KALYANI STEELS

C.I.N.: L27104MH1973PLC016350

KSL:SEC: July 21, 2023

BSE Limited

Phiroze Jeejeebhoy Towers,

Dalal Street,

Fort, Mumbai – 400 001 **Scrip Code : 500235**

National Stock Exchange of India Limited

Exchange Plaza,

Bandra Kurla Complex, Bandra (E)

Mumbai – 400 051 Scrip Symbol : KSL

Dear Sir,

Sub. : Business Responsibility and Sustainability Report

for the Financial Year 2022-23

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Business Responsibility and Sustainability Report ("BRSR") for the Financial Year 2022-23, which forms an integral part of the Annual Report of the Company for the Financial Year 2022-23.

The same is also available on the Company's website at the following link:

Click here

Thanking you,

Yours faithfully, For KALYANI STEELS LIMITED

MRS.D.R. PURANIK COMPANY SECRETARY

E-mail: puranik@kalyanisteels.com

Encl.: As above

ANNEXURE - G TO DIRECTORS' REPORT

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

[Pursuant to Regulation 34 (2) (f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

SECTION A: GENERAL DISCLOSURES

I. Details of the Listed Entity

1.	Corporate Identity Number (CIN) of the Listed Entity	L27104MH1973PLC016350
2.	Name of the Listed Entity	Kalyani Steels Limited
3.	Year of incorporation	1973
4.	Registered office address	Mundhwa, Pune - 411036, Maharashtra, India
5.	Corporate address	Mundhwa, Pune - 411036, Maharashtra, India
6.	E-mail	investor@kalyanisteels.com
7.	Telephone	+91-020-66215000
8.	Website	www.kalyanisteels.com
9.	Financial year for which reporting is being done	FY 2022-23
10	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited (NSE) BSE Limited (BSE)
11.	Paid Up Capital	₹218.64 Million
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mrs.D.R. Puranik, Company Secretary Contact No : +91-020-66215000 Email ID : investor@kalyanisteels.com
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)	The disclosures under this report are made on a standalone basis.

II. Products / services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Manufacturing	Manufacturing of forging and engineering quality carbon and alloy steel	97.76%

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.	Rolled Products Blooms and Rounds Pig Iron	24105 24103 24101	97.76%

III. Operations

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

Location	Number of plants	Number of offices	Total
National	1	4	5
International	0	0	0

17. Markets served by the entity

a. Number of locations

Locations	Number
National (No. of States and Union Territories)	36
International (No. of Countries)	3
b. What is the contribution of exports as a percentage of the total turnover of the entity?	1.04 %
c. A brief on types of customers	The forging industry in India is the primary market for the Company's products. Indian and International component manufacturers for commercial vehicles, two wheelers, diesel engines, bearings, tractors, turbines and rail form the significant part of the Company's clientele. Additionally, the Company has earned the status of preferred steel supplier for engineering, seamless tube and aluminum-smelting industry.

IV. Employees

The Company's Integrated Steel Manufacturing Facility at Ginigera is under a strategic alliance with Mukand Limited (ML). Under this alliance, the Company and ML share the production in the ratio of 41.38% by the Company and 58.62% by ML.

The said Manufacturing Facility is managed and operated by Hospet Steels Limited (HSL), which is a joint venture between the Company and ML. All employees and workers engaged in Manufacturing Facility are on the roll of HSL.

HSL has 1,020 employees on roll and 1,400 workers on contract basis. The expenses incurred by HSL are shared by the Company and ML in the production sharing ratio as above. As a result, these employees and workers do not form part of the Company's Business Responsibility and Sustainability Report.

As on March 31, 2023, the Company has 71 employees on roll and 200 workers on contract basis. These employees and workers form part of the Company's Business Responsibility and Sustainability Report.

