

ELECTROSTEEL CASTINGS LIMITED

H.O. : G.K. Tower, 19, Camac Street, Kolkata 700 017, India
Regd. Office : Rathod Colony, Rajgangpur, Sundergarh, Odisha 770 017
Tel : +91 33-2283 9900, 7103 4400
CIN : L27310OR1955PLC000310
Web : www.electrosteelcastings.com



1 August, 2024

BSE Limited

Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001

National Stock Exchange of India Limited

Exchange Plaza,
Bandra Kurla Complex,
Bandra (E),
Mumbai – 400 051

Scrip Code: 500128

Symbol: ELECTCAST

Dear Sir/Madam,

Sub: Business Responsibility and Sustainability Report- Financial Year 2023-24
(ISIN INE086A01029)

In compliance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, please find enclosed the Business Responsibility and Sustainability Report for the Financial Year 2023-24.

This is for your information and records.

Kindly acknowledge receipt.

Thanking you,

Yours faithfully,

For Electrosteel Castings Limited

Indranil Mitra
Company Secretary

Encl: As above



BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

SECTION A: GENERAL DISCLOSURE

I. Details of Listed Entity

1	Corporate Identity Number (CIN) of the Company	L27310OR1955PLC000310
2	Name of the Company	Electrosteel Castings Limited
3	Year of Incorporation	1955
4	Registered Office address	Rathod Colony, Rajgangpur, Sundergarh, Odisha 770 017
5	Corporate Address	G. K. Tower, 19, Camac Street, Kolkata – 700017
6	Email ID	companysecretary@electrosteel.com
7	Telephone	+91 33 2283 9990
8	Website	www.electrosteel.com
9	Financial year of which Reporting is being done	1st April 2023 to 31st March 2024
10	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited, BSE Limited
11	Paid Up Capital	Rs. 6,181.84 Lakhs
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:	Mr. Indranil Mitra Company Secretary 033-22839990 companysecretary@electrosteel.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).	Disclosures are on a standalone basis.
14	Name of assurance provider	Not Applicable
15	Type of assurance obtained	Not Applicable

II. Products/Services

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

S.No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Manufacturing of pipe and pipe fittings	The Company manufactures Ductile Iron Pipes and Ductile Iron Fittings used for various applications, such as water transmission and distribution, desalination plants, stormwater drainage, and sewage treatment plants.	100%

17. 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.	Ductile Iron Pipes	24311	81.53
2.	Cast Iron Pipes	24311	3.07
3.	Ductile Iron Fittings	24311	4.03
4.	Ferro Products	24104	2.95
5.	Cement	23942	0.03
6.	Others	243	8.39

III. Operations

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

Location	Number of Plants	Number of Offices	Total
National	5	10	15
International	Nil	18	18

19. Markets served by the entity:

a. Number of locations

Location.	Number
National (No. of states)	28
International (No. of countries)	110

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

Exports contributes to 18% of our total turnover.

c. A brief on types of customers –

Electrosteel Castings Limited (ECL) serves a diverse customer base encompassing companies in the infrastructure and industrial sectors. The Company supplies ductile iron pipes and fittings to major turnkey contractors like L&T, Megha Engineering, and NCC. ECL also directly supplies to state government departments such as PHED/Water supply, as well as to the private contractors catering to semi-government agencies.

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	1439	1413	98%	26	2%
2.	Other than Permanent (E)	154	153	99%	1	1%
3.	Total Employees (D + E)	1593	1566	98%	27	2%
WORKERS						
4.	Permanent (F)	1514	1514	100%	0	0%
5.	Other than Permanent (G)	8926	8883	99%	43	1%
6.	Total workers (F + G)	10440	10397	99.5%	43	0.5%

b. Differently abled Employees and workers:

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

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	18	4	22%
Key Management Personnel	10*	3	30%

*Includes 9 Board of Directors

22. Turnover rate for permanent employees and workers

	FY 2023-24			FY 2022-23			FY 2021-22		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	6%	8%	6%	12%	9%	12%	7%	13%	7%
Permanent Workers	3%	-	3%	2%	-	2%	2%	-	2%

V. HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

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

S. No.	Name of the holding/subsidiary/ associate companies/ joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Electrosteel Europe S.A.	Subsidiary	100%	No
2	Electrosteel Castings (UK) Limited	Subsidiary	100%	No
3	Electrosteel Algeria SPA	Subsidiary	100%	No
4	Electrosteel USA, LLC and its wholly owned subsidiary, Water Fab LLC, USA	Subsidiary	100%	No
5	Electrosteel Trading, S.A.	Subsidiary	100%	No
6	Electrosteel Doha for Trading LLC	Subsidiary	49%	No
7	Electrosteel Castings Gulf FZE	Subsidiary	100%	No
8	Electrosteel Bahrain Holding W.L.L. and its wholly owned subsidiary, Electrosteel Bahrain Trading WLL	Subsidiary	100%	No
9	Electrosteel Brazil Ltd a Tubos e Conexoes Duteis	Subsidiary	100%	No
10	North Dhadhu Mining Company Private Limited	Joint Venture	48.98%	No

VI. CSR DETAILS

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

Yes

- (ii) **Turnover (in Rs)** 7,04,368.82 lakhs.
- (iii) **Net worth (in Rs.)** 4,99,189.52 lakhs.

VII. TRANSPARENCY AND DISCLOSURES COMPLIANCES

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)	FY 2023-24			FY 2022-23		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints pending resolution at close of the year	Remarks	
Communities		0	0	Nil	0	0	Nil
Investors (Other than shareholders)		0	0	Nil	0	0	Nil
Shareholders	https://www.electrosteel.com/investor/code_of_conduct_and_policies.php	28	0	-	25	0	-
Employees and workers		0	0	Nil	0	0	Nil
Customers		5	0	-	4	0	-
Value Chain Partners		0	0	Nil	0	0	Nil
Others Please specify		0	0	Nil	0	0	Nil

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	GHG Emissions and Climate Change	Risk	<p>Risk</p> <p>The ductile iron pipe & fittings production process contributes to greenhouse gases with emissions arising primarily during the conversion of iron ore to iron or subsequent refining of the iron to finished ductile iron products.</p>	<p>ECL has commissioned an environment cell that prioritizes mitigating emissions with utmost importance adhering to ISO 14001 standards.</p> <p>The Company has implemented a 12 MW power plant at the Haldia CDM (Clean Development Mechanism) project, enabling power generation through waste heat and significantly reducing GHG emissions. This project is also registered under the United Nations Framework Convention on Climate Change (UNFCCC) as a CDM project.</p> <p>Environment compliance reports are submitted annually to the respective pollution control boards for monitoring</p>	Negative

progress and transparency.

