL DISCLOSURES**

I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity

2. Name of the Listed Entity

3. Year of incorporation

4. Registered office address

5. Corporate address

6. E-mail

7. Telephone

8. Website

9. Financial year for which reporting is being done

11. Paid-up Capital

on the BRSR report

: L27100PB2010PLC033930

: Vardhman Special Steels Limited

: Vardhman Premises, Chandigarh Road,

Ludhiana-141010.

: Vardhman Premises, Chandigarh Road,

Ludhiana-141010.

: secretarial.lud@vardhman.com

: 0161-2228943-48, 2670707-09, 2675243

: www.vardhman.com/ www.vardhmansteel.com

: FY 2022-23

10. Name of the Stock Exchange(s) where shares are listed : BSE Limited

National Stock Exchange of India Limited

: ₹ 40.63 crores

**12. Name and contact details (telephone, email address) of** : Mr. Sachit Jain

the person who may be contacted in case of any queries Vice-Chairman & Managing Director

email ID- secretarial.lud@vardhman.com

Telephone-0161-2251245

13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).: Standalone.

## II. Products/services:

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

| S. No. | Description of Main Activity | Description of Business<br>Activity | % of Turnover of the entity |
|--------|------------------------------|-------------------------------------|-----------------------------|
| 1      | Manufacturing                | Special & Alloy Steel               | 100%                        |

## 15. 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      | Steel bars, rods and bright bars of | 241      | 100%                            |
|        | various grades and sizes.           |          |                                 |

## III. Operations

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

| Location      | Number of plants | Number of offices | Total |
|---------------|------------------|-------------------|-------|
| National      | 1                | 8                 | 9     |
| International | 0                | 0                 | 0     |

## 17. Markets served by the entity:

#### a. Number of locations

| Locations                        | Number |
|----------------------------------|--------|
| National (No. of States)         | 12     |
| International (No. of Countries) | 9      |

Being a consistent supplier of quality special steels to leading automotive OEMs, the Company enjoys a pan-India marketing footprint. Having adopted a customer-centric business approach since inception, the Company's client base has expanded considerably. It has also helped the Company in establishing an international presence.

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

Exports play a key role in the economy, impacting the level of economic growth, employment and balance of payments.

Although, VSSL is predominantly a domestic player, it enjoys an international presence in important markets for niche products. In FY23, exports comprised 5% of the Company's turnover. This number is expected to increase over the coming years owing to its Joint Venture with Aichi Steel - it will export quality and niche steel to various global forging companies of its joint venture partner.

## c. A brief on types of customers:

The Tier I & II suppliers for Auto OEs in India is the primary market for the Company's products. Indian and International component manufacturers for passenger cars, two wheelers, commercial vehicles, etc. form a significant part of Company's clientele.



# IV. Employees

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

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

| S.        | Particulars              | Total | М       | ale       | Fer     | nale      |  |
|-----------|--------------------------|-------|---------|-----------|---------|-----------|--|
| No.       |                          | (A)   | No. (B) | % (B / A) | No. (C) | % (C / A) |  |
| EMPLOYEES |                          |       |         |           |         |           |  |
| 1.        | Permanent (D)            | 400   | 382     | 95.50     | 18      | 4.50      |  |
| 2.        | Other than Permanent (E) | 3     | 2       | 66.67     | 1       | 33.33     |  |
| 3.        | Total employees (D + E)  | 403   | 384     | 95.29     | 19      | 4.71      |  |
| WOF       | KERS                     |       |         |           |         |           |  |
| 4.        | Permanent (F)            | 725   | 723     | 99.72     | 2       | 0.28      |  |
| 5.        | Other than Permanent (G) | 655   | 650     | 99.24     | 5       | 0.76      |  |
| 6.        | Total workers (F + G)    | 1380  | 1373    | 99.49     | 7       | 0.51      |  |

# b. Differently abled Employees and workers:

| S.                          | Particulars                               | Total | М       | Male      |         | nale      |  |
|-----------------------------|---|-------|---------|-----------|---------|-----------|--|
| No                          | Particulars                               | (A)   | No. (B) | % (B / A) | No. (C) | % (C / A) |  |
| DIFFERENTLY ABLED EMPLOYEES |   |       |         |           |         |           |  |
| 1.                          | Permanent (D)                             | 1     | 1       | 100       | 0       | 0         |  |
| 2.                          | Other than Permanent (E)                  | 0     | 0       | 0         | 0       | 0         |  |
| 3.                          | Total differently abled employees (D + E) | 1     | 1       | 100       | 0       | 0         |  |
| DIFF                        | ERENTLY ABLED WORKERS                     |       |         |           |         |           |  |
| 4.                          | Permanent (F)                             | 13    | 13      | 100       | 0       | 0         |  |
| 5.                          | Other than permanent (G)                  | 5     | 5       | 100       | 0       | 0         |  |
| 6.                          | Total differently abled workers (F + G)   | 18    | 18      | 100       | 0       | 0         |  |

# 19. Participation/Inclusion/Representation of women:

(as on 31st March, 2023)

|                          | Total (A) | No. and perce | ntage of Females |
|--------------------------|-----------|---------------|------------------|
|                          | Total (A) | No. (B)       | % (B / A)        |
| Board of Directors       | 12        | 2             | 16.67            |
| Key Management Personnel | 3         | 1             | 33.33            |

# 20. Turnover rate for permanent employees and workers:

|                     | FY 2022-23 |        | FY 2021-22 |      |        | FY 2020-21 |      |        |       |
|---------------------|------------|--------|------------|------|--------|------------|------|--------|-------|
|                     | Male       | Female | Total      | Male | Female | Total      | Male | Female | Total |
| Permanent Employees | 9.9%       | 9.8%   | 9.9%       | 6.8% | 4.5%   | 6.7%       | 6.2% | 4.3%   | 6.1%  |
| Permanent Workers   | 3.5%       | 0%     | 3.5%       | 4.0% | 0%     | 4.0%       | 4.9% | 0%     | 4.9%  |

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

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

| S.<br>No. | Name of the holding /<br>subsidiary / associate<br>companies / joint<br>ventures (A) | Indicate whether<br>holding/ Subsidiary/<br>Associate/ Joint<br>Venture | % of shares<br>held by listed<br>entity | Does the entity indicated at column<br>A, participate in the Business<br>Responsibility initiatives of the<br>listed entity? (Yes/No) |
|-----------|--|---|---|---|
|           | NIL  | N.A.  | N.A.                                    | N.A.  |

## **VI. CSR Details**

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

(ii) Turnover (₹ in crores): 1,734.99 (iii) Net worth (₹ in crores): 642.21

# VII. Transparency and Disclosure Compliances

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

| Stakeholder                                 | Grievance<br>Redressal<br>Mechanism<br>in place (Yes/<br>No)                |   | FY 2022-23  |         | FY 2021-22  |   |         |  |
|---|---|---|---|---------|---|---|---------|--|
| group from<br>whom complaint<br>is received | (If Yes, then<br>provide<br>web-link for<br>grievance<br>redress<br>policy) | Number of<br>complaints<br>filed during<br>the year | Number of<br>complaints<br>pending<br>resolution<br>at close of<br>the year | Remarks | Number of<br>complaints<br>filed during<br>the year | Number of<br>complaints<br>pending<br>resolution<br>at close of<br>the year | Remarks |  |
| Communities                                 | Yes   | Nil   | Nil   | Nil     | Nil   | Nil   | Nil     |  |
| Investors (other than shareholders)         | Yes   | Nil   | Nil   | Nil     | Nil   | Nil   | Nil     |  |
| Shareholders                                | Yes   | Nil   | Nil   | Nil     | Nil   | Nil   | Nil     |  |
| Employees and workers                       | Yes   | 1   | 0   | Nil     | 1   | 0   | Nil     |  |
| Customers                                   | Yes   | 27  | 0   | Nil     | 25  | 0   | Nil     |  |
| Value Chain<br>Partners                     | Yes   | Nil   | Nil   | Nil     | Nil   | Nil   | Nil     |  |
| Other (please specify)                      | Nil   | Nil   | Nil   | Nil     | Nil   | Nil   | Nil     |  |