18. Details as at the end of Financial Year

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Ma	Male		nale	
			No. (B)	% (B/A)	No. (C)	% (C/A)	
EMPLOYEES							
1.	Permanent (D)	70	66	94.29	4	5.71	
2.	Other than Permanent (E)	1	1	100	0	0	
3.	Total employees (D + E)	71	67	94.37	4	5.63	
			WORKERS				
4.	Permanent (F)	0	0	0	0	0	
5.	Other than Permanent (G)	214	214	100	0	0	
6.	Total Workers (F + G)	214	214	100	0	0	

b. Differently abled Employees and workers :

S. No.	Particulars	Total (A)	Male		Fema	le
			No. (B)	% (B/A)	No. (C)	% (C/A)
	I	DIFFERENTLY	' ABLED EMPLOYE	ES		
1.	Permanent (D)	0	0	0	0	0
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total differently abled employees (D + E)	0	0	0	0	0
		DIFFERENTL	Y ABLED WORKER	RS		
4.	Permanent (F)	0	0	0	0	0
5.	Other than Permanent (G)	0	0	0	0	0
6.	Total differently abled workers (F + G)	0	0	0	0	0

19. Participation / Inclusion / Representation of Women

	Total (A)	Number and Percentage of Females	
		No. (B)	% (B/A)
Board of Directors	12	2	16.67%
Key Management Personnel*	7	1	14.29%

^{*}Key Management Personnel includes Vice President and above

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	26.23%	20.00%	25.75%	19.64%	0	18.03%	10.20%	0	9.25%
Permanent Workers	0	0	0	0	0	0	0	0	0

^{*}includes employees who left voluntarily or due to retirement, dismissal or death.

V. Holding, Subsidiary and Associate Companies (including Joint Ventures)

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

Please refer to Form AOC-1 (Annexure F to the Directors' Report) for the above information. The Company's Associate Company and Joint Venture Company do not participate in its Business Responsibility initiatives.

VI. CSR Details

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

ii) Turnover (in ₹): ₹18,994 Million

iii) Net Worth (in ₹): ₹14,894.78 Million

VII. Transparency and Disclosures Compliances

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

Stakeholder	Grievance	I	FY 2022-23		F	Y 2021-22	
group from whom complaint is received	Redressal Mechanisms in Place (Yes / No) (If yes, then provide web-link for grievance redressal policy)	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes. https :// www. kalyanisteels. com/contact-us/	0	0	_	0	0	_
Investors (other than Shareholders)	NA	0	0	_	0	0	_
Shareholders	Yes. As per SEBI Listing Regulations	5	0	_	2	0	_
Employees and Workers	Yes	0	0	_	0	0	_
Customers	Yes. https :// www. kalyanisteels. com/contact-us/	39	0	_	40	0	_
Value Chain Partners	Yes. https:// www. kalyanisteels.com /contact-us/	0	0	_	0	0	_

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R / O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implication of the risk or opportunity (indicate Positive / negative implications)
1	Disaster recovery	Risk	Business operations may be affected due to natural calamities like earthquakes, cyclones, floods, etc.	Adequate protection against calamities through appropriate insurance.	Interruption in business operations may have negative financial impact.
2	Health and safety	Risk	Failure to ensure health and safety of employees and workers could result in high rate of absenteeism and can affect operations of the Company.	Training all employees and workers on health and safety. Medical check-up at regular intervals. Corrective and Preventive actions on identified unsafe working practices and unsafe working conditions.	Interruption in business operations may have negative financial impact.
3	Training and education	Opportunity	The highly trained employees and workers perform their tasks more efficiently and in safe manner.	Providing a need-based training courses.	Positive impact due to improvement in productivity, quality and Customer Service etc.

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.

The National Guidelines for Responsible Business Conduct (NGRBC) as prescribed by the Ministry of Corporate Affairs advocates Nine Principles referred to as P1-P9, as given below:

P1	Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent and accountable.
P2	Businesses should provide goods and services in a manner that is sustainable and safe.
P3	Businesses should respect and promote the well-being of all employees, including those in their value chains.
P4	Businesses should respect the interests of and be responsive towards all its stakeholders.
P5	Businesses should respect and promote human rights.
P6	Businesses should respect, protect and make efforts to restore the environment.
P7	Businesses when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
P8	Businesses should promote inclusive growth and equitable development.
P9	Businesses should engage with and provide value to their consumers in a responsible manner.