2	Energy Management	Risk & Opportunity	Risk: The manufacturing processes of our products, such as ductile iron and cast-iron pipes and fittings, require energy, which is sourced from captive power plants and the grid. Optimizing energy is key to ensuring efficient production, reducing costs, and improving financial stability.	The Company's Khardah units are certified with the ISO 50001 energy management system (EMS) which enhances energy performance, increases energy efficiency, and reduces energy costs, thereby contributing to sustainability goals and reducing environmental impact.	Positive & Negative
			Opportunity: Implementing energy-efficient technologies and processes to reduce energy consumption per unit of output also results in improved overall efficiency.	ECL has implemented initiatives to reduce fuel and electricity usage, harnessing waste gases, and enhancing renewable energy capabilities.	

3	Water Management	Risk/ Opportunity	Risk: The manufacturing process requires water as a key input. Ineffective water management can lead to non-compliance, impacting the company's operations and creating reputational risks as well as ecological impacts on the water level in the surrounding region.	The environment management cell actively engages in implementing measures to minimize water consumption and prevent water wastage.	Positive & Negative
			Opportunity:	The Company has set up a state-of-the-art effluent treatment plant (ETP). Additionally, it conducts regular effluent water analysis to ensure compliance, and reports are submitted to the authorities.	

			<p>Implementing water-saving measures not only reduces costs but also enhances compliance and reputation. Strong water management practices can attract environmentally conscious stakeholders, offering a competitive edge.</p>	<p>At one of the facilities, the company collects sewage water from the municipality. This wastewater undergoes treatment through a sewage treatment plant (STP) and is utilized in the production process. This recycling initiative has resulted in significant conservation of freshwater resources.</p>	
4	Waste Management	Risk/Opportunity	<p>Risk: The manufacturing process generates both hazardous and non-hazardous waste. Improper management of this waste can lead to negative environmental impacts, affect the workforce, and can harm nearby communities, potentially resulting in non-compliance with regulations.</p> <p>Opportunity: Implementing efficient waste management practices can lead to cost savings through reduced disposal costs and increased efficiency in resource utilization. Further, it ensures that the Company remains compliant with environmental regulations.</p>	<p>The Company's facilities are ISO 14001-certified, and it has adopted a systematic waste management method to ensure that waste materials are properly handled, stored, and disposed of.</p> <p>Most of the process waste generated during operations can be reprocessed and utilized as raw materials to manufacture different products.</p> <p>Hazardous waste such as used oil/waste lubricating oil, zinc dust, and used batteries are stored and disposed of by authorized recyclers in accordance with CPCB/SPCB rules.</p>	Positive & Negative
5	Health & Safety	Risk & Opportunity	<p>Risk: The manufacturing process is exposed hazards, including occupational health</p>	<p>The Company's facilities are ISO 45001 certified, and it is committed to creating and maintaining a culture of high safety.</p>	Positive & Negative

		risks such as exposure to high temperatures and machinery accidents. Failure to address these risks can result in injuries and adversely impact the Company's reputation.	The Company regularly conducts health and safety assessments, mock drills, training awareness sessions, and health check-ups for its employees and workers.	
		Opportunity: Prioritizing employee health and safety enhances morale, boosts productivity, and improves retention rates.	To ensure safety, the workers are provided with necessary PPE based on the risks they are exposed to in their operations.	
6	Community Support and Corporate Social Responsibility	Opportunity	The Company's vision extends beyond pioneering technology and innovation, embracing a holistic approach to societal impact. This provides an opportunity to actively engage in Corporate Social Responsibility (CSR) programs in the areas of education, and community development health and safety. This commitment underscores the Company's dedication to creating positive change and fostering a better future for all. This enables building a positive image for the Company and fosters harmonious relations.	Positive
7	Human-rights	Opportunity	The Company complies with all applicable labour laws. Further, it has implemented a social accountability policy across all its facilities, and three of its units are SA8000 certified. These	Positive

initiatives highlight the Company's dedication to ethical operations and social responsibility.

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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 elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
c. Web Link of the Policies, if available	https://www.electrosteel.com/investor/code_of_conduct_and_policies.php								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4. Name of the national and international codes/certifications/labs/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	ISO 9001: Quality Management Systems (QMS) Certification ISO 14001: Environmental Management Systems (EMS) Certification ISO 50001: Energy Management Systems (EnMS) Certification ISO 45001: Occupational Health and Safety Management Systems (OHSMS) Certification SA 8000: Social Accountability Certification IS 9523: 2000: BIS Certification for Ductile Iron Fittings IS 8329: 2000: Spun ductile iron pipes								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	The Company periodically reviews the goals and targets set for various business divisions and corporate functions, demonstrating its commitment to financing sustainable business activities.								
6. Performance of the entity against the specific commitments,	As a leading company, we ensure compliance with national laws and regulations by integrating performance evaluation as a fundamental aspect across all functions within the organization.								

goals and targets
along-with reasons in
case the same are not
met.

Governance, leadership and oversight

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

At ECL, our commitment to the environment and society is evident through measures such as modifying oil-fired heat treatment furnaces to use Blast Furnace Gas and efforts to minimize water and energy usage. This aligns with our goal of contributing to a circular economy amidst unpredictable geopolitical and economic circumstances. Effective and transparent communication within our governing bodies, responsible supply chain models, and sensitive human resources policies have been crucial to our success. We remain dedicated to sustainable growth, corporate governance, and delivering excellent results, strengthening ECL's reputation as a top ethical, sustainable, and customer-focused brand. We thank our customers for their support and positive response to our product lines. Through our ESG initiatives, we will achieve improved results and reinforce ECL's position as a leading ethical, sustainable and customer-focused brand.

- Sunil Katial, Chief Executive Officer and Whole-time Director

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).

Mr. Sunil Katial,
Chief Executive Officer and Whole-time Director

9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.

