

SMEL/SE/2026-27/61

August 3, 2026

The Secretary, Listing Department, BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai 400 001 Maharashtra, India Scrip Code: 543299	The Manager – Listing Department National Stock Exchange of India Limited “Exchange Plaza”, 5th Floor, Plot No. C/1, G-Block, Bandra-Kurla Complex, Bandra (East), Mumbai 400 051, Maharashtra, India Symbol: SHYAMMETL
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Dear Sir/Madam,

Sub: Business Responsibility and Sustainability Report for F.Y 2025-26

Please find enclosed herewith the Business Responsibility and Sustainability Report (‘BRSR’) of Shyam Metalics and Energy Limited (‘Company’) for FY 2025-26. The BRSR forms part of the 24th Annual Report of the Company for the FY 2025-26.

The Business Responsibility and Sustainability Report for the F.Y 2025-26 is available on the website of the Company at www.shyammetalics.com.

This is submitted pursuant to Regulation 34(2) and other applicable provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with applicable SEBI Circulars, if any.

This is for your information and records.

Thanking You,

For Shyam Metalics and Energy Limited

Birendra Kumar Jain

Company Secretary & Compliance Officer

Membership No. F13320

Encl: as above

OUR BRANDS



SHYAM METALICS AND ENERGY LIMITED

Regd. Office: P-19, (Plate No.: D-403), Taratala Road, CPT Colony, Kolkata, West Bengal – 700088

CIN: L40101WB2002PLC095491 **GSTIN:** 19AAHCS5842A1ZE

T: +91 33 6521 6521 Email: contact@shyamgroup.com **Web:** www.shyammetalics.com **Follow us on :**



BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORTING

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

Sr. No.	Particulars	Details
1.	Corporate Identity Number (CIN) of the Listed Entity	L40101WB2002PLC095491
2.	Name of the Listed Entity	Shyam Metalics and Energy Limited
3.	Year of incorporation	2002
4.	Registered office address	P-19, (Plate No.: D-403), Taratala Road, CPT Colony, Kolkata, West Bengal 700088
5.	Corporate address	SS Chamber, 5 CR Avenue, Kolkata, West Bengal- 700072
6.	Email	compliance@shyamgroup.com
7.	Telephone	+91 33 6521 6521
8.	Website	http://www.shyammetalics.com/
9.	Financial year reported	2025-2026
10.	Name of the Stock Exchange(s) where shares are listed	A. National Stock Exchange of India Limited (NSE) B. BSE Limited (BSE)
11.	Paid-up capital	₹2,79,13,18,530
12.	Name and contact details (telephone, e-mail address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Anindya Pal DGM ESG +91 - 9007038704 anindya.pal@shyamgroup.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).	Consolidated Basis
14.	Name of assurance provider	BDO India Services Private Limited
15.	Type of assurance obtained	Reasonable Assurance of BRSR Core

*(Note inclusion of subsidiaries, Shyam Sel and Power Limited, Ramsarup Industries Limited and Shree Venkateshwara Electrocast Private Limited)

II. Products/services

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

Sr. No.	Description of Main Activity	Description of Business Activity	Percentage of Turnover of the entity
1	Manufacturing	Metal and metal products (C7)	98.91%
2	Trade	Wholesale Trading (G1)	1.09%

17. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

Sr. No.	Product/Service	NIC Code	Percentage of total Turnover contributed
1	Carbon Steel	24109	39.44%
2	Pig Iron	24102	12.08%
3	Sponge Iron	24102	11.50%
4	Specialty Alloys	24104	11.30%

Sr. No.	Product/Service	NIC Code	Percentage of total Turnover contributed
5	Stainless Steel	24109	7.12%
6	C R Coils	24202	6.80%
7	Pellets	24109	5.76%
8	Aluminium	24202	4.43%
9	Others	24109	1.57%

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	8	17	25
International	0	0	0

19. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States/Union Territories)	25 states (including UT)
International (No. of Countries)	40 countries

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

Response: 10.63% (Major export is Ferro Alloy and Stainless Steel)

c. A brief on types of customers

Response: Shyam Metals and Energy Limited (SMEL) has built a strong reputation for producing and supplying high-quality long steel products and ferro alloys. With manufacturing plants smartly positioned across locations in West Bengal, Odisha, Jharkhand and Madhya Pradesh, Jharkhand it is making it easy to supply products to customers all over India from the south and west to the north and east. At its core, Shyam Metals is all about putting customers first. They stay in close touch with business clients, whether commercial or industrial, to really get what they need. This back-and-forth helps the company tweak its products and roll out tailored solutions that go beyond expectations. Working in B2B, B2C, and B2D spaces, they're focused on building lasting partnerships and delivering top-notch results every time. SMEL engages customers via dedicated account management, technical support, on site testing and customised product offerings; feedback mechanisms and regular commercial reviews inform product development and quality improvements.