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

| S<br>No. | Material issue<br>identified    | Indicate<br>whether<br>risk or<br>opportunity<br>(R/O) | Rationale for identifying the risk / opportunity   | In case of risk, approach<br>to adapt or mitigate  | Financial implications of the risk or opportunity (Indicate positive or negative implication) |
|----------|---------------------------------|--|--|--|---|
| 1        | Corporate<br>Governance         | Risk   | Impact on the ethical fabric of the organisation   | Eminent personalities on the Board for maintaining checks and balances; maker-checker approach for all processes organisation-wide | Negative  |
| 2        | Economic performance            | Risk   | Economic slowdown will dampen demand               | Enhance market, customer and geographic diversity  | Negative  |
| 3        | Occupational<br>health & safety | Risk   | output in the short-term                           | Aligning with safety<br>standards of global partner<br>to achieve Zero-accident<br>status  | Negative  |
| 4        | People<br>management            | Opportunity  | Strong employee bond to drive growth               |  | Positive  |
| 5        | Quality<br>management           | Opportunity  | Superior quality to enhance respect and returns    |  | Positive  |
| 6        | Waste<br>Management             | Opportunity  | Strengthens the sustainability quotient            |  | Negative  |
| 7        | Customer<br>Management          | Opportunity  | Superior service to enhance business opportunities |  | Positive  |
| 8        | Energy<br>Management            | Opportunity  | Cost optimisation to enhance margins               |  | Positive  |
| 9        | Local<br>community              | Opportunity  | Stronger relations leading to a thriving ecosystem |  | Negative  |

# **SECTION B: MANAGEMENT AND PROCESS DISCLOSURES**

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

| Disclosure Questions  | P 1    | P 2   | P 3 | P 4      | P 5                       | P 6 | P 7 | P 8                  | P 9 |
|---|--------|-------|-----|----------|---------------------------|-----|-----|----------------------|-----|
| Policy and management processes   |        |       |     |          |                           |     |     |                      |     |
| 1. a. Whether your entity's policy/policies cover each principle and its core element of the NGRBCs. (Yes/No) | s Y    | Υ     | Υ   | Υ        | Υ                         | Υ   | Υ   | Υ                    | Υ   |
| b. Has the policy been approved by the Board? (Yes/No)  | Υ      | Υ     | Υ   | Υ        | Υ                         | Υ   | Υ   | Υ                    | Υ   |
| c. Web Link of the Policies, if available   | of the | Compa |     | tps://wv | any are<br><u>ww.vard</u> |     |     | e website<br>estors/ | e   |

| 2.                              | Whether the entity has translated the policy into procedures. (Yes / No)  | Υ | Υ   | Υ    | Υ                       | Υ                            | Υ  | Υ       | Υ       | Υ                         |
|---------------------------------|---|---|---|------|-------------------------|------------------------------|--|---------|---------|---------------------------|
| 3.                              | Do the enlisted policies extend to your value chain partners? (Yes/No)  |   | w of the  |      |                         |                              | Compa  | ıny hav | e exten | ded                       |
| 4.                              | Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trusted) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | N | Y<br>ISO<br>14001:<br>2015,<br>ISO<br>45001:<br>2018,<br>ISO<br>9001:<br>2015 | 2018 | Y<br>ISO: 45001<br>2018 | Y<br>ISO<br>: 45001:<br>2018 | Y<br>ISO<br>14001:<br>2015,<br>ISO<br>45001:<br>2015 |         | N       | Y<br>ISO<br>9001:<br>2015 |
| <ul><li>5.</li><li>6.</li></ul> | Specific commitments, goals and targets set by the entity with defined timelines, if any.  Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.                               | _ | h not se  |      |                         |                              | nent goa   | als, we | continu | e to                      |

## Governance, leadership and oversight

7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements:

Climate change and sustainability have become pivotal factors in a company's' long-term business and it has become imperative to embed sustainability in business strategies and investment justifications. VSSL as an organization has always believed in responsible business operations and ethical corporate behaviour. We are committed to living up to the tenets of UN-SDGs and fulfilling India's promise to the global community of moving towards net-zero emissions by 2070.

Our commitment to a better Earth became significantly stronger owing to our joint venture with Aichi Steel. They opened our minds to global best-practices, hand-held us in altering our systems and processes to weave in the 3R (reuse, recycle, reduce) philosophy in our business operations. In doing so, we make cleaner steel and are stepping ahead in making a greener enterprise.

We consider this progress as only the initial steps in our long journey. We, along with our partner and other stakeholders, will remain steadfast on making a meaningful contribution to the nation in its commitment and effort to a cleaner and greener planet. We also look forward to scaling our endeavours in giving back to society and leaving behind a legacy of positive social impact.

|    | ,    | •   |
|----|--|---|
| 8. | Details of the highest authority           | Mr. Sachit Jain   |
|    | responsible for implementation             | Designation: Vice-Chairman & Managing Director                      |
|    | and oversight of the Business              | DIN number: 00746409  |
|    | Responsibility Policy (ies).               | Telephone Number: 0161-2251245                                      |
|    |  | Email ID: secretarial.lud@vardhman.com                              |
| 9. | Does the entity have a specified           | Yes, the Risk Management Committee and the Corporate Social         |
|    | Committee of the Board/ Director           | Responsibility Committee constituted by the Board of Directors of   |
|    | responsible for decision making on         | the Company evaluate the sustainability related issues from time to |
|    | sustainability related issues? (Yes / No). | time.   |
|    | If yes, provide details.                   |   |
|    |  |   |



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<br>yearly/ Quarterly/ Any other –<br>please specify) |        |   |   |   |   |  |        |        |        |
|--|---|---|--------|---|--------|-------------|--------|--------|--|--------|---|---|---|---|--|--------|--------|--------|
|  | P<br>1  | - | P<br>3 | - |        |             | -      | _      | _  | P<br>1 | - | _ | _ | - |  | P<br>7 | P<br>8 | P<br>9 |
| Performance against above policies and follow up action  | All the policies of the Company are reviewed periodically or on a need basis. The Company complies with the regulations, extant and principles as are applicable. |   |        |   |        | on a        |        |        |  |        |   |   |   |   |  |        |        |        |
| Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances |   |   |        |   |        |             |        |        |  |        |   |   |   |   |  |        |        |        |
| 11. Has the entity carried out independent working of its policies by an external agence of the agency.          | 2 (///N -)   (  |   |        |   | P<br>4 | P<br>5<br>N | P<br>6 | P<br>7 | P<br>8   | P<br>9 |   |   |   |   |  |        |        |        |

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

Questions P 1 P2 P3 P4 P5 P 6 P7 P8 P9 The entity does not consider the Principles material to its business (Yes/No)

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)

Not Applicable

#### SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

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<br>in respective<br>category covered<br>by the awareness<br>programme |
|---|--|--|---|
| Board of<br>Directors                   | 3  | Key developments, Strategic discussions with respect to Aichi Vardhman Business, Changes in economic and industrial scenario, CSR, Sustainability initiatives, Operational training by doing plant visit, etc. | 100%  |
| Key Managerial<br>Personnel             | 3  | Key developments, Strategic discussions with respect to Aichi Vardhman Business, Changes in economic and industrial scenario, CSR, Sustainability initiatives, Operational training by doing plant visit, etc. | 100%  |
| Employees<br>other than BoD<br>and KMPs | 120  | Health & Safety, Skills Upgradation, TPM & 5S,<br>Communication & Presentation Skills etc.   | 94%   |
| Workers                                 | 337  | Health & Safety, Skills Upgradation, EHS Legal<br>Requirements, General Safety Awareness, TPM<br>& 5S etc.   | 90%   |

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

#### Monetary

|                 | NGRBC<br>Principle | Name of the regulatory/<br>enforcement agencies/<br>judicial institutions | Amount<br>(In ₹) | Brief of the Case | Has an appeal<br>been preferred?<br>(Yes/No) |
|-----------------|--------------------|---|------------------|-------------------|--|
| Penalty/ Fine   | NIL                | NIL   | NIL              | NIL               | NIL  |
| Settlement      | NIL                | NIL   | NIL              | NIL               | NIL  |
| Compounding fee | NIL                | NIL   | NIL              | NIL               | NIL  |



## Non-Monetary

|              | NGRBC<br>Principle | Name of the regulatory/<br>enforcement agencies/<br>judicial institutions | Brief of the Case | Has an appeal been preferred? (Yes/No) |
|--------------|--------------------|---|-------------------|--|
| Imprisonment | NIL                | NIL   | NIL               | NIL                                    |
| Punishment   | NIL                | NIL   | NIL               | NIL                                    |

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 |
|--------------|---|
| NA           | NA  |

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 Vigil Mechanism of the Company, which also incorporates a whistle blower policy in terms of the Uniform Listing Agreement aims to provide a channel to the employees and Directors to report to the management concerns about unethical behavior, actual or suspected fraud or violation of the Codes of Conduct or policy. The mechanism provides for adequate safeguards against victimization of employees and Directors to avail of the mechanism and also provide for direct access to the Chairman/ Chairman of the Audit Committee in exceptional cases.