Yes, the Company has a specified Committee of the Board/ Director responsible for decision-making on sustainability-related issues
Mr. Sunil Katial, Chief Executive Officer and
Whole-time Director

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	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9	
Performance against above policies and follow up action																			Annually
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances																			Monthly

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

P1	P2	P3	P4	P5	P6	P7	P8	P9

The Company carries out external and internal audits from time to time in accordance with the regulatory and statutory requirements. However, a specific independent audit of the NGRBC principles has not yet been carried out.

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

SECTION C PRINCIPLE-WISE PERFORMANCE DISCLOSURE

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

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	2	During this financial year, apart from Statutory updates, the Board of Directors were familiarised with upcoming regulations and topics like GRI, including risk factors and mitigation processes.	100%
Key Managerial Personnel	1	Health & safety, First aid training, Skill development, POSH, SA 8000, Skill upgradation SOPS, Safety awareness.	100%
Employees other than BoD and KMPs	375	Effective communication Conservation of resource Leadership training CBM - Condition-based maintenance Importance of PPE Analytical thinking	100%
Workers	641		

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 Company’s website):**

Monetary				
NGRBC Principle	Name of the Regulatory Enforcement Agencies/Judicial Institutions	Amount (In INR)	Brief of the Case	Has an Appeal been preferred? (Yes/No)
Penalty/ Fine				
Settlement		Nil		
Compounding Fee				

Non-Monetary				
NGRBC Principle	Name of the Regulatory Enforcement Agencies/Judicial Institutions	Brief of the Case	Has an Appeal been preferred? (Yes/No)	
Imprisonment				
Punishment		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

4. **Does the entity have an anti-corruption or anti-bribery policy?**
 Yes, ECL has an anti-corruption and anti-bribery (ACAB) policy and has measures in place to prevent such misconduct. Additionally, the ACAB policy explicitly mentions the prohibition of bribery or any form of undue advantage to gain business benefits, directly or indirectly. Strong processes exist for monitoring and taking disciplinary actions if there are any violations of this policy.

The policy is available at:
<https://www.electrosteel.com/admin/pdf/385692356-Electrosteel-Antibribery-Policy.pdf>

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

	FY 2023-24	FY 2022-23
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

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

	FY 2023-24		FY 2022-23	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	Nil	Nil	Nil
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	Nil	Nil	Nil

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

Not Applicable

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

	FY 2023-24	FY 2022-23
Number of days of accounts payables	33	33

9. **Open-ness of business**

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

Parameter	Metrics	FY 2023-24	FY 2022-23
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	17.4%	17.0%

	b. Number of trading houses where purchases are made from	176	178
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	65.8%	75.1%
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	1.05%	1.01%
	b. Number of dealers / distributors to whom sales are made	23	44
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	97.3%	89.6%
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0	0
	b. Sales (Sales to related parties / Total Sales)	16.5%	17.9%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	0	0
	d. Investments (Investments in related parties / Total Investments made)	0	0

Leadership Indicators

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

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

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 processes in place to avoid and manage the conflict of interest involving members of the Board. The processes are outlined in the Code of Conduct that prohibits engagement in any business or activity conflicting with the Company's interests. The Code ensures that directors and senior management members avoid activities or engagements that may interfere with their duties or prejudice the Company's interests, as well as activities that impede objective or independent work. Additionally, it prohibits the receipt of personal benefits by directors or senior management, including their families, and activities that hinder their ability to devote appropriate time and attention to responsibilities. These measures aim to uphold integrity and prevent conflict of interests within the entity's governance structure.

Please refer to the policy by following link:

<https://www.electrosteel.com/admin/pdf/1608017827code-of-conduct-49.pdf>

PRINCIPLE 2: BUSINESSES SHOULD PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE

Essential Indicator

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

	FY 2023-24	FY 2022-23	Details of improvements in environmental and social impacts
R&D	-	0.04%	
Capex	2.13%	0.39%	The Company has invested in several pollution control measures during the current financial year.

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

The Company is dedicated to sourcing its raw materials sustainably, guided by its sustainable procurement policy. This policy prioritizes social, economic, and environmental considerations across the entire supply chain. As per the SA8000 system, the Company conducts periodic audits of its supplier's sustainability credentials. The Company expects its supply chain partners to adhere to the same ethical standards of sustainability in their business operations and encourages suppliers to follow the principles and practices outlined in the sustainable procurement policy.

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

The Company has implemented a sustainable procurement policy and is currently tracking its procurement from sustainable sources.

Please refer to the policy by following link:

<https://www.electrosteel.com/admin/pdf/18562356-Electrosteel-Sustainable-Procurement-Policy.pdf>

- 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:**

Not applicable, as the lifespan of ductile iron pipes extends beyond 100 years. The product comprises mainly iron and cement mortar. The iron component can be recycled at the end of the product's lifecycle, contributing to resource conservation and environmental responsibility.

- 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.**

Yes, the EPR is applicable for the entity and the activities are in compliance with CPCB.

Leadership Indicators

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following 2Bg format?

NIC Code	Name of Product /Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
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The Company has initiated a life cycle assessment (LCA) for 3 of its products,

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

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

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2023-24	FY 2022-23
Coke & Iron fines	8.34%	8.91%

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

	FY 2023-24			FY 2022-23		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)						
E-waste						
Hazardous waste						

Not Applicable

Other waste

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
	Not Applicable

PRINCIPLE 3: BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS

Essential Indicators

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

% Employees covered by											
Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	1413	1413	100%	1413	100%	0	0%	0	0%	0	0%
Female	26	26	100%	26	100%	26	100%	0	0%	0	0%
Total	1439	1439	100%	1439	100%	26	2%	0	0%	0	0%
Other than Permanent employees											
Male	153	115	75%	153	100%	0	0%	0	0%	0	0%
Female	1	0	0%	1	100%	1	100%	0	0%	0	0%
Total	154	115	75%	154	100%	1	1%	0	0%	0	0%

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

% Workers covered by											
Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent workers											
Male	1514	1514	100%	1514	100%	0	0%	0	0%	0	0%
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	1514	1514	100%	1514	100%	0	0%	0	0%	0	0%
Other than Permanent workers											
Male	8883	8883	100%	8883	100%	0	0%	0	0%	0	0%
Female	43	43	100%	43	100%	43	100%	0	0%	0	0%

Total	8926	8926	100%	8926	100%	43	0.5%	0	0%	0	0%
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c. Spending on measure towards well-being of employees and workers (including permanent and other than permanent) in the following format –

	FY 2023-24	FY 2022-23
Cost incurred on well-being measures as a % of total revenue of the company	0.30%	0.29%

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

Benefits	FY 2023-24			FY 2022-23		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Yes	100%	100%	Yes
Gratuity	100%	100%	Yes	100%	100%	Yes
ESI	9%	68%	Yes	9%	98%	Yes
Others- please specify	-	-	-	-	-	-

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.