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

Sr. No.	Particulars	Total (A)	Male		Female		Other	
			No. (B)	% (B / A)	No. (C)	% (C / A)	No. (H)	% (H / A)
Employees								
1	Permanent (D)	4845	4654	96.06%	191	3.94%	0	0.00%
2	Other than Permanent (E)	0	0	0.00%	0	0.00%	0	0.00%
3	Total employees (D + E)	4845	4654	96.06%	191	3.94%	0	0.00%
Workers								
4	Permanent (F)	5419	5403	99.70%	16	0.30%	0	0.00%
5	Other than Permanent (G)	0	0	0.00%	0	0.00%	0	0.00%
6	Total workers (F + G)	5419	5403	99.70%	16	0.30%	0	0.00%

b. Differently abled Employees and workers:

Sr. No.	Particulars	Total (A)	Male		Female		Other	
			No. (B)	% (B / A)	No. (C)	% (C / A)	No. (H)	% (H / A)
Differently abled Employees								
1	Permanent (D)	0	0	0.00%	0	0.00%	0	0.00%
2	Other than Permanent (E)	0	0	0.00%	0	0.00%	0	0.00%
3	Total employees (D + E)	0	0	0.00%	0	0.00%	0	0.00%
Differently abled Workers								
4	Permanent (F)	0	0	0.00%	0	0.00%	0	0.00%
5	Other than Permanent (G)	0	0	0.00%	0	0.00%	0	0.00%
6	Total workers (F + G)	0	0	0.00%	0	0.00%	0	0.00%

21. Participation/ Inclusion/ Representation of women:

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	11	1	9%
Key Management Personnel	6	0	0%

22. Turnover rate for permanent employees and workers:

	Turnover rate of current FY 2025-26			Turnover rate of previous FY 2024-25			Turnover rate of previous FY 2023-24		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	6.53%	0.09%	6.63%	7.28%	0.10%	7.38%	3%	0.2%	3.2%
Permanent Workers	10.17%	0.13%	10.32%	10.92%	0.15%	11.07%	2.5%	0.1%	2.6%

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

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

Sr. No.	Name of the holding/ subsidiary/ associate companies/ joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	Percentage 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.	Shyam Sel and Power Limited	Wholly Owned Subsidiary	100.00%	Yes
2.	Shyam Energy Limited	Step down Subsidiary	87.12	No
3.	Shree Venkateshwara Electrocast Private Limited	Step down Subsidiary	100%	Yes
4.	Meadow Housing Private Limited	Step down Subsidiary	71.43%	No
5.	Whispering Developers Private Limited	Step down Subsidiary	67.57%	No
6.	Nirjhar Commodities Private Limited	Step down Subsidiary	51%	No
7.	Shree Sikhar Iron & Steel Private Limited	Step down Subsidiary	99.91%	No
8.	S S Natural Resources Private Limited	Step down Subsidiary	60%	No
9.	Ramsarup Industries Limited	Step down Subsidiary	60%	Yes
10.	Smel Steel Structural Private Limited	Step down Subsidiary	100%	No
11.	Star Metalworks Private Limited	Step down Subsidiary	100%	No
12.	Shyam Metalics International DMCC	Step down Subsidiary	100%	No
13.	Meghana Vyapar Private Limited	Associate	33.51%	No
14.	Emerge Solar Projects Private Limited	Associate	26%	
15.	MJSJ Coal Limited	Joint Venture	9%	No
16.	Kolhan Complex Private Limited	Associate of SSPL (WoS)	41.28%	No
17.	Kalinga Energy & Power Limited	Joint Venture of SSPL (WoS)	50%	No

CSR Details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: **Yes**
- (ii) Turnover (in ₹ Cr.): **18,552.21**
- (iii) Net worth (in ₹ Cr.): **10,499.60**

VI. 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 2025-26			FY 2024-2025		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaint filed during the year	Number of complaints pending resolution at close of the year	Remarks
Commodities		0	0		0	0	
Shareholders	Yes, the Company has put in place a structured mechanism to engage with community leaders, enabling a thorough understanding of their concerns and ensuring timely resolution. Shyam Metals India's Leading Integrated Metal Conglomerate	19	0		22	0	
(Investors) Other stakeholders	Yes, the Company has a robust grievance redressal system in place to address concerns raised by investors and shareholders. a) A Stakeholders Relationship Committee has been constituted to monitor and resolve investor grievances. The Company also submits quarterly updates on investor complaints to the stock exchanges. https://www.shyammetals.com/investors/investors-grievances-report/ b) A dedicated Investor Relations team is available to respond to investor queries. https://www.shyammetals.com/investors/investor-relations-contact/ . The Company also conducts regular Investor/Analyst meetings—including one-on-one meetings, earnings and update calls, and group interactions—the details of which are made available on the Company's website. https://www.shyammetals.com/investors/investor-relations-%20contact/	0	0		0	0	