The Vigil Mechanism/ Whistle Blower Policy is available at the Company's website at the link https:// www.vardhman.com/Document/Report/Company%20Information/Policies/Vardhman%20Special%20 Steels%20Ltd/\_Whistle\_Blower\_Policy.pdf

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

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

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

|  | FY 202 | 22-23   | FY 202 | 21-22   |
|--|--------|---------|--------|---------|
|  | Number | Remarks | Number | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | Nil    | Nil     | Nil    | Nil     |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs      | Nil    | Nil     | Nil    | Nil     |

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**

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

| Total number<br>of awareness<br>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 |
|---|--|--|
|   | NII  |  |

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

Yes, the Company has a Code of conduct which is applicable to all directors and senior employees of the Company. It aims at maintaining highest standards of business conduct in line with the Ethics of the Company, provides quidance in difficult situations involving conflict of interest & moral dilemma and ensures compliance with all applicable laws. All senior employees are required to read and understand this code and agree to abide by it.

The Code of Conduct is available at the Company's website at the link: https://www.vardhman.com/ Document/Report/Company%20Information/Policies/Vardhman%20Special%20Steels%20Ltd/Code\_of\_ Conduct\_for\_Directors\_&\_Senior\_Management.pdf

#### 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.

| Category | FY 2022-23 | FY 2021-22 | Details of Improvements in environmental and social impacts   |
|----------|------------|------------|---|
| R&D      | 0.73%      | 0.00%      | -   |
| Capex    | 52.05%     | 7.32%      | Installation of Mechanical Pump will result in reduction of CO2 emissions. Secondly, installation of FES at LRF will improve ambient air quality. |

- 2. a. Does the entity have procedures in place for sustainable sourcing? - Yes
  - b. If yes, what percentage of inputs were sourced sustainably? About 73%
- 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.

We are a secondary steel producer. With the implementation of the scrappage policy, we shall be contributing more to the national objective of recycling of steel scrap which is our basic raw material.

- Disposal of hazardous solid waste generated at the unit is done only through recognized recycler. A fume extraction system is installed to collect the dust going into the air.
- 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.

By virtue of its operations, EPR is not applicable to VSSL.



#### **Leadership Indicators**

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<br>Code | Name of<br>Product /<br>Service  | % of total<br>Turnover<br>contributed | Boundary for which the<br>Life Cycle Perspective<br>/ Assessment was<br>conducted                                  | Whether<br>conducted by<br>independent<br>external agency<br>(Yes/No) | Results -communicated in public domain (Yes/ No) If yes, provide the web-link. |
|-------------|--|---------------------------------------|--|---|--|
| 241         | Steel bars, rods<br>and bright bars<br>of various grades<br>and sizes. | 100%                                  | Manufacture & Sale of<br>Steel bars, rods and bright<br>bars of various categories<br>of special and alloy steels. | No  | No   |

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

| Name of Product /<br>Service | Description of the risk / Concern | Action Taken                                  |
|------------------------------|-----------------------------------|---|
| FES Dust                     | Hazardous                         | We are disposing off the dust with the PPCB's |
|                              |                                   | approved agency                               |

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                 | FY2021-22                  |
| Scrap                   | 89%                       | 93%                        |

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

|                                     |         | FY 2022  | 2-23                            | FY 2021-22 |          |                                |  |
|-------------------------------------|---------|----------|---------------------------------|------------|----------|--------------------------------|--|
|                                     | Re-used | Recycled | Safely Disposed                 | Re-used    | Recycled | <b>Safely Disposed</b>         |  |
| Plastics<br>(including packaging)   | Nil     | Nil      | 29.941                          | Nil        | Nil      | 14.961                         |  |
| E-waste                             | Nil     | Nil      | 0.210                           | Nil        | Nil      | 0.430                          |  |
| Hazardous waste                     | Nil     | Nil      | Dust 2161.04<br>Spent Oil 5.780 | Nil        | Nil      | Dust 1806.1<br>Spent Oil 4.480 |  |
| Other waste – Bio-<br>Medical Waste | Nil     | Nil      | 0.016                           | Nil        | Nil      | 0.022                          |  |

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

| Indicate product category | Reclaimed products and their packaging materials as % of total products sold in respective category |
|---------------------------|---|
|                           | NOT APPLICABLE  |

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

## **Essential Indicators**

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

|               | % of employees covered by |                  |        |                    |            |                 |            |                    |            |                     |            |
|---------------|---------------------------|------------------|--------|--------------------|------------|-----------------|------------|--------------------|------------|---------------------|------------|
| Category      | Total<br>(A)              | Health insurance |        | Accident insurance |            | Materi<br>benef | •          | Paternity benefits |            | Day Care facilities |            |
|               |                           | Number<br>(B)    | %(B/A) | Number<br>(C)      | %<br>(C/A) | Number<br>(D)   | %<br>(D/A) | Number<br>(E)      | %<br>(E/A) | Number<br>(F)       | %<br>(F/A) |
| Permanent en  | nployee                   | es               |        |                    |            |                 |            |                    |            |                     |            |
| Male          | 382                       | 382              | 100%   | 382                | 100%       | -               | -          | 382                | 100%       | 382                 | 100%       |
| Female        | 18                        | 18               | 100%   | 18                 | 100%       | 18              | 100%       | -                  | -          | 18                  | 100%       |
| Total         | 400                       | 400              | 100%   | 400                | 100%       | 18              | 4.5%       | 382                | 95.5%      | 400                 | 100%       |
| Other than Pe | rmanei                    | nt employ        | ees/   |                    |            |                 |            |                    |            |                     |            |
| Male          | 2                         | -                | -      | 2                  | 100%       | -               | -          | -                  | -          | 2                   | 100%       |
| Female        | 1                         | -                | -      | 1                  | 100%       | -               | -          | -                  | -          | 1                   | 100%       |
| Total         | 3                         | -                | -      | 3                  | 100%       | -               | -          | -                  | -          | 3                   | 100%       |

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

|              |        |               | % of employees covered by |               |            |               |            |               |          |                     |            |
|--------------|--------|---------------|---------------------------|---------------|------------|---------------|------------|---------------|----------|---------------------|------------|
| Category     | Total  | Hea<br>insura |                           | Accide insura |            | Mater<br>bene | •          | Paternity     | benefits | Day Care facilities |            |
|              | (A)    | Number<br>(B) | %(B/A)                    | Number<br>(C) | %<br>(C/A) | Number<br>(D) | %<br>(D/A) | Number<br>(E) | % (E/A)  | Number<br>(F)       | %<br>(F/A) |
| Permanent v  | vorker | s             |                           |               |            |               |            |               |          |                     |            |
| Male         | 723    | 723           | 100%                      | 723           | 100%       | -             | -          | 723           | 100%     | 723                 | 100%       |
| Female       | 2      | 2             | 100%                      | 2             | 100%       | 2             | 100%       | -             | -        | 2                   | 100%       |
| Total        | 725    | 725           | 100%                      | 725           | 100%       | 2             | 0.28%      | 723           | 99.72%   | 725                 | 100%       |
| Other than P | ermar  | ent work      | ers                       |               |            |               |            |               |          |                     |            |
| Male         | 650    | -             | -                         | 650           | 100%       | -             | -          | -             | -        | 650                 | 100%       |
| Female       | 5      | -             |                           | 5             | 100%       | -             | -          |               | -        | 5                   | 100%       |
| Total        | 655    | -             | -                         | 655           | 100%       | -             | -          | -             | -        | 655                 | 100%       |

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

|          |  | FY 2022-23   | 5   | FY 2021-22   |   |   |  |  |
|----------|--|--|---|--|---|---|--|--|
| Benefits | No. of employees covered as a % of total employees | No. of<br>workers<br>covered as<br>a % of total<br>workers | Deducted and<br>deposited with<br>the authority<br>(Y/N/N.A.) | No. of<br>employees<br>covered as<br>a % of total<br>employees | No. of workers<br>covered as<br>a % of total<br>workers | Deducted and<br>deposited with<br>the authority<br>(Y/N/N.A.) |  |  |
| PF       | 100%   | 100%   | Υ   | 100%   | 100%  | Υ   |  |  |
| Gratuity | 100%   | 100%   | Υ   | 100%   | 100%  | Υ   |  |  |
| ESI      | 61%  | 78%  | Υ   | 64%  | 82%   | Υ   |  |  |
| NPS      | 2%   | Nil  | Y   | 2%   | Nil   | Y   |  |  |



#### **Accessibility of workplaces** 3.

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

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

The Company provides equal opportunity to normal employees as well as employees with disabilities. However, there is no formal policy laid in this regard.

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

|        | Permanent e         | employees      | Permanent workers   |                |  |  |
|--------|---------------------|----------------|---------------------|----------------|--|--|
| Gender | Return to work rate | Retention rate | Return to work rate | Retention rate |  |  |
| Male   | NA                  | NA             | NA                  | NA             |  |  |
| Female | 100%                | 100%           | NA                  | NA             |  |  |
| Total  | 100%                | 100%           | NA                  | NA             |  |  |

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

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

Yes, we have in place grievance redressal mechanism and we try to ensure a harassment free work environment along with workplace health and safety. A Labour Welfare Officer is placed ensuring the basic amenities to workers. Communication meetings between workers and senior officials are regularly conducted to redress the grievance of workers and maintain harmonious relations between the management and workers.