While the Company premises may not be fully compliant with the Rights of Persons with Disabilities Act, of 2016 the Company actively responds to the needs of differently-abled employees by providing assistance whenever required.

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 has implemented a social accountability policy, and three of its facilities are SA8000 certified, demonstrating adherence to international standards of ethical workplace practices. This certification demonstrates compliance with critical performance criteria, which include ensuring the prohibition of child and forced labour, providing a safe and healthy work environment, respecting workers' rights to association and collective bargaining, and enforcing a non-discriminatory workplace. This commitment reflects the company's dedication to maintaining not only legal standards but also a moral stance in promoting ethical and fair working conditions.

Please refer to the policy by following link:

https://www.electrosteel.com/admin/pdf/1608019883Social_Accountability_Policy.pdf

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

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

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, the Company has established a grievance mechanism to ensure that all concerns and issues raised by employees and workers are promptly addressed.
Other than Permanent Workers	Employees are encouraged to contact the local Head of Department (HOD) or Human Resources (HR) representative at their respective facilities to report any grievances they may have.
Permanent Employees	Additionally, grievances can be reported through alternative channels. Complaint boxes have been installed at all facilities, allowing grievances to be submitted anonymously.
Other than Permanent Employees	The Company also has the 'Meet your CEO' initiative, which facilitates open communication channels between employees and management.

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

Category	FY 2023-24			FY 2022-23		
	Total employees / workers	No. of employees / workers in respective	% (B / A)	Total employees / workers	No. of employees / workers in respective	% (D/C)

	in respective category (A)	category, who are part of association(s) or Union (B)		in respective category (C)	category, who are part of association(s) or Union (D)	
Total Permanent Employees	1439	0	0%	1372	0	0%
- Male	1413	0	0%	1349	0	0%
- Female	26	0	0%	23	0	0%
Total Permanent Workers	1514	1514	100%	1487	1487	100%
- Male	1514	1514	100%	1487	1487	100%
- Female	0	0	-	0	0	-

8. Details of training given to employees and workers:

Category	FY 2023-24					FY 2022-23				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	1413	539	38%	1178	83%	1349	645	48%	1121	83%
Female	26	1	4%	4	15%	23	8	35%	10	43%
Total	1439	540	38%	1182	82%	1372	653	48%	1131	82%
Workers										
Male	1514	914	60%	916	61%	1487	543	37%	851	57%
Female	0	0	0%	0	0%	0	0	0%	0	0%
Total	1514	914	60%	916	61%	1487	543	37%	851	57%

Note: the above data mentioned is of permanent workforce.

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	1413	1088	76%	1349	1014	75%
Female	26	19	73%	23	11	48%
Total	1439	1107	77%	1372	1025	75%
Workers						
Male	1514	66	4%	1487	150	10%
Female	0	0	-	0	0	-
Total	1514	66	4%	1487	150	10%

Note: the above data mentioned is of permanent workforce.

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 such system?

Yes, the Company's occupational health and safety management system is aligned with ISO 45001:2018 standards. Several initiatives have been implemented to achieve the Company's objective of zero accidents and zero health impairments. The occupational health and safety system facilitates risk assessment and hazard control, supported by regular assurance initiatives and prompt corrective measures.

The Company conducts regular training and awareness programmes on health and safety. Pre-employment and periodical medical check-ups are also conducted for its employees and workers. Third-party safety audits are conducted at all the facilities.

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 employs various processes to identify work-related hazards and assess risks on both routine and non-routine basis. All safety committees actively engage staff and worker representatives to identify workplace hazards and develop corrective actions within specified time frames.

The Company has implemented the Japan Institute of Plant Management (JIPM) Total Productive Maintenance TPM methodology, specifically using the KYT (Danger Prediction Drill) as a continuous improvement tool to enhance the safety consciousness among workmen and supervisors. Measures such as mistake-proofing (Pokayoke) and Safety Assurance Perfect Line (SAPL) have been adopted

to prevent failures and ensure safety checks.

Senior officials conduct plant inspections to detect deviations from standard safety practices and to address them promptly. These inspections also serve as opportunities to explore and implement advanced technologies recommended for eliminating safety risks in the workplace.

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 established procedures that enable workers to promptly report work-related hazards. Workers are encouraged to use various channels for reporting, and once reported, these hazards are promptly investigated. They have the right to remove themselves from unsafe situations without fear of reprisal. Regular training reinforces these procedures, fostering a proactive safety culture.

d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services?

Yes, the Company provides non-occupational medical and healthcare services for its employees and workers.

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

Safety Incident/Number	Category*	FY 2023-24	FY 2022-23
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.69	0
	Workers	0.42	0.77
Total recordable work-related injuries	Employees	2	0
	Workers	11	19
No. of fatalities	Employees	0	0
	Workers	0	2
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	1

*Including in the contract workforce

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

ECL has established clear policies outlining safety protocols and procedures for all employees to follow. Employees undergo regular training sessions and awareness programs to educate themselves about potential hazards and safe work practices. Regular safety assessments are conducted to identify workplace hazards and assess associated risks, allowing for timely mitigation measures.

Employees are provided with appropriate safety equipment, tools, and resources necessary to perform their tasks safely. ECL has developed and implemented emergency preparedness and

response plans to effectively handle workplace incidents or emergencies. Health monitoring programs and access to medical facilities are offered to ensure early detection and treatment of health issues among employees.

Routine inspections and audits are conducted to monitor compliance with safety regulations and identify areas for improvement. Employees are encouraged to actively participate in safety committees, provide feedback, and report safety concerns to management. These measures collectively contribute to fostering a safe and healthy work environment for all employees.

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

	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	Nil	-	Nil	Nil	-
Health & Safety	Nil	Nil	-	Nil	Nil	-

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.