Disclosure Questions	P1	P2	Р3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1. a. Whether your entity's policy / policies cover each principle and its core elements of the NGRBCs. (Yes / No)		Y	Υ	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Yes / No)		N	N	N	N	N	N	N	N
c. Web Link of the Policies, if available	Policies on CSR, Prohibition of Insider Trading, RPTs, Whistle Blower are available on the link : https://www.kalyanisteels.com/profile/policies/					stle			
Whether the entity has translated the policy into procedures. (Yes / No)		Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes / No)		Υ	Υ	Y	Y	Υ	Y	Y	Y
4. Name of the national and international codes certifications / labels / standards adopted by your entity and mapped to each principle.	1								

- 1. ISO 9001 : 2015 (Quality Management Certification for Manufacturing of Plain Carbon and Alloy Steel Rolled Products)
- 2. IATF 16949 First Edition (Automotive Quality Management System Certification for Manufacturing of Plain Carbon and Alloy Steel Rolled Products)
- 3. ISO 14001: 2015 (Environment Management System Certification)
- 4. ISO 45001: 2018 (Health & Safety Management System Certification)
- 5. IBR Certificate (Well known Steel Maker Certificate from Central Boilers Board)

5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	The Company is in the process of setting up specific goals and targets with defined timelines.
6. Performance of the entity against the specific commitments, goals and targets alongwith reasons in case the same are not met.	N.A.

Governance, leadership and oversight

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

The Company is committed to integrating Environmental, Social and Governance (ESG) Principles into its business which is central to improving the life of the communities it serves. The Company is also committed to reduce Carbon Footprint and exploring promising ways for green power and securing supply of carbon credits.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).	Managing Director
 Does the entity have a specified Committee of the Board / Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details. 	No.

10. Details of Review of NGRBCs by the Company

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee	Frequency (Annually / Half Yearly / Quarterly / Any other – please specify)		
	P1 to P9	P1 to P9		
Performance against above policies and follow up action	Yes	Annually		
Compliance with Statutory requirements of relevance to the principles and rectification of any non-compliances	Yes	Annually		

11. Has the entity carried out independent assessment / evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.

No

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

SECTION C: PRINCIPLE-WISE PERFORMANCE DISCLOSURE

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

ESSENTIAL INDICATORS

1. Percentage coverage by training and awareness programs 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	% of persons in respective category covered by the awareness programmes
Board of Directors & Key Managerial Personnel (KMP) (includes VPs and above)	Nil	Nil	Nil
Employees other than BoD and KMPs	4	Technical Capability Development Communication skills, Ways to live Healthy Life, Combating Stress through Yoga, POSH.	60% 100%
Workers	4	Health and Safety Training, On the job Technical Training	100%

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

No Fines / Penalties / Punishment / Award / Compounding Fees / Settlement amount were paid in any proceedings (by the entity or by Directors / KMPs) with any regulators / law enforcement agencies / judicial institutions, in the financial year.

- 3. Of the instances disclosed in Question 2 above, details of the Appeal / Revision preferred in cases where monetary or non-monetary action has been appealed.
 - Not Applicable
- 4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.
 - The Company has zero tolerance for any form of corruption or bribery and has an Anti-Corruption and Anti-Bribery Policy. The said Policy commands strict actions against anyone caught engaging in such unethical behaviour. The copy of the said Policy is accessible through the intranet of the Company.
- 5. Number of Directors / KMPs / Employees / Workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery.

No disciplinary action was taken by any law enforcement agency against any of the Company's Directors, KMPs, Employees or Workers for the charges of bribery or corruption in current as well as previous financial year.

6. Details of complaints regarding conflict of interest.

No complaints are reported with regard to conflict of interest of Directors as well as KMPs in current as well as previous financial year.

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

Not Applicable

Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe

ESSENTIAL INDICATORS

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

	FY 2022-23	FY 2021-22	Details of Improvements in environmental and social impacts
R&D	_	_	_
Capex	0.30 %	7.32 %	a) Wind Breaker Sheets along the periphery of RM Yard.b) Canon Mist Fogger.c) Revamping of Air Pollution Control Equipmentd) Concreting of Coke yard.

2. a. Does the entity have procedures in place for sustainable sourcing?