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

| Category         |  | FY 2022-23   |              | FY 2021-22<br>(Previous Financial Year)                          |  |              |  |  |  |
|------------------|--|--|--------------|--|--|--------------|--|--|--|
|                  | Total<br>employees<br>/ workers in<br>respective<br>category (A) | No. of employees /<br>workers in respective<br>category, who are<br>part of association(s)<br>or Union (B) | % (B /<br>A) | Total<br>employees<br>/ workers in<br>respective<br>category (C) | No. of employees/<br>workers in<br>respective category,<br>who are part of<br>association(s) or<br>Union (D) | % (D<br>/ C) |  |  |  |
| Total            |  |  |              |  |  |              |  |  |  |
| Permanent        |  |  | 1            | Vil  |  |              |  |  |  |
| <b>Employees</b> |  |  |              |  |  |              |  |  |  |
| - Male           |  |  |              |  |  |              |  |  |  |
| - Female         |  |  |              |  |  |              |  |  |  |
| Total            |  |  |              |  |  |              |  |  |  |
| Permanent        |  |  | 1            | Vil  |  |              |  |  |  |
| Workers          |  |  |              |  |  |              |  |  |  |
| - Male           |  |  |              |  |  |              |  |  |  |
| - Female         |  |  |              |  |  |              |  |  |  |

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

|           |              |         | Y 2022-2<br>It Financi              |         |                         | FY 2021-22<br>(Previous Financial Year) |                                     |        |                         |        |
|-----------|--------------|---------|-------------------------------------|---------|-------------------------|---|-------------------------------------|--------|-------------------------|--------|
| Category  | Total<br>(A) | And s   | On Health<br>And safety<br>measures |         | On skill<br>upgradation |   | On Health<br>and safety<br>measures |        | On Skill<br>upgradation |        |
|           |              | No. (B) | %(B/A)                              | No. (C) | %(C/A)                  |   | No. (E)                             | %(E/D) | No. (F)                 | %(E/D) |
| Employees |              |         |                                     |         |                         |   |                                     |        |                         |        |
| Male      | 382          | 349     | 91.36%                              | 370     | 96.86%                  | 391                                     | 368                                 | 94.12% | 300                     | 76.73% |
| Female    | 18           | 12      | 66.67%                              | 17      | 94.44%                  | 20                                      | 10                                  | 50%    | 15                      | 75%    |
| Total     | 400          | 361     | 90.25%                              | 387     | 96.75%                  | 411                                     | 378                                 | 91.97% | 315                     | 76.64% |
| Workers   |              |         |                                     |         |                         |   |                                     |        |                         |        |
| Male      | 723          | 681     | 94.19%                              | 625     | 86.45%                  | 618                                     | 532                                 | 86.08% | 538                     | 87.06% |
| Female    | 2            | 2       | 100%                                | 2       | 100%                    | 2                                       | 2                                   | 100%   | 2                       | 100%   |
| Total     | 725          | 683     | 94.21%                              | 627     | 86.48%                  | 620                                     | 534                                 | 86.13% | 540                     | 87.10% |

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

| Category  |              | FY 2022-23       |      |              | FY 2021-22 |              |  |
|-----------|--------------|------------------|------|--------------|------------|--------------|--|
|           | Total<br>(A) | l No. (B) % (B / |      | Total<br>(C) | No. (D)    | % (D /<br>C) |  |
| Employees |              | •                |      |              |            |              |  |
| Male      | 382          | 382              | 100% | 391          | 391        | 100%         |  |
| Female    | 18           | 18               | 100% | 20           | 20         | 100%         |  |
| Total     | 400          | 400              | 100% | 411          | 411        | 100%         |  |
| Workers   |              |                  |      |              |            |              |  |
| Male      | 723          | 723              | 100% | 618          | 618        | 100%         |  |
| Female    | 2            | 2                | 100% | 2            | 2          | 100%         |  |
| Total     | 725          | 725              | 100% | 620          | 620        | 100%         |  |

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

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

Yes, an occupational health and safety management system has been implemented. The Company is dedicated to develop an active occupational health and safety culture across all its activities. The primary goal is to achieve a zero-accident workplace. To ensure the health and safety of the employees, the Company has organized various health checkup camps at regular intervals over the past years. We have also established occupational health centers staffed by qualified healthcare professionals.

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

The Company utilizes GEMBA, HIRA Assessment, Root Cause Analysis (RCA), etc. processes to identify work-related hazards and assess risks on both routine and non-routine basis.

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

Yes, the Company has a process in place for workers to report work-related hazards and to remove themselves from such risks. We have recorded Unsafe Activity & Unsafe Condition data. This data provide a platform for workers to report any unsafe acts or conditions they observe in the workplace.



This system encourages employees to actively participate in identifying and addressing hazards, promoting a culture of safety. By having this data, the Company enables workers to raise concerns and take necessary actions to remove themselves from potential risks, ensuring their well-being and minimizing accidents or incidents.

# 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  | FY 2022-23 | FY 2021-22 |
|---|-----------|------------|------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one million- | Employees | 0          | 0          |
| person hours worked)                                      | Workers   | 0.68       | 1.36       |
| Total reportable work related injuries                    | Employees | 0          | 0          |
| Totalrecordable work-related injuries                     | Workers   | 3          | 5          |
| No. of fatalities   | Employees | 0          | 0          |
| NO. OF fatalities   | Workers   | 0          | 0          |
| High consequence work-related injury or ill-health        | Employees | 0          | 0          |
| (excluding fatalities)                                    | Workers   | 0          | 0          |

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

VSSL is committed to provide a safe, progressive and sustainable work environment to all its employees. It has grievance redressal mechanism and strives to provide a work environment that is harassment free, healthy and safe. The Company is highly focused on improvement in health and safety of its workers. All hazards and its associated risks are identified across its facilities and any risk that deems to be high in the Hazard Identification and Risk Analysis (HIRA) is prioritized in the management plan. Various control measures are adopted to oversee safe functioning of business activities.

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

|                       |                          | FY 2022-23                                     |         | FY 2021-22               |  |         |  |
|-----------------------|--------------------------|--|---------|--------------------------|--|---------|--|
|                       | Filed during<br>the year | Pending<br>resolution<br>at the end of<br>year | Remarks | Filed during<br>the year | Pending<br>resolution<br>at the end of<br>year | Remarks |  |
| Working<br>Conditions | Nil                      | Nil  | NA      | Nil                      | Nil  | NA      |  |
| Health & Safety       | Nil                      | Nil  | NA      | Nil                      | Nil  | NA      |  |

#### 14. Assessments for the year:

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

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

Our Safety team performs detailed Root Cause Analysis (RCA) for every issue. It is discussed and debated in the Board rooms and shop-floor Control Rooms. Accidents and their analysis are circulated across the organization for increased awareness and horizontal deployment in other work areas. We recognize that 'Near Misses' are as good as accidents. So, we define everything that come under the Near Miss umbrella. We strictly track and record 'Near Misses'.

#### **Leadership Indicators**

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

Yes, the Company extends life insurance and compensatory packages in the event of the death of employees and workers. The company offers benefits under various schemes such as Employee State Insurance (ESI), Group Personal Accident (GPA) insurance, Mediclaim and Group Term Insurance. Additionally, the Company offers the Employees' Deposit Linked Insurance (EDLI) scheme, which provides life insurance coverage in case of natural death.

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

The contract agreement with the value chain partners incorporates strict adherence to all applicable statutory provisions, including the timely payment and deduction of statutory dues. The Company ensures that all relevant clauses pertaining to statutory compliance are thoroughly validated and upheld by both parties involved.

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 afferworkers | cted employees/ | No. of employees/workers that are rehabilitate<br>and placed in suitable employment or whose<br>family members have been placed in suitable<br>employment |            |  |  |
|-----------|--------------------------|-----------------|---|------------|--|--|
|           | FY 2022-23               | FY 2021-22      | FY 2022-23  | FY 2021-22 |  |  |
| Employees | Nil                      | Nil             | Nil   | Nil        |  |  |
| Workers   | Nil                      | Nil             | Nil   | Nil        |  |  |

Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment?

5. Details on assessment of value chain partners:

|                             | 9/ - 6  |
|-----------------------------|---|
|                             | % of value chain partners (by value of business done with |
|                             | such partners) that were assessed                         |
| Health and safety practices | Nil   |
| Working Conditions          | Nil   |

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:

Not Applicable



# PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders.

## **Essential Indicators**

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

We have various stakeholder groups with different priorities and diverse interests. Therefore, we created a method for structured identification of stakeholder groups, understanding their issues and including their views in our sustainability strategy.