The management regularly conducts reviews and updates of the safety and health protocol, ensuring its alignment with the most current industry standards and regulations as an ongoing practice.

Leadership Indicators

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

Yes, all employees and workers are covered under group health insurance and accident insurance of the Company.

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

The Company ensures transparent business practices across the value chain. Furthermore, the

statutory compliance checklist for all departments is periodically reviewed by the concerned departments, and timely remittance is ensured.

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

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-24	FY 2022-23	FY 2023-24	FY 2022-23
Employees	0	0	0	0
Workers	0	1	0	1

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

ECL provides a transition assistance program upon request from the employee and based on the merit of the case.

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

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	14%
Working Conditions	14%

6. **Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.**

No major concerns are found through the assessment of the value of chain partners.

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.

The Company conducted an internal assessment to identify its primary stakeholders, encompassing both internal and external groups. This comprehensive process involved mapping out key stakeholders, including the Board of Directors, employees, workers, customers, investors, local communities, statutory authorities, and suppliers. The Company has mapped the key concerns of each stakeholder group, enabling it to effectively address and prioritize their needs. This proactive approach fosters strong relationships and engagement with stakeholders across all levels, ultimately enhancing stakeholder satisfaction and support.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	<ul style="list-style-type: none"> • Letters • E-mails • Website of the company • Stock exchanges • Newspaper advertisement 	Ongoing basis – as and when required	<p>To inform customers about new products, services, promotions, and updates.</p> <p>To gather feedback on customer satisfaction, needs, and preferences.</p> <p>To build relationships and loyalty with customers.</p>
Shareholders and Investors	No	<ul style="list-style-type: none"> • Press releases • Website • Email advisories • In-person meetings • Investor conferences • Conference calls 	<p>Annual: General Meeting, Annual report</p> <p>Half Yearly: Financial statements in IndAS and IFRS, earnings call, exchange notifications, press</p>	To educate the investor community about the ECL integrated value creation model and long-term business strategy.

			releases		To assist investors in addressing their concerns regarding company policies, reporting, strategy.
			Quarterly: Financial statements in IndAS and IFRS, earnings call, exchange notifications, press releases		
			Continuous: Investors page on the ECL website		
Employees	No	<ul style="list-style-type: none"> • Letters • Emails • Website • Newsletters on the intranet • Notice boards 	Ongoing basis – as and when required		To promote open communication, gather feedback, address concerns, provide opportunities for employees to share their thoughts, ideas, and concerns about their work environment, policies, and procedures.
Supplier	No	<ul style="list-style-type: none"> • Emails • Phone calls • Meetings • Website • Onsite audits 	Regular continuous engagement	and	To engage with suppliers to communicate procurement requirements, specifications, and expectations, and to ensure smooth and efficient supply chain operations.
Communities	Yes	<ul style="list-style-type: none"> • Community Meeting • CSR programs • CSR reviews and • Feedback discussions 	Regular continuous engagement	and	To encourage suppliers to adhere to the sustainable principles upheld by ECL
					To engage with local communities to build positive relationships, foster trust, and demonstrate

				corporate citizenship and social responsibility.
				To use engagement channels to listen to and address community concerns, such as environmental impact, community development, or social issues.
Statutory & Regulatory Authorities	No	<ul style="list-style-type: none"> • Email • In-person representations • Letters • Meetings and conferences • Online portals 	Regular and continuous engagement	To ensure compliance with laws, regulations, and standards relevant to the industry and operations of the organization.

Leadership Indicators

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

The Company's Risk Management Committee has developed a risk management policy encompassing the identification of both internal and external risks, with a specific focus on Environmental, Social, and Governance (ESG) risks. This framework includes robust measures for risk mitigation, incorporating systems and processes for internal control to address identified risks effectively by consulting relevant stakeholders. Additionally, the committee ensures the implementation of appropriate methodologies, processes, and systems to monitor and evaluate ESG risks associated with business operations, ensuring alignment with sustainability objectives and regulatory requirements.

The committee maintains communication with the Board of Directors, providing regular updates on the nature and content of discussions, recommendations, and actions related to environmental and social topics. Keeping the Board informed about risk management strategies and initiatives ensures the Company's commitment to sustainability.

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

Yes, The Company is committed to fostering constructive relationships with all its stakeholders, encompassing a wide range of environmental and social issues that reflect its dedication to

addressing diverse concerns. Through proactive engagement and valuable insights, the Company has identified its material issues. This plays a pivotal role in shaping the Company's business strategy and operations.

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

The Company has engaged with vulnerable and marginalized stakeholders to understand and address their concerns through meaningful dialogue and collaboration, reflecting its commitment to social responsibility and community relations.

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 2023-24			FY 2022-23		
	Total (A)	No. of employees workers covered (B)	% (B / A)	Total (C)	No. of employees workers covered	% (D / C)
Employees						
Permanent	1439	445	31%	1372	78	6%
Other than permanent	154	19	12%	63	0	0
Total Employees	1593	464	29%	1435	78	5%
Workers						
Permanent	1514	191	13%	1487	187	13%
Other than permanent	8926	477	5%	8875	210	2%
Total Workers	10440	668	6%	10362	397	4%

2. Details of Minimum wages paid to Employees and workers in the following format

Category	FY 2023-24					FY 2022-23				
	Total (A)	Equal to minimum wages		More than Minimum Wages		Total (D)	Equal to minimum wages		More than Minimum Wages	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Permanent	1439	0	0%	1439	100%	1372	0	0%	1372	100%
Male	1413	0	0%	1413	100%	1349	0	0%	1349	100%
Female	26	0	0%	26	100%	23	0	0%	23	100%

Other than Permanent	154	0	0%	154	100%	63	0	0%	63	100%
Male	153	0	0%	153	100%	63	0	0%	63	100%
Female	1	0	0%	1	100%	0	0	0%	0	0%
Workers										
Permanent	1514	0	0%	1514	100%	1487	0	0%	1487	100%
Male	1514	0	0%	1514	100%	1487	0	0%	1487	100%
Female	0	0	-	0	-	0	0	-	0	-
Other than Permanent	8926	351	4%	8575	96%	8875	323	4%	8552	96%
Male	8883	351	4%	8532	96%	8815	323	4%	8492	96%
Female	43	0	0%	43	100%	60	0	0%	60	100%

3. Details of remuneration/salary/wages.

a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	14	18,40,000	4	1,04,05,573
Key Managerial Personnel	1*	41,93,373	-	-
Employees other than BoD and KMP	1539	5,49,890	24	6,00,434
Workers	1557	3,70,344	-	-

*Excluding all the Board of Directors.