No. Steel is fifth largest carbon emitting industry in the world. Globally, research and development is underway to de-carbonize the steel making process. However, the development of such technology is yet to be matured for a large commercial scale operations. Considering this, sustainable sourcing of input raw materials (major carbon emitting materials) is a significant challenge. Nonetheless, the Company is trying to develop suppliers to have sustainable sourcing and plans to introduce such procedures.

b. If yes, what percentage of inputs were sourced sustainably?

Not Applicable

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

Steel has a very long service life before it needs to be recycled. End-of-life steel or scrap steel is not considered as waste product by the Company, instead used as input product by remelting. The Company is committed to circularity and reuses scrap generated during the production process. Further the steel slag generated during the production is sold to cement manufacturers which helps in reducing the emmission intensity of cement production.

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

Not Applicable

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 well-being of employees :

Category		% of employees covered by											
Total (A)		1			Accident Matern insurance Benefi		,	, ,		Day Care Facilities			
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)		
				Р	ermanent	employee	5						
Male	66	66	100	66	100	0	0	0	0	0	0		
Female	4	4	100	4	100	4	100	0	0	0	0		
Total	70	70	100	70	100	4	5.71	0	0	0	0		
				Other t	han Perm	anent emp	loyees						
Male	1	1	100	1	100	0	0	0	0	0	0		
Female	0	0	0	0	0	0	0	0	0	0	0		
Total	1	1	100	1	100	0	0	0	0	0	0		

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

Category		% of workers covered by										
	Total (A)	1	alth rance		Accident insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)	
	Permanent workers											
Male	0	0	0	0	0	0	0	0	0	0	0	
Female	0	0	0	0	0	0	0	0	0	0	0	
Total	0	0	0	0	0	0	0	0	0	0	0	
				Other	than Perr	nanent wo	rkers					
Male	214	214	100	214	100	0	0	0	0	0	0	
Female	0	0	0	0	0	0	0	0	0	0	0	
Total	214	214	100	214	100	0	0	0	0	0	0	

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

Benefits		FY 2022-23		FY 2021-22			
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	
PF	100	100	Υ	100	0	Υ	
Gratuity	100	100	Υ	100	0	Y	
ESI	0	100	Υ	0	0	N.A.	

3. Accessibility of workplaces

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

The Company's various locations, including the offices / premises have been equipped with lifts and handrails for stairwells to facilitate the movement of differently abled individuals. Thus, Company's premises has been made access friendly.

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

The Company provides equal employment opportunities, without any discrimination on the grounds of age, colour, disability, marital status, nationality, race, religion, sex, sexual orientation. The Company strives to maintain a work environment that is free from any harassment based on above considerations. This Equal Opportunities Policy is subject to applicable regulations, qualifications and merit of the individual and the same is available on the intranet of the Company.

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

Gender	Permanent	employees	Permanent workers		
	Return to work rate	Retention rate	Return to work rate	Retention rate	
Male	0	0	0	0	
Female	0	0	0	0	
Total	0	0	0	0	

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, give details of the mechanism)
Permanent Workers	Kalyani Steels does not have any Permanent Workers.
Other than Permanent Workers	Yes - HR Department has established a grievance handling mechanism.
Permanent Employees	Yes - HR Department has established a grievance handling mechanism.
Other than Permanent Employees	Yes - HR Department has established a grievance handling mechanism.

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

Category		FY 2022-23		FY 2021-22				
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)		
Total Permanent Employees	70	0	0	66	0	0		
Male	66	0	0	61	0	0		
Female	4	0	0	5	0	0		
Total Permanent Workers	0	0	0	0	0	0		
Male	0	0	0	0	0	0		
Female	0	0	0	0	0	0		

8. Details of training given to employees and workers :

Category	FY 2022-23					FY 2021-22				
	Total (A)		lth and neasures	On Skill up	gradation	Total (D)	On Hea safety m		On Skill up	gradation
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
					Employees					
Male	67	67	100	25	37.31	61	61	100	20	32.79
Female	4	4	100	0	0	5	5	100	1	20.00
Total	71	71	100	25	35.21	66	66	100	21	31.82
					Workers					
Male	214	214	100	214	100	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
Total	214	214	100	214	100	0	0	0	0	0

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

Category	FY 2022-23			FY 2021-22					
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)			
	Employees								
Male	67	67	100	61	61	100			
Female	4	4	100	5	5	100			
Total	71	71	100	66	66	100			
			Workers						
Male	0	0	0	0	0	0			
Female	0	0	0	0	0	0			
Total	0	0	0	0	0	0			

10. Health and safety management system:

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

The health and safety management systems covers activities across all locations and ensures maintaining and improving employees' health and safety.