The Company actively engages with all its stakeholders throughout the year on its strategic aspirations. Material matters arising from stakeholder engagements are managed as a part of the risk management

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

| Stakeholder<br>Group        |     | Channels of communication<br>(Email, SMS, Newspaper,<br>Pamphlets, Advertisement,<br>Community Meetings, Notice<br>Board, Website), Other                                     | Frequency of<br>engagement<br>(Annually/<br>Half yearly/<br>Quarterly/<br>others – please<br>specify) | Purpose and scope of<br>engagement including<br>key topics and concerns<br>raised during such<br>engagement   |
|-----------------------------|-----|---|---|---|
| Shareholders<br>& Investors | No  | Annual General Meeting,<br>Shareholder Meets, Email,<br>Stock Exchange intimations,<br>Investor Meet, Annual Report,<br>Quarterly Results, Media<br>Releases, Company Website | As and when required  | Profitability & Stability,<br>Growth Prospects, Major<br>Events   |
| Media                       | No  | Press Releases, Quarterly<br>Results, Annual Reports.   | As & when required  | Performance Reporting,<br>Award & Achievements,<br>Initiatives etc. are<br>reported.  |
| Customers                   | No  | Email, SMS, Advertisement,<br>Website, Social Media,<br>Customer Surveys, Customer<br>Meets, Business Interactions,<br>Audits by customers                                    | Regular   | Product Launches, Brand Promotion & Communication, Technical & Commercial approvals, Customer Satisfaction & Feedback, New Technology or Process adopted. |
| Employees                   | No  | Email, SMS, In House<br>Magazines, Engagement<br>Activities, Employee<br>Satisfaction Surveys.  | Regular   | Career Growth, Training & Development, Improvement Plans, Long-Term Strategy, Awareness Campaigns, Health & Safety Initiatives.                           |
| Communities                 | Yes | Community & Local Authority<br>Meets, Direct Engagement,<br>Community Visits, Partnership<br>with NGO's.  | Regular   | Need Assessment,<br>Expectation and<br>Feedback on impact/<br>success of CSR Projects.  |

| Value Chain<br>Partners | No | Email, SMS, Vendor Visits &<br>Meets | As & when required | Quality, Timely Paymer<br>ESG Considerat        |               |
|-------------------------|----|--------------------------------------|--------------------|---|---------------|
|                         |    |                                      |                    | (Sustainabilit                                  | zy, Safety    |
|                         |    |                                      |                    |   | Compliances,  |
|                         |    |                                      |                    | Ethical Behavior), ISO<br>OHSAS Standards, Supp |               |
|                         |    |                                      |                    |   |               |
|                         |    |                                      |                    | Chain Issue                                     | es, Technical |
|                         |    |                                      |                    | Training Se                                     | ssions, New   |
|                         |    |                                      |                    | Technology                                      | Launches by   |
|                         |    |                                      |                    | Vendors   |               |

## **Leadership Indicators**

1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

The Company has established several committees dedicated to economic and ESG (Environmental, Social, and Governance) domains to effectively monitor performance in these areas. These include the committees on Audit, Risk Management & CSR.

These Committees meet regularly to appraise performance in the respective domains, evaluating the company's achievements, challenges and opportunities. These evaluations are crucial for identifying areas of improvement and implementing strategies to drive positive change.

These reports are then presented to the Board. The Board, comprised of key stakeholders and decision-makers, actively analyzes reports to gain a holistic understanding of the company's economic and ESG performance.

Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

Yes, stakeholder consultation is indeed utilized to support the identification and management of environmental and social topics within our entity. We recognize the importance of engaging with stakeholders to gather diverse perspectives and incorporate their inputs into our decision-making processes.

- Environmental Policy Development: While formulating our environmental policy, we conducted consultations with various stakeholders, including local communities, environmental organizations and industry experts. Through these consultations, we received valuable insights on environmental concerns, such as resource depletion and pollution. Stakeholders shared their suggestions and expectations regarding sustainable practices and we incorporated their inputs into our policy framework. This led to the inclusion of specific targets for reducing greenhouse gas emissions, adopting renewable energy sources, and implementing waste management strategies.
- Social Impact Assessment: Before undertaking major projects or expansions, we conduct social impact assessments to understand the potential effects on local communities. As part of this process, we engage with stakeholders, including community representatives, non-governmental organizations and indigenous groups. Their input helps us identify and mitigate any adverse social impacts.
- Supply Chain Management: To address social and environmental concerns in our supply chain, we actively involve stakeholders such as suppliers, workers' organizations and human rights advocates. Through ongoing dialogues and consultation sessions, we gather feedback and suggestions on responsible sourcing, labor practices, and community well-being.



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

The Company actively contributes to the socio-economic development of the community through various participatory and need-based initiatives in the field of Education, Healthcare, Rural Development & Disaster Relief.

| Vulnerable Group  | Concerns  | Action Taken  |
|---|---|---|
|   | Needy People not having access to Healthcare Facilities | <ol> <li>Support for Medical Checkup Program for industrial<br/>workers by DMC Hospital.</li> <li>Distribution of Free Sanitary Napkins to girls in slum<br/>areas and installation of Sanitary Napkin Vending<br/>Machines in various Government Schools.</li> </ol>   |
|   | Disadvantaged Sections of<br>Society                    | <ol> <li>Provided artificial limbs to handicaps through Bharat Vikas Parishad</li> <li>Financed neuro surgery for needy patient on recommendation of Local Administration.</li> <li>Financial support for promotion of Karate Paralympic Sports for deserving children and sportsman in rural areas/ villages.</li> </ol> |
| Underprivileged<br>Community from<br>Rural, Urban and<br>Peri-Urban Areas | Women Empowerment                                       | 1. Provided Sewing machine complete set (motor and stand), industrial button hole sewing machine, industrial button attaching sewing machine to Hunar Vikas Kendra/Skill Development Center for enhancing vocational skills of children and women and enhance their livelihood.   |
|   | Promoting Education                                     | <ol> <li>Development of E-Classroom in Bal Bhawan Hisar.</li> <li>Education Sponsorship for BDS/MDS for Meritorious student.</li> <li>Financial support to Hunar Vikas Kendra/Skill Development Center for enhancing vocational skills of children and women and improving their livelihood opportunities.</li> </ol>     |
|   | Promoting Sports  | 1. Financial support to deserving players to prepare for Table Tennis competition.  |

# PRINCIPLE 5 Businesses should respect and promote human rights.

## **Essential Indicators**

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

| Category             | FY 2022-23   |  |              |              |   |              |
|----------------------|--------------|--|--------------|--------------|---|--------------|
|                      | Total<br>(A) | No. of employees /<br>workers in covered<br>or Union (B) | %<br>(B / A) | Total<br>(C) | No. of employees/<br>workers covered<br>(D) | %<br>(D / C) |
| Employees            | •            |  | •            |              |   |              |
| Permanent            |              |  |              |              |   |              |
| Other than permanent |              |  | Nil          |              |   |              |
| Total Employees      |              |  |              |              |   |              |

| Workers              |     |
|----------------------|-----|
| Permanent            |     |
| Other than permanent | Nil |
| Total Workers        |     |

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

|                       |       | F                        | Y 2022-2   | 3                         |            | FY 2021-22 |                          |         |                           |            |
|-----------------------|-------|--------------------------|------------|---------------------------|------------|------------|--------------------------|---------|---------------------------|------------|
| Category<br>Total (A) | Total | Equal to<br>Minimum Wage |            | More than<br>Minimum Wage |            | Total      | Equal to<br>Minimum Wage |         | More than<br>Minimum Wage |            |
|                       | (A)   | No.<br>(B)               | %<br>(B/A) | No. (C)                   | %<br>(C/A) | (D)        | No.<br>(E)               | % (E/D) | No. (F)                   | %<br>(F/D) |
|                       |       |                          |            | Emp                       | oloyees    |            |                          |         |                           |            |
| Permanent             |       |                          |            |                           |            |            |                          |         |                           |            |
| Male                  | 382   | 40                       | 10.47      | 342                       | 89.53      | 391        | 8                        | 2.05    | 383                       | 97.95      |
| Female                | 18    | 1                        | 5.56       | 17                        | 94.44      | 20         | 1                        | 5.00    | 19                        | 95.00      |
| Other than            |       |                          |            |                           |            |            |                          |         |                           |            |
| Permanent             |       |                          |            |                           |            |            |                          |         |                           |            |
| Male                  | 2     | 0                        | 0          | 2                         | 100        | 2          | 0                        | 0       | 2                         | 100        |
| Female                | 1     | 0                        | 0          | 1                         | 100        | 1          | 0                        | 0       | 1                         | 100        |
|                       |       |                          |            | Wo                        | orkers     |            |                          |         |                           |            |
| Permanent             |       |                          |            |                           |            |            |                          |         |                           |            |
| Male                  | 723   | 89                       | 12.31      | 634                       | 87.69      | 618        | 32                       | 5.18    | 586                       | 94.82      |
| Female                | 2     | 0                        | 0          | 2                         | 100        | 2          | 0                        | 0       | 2                         | 100        |
| Other than            |       |                          |            |                           |            |            |                          |         |                           |            |
| Permanent             |       |                          |            |                           |            |            |                          |         |                           |            |
| Male                  | 650   | 629                      | 96.77      | 21                        | 3.23       | 433        | 401                      | 92.61   | 32                        | 7.39       |
| Female                | 5     | 5                        | 100        | 0                         | 0          | 5          | 5                        | 100     | 0                         | 0          |