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

	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages.	2.3%	2.2%

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, the Company's human resource team serves as the focal point for addressing all impacts related to human rights. Employees and workers are encouraged to report any concerns they may have

regarding human rights violations, discrimination, harassment, or any other related incidents. The HR team then thoroughly investigates the incidents and provides appropriate corrective action.

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

The Company is committed to upholding human rights principles and fostering a safe and ethical work environment for all its employees and workers. To ensure the effective redressal of any grievances related to human rights issues, robust internal mechanisms are designed to address concerns promptly and impartially. The Company has aligned itself with SA 8000 standards, which focus on promoting ethical labour practices within the organization.

Employees and workers are encouraged to report any concerns they may have regarding human rights violations, discrimination, harassment, or any other related issues. The Company provides multiple channels through which employees can raise their concerns, including confidential reporting mechanisms such as a whistleblower system, complaint boxes, and dedicated email addresses for grievance reporting. Upon receiving a report of a human rights grievance, the HR team conducts thorough and impartial investigations to assess the validity of the concerns raised. These investigations are conducted with utmost sensitivity and confidentiality, respecting the privacy and rights of all parties involved.

Based on the findings appropriate corrective actions are taken which may include disciplinary measures, training and awareness programs, policy revisions, or other necessary steps to address the root cause of the grievance and prevent recurrence in the future.

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

	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the End of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment						
Discrimination at workplace						
Child Labour						
Forced Labour /Involuntary Labour		Nil			Nil	
Wages						
Other human rights related issues						

7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

	FY 2023-24	FY 2022-23
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act,2013(POSH)	0	0
Complaints on POSH as a % of female employees / workers	0	0
Complaints on POSH upheld	0	0

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

The Company prioritizes the prevention of adverse consequences for complainants in cases of discrimination and harassment, ensuring a safe and inclusive workplace environment for all employees and workers. The Company has established policies such as the Business Responsibility and Sustainability Policy, which outlines the commitment to providing a safe working environment and protecting employees from sexual and mental harassment. The Policy on Prevention of Sexual Harassment (POSH) deals extensively with providing a safe working environment and protection from sexual harassment. SA 8000 prohibits discrimination in all its forms, emphasizing equal opportunities and fair treatment for all individuals within the workplace.

The Company also provides internal and external training sessions and awareness programs on POSH and Social Accountability standards to prevent any forms of discrimination and harassment. The Company has a zero-tolerance policy towards discrimination and harassment, and management takes strict disciplinary actions against violations, which may include the termination of employment.

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

Yes, our suppliers are required to adhere to all requirements of the SA8000 Standard, which includes child labour, forced labour, health and safety, freedom of association, collective bargaining, discrimination, disciplinary practices, working hours, and remuneration. This commitment ensures that our supply chain maintains the highest standards of ethical and sustainable practices.

10. Assessments for the year:

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

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

The management implements corrective actions to address significant risks and concerns identified during assessments on priority basis.

Leadership Indicators

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

As there were no complaints, no business processes were modified or introduced.

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

The Company demonstrates its commitment to human rights by conducting a biannual third-party Social Accountability (SA8000) audit.

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

Although the Company premises may not be fully compliant with the Rights of Persons with Disabilities Act 2016, the Company actively assists differently-abled visitors in accessing its premises.

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

Forced Labour/Inventory Labour

Wages

Others – please specify

14%*

Note: The percentage is based on on-site audits that were carried out.

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

No major observations were identified during the assessment.

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

Essential Indicators

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

Parameter	FY 2023-24	FY 2022-23
From renewable sources		
Total electricity consumption (A)	69	78
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total energy consumption from renewable sources (A+B+C)	69	78
From non-renewable sources		
Total electricity consumption (D)	13,05,595	12,83,292
Total fuel consumption (E)	1,97,13,387	2,05,48,463
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewable sources (D+E+F)	2,10,18,982	2,18,31,755
Total energy consumed (A+B+C+D+E+F)	2,10,19,051	2,18,31,833
Energy intensity per Lakh of turnover (Total energy consumed / Revenue from operations)	30.30	31.57
Energy intensity per Lakh of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	693	722
Energy intensity in terms of physical output per MT	26.0	27.2
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

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

The Company has three plants identified as designated consumers under the PAT scheme. Khardah Works and Srikalahasti Works are part of the PAT 8 cycle, with targets to be achieved by 2026. Haldia Works, under the PAT 5 cycle, has successfully achieved its targets.

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

Parameter	FY 2023-24	FY 2022-23
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	9,82,795	12,09,420
(iii) Third party water	5,82,220	5,80,420
(iv) Seawater / desalinated water	0	0
(v) Others (Sewage Water)	17,89,136	15,96,435
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	33,54,151	33,86,275
Total volume of water consumption (in kilolitres)	33,08,453	33,41,576
Water intensity per rupee of turnover (Total Water consumption / Revenue from operations)	4.77	4.83
Water intensity per Lakh of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	106.82	108.23
Water intensity in terms of physical output	4.09	4.16
Water 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

4. Provide the following details related to water discharged:

Parameter	FY 2023-24	FY 2022-23
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment	-	-
With Treatment – please Specify level of treatment	-	-
(ii) To Groundwater		
No treatment	-	-
With treatment – please specify level of treatment.	-	-
(iii) To Seawater		
No treatment	-	-
With treatment – please specify level of treatment.	-	-
(iv) Sent to third-parties		
No treatment	-	-
With treatment – please specify level of treatment.	-	-
(v) Others		
No treatment		-
With treatment – Please specify level of treatment.	45,698	44,628
Total water discharged (in kilolitres)	45,698	44,628

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

ECL has implemented Zero Liquid Discharge (ZLD) at its Srikalahasthi Works (SW) facility. At the Khardah facility, three large ponds collect rainwater and all process blow-down water, which is then reused in the manufacturing process. Excess water is used for dust suppression and gardening purposes. The company ensures that all process water is treated and safely discharged at its remaining units.