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 follows following steps to identify work-related hazards and risk assessment:

- a. Safety visits, which involve regular inspections of the workplace to identify potential hazards and unsafe practices.
- b. Elimination of Commonly Accepted Unsafe Practices.
- c. Third Party Safety Audits.
- 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 put in place Safety Observation and Near Miss Reporting System.

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

All the employees are offered a variety of health and wellness benefits, including medical insurance and accident insurance. Regular medical consultation is provided on weekly basis.

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)	Employees	0	0
(per one million person hours worked)	Workers	0	0
Total recordable work related injuries	Employees	0	0
	Workers	0	0
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or	Employees	0	0
ill-health (excluding fatalities)	Workers	0	0

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

The Company considers employees as its most valued asset and hence prioritizes their health and safety. The Company has created extensive compliant measures at all touch points to safeguard everyone's safety in the work place and ensure safe working environment. The Company has taken the following measures to ensure a safe and healthy work place:

- a. The Company has taken measures which are compliant with all statutory preventive healthcare and occupational health and safety requirements.
- b. The Company provides training on health and safety measures to all employees on a periodic basis.

13. Number of Complaints on the working conditions, health and safety made by employees and workers :

No complaints were made by any employee or worker, on the working conditions and / or health and safety practices of the Company.

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.

Safety related incidences, if any, are studied in detail by internal / external audits. Corrective and preventive action plans are implemented to avoid re-occurrence of similar incidents.

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.

Internal and External group of stakeholders have been identified. Presently the said stakeholders' group have the immediate impact on the working and operations of the Company which includes employees, investors, suppliers and service providers, customers and community.

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

Stakeholder Group	Whether identified as Vulnerable and Marginalized Group (Yes / No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually / Half yearly / Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	Online portals, Conferences, Open House briefing, workshops	Ongoing	 Help the employees to expand their knowledge in the industry. Inform about important advances of the Company. Getting employee feedback and resolving their issues.
Investors	No	Annual Report, Company's Website, Quarterly & Annual Results, Annual General Meeting	Annually, Quarterly, Periodically as applicable	Investors prefer to invest in the organizations that are compliant with applicable laws.
Suppliers and Service providers	No	Supplier and Vendor meets Workshops & Trainings Code of Conduct	Periodically	Supply of materials and services
Customers	No	Personal visits, Plant visits, Emails, Conferences and events	Periodically	Sale of materials and services, product quality and availability, responsible manufacturing.
Community	No	Personal meetings / training / workshops	Periodically	CSR obligations

Principle 5: Businesses should respect and promote human rights.

ESSENTIAL INDICATORS

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

Category		FY 2022-23			FY 2021-22			
	Total (A)	No of employees / workers covered (B)	% (B / A)	Total (C)	No of employees / workers covered (D)	% (D / C)		
EMPLOYEES								
Permanent	70	70	100	66	66	100		
Other than permanent	1	1	100	0	0	0		
Total Employees	71	71	100	66	66	100		
	WORKERS							
Permanent	0	0	0	0	0	0		
Other than permanent	214	214	100	0	0	0		
Total Workers	214	214	100	0	0	0		

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

Category			FY 2022-23	}			FY 2021-22			
	Total (A)		Minimum age		than m Wage	Total (D)		Minimum ige	More Minimur	
		No. (B)	% (B/A)	No. (C)	% (C /A)		No. (E)	% (E/D)	No. (F)	% (F/D)
				EN	1PLOYEES					
				Pe	ermanent					
Male	66	0	0	66	100	61	0	0	61	100
Female	4	0	0	4	100	5	0	0	5	100
				Other t	han Permar	nent				
Male	1	0	0	1	100	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
				٧	ORKERS					
				Pe	ermanent					
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
Other than Permanent										
Male	214	62	28.97	152	71.03	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0