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

|                                  | Male   |   | Female |   |  |
|----------------------------------|--------|---|--------|---|--|
|                                  | Number | Median remuneration/<br>salary/ wages of<br>respective category | Number | Median remuneration/<br>salary/ wages of<br>respective category |  |
| Board of Directors (BoD)         | 10     | 332500  | 2      | 290000  |  |
| Key Managerial Personnel         | 1      | 6820416   | 1      | 1197360   |  |
| Employees other than BoD and KMP | 379    | 342039  | 17     | 233720  |  |
| Workers                          | 723    | 208125  | 2      | 165443  |  |

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

Yes, all employees can reach out to the management to address their concerns and the Company also have grievance redressal mechanism.

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



We have formulated a grievance redressal mechanism to ensure a healthy work atmosphere for all employees. A labour welfare officer is assigned in our unit who ensures basic amenities to all employees.

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

|  |                          | FY 2022-23                                    |         | FY 2021-22               |   |         |
|--|--------------------------|---|---------|--------------------------|---|---------|
|  | Filed during<br>the year | Pending<br>resolution<br>at theend of<br>year | Remarks | Filed during<br>the year | Pending<br>resolution<br>at theend of<br>year | Remarks |
| Sexual Harassment Discrimination at workplace Child Labour Forced Labour/ Involuntary Labour Wages Other human |                          |   | ١       | Nil                      |   |         |

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

We have formulated a grievance redressal mechanism to ensure a healthy work atmosphere for all employees. A labour welfare officer is assigned in our unit who ensures basic amenities to all employees.

Do human rights requirements form part of your business agreements and contracts?

9. Assessments for the year:

rights related issues

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

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

No such incident of non-compliance has been observed during assessment.

#### **Leadership Indicators**

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

The Company recognizes its responsibility of treating all employees equal in dignity, respect and rights. We have a Human Rights Policy. The objective of this policy is to respect and protect human rights and to provide a safe and healthy working environment for all the employees.

2. Details of the scope and coverage of any Human rights due-diligence conducted. The Company is committed to a value-based culture which is embodied in our code of conduct and ethics. We have a Code of Conduct Policy to outline the standards and behaviors that company upholds as a company and that it expects from its employees. This code provides a quide to the values, behaviors and ways of working. We have a learning portal for our employees which includes topics on human rights also.

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

Yes

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

|                                  | % of value chain partners (by value of business done with such partners) that were assessed |
|----------------------------------|---|
| Sexual Harassment                |   |
| Discrimination at workplace      |   |
| Child Labour                     | N   |
| Forced Labour/Involuntary Labour | No assessment conducted during the year 2022-23.  |
| Wages                            |   |
| Others – please specify          |   |

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

Not Applicable

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

#### **Essential Indicators**

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

| Parameter                                     | FY 2022-23 | FY 2021-22 |
|---|------------|------------|
| Total electricity consumption (A)             | 655592     | 600322     |
| Total fuel consumption (B)                    |            |            |
| Natural Gas                                   | 285954     | 37481      |
| Furnace Oil                                   | 59385      | 267236     |
| Diesel  | 11766      | 16210      |
| LPG   | 27783      | 12359      |
| Energy consumption through                    | Nil        | Nil        |
| other sources (C)                             |            |            |
| Total energy consumption                      | 1040480    | 933608     |
| (A+B+C)                                       |            |            |
| Energy intensity per rupee of turnover        | 0.0001     | 0.0001     |
| (Total energy consumption/                    |            |            |
| turnover in rupees)                           |            |            |
| Energy intensity (optional) – the             | -          | -          |
| relevant metric may be selected by the entity |            |            |

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

No



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

Not Applicable.

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

| Parameter  | FY 2022-23 | FY 2021-22 |
|--|------------|------------|
| Water withdrawal by source (in kiloliters)                                       |            |            |
| (i) Surface water  | 0          | 0          |
| (ii) Groundwater   | 243503     | 222818     |
| (iii) Third party water  | 0          | 0          |
| (iv) Seawater / desalinated water  | 0          | 0          |
| (v) Others   | 0          | 0          |
| Total volume of water withdrawal (In kiloliters) (i $+$ ii $+$ iii $+$ iv $+$ v) | 243503     | 222818     |
| Total volume of water consumption (In kiloliters)                                | 243503     | 222818     |
| Water intensity per rupee of turnover (Water consumed / turnover)                | 0.01403    | 0.01628    |
| Water intensity per ton of liquid metal steel (Water consumed/ Liquid            | 1043       | 1140       |
| Steel Production)  |            |            |

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

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

Yes, Implementation started in FY 22-23 & shall be operational in FY 23-24.

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

| Parameter                           | Unit   | FY 2022-23     | FY 2021-22     |
|-------------------------------------|--------|----------------|----------------|
| NOx                                 | Mg/Nm3 | Ambient – 22.4 | Ambient – 24.2 |
| SOx                                 | Mg/Nm3 | Ambient – 13.7 | Ambient – 23.6 |
| Particulate matter                  | Mg/Nm3 | EAF - 17.9     | EAF - 31       |
| (PM)                                |        | RHF – 20.6     | RHF -25        |
| Persistent organic pollutants (POP) | NA     | NA             | NA             |
| Volatile organic compounds (VOC)    | NA     | NA             | NA             |
| Hazardous air<br>pollutants (HAP)   | NA     | NA             | NA             |
| Others-please specify               | NA     | NA             | NA             |

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

No

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

| Parameter  | Unit   | FY 2022-23 | FY 2021-22 |
|--|--|------------|------------|
| <b>Total Scope 1 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)        | CO2 in Ton   | 39335      | 39449      |
| <b>Total Scope 2 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)        | CO2 in Ton   | 143544     | 131854     |
| Total Scope 1 and Scope 2 emissions per rupee of turnover  | CO2 in Ton per rupee of turnover                           | 0.00001    | 0.00001    |
| <b>Total Scope 1 and Scope 2 emission intensity</b> (optional) – the relevant metric may be selected by the entity | CO2 in Ton<br>Against<br>production of<br>one Ton of steel | 0.83       | 0.90       |

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

Yes. Scope 1 & Scope 2 emissions assessment has been done by Sohrabji Godrej Green Business Centre, Hyderabad (A division of CII).

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

- The Company is actively engaged in sustainability efforts and has implemented various initiatives to reduce its emission intensity year on year.
- b) We have switched over to Greener Fuel i.e. Natural Gas in place of Furnace oil being used in our Reheating Furnace.
- We have replaced Furnace oil fueled Boiler with Mechanical Pump.
- d) Fume extraction system installed at LRF to collect the dust going into the air.
- Miyawaki Forest: The Company has taken a new initiative of developing a forest on 5 acres of land situated at centre of the Focal Point, Ludhiana. We have planted about 53,500 trees on this land with Miyawaki technique. It will become a dense self-sustainable forest in 2 to 3 years. This will be a unique facility benefitting the environment and society at large.
- Water being a resource without which life cannot survive on Earth, remains our major priority in terms of sustainability measures undertaken by us. To ensure proper treatment of waste water and its safe discharge, we monitor the effluent quantities and started treating to keep it well-within the standards set by Central and State Pollution Control Boards.
- To contribute towards replenishment of ground water, we have been continuously investing in water conservation initiatives. Till March 2023, we have constructed 10 Rain Water Harvesting Systems (RWH) within our premises.
- When it comes to managing waste, our first priority is to reduce and reuse, wherever possible and responsibly dispose whatever little is left. We have dedicated hazardous waste, e-waste and scrap management facilities, complying with all the legal requirements associated with these wastes. All type of hazardous waste is handed over to the respective State Pollution Control Board Authorized Treatment, Storage and Disposal Facility.