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

Parameter	Please specify unit	FY 2023-24	FY 2022-23
NOx	mg /Nm ³	63.56	67.67
SOx	mg /Nm ³	82.25	95.04
Particulate matter (PM)	mg /Nm ³	42.85	41.93
Persistent organic pollutants (POP)	NA	NA	NA
Volatile organic compounds (VOC)	NA	NA	NA
Hazardous air pollutants (HAP)	NA	NA	NA
Others– please specify	NA	NA	NA

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? No

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

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	19,48,504	20,34,456
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	2,59,668	2,55,233
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	MT CO ₂ e/ INR Lakh revenue	3.18	3.31
Total Scope 1 and Scope 2 emission intensity per Lakh of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)		72.82	75.75
Total Scope 1 and Scope 2 emission intensity in terms of physical output	MTCO₂e/ MT production output	2.73	2.85
Total Scope 1 and Scope 2 emission 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? – No

8. Does the entity have any project related to reducing Green House Gas emission?

If yes, then provide details.

Yes, the Company has commissioned a 5 MW waste heat recovery power generation in one of its units at Haldia. The Company has also installed energy efficient LED lights in its facilities and offices which reduces energy consumption considerably.

Other notable GHG reduction initiatives are:

I. Burner modification in heat treatment furnace to increase blast furnace gas (a process by-product) usage replacing fuel oil.

II. Automation of ladle/hopper heating system to reduce fuel oil consumption.

III. A waste heat recovery boiler (WHRB) has been installed for utilising battery waste hot flue gas.

IV. In SW unit three initiatives were undertaken: Installation of solar panels, set up of BF gas boiler and use of BF gas as a clean fuel.

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

Parameter	FY 2023-24	FY 2022-23
Total Waste generated (in metric tonnes)		
Plastic waste (A)	34	15
E-waste (B)	3	5
Bio-medical waste (C)	0.03	0.04
Construction and demolition waste (D)	1,150	1,080
Battery waste (E)	234	229
Radioactive waste (F)	0	0
Hazardous waste. Please specify, if any. (G) (MT)		
Discarded/Empty Containers & barrels	168	138
ETP sludge	1,254	416
Flue dust	8,581	14,610
GCP sludge/residue	9,896	10,311
Granulated slag	2,28,197	2,93,088
Ladle slag	4,856	5,577
Refractory waste	314	1,111
Spent/waste oil	9,686	10,871
Zinc dust	923	1,213
Other hazardous waste	40	227
Other Non-hazardous waste generated (H). Please specify, if any. (MT)		
Burnt core sand	13,881	11,129

Canteen waste	78	24
Cement slurry	13,647	16,547
Charcoal dust	4,148	2,440
Charcoal SIP	24,571	23,488
Coke fines	27,607	35,622
Ferro slag	11,815	18,858
Iron ore fines/scrap	1,02,870	1,50,369
Metal scrap	62,293	34,949
Solid waste	21,191	22,511
Total (A+B + C + D + E + F + G + H)	5,47,437	6,54,828
Waste intensity per Lakh of turnover (Total waste generated / Revenue from operations)	0.79	0.95
Waste intensity per Lakh of turnover adjusted Purchasing for Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	18.05	21.66
Waste intensity in terms of physical output per MT	0.68	0.81
Waste intensity (optional) – the relevant metric may be selected by the entity		
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Parameter	FY 2023-24	FY 2022-23
Category of waste (MT)		
(i) Recycled	1,91,097	2,51,787
(ii) Re-used	-	-
(iii) Other recovery operations	-	-
Total	1,91,097	2,51,787
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	232	229

(ii) Landfilling	44,723	62,531
(iii) Other disposal operations (Sent to Authorised recyclers)	3,09,196	3,62,384
Total	3,54,151	4,25,144

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) – No

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

The Company has aligned itself with the ISO 14001 environmental management system and has established standard operating procedures for handling hazardous and non-hazardous waste. All units have dedicated waste management systems in place. Each respective division collects and segregates the waste, storing it in designated locations. Major hazardous waste, such as zinc dust, is sent to authorized recyclers with a complete manifest system. Bitumen waste is collected safely and reused in the process, avoiding disposal. Other hazardous wastes are accumulated and disposed of according to a 90-day schedule with SPCB/CPCB authorized vendors.

In an effort to minimize the use of hazardous and toxic chemicals in products and processes, the Company adheres to Operation Control Procedures (OCP) and complies with legal directives. Further, plant inspections are conducted for hazardous waste and chemical handling compliance. These measures aim to reduce environmental impact and ensure responsible chemical management throughout the Company's operations.

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

Not Applicable, as none of the Company's facilities are located near ecologically sensitive areas.

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
Not Applicable			

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

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

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

The Company is compliance with all applicable environmental laws/ regulations/ guidelines in India.

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

Leadership Indicators

1. 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:

- (i) Name of the area
- (ii) Nature of operations
- (iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2023-24	FY 2022-23
Water withdrawal by source (in Kilolitres)		
(i) Surface water		
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		Not Applicable
(v) Others		
Total volume of water withdrawal (in kilolitres)		
Total volume of water consumption (in kilolitres)		

Water intensity per rupee of turnover (Water consumed / turnover)

Water intensity (optional) – the relevant metric may be selected by the entity

Water discharge by destination and level of treatment (in kilolitres)

(i) Into Surface water

- No treatment

Not Applicable

- With treatment – please specify level of treatment

Parameter

FY 2023-24

FY 2022-23

(ii) Into Groundwater

No treatment

With treatment – please specify level of treatment

(iii) Into Seawater

No treatment

With treatment – please specify level of treatment

Not Applicable

(iv) Sent to third-parties

No treatment

With treatment – please specify level of treatment

(v) Others

No treatment

With treatment – please specify level of treatment

Total water discharged (in 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

2. Provide the details of total Scope 3 emissions & its intensity, in the following format:

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 3 emissions (Break-up	Metric tonnes of CO2 equivalent	-	-

of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	
Total Scope 3 emissions per rupee of turnover	Metric tonnes of CO ₂ equivalent
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	Metric tonnes of CO ₂ equivalent

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

3. **With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.**

Not Applicable

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

Sr. No.	Initiative undertaken	Details of the initiative (<i>Web-link, if any, may be provided along-with summary</i>)	Outcome of the initiative
Please refer to Annexure 8 Particulars on conservation of energy, technology absorption & foreign exchange earnings & outgo			

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

The Company has an emergency mitigation plan in application. The department heads review the plan annually to spot potential new hazards and develop measures for mitigation and reaction. The Company has protocols, SOPs and mock drill exercises in place for managing disasters. Every mock drill is examined by an experienced council. The appropriate department implements the recommendation.