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

		Male	Female		
	Number Median remuneration / salary / wages of respective category (₹ in Million)		Number	Median remuneration / salary / wages of respective category (₹ in Million)	
Board of Directors (BoD) (Only Executive Directors)	1	116.47	0	0	
Key Managerial Personnel (includes VPs and above)	6	9.27	1	7.05	
Employees other than BoD and KMP	60	1.50	3	1.14	
Workers (Permanent)	0	0	0	0	

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

The Company has formulated a Human Rights Policy which states that the employees can address their complaints or grievances to the Human Resource Department. There shall be no retaliation taken against any employee who raises concern in accordance with the policy. Human Resource Department is responsible to investigate the reported issues and ensure that they are addressed and rectified.

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

The Company is actively involved in the protection and enhancement of human rights and is fully committed in promoting inclusivity and equality and prohibiting any discrimination. The Company has formulated Human Rights Policy which works in combination with the Grievance Policy to ensure that grievances are addressed promptly and effectively.

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

		FY 2022-23		FY 2021-22			
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks	
Sexual Harassment	0	0	_	0	0	_	
Discrimination at workplace	0	0	_	0	0	_	
Child Labour	0	0	_	0	0	_	
Forced Labour / Involuntary Labour	0	0	_	0	0	_	
Wages	0	0	_	0	0	_	
Other Human Rights related issues	0	0	_	0	0	_	

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

The Company has put in place a robust grievance redressal process for investigation of employee concern and has instituted a code of conduct and employee service rules, that clearly describes employee responsibility and acceptable employee conduct. The details of complainant, if any, are kept confidential and the complainant is protected from any discrimination / harassment till the issue is resolved.

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

Yes, human rights requirements form part of Supplier Code of Conduct, whereby suppliers are insisted to respect human rights standards and work towards them in all business activities.

9. Assessments for the year :	% 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	
Wages	

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

The Plant and Offices of the Company were found to be having no negative impacts and as a result, no corrective actions were required on the criteria stated above.

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

ESSENTIAL INDICATORS

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total electricity consumption (A)	GJ	359,869	386,752
Total fuel consumption (B)	GJ	4,748,538	4,506,566
Energy consumption through other sources (C)	GJ	0	0
Total energy consumption (A+B+C)	GJ	5,108,407	4,893,318
Energy intensity per rupee of turnover (Total energy consumption / turnover in rupees)	GJ / ₹ in Million	0.00026	0.00028

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

No

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

No

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

Parameter	FY 2022-23	FY 2021-22					
Water withdrawal by the source in Kilolitres (KLs)							
i) Surface Water	1,101,531	1,385,024					
ii) Ground water	0	0					
iii) Third party water	0	0					
iv) Sea water / Desalinated water	0	0					
v) Other	0	0					
Total volume of water withdrawal (in Kilolitres) (i + ii + iii + iv + v)	1,101,531	1,385,024					
Total volume of water consumption (in Kilolitres)	709,489	804,831					
Water intensity per rupee of turnover (Water consumed / turnover)	0.000037	0.000047					

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

Yes, the Company acknowledges the importance of effective water resource management both inside and outside of its operational sites. The Company is committed to improving water use efficiency while ensuring that water is available to all stakeholders. The Company, at its plant at Hospet, operates a Wastewater Treatment System since it is a Zero Liquid Discharge (ZLD) plant. The said system treats 100% of waste water into re-usable water. The treated wastewater is then used to reduce the consumption of freshwater and also used in various areas of the Plant like recreational garden.

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	µgm/m³	16.67	13.47	
SOx	µgm/m³	16.53	13.75	
Particulate matter (PM)	μgm/m³	43.64	39.55	
Persistent organic pollutants (POP)	_	_	_	
Volatile organic compounds (VOC)	_	_	_	
Hazardous Air Pollutants (HAP)	_	_	_	

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) and its intensity, in the following format:

Parameter	Unit	FY 2022-23	FY 2021-22	
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	592,624	568,654	
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	21,876	39,665	
Total Scope 1 and Scope 2 emissions per rupee of turnover	Metric tonnes of CO2 equivalent / rupee turnover	0.000032	0.000035	

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. Deutsch Quality Systems (India) Private Limited.