- Overall, the Company's efforts in energy mix diversification, energy conservation, water conservation, and plastic waste management demonstrate a proactive approach to sustainability and environmental responsibility.
- 8. Provide details related to waste management by the entity, in the following format:

| Parameter   | FY 2022-23           | FY 2021-22              |
|---|----------------------|-------------------------|
| Total Waste generated (in metric tonnes)  | - <del>-</del>       |                         |
| Plastic waste (A)   | 29.941               | 14.962                  |
| E-waste (B)   | 0.210                | 0.430                   |
| Bio-medical waste (C)   | 0.016                | 0.022                   |
| Construction and demolition waste (D)   | 14682                | 1764                    |
| Battery waste (E)   | 2.910                | 0.580                   |
| Radioactive waste (F)   | Nil                  | Nil                     |
| Other Hezerdeus wests Please specify if any (C)   | Dust 2161.04         | Dust 1806.1             |
| Other Hazardous waste. Please specify, if any. (G)  | Spent Oil 5.780      | Spent Oil 4.480         |
| Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) | Slag – 35173         | Slag - 34939            |
| Total (A+B + C + D + E + F + G + H)   | 52054.897            | 38529.574               |
| recovery operations (in metric tonnes) Category of waste  |                      | 1                       |
| (i) Recycled  | NA                   | NA                      |
| (ii) Re-used  | NA                   | NA                      |
| (iii) Other recovery operations   | NA                   |                         |
| Total   |                      | NA                      |
|   | NA                   | NA                      |
| For each category of waste generated, total waste disposed by r   | _                    | NA                      |
| tonnes)   | _                    | NA                      |
| tonnes) Category of waste   | nature of disposal n | NA<br>nethod (in metric |
| tonnes) Category of waste (i) Incineration  | nature of disposal n | NA nethod (in metric    |
| tonnes) Category of waste   | nature of disposal n | NA<br>nethod (in metric |
| tonnes) Category of waste (i) Incineration  | nature of disposal n | NA nethod (in metric    |

Briefly describe the waste management practices adopted in your establishment. 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 established dedicated facilities for handling hazardous waste, e-waste and scrap, ensuring compliance with all legal requirements associated with these types of waste. Our primary focus is on waste reduction and reuse and we responsibly dispose of whatever remains.

To effectively manage waste, we undertake the following key steps:

- Waste reduction: We identify areas within our operations where waste can be reduced. This involves optimizing processes and finding alternatives to wasteful practices, ultimately minimizing the amount of waste generated.
- Recycling & Reuse: We actively explore opportunities to reuse materials within our operations.
- Responsible disposal: For waste that cannot be reduced, recycled or reused, we ensure that it is disposed-off properly. Hazardous waste and biomedical waste is handed over to Treatment, Storage and Disposal Facilities (TSDFs) authorized by the State Pollution Control Board. Similarly, non-hazardous

waste and e-waste is given to vendors authorized by the State Pollution Control Board. This ensures that the disposal of such waste follows all necessary regulations and guidelines.

By following these waste management practices, we prioritize waste reduction, maximize recycling and reuse opportunities and ensure responsible disposal of any remaining waste. Our commitment to proper waste management aligns with our goal of minimizing our environmental impact and promoting sustainable practices.

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

Not Applicable

The above-mentioned requirement is not applicable to the Company as the Company does not have any of its operations/offices in/around ecologically sensitive areas.

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

| Name and<br>brief details of<br>project | EIA<br>Notification<br>No. | Date | Whether conducted by independent external agency (Yes / No) | Results communicated in public domain (Yes / No) | Relevant<br>Web link |
|---|----------------------------|------|---|--|----------------------|
|   |                            |      | Not Applicable  |  |                      |

12. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N).

Yes, the Company is compliant with the applicable environmental law/ regulations/ guidelines in India.

If not, provide details of all such non-compliances, in the following format:

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



# **Leadership Indicators**

# Provide break-up of the total energy consumed (In GJ) from renewable and non-renewable sources, in the following format:

| Parameter  | FY 2022-23 | FY 2021-22 |
|--|------------|------------|
| From renewable sources (Solar Rooftop)                   |            |            |
| Total electricity consumption (A)                        | Nil        | Nil        |
| Total fuel consumption (B)                               | Nil        | Nil        |
| Energy consumption through other sources (C)             | Nil        | Nil        |
| Total energy consumed from renewable sources (A+B+C)     | Nil        | Nil        |
| From non-renewable sources                               |            |            |
| Total electricity consumption (D)                        | 655592     | 600322     |
| Total fuel consumption (E)                               |            |            |
| Natural Gas  | 285954     | 37481      |
| Furnace Oil  | 59385      | 267236     |
| Diesel   | 11766      | 16210      |
| LPG  | 27783      | 12359      |
| Energy consumption through other sources (F)             | Nil        | Nil        |
| Total energy consumed from non-renewable sources (D+E+F) | 1040480    | 933608     |

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

No

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

| Parameter   | FY 2022-23 FY 2021-22 |
|---|-----------------------|
| Water discharge by destination and level of treatment (in kilolitres) |                       |
| (i) To Surface water  |                       |
| -No treatment   | Not Applicable        |
| -With treatment – please specify level of Treatment                   | пот Аррисавте         |
| (ii) To Groundwater   |                       |
| -No treatment   | Not Applicable        |
| -With treatment – please specify level of treatment                   | пос дрисавіе          |
| (iii) To Seawater   |                       |
| -No treatment   | Not Applicable        |
| -With treatment – please specify level of treatment                   | пос дрисавіе          |
| (iv) Sent to third-parties (CETP)                                     |                       |
| -No treatment   | Not Applicable        |
| -With treatment – please specify level of treatment                   |                       |
| (v) Others (Municipal Sewer) (Industrial)                             |                       |
| -No treatment   |                       |
| -With treatment – please specify level of treatment                   | Not Applicable        |
| Total water discharged (in kilolitres)                                |                       |

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

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

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

- Name of the area- Focal Point, Ludhiana 1.
- 2. Nature of operations- Manufacturing of Steel bars, rods and bright bars of various grades and sizes
- 3. Water withdrawal, consumption and discharge in the following format:

| Parameter   | FY 2022-23 | FY 2021-22 |
|---|------------|------------|
| Water withdrawal by source (in kilolitres)  | _          |            |
| (i) Surface water   |            |            |
| (ii) Groundwater  | 243503     | 222818     |
| (iii) Third party water   | 0          | 0          |
| (iv) Seawater / desalinated water   | 0          | 0          |
| (v) Others  | 0          | 0          |
| Total volume of water withdrawal (in kilolitres)  | 243503     | 222818     |
| Total volume of water consumption (in kilolitres)                                       | 243503     | 222818     |
| Water intensity per rupee of<br>turnover (Water consumed / turnover) – in litres        | 0.01403    | 0.01628    |
| Water intensity per ton of liquid metal steel (Water consumed/ Liquid Steel Production) | 1043       | 1140       |
| (i) Into Surface water  | NA         | NA         |
| -No treatment   | NA         | NA         |
| -With treatment-please specify level of treatment                                       | NA         | NA         |
| (ii) Into Groundwater   | NA         | NA         |
| -No treatment   | NA         | NA         |
| -With treatment-please specify level of treatment                                       | NA         | NA         |
| (iii) Into Seawater   | NA         | NA         |
| -No treatment   | NA         | NA         |
| -With treatment-please specify level of treatment                                       | NA         | NA         |
| (iv) Sent to third-parties  | NA         | NA         |
| -No treatment   | NA         | NA         |
| -With treatment-please specify level of treatment                                       | NA         | NA         |
| (v) Others (Municipal Sewer) (Industrial)   |            |            |
| -No treatment   |            |            |
| -With treatment-please specify level of treatment                                       | NA         | NA         |
| Total water discharged (in kilolitres)  |            |            |

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

No



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

| Parameter   | Unit | FY 2022-23   | FY 2021-22 |  |
|---|------|--------------|------------|--|
| <b>Total Scope 3 emissions</b> (Break-up of<br>the GHG into CO2, CH4, N2O, HFCs,<br>PFCs, SF6, NF3, if available) |      |              |            |  |
| Total Scope 3 emissions per rupee of turnover   |      | Not Assessed |            |  |
| <b>Total Scope 3 emission intensity</b> (optional) – the relevant metric may be selected by the entity            |      |              |            |  |