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

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

assessed for environmental impacts. Nil

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 affiliated with four 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.

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Confederation of Indian Industry	National
2	Engineering Export Promotion Council	National
3	Indian Chamber of Commerce, Kolkata	National
4	The Bengal Chamber of Commerce and Industry	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
Not Applicable		

Leadership Indicator

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

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

PRINCIPLE 8: BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

Essential Indicators

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

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
The Company is assessing its applicability for conducting SIA on its CSR projects.					

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.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
Not Applicable						

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

The Company has implemented effective grievance redressal systems to address the concerns of different stakeholder groups. Concerned stakeholders can reach out to the Company's management by writing or meeting with administrative officers at the respective plants. Additionally, communities have the opportunity to share feedback on CSR programs. The management takes immediate steps to address such grievances.

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

	FY 2023-24	FY 2022-23
Directly sourced from MSMEs/ small producers	5%	4%
Directly from within India	65%	64%

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

Location	FY 2023-24	FY 2022-23
Rural	48%	46%
Semi-Urban	-	-
Urban	34%	34%
Metropolitan	17%	19%

Leadership Indicators

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

Details of negative social impact identified	Corrective action taken
Not Applicable	

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 INR)
Not Applicable			

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No) No
 (b) From which marginalized /vulnerable groups do you procure? Not Applicable
 (c) What percentage of total procurement (by value) does it constitute? Not Applicable

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

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
Nil				

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

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

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

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Medical and Health care	The number cannot be ascertained	-
2	Free education to students from economically backward sector	The number cannot be ascertained	-
3	Developing the down trodden, particularly Dalits,	The number cannot be ascertained	-
4	Destitute Home for Senior Citizens	The number cannot be ascertained	-
5	Gauseva and allied projects directly related to Gauseva	The number cannot be ascertained	-

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.

- a. Customer complaint is received via verbal or electronic communication by the concerned subsidiary or sales or territory in charge.
- b. Depending upon the nature and severity of the complaint, they solve the issue or forward it to the technical team.
- c. Technical-team analyses the problem to probe in to the root cause and proposes correction and corrective action accordingly.
- d. After receiving the satisfactory customer feedback, the complaint is considered as closed.

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	
	100%
Environmental and social parameters relevant to the product	The Company's products are predominantly made from iron & cement mortar. These products play a crucial role in facilitating the transmission of essential drinking water, thereby holding significant social importance. They contribute immensely to communities by ensuring access to life-sustaining resources.
	100%
Safe and responsible usage	The Company's product is devoid of any hazardous aspects and is considered completely safe to use as long as the recommended conditions of use are adhered to.
Recycling and/or safe disposal	Approximately 75% of the Company's product consists of ductile iron, which can be melted down and recycled for further use. The remaining 25% by weight comprises lining and coating materials such as cement mortar and paint.

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

FY 2023-24		Remarks	FY 2022-23		Remarks
Received during the	Pending resolution		Received during the	Pending resolution	

	year	at end of year		year	at end of year	
Data privacy	0	-	NA	0	-	NA
Advertising	0	-	NA	0	-	NA
Cyber-security	0	-	NA	0	-	NA
Delivery of essential services	0	-	NA	0	-	NA
Restrictive Trade Practices	0	-	NA	0	-	NA
Unfair Trade Practices	0	-	NA	0	-	NA
Other	0	-	NA	0	-	NA

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

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

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

ECL has implemented a comprehensive array of cyber tools and measures to safeguard the cybersecurity and data privacy of its customers. This includes the deployment of a Next Generation Endpoint Detection & Response System (EDR) across all servers and workstations connected to the corporate LAN, providing robust protection against malware, viruses, ransomware, and other cyber threats. Additionally, USB ports on end-user workstations have been blocked to prevent data leakage and unauthorized access. ECL employs web filtering and application control mechanisms to regulate internet usage and ensure the security of network resources. Authentication is enforced through Active Directory and Domain Authentication for all ECL users. Cloud email security measures are in place to mitigate risks associated with ransomware, phishing attacks, and business email compromise. Secure remote access is facilitated with Multi-Factor Authentication (MFA). These initiatives collectively demonstrate the Company's commitment to maintaining a robust cybersecurity posture and safeguarding the confidentiality, integrity, and availability of customer data.

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. NA

7. Provide the following information relating to data breaches:

- Number of instances of data breaches. - Nil
- Percentage of data breaches involving personally identifiable information of customers - Nil
- Impact, if any, of the data breaches. - 0%

Leadership Indicators

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

All information regarding the business of ECL can be accessed through the Company's website <https://www.electrosteel.com/> and in its periodic disclosures such as the annual report and the integrated report.

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

Technical data sheets (TDS), standard operating procedures (SOPs), user guides, brochures, and safety-related videos are provided to customers for guidance on safe handling and installation. Additionally, the recent launch of the mobile application "Toolbox by Electrosteel" enhances accessibility to information for customers. The Company's website, <https://www.electrosteel.com/>, hosts comprehensive information on the safe and responsible usage of our products, ensuring easy access for customers seeking guidance. The Company provides training sessions for customers through seminars, video calls, and other mediums, aiming to enhance their knowledge and skills regarding product usage and safety protocols.

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

To inform consumers about potential disruptions or discontinuation of essential services, the Company communicates planned plant shutdowns to the sales team. Subsequently, the sales team adjusts delivery commitments accordingly, ensuring transparency and minimizing inconvenience to consumers. The Company uses communication channels like SMS, calls and/or a mobile application called Toolbox by ECL to notify the customers of any disruptions.

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

Yes, the Company displays product information on the accompanying documentation including its specifications, standards compliance, and manufacturer details.

For more information on the product, customers can find product brochures on the Company's website: https://www.electrosteel.com/products/product_brochures.php

The Company has conducted a survey in FY 2023-24 relating to the major export products and about 10% of the customer base, as per ISO 9001 requirements.