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

The Company is dedicated to taking action to address climate change and to make a positive contribution to the environment and communities in which it operates. The Company used 5.736 Cr units of renewable energy to replace equivalent amount of units from Karnataka Power Transmission Corporation Limited (KPTCL) Grid Power. Various other initiatives include introduction of Energy Efficient Pump for mould and spray cooling in caster that saves power. Energy saving is also achieved by installing VFD in Sinter cooler motor, for adjusting speed with sinter discharge temperature.

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)					
Plastic waste (A)	0	0			
E-waste (B)	10.25	8.90			
Bio-medical waste (C)	0.005	0.005			
Construction and Demolition Waste (D)	0	0			
Battery waste (E)	178	60			
Radioactive waste (F)	0	0			
Other Hazardous waste (Used Oil / Waste Oil) (G)	0.264 KL	4.55 KL			
Other Non-hazardous waste generated (H) Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	442,401	442,949			
i) Granulated Slag	237,868	246,344			
ii) MBF Slag	1,651	3,375			
iii) Skull Powder	1,157	1,313			
iv) Pig Iron Scrap	12,600	15,808			
v) GCP Dust	11,635	13,395			
vi) RMS Mill Scale	4,129	4,837			
vii) RMS Cut ends	9,034	8,992			
viii) Thickener Sludge	1,422	4,497			
ix) Iron Ore Fines	134,266	118,595			
x) Coke Fines	28,639	25,793			
Total (A+B + C + D + E + F + G + H)	442,589 MTs and 0.264 KL	443,018 MTs and 4.55 KL			

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

Category of Waste		
(i) Recycled	0	0
(ii) Re-used	181,213	158,697
(iii) Other recovery operations	0	0
Total	181,213	158,697

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

Category of Waste		
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations	237,625	245,854
Total	237,625	245,854

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

No

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

Hazardous wastes and other wastes that include e-waste, are stored in a designated place and they are safely disposed as per the norms laid by Karnataka State Pollution Control Board (KSPCB).

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

Not Applicable

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

The Company is in compliance with all applicable environmental laws.

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

ESSENTIAL INDICATORS

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

The Company is a member of 8 Trade Associations.

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

Sr. No.	Name of the trade and industry chambers / associations	Reach of trade and industry chambers / associations (State / National)
1.	Confederation of Indian Industry	National
2.	The Alloy Steel Producers Association of India	National
3.	Associated Chamber of Commerce & Industries of India	National
4.	Indian Stainless Steel Development Association	National
5.	Steel Furnace Association of India	National
6.	Engineering Export Promotion Council	National
7.	Federation of Indian Export Association	National
8.	Thane Belapur Industrial Association	State

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

There were no incidents of anti-competitive behaviour, abuse of dominant position or unfair trade practices involving the Company during the reporting period i.e. FY 2022-23.

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

ESSENTIAL INDICATORS

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

Not Applicable

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

Not Applicable

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

The Company has regular engagement with key community institutions and representatives from key neighbourhood areas. The Company has provided e-mail ID and drop box system for grievance redressal, to enable the stakeholders to easily communicate their concerns and suggestions.

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	2.72%	0.71%
Sourced directly from within the district and neighbouring district	29.86%	27.04%

PRINCIPLE 9: Businesses should promote inclusive growth and equitable development

ESSENTIAL INDICATORS

- Describe the mechanisms in place to receive and respond to consumer complaints and feedback.
 - Customer complaints are captured through e-mails and personal meetings and the same are addressed as per documented procedure.
- 2. Turnover of products and / services as a percentage of turnover from all products / service that carry information about Environmental and social parameters relevant to the product, Safe and responsible usage, Recycling and / or safe disposal:

Not Applicable

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

	FY 2022-23			FY 2021-22		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data Privacy	0	0	_	0	0	
Advertising	0	0	_	0	0	_
Cyber Security	0	0	_	0	0	_
Delivery of essential services	0	0	_	0	0	_
Restrictive Trade Practices	0	0	_	0	0	_
Unfair Trade Practices	0	0	_	0	0	_

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

Not Applicable

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

The Company has a formal policy on Data Protection and Privacy and a copy of the same is available on the Intranet of the Company.

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

Not Applicable