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

No

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

Not Applicable

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

| Sr. No | Initiative<br>undertaken            | Details of the initiative (Web-link, if any, may be provided along-with summary)   | Outcome of the initiative   |
|--------|-------------------------------------|--|---|
| 1.     | Water<br>conservation               | Water being a resource without which life cannot survive on Earth, remains our major priority in terms of sustainability measures undertaken by us. To ensure proper treatment of waste water and its safe discharge, we monitor the effluent quantities and started treating to keep it well-within the standards set by Central and State Pollution Control Boards.  | Utilization of treated wastewater in process activities results in a reduction in the amount of usage of fresh water.             |
| 2.     | Ground water recharging initiatives | To contribute towards replenishment of ground water we have been continuously investing in water conservation initiatives. Till March 2023, we have constructed 10 Rain Water Harvesting Systems (RWH) within our premises.  | A step towards<br>Replenishment of<br>ground water.   |
| 3.     | Waste<br>Management                 | When it comes to managing waste, our first priority is to reduce and reuse, wherever possible and responsibly dispose whatever little is left. We have dedicated hazardous waste, e-waste and scrap management facilities, complying with all the legal requirements associated with these wastes. All type of hazardous waste is handed over to the State Pollution Control Board Authorized Treatment, Storage and Disposal Facility | Regularly monitor<br>the waste generated<br>from operations<br>and identify areas<br>for waste reduction,<br>recycling and reuse. |
| 4.     | Solar Plant                         | Solar Power Plant planned to be installed in coming years.   | Helps to reduce emissions.  |

| Sr. No Initiative undertaken |                        | Details of the initiative (Web-link, if any, may be provided along-with summary)  | Outcome of the initiative   |  |  |
|------------------------------|------------------------|---|---|--|--|
| 5.                           | Energy<br>Conservation | We keep investing in energy-efficient technologies to save energy. We have invested in Statcom System which has resulted in improvement in power factor from 0.94 to 0.99.  LED lights installed by replacing conventional lights.  | Saving in consumption of energy.  |  |  |
| 6.                           | Air Emissions          | Switch over to Greener Fuel i.e. Natural Gas from Furnace oil. Fume extraction system installed to collect the dust going into the air. Miyawaki Forest: The Company has taken a new initiative of developing a forest on 5 acres of land situated at centre of the Focal Point, Ludhiana. We have planted about 53,500 trees on this land with Miyawaki technique. It will become a dense self-sustainable forest in 2 to 3 years. This will be a unique facility benefitting the environment and society at large | A collective effort<br>that addresses<br>environmental<br>challenges more<br>effectively and<br>promotes a greener<br>and more sustainable<br>future. |  |  |

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

Yes, the Company acknowledges the unpredictable nature of emergencies and disasters, which can strike without warning. To ensure the safety of our employees, surrounding communities and the environment, we have established an effective emergency preparedness and response program. This plan serves as a guide to facilitate the planning and execution of appropriate actions in response to local emergencies. To maintain the effectiveness of our emergency preparedness plan, we conduct testing and evaluation. This includes management reviews, third-party audits and mock drills. Through these measures, we assess the readiness of our systems, identify areas for improvement and make necessary adjustments to enhance our emergency response capabilities.

# 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.

Based on the available information, the Company's value chain has not resulted in any significant adverse impacts on the environment. We are committed to conducting our business operations in an environmentally responsible manner and strive to minimize any potential negative effects on the environment throughout our value chain.

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

No, Value Chain partner evaluation is being done at present. We look forward to formalise the process in coming years.



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

#### **Essential Indicators**

- a. Number of affiliations with trade and industry chambers/ associations. 06
  - 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 Industries, CII               | National  |
| 2      | Engineering Export Promotion Council of India (EEPC)  | National  |
| 3      | Society of Indian Automobile Manufacturers            | National  |
| 4      | Chamber of Industrial & Commercial Undertaking (CICU) | State   |
| 5      | Steel Furnace Association of India                    | National  |
| 6      | Alloy Steel Producers Association (ASPA)              | National  |

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

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

# **Leadership Indicators**

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

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

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

# **Essential Indicators**

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

| Name and brief<br>details of project | SIA<br>Notification<br>No. | Date of notification | Whether Results<br>conducted by<br>independent in<br>external agency<br>(Yes/No) | Results<br>communicated<br>in public domain<br>(Yes/No) | Relevant<br>Web link |
|--------------------------------------|----------------------------|----------------------|--|---|----------------------|
|                                      |                            |                      | N.A.   |   |                      |

VSSL internally performs an impact assessment for CSR programs at the end of each financial year. This assessment helps in evaluating the efficacy of the programs in terms of delivering the intended benefits to the target beneficiary and in gaining insights for improving the design and impact of future initiatives

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

| S. No. Na | ame of Project for<br>hich R&R is ongoing | State | District | Affected | % of PAFs<br>covered by<br>R&R | Amounts paid<br>to PAFs in the FY<br>(In ₹) |
|-----------|---|-------|----------|----------|--------------------------------|---|
|           |   | 1     | N.A.     |          |                                |   |

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

The stakeholders can send their grievances to the Compliance Officer at <a href="mailto:secretarial.lud@vardhman.com">secretarial.lud@vardhman.com</a>

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

|   | FY 2022-23 | FY 2021-22 |
|---|------------|------------|
| Directly sourced from MSMEs/ small producers                        | 5.78%      | 5.67%      |
| Sourced directly from within the district and neighboring districts | 52.58%     | 65.44%     |

## **Leadership Indicators**

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

| Details of negative social impact identified | Corrective action taken |
|--|-------------------------|
| Not Applicable                               |                         |

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

| S. No. | State          | Aspirational District | Amount spent (In ₹) |
|--------|----------------|-----------------------|---------------------|
| 1      | Punjab/Haryana | Ludhiana/Hisar        | ₹ 1.23 crores       |

Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups?

No

(a) From which marginalized /vulnerable groups do you procure?

Not Applicable

(b) What percentage of total procurement (by value) does it constitute?

Not Applicable

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

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

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

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



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

| S.<br>No. | CSR Project  | No. of persons<br>benefitted from CSR<br>Projects                                  | % of beneficiaries<br>from vulnerable<br>and marginalized<br>groups |
|-----------|--|--|---|
| 1.        | Development of Green Forest with Miyawaki technique in Focal Point, Ludhiana.  | Community at large<br>living in critical<br>polluted Focal Point<br>area, Ludhiana |   |
| 2.        | Medical Checkup Program for industrial workers by DMC Hospital   | 2500   |   |
| 3.        | Artificial limbs to handicaps through Bharat Vikas Parishad  | 300  |   |
| 4.        | Anti-Smog Gun and Road sweeping machine to the local District Administration   | Community at large<br>living in critical<br>polluted Focal Point<br>area, Ludhiana | 100%  |
| 5.        | Support to Hunar Vikas Kendra/Skill Development Center for enhancing vocational skills of children and women and improve their livelihood. | 100  |   |
| 6.        | Support for promotion of Karate Paralympic Sports for deserving children and sportsman in rural areas/ villages                            | 80   |   |
| 7.        | Support to deserving players to prepare for Table Tennis competition   | 2  |   |

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

## **Essential Indicators**

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

The Company and its management engage with customers at multiple forums to gauge customer satisfaction levels so that necessary steps may be taken accordingly. The inputs are forwarded to the respective business teams for undertaking new developments besides corrective actions, as required. In 2022-23, the Company received 27 customer complaints. All these complaints were amicably resolved.

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

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

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

|                                | FY <u>2</u>                    | 2022-23                         | FY <u>2021-22</u> |                                |                                   |         |
|--------------------------------|--------------------------------|---------------------------------|-------------------|--------------------------------|-----------------------------------|---------|
|                                | Received<br>during<br>the year | Pending resolutionat end ofyear | Remarks           | Received<br>during the<br>year | Pending resolution at end of year | Remarks |
| Data privacy                   | Nil                            | Nil                             | NA                | Nil                            | Nil                               | NA      |
| Advertising                    | Nil                            | Nil                             | NA                | Nil                            | Nil                               | NA      |
| Cyber-security                 | Nil                            | Nil                             | NA                | Nil                            | Nil                               | NA      |
| Delivery of essential services | Nil                            | Nil                             | NA                | Nil                            | Nil                               | NA      |
| Restrictive Trade Practices    | Nil                            | Nil                             | NA                | Nil                            | Nil                               | NA      |
| Unfair Trade Practices         | Nil                            | Nil                             | NA                | Nil                            | Nil                               | NA      |
| Other                          | Nil                            | Nil                             | NA                | Nil                            | Nil                               | NA      |

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

|                   | Number | Reasons for recall |
|-------------------|--------|--------------------|
| Voluntary recalls | Nil    | NA                 |
| Forced recalls    | Nil    | NA                 |

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy?

Yes. The company has an IT Policy.

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

Not Applicable

## **Leadership Indicators**

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

https://www.vardhmansteel.com/

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

We have a dedicated sales team to ensure pre to post sale services to our customer. Post-sale service ensures smooth usage of our products and problem solving through a partnership approach that helps us forge long-lasting relationships with our customers.

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

We maintain active communication channels with our customers, including instant email support and SMS messaging. These channels serve as an effective means to proactively inform customers about any potential disruptions or discontinuations of essential services.

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

Yes, we disclose the relevant information required by the customer. The company engages with its customers and conducts periodical surveys to assess the satisfaction levels related to service, delivery, quality of product, complaint handling etc.

- Provide the following information relating to data breaches:
  - a) Number of instances of data breaches along-with impact.:

Nil

b) Percentage of data breaches involving personally identifiable information of customers:

Nil