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 2025-26			FY 2024-2025		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaint filed during the year	Number of complaints pending resolution at close of the year	Remarks
Employees & Workers	The Company offers a one-stop solution for addressing all employee-related concerns through its dedicated HR-One portal, specifically designed to manage and resolve employee queries and issues https://shyam.hrone.cloud/Account/Index	13	0		22	0	
Value Chain Partners	Yes, the Company has a balanced vendor grievance redressal mechanism. Several meets and interactive sessions are being held with the Value Chain Partners. https://www.shyammetalics.com/wp-content/	35	0		22	0	
Customers	Yes, Shyam Metalics has a well- defined Customer Complaint Management System. https://www.shyammetalics.com/contact-us/	38	0		26	0	
Others	https://www.shyammetalics.com/wp-content/uploads/2025/04/Whistle-Blower-Policy.pdf	0	0		12	0	

Note: The grievance redressal policy and vigil mechanism of the company provides organized framework for dealing with concerns and grievances.

26. 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

Sr. 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	Environmental Impact Assessment	Opportunity	Environmental Impact Assessment (EIA) is an essential process used to assess the potential environmental, economic, and social effects of a proposed project or development. Through a comprehensive EIA, the Company can recognize both positive and negative impacts and implement appropriate measures to maximize the benefits while minimizing any adverse effects. This approach supports the adoption of more sustainable and environmentally responsible business practices.		Positive, a well-conducted EIA offers significant advantages, as it can help the Company avoid expensive environmental remediation or legal issues, while also uncovering opportunities for cost savings and improved operational efficiency.
2	Anti-corruption practices of the company	Risk	Corruption poses serious legal and reputational risks, along with potential financial losses for the Company. Inadequate anti-corruption measures can leave the Company vulnerable to bribery, fraud, and other unethical conduct, potentially leading to fines, penalties, and a loss of stakeholder trust.	Corruption poses serious legal and reputational risks, along with potential financial losses for the Company. Inadequate anti-corruption measures can leave the Company vulnerable to bribery, fraud, and other unethical conduct, potentially leading to fines, penalties, and a loss of stakeholder trust.	Negative, failure to uphold these standards can have negative consequences, including substantial costs arising from legal actions, financial penalties, and missed business opportunities resulting from reputational harm.
3	Health & safety of employees	Risk	Failure to ensure a safe working environment can result in accidents, injuries, or fatalities, leading to legal liabilities, operational setbacks, and reputational harm.	To mitigate such risks, the Company has implemented a comprehensive occupational health and safety management system across all its facilities and work sites. Aligned with ISO 45001 standards, this system ensures compliance with legal requirements and promotes a safe and secure workplace for employees.	Negative, neglecting workplace safety can have adverse consequences, including expenses related to worker compensation claims, legal action, and reduced productivity due to work-related injuries or illnesses.

Sr. 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)
4	Development and well-being of local communities	Opportunity	Actively engaging with and supporting local communities enables the Company to build trust, strengthen its social license to operate, and contribute to the sustainable development of the regions where it functions.		Positive, as it can lead to better community relationships, lower operational risks, and an enhanced brand reputation.
5	Sustainability disclosures	Opportunity	Transparent and comprehensive sustainability disclosures enable the Company to showcase its dedication to environmental and social responsibility, build stakeholder trust, and appeal to investors focused on sustainability.		Positive, as it can help the Company secure sustainable financing, attract environmentally and socially responsible investors, and enhance overall financial performance through strengthened stakeholder confidence and brand reputation.
6	Environmental declaration of products	Opportunity	Offering environmental declarations for products allows the Company to showcase the sustainability of its products, comply with customer and regulatory expectations, and stand out in the marketplace.		Positive, because it can enable the Company to command premium pricing for its sustainable products, enter new markets, and boost its overall competitiveness.
7	GHG emissions and climate change	Risk	Greenhouse gas (GHG) emissions and climate change present substantial risks to the Company's operations, supply chain, and reputation. Without effective mitigation and adaptation, the Company may face physical risks like extreme weather events and resource shortages, as well as transition risks including evolving regulations, market changes, and reputational harm.	Shyam Metalics is actively addressing these challenges through strategic initiatives. Their solarization project, with a capacity of 1.085 MWp, reduces CO2 emissions by 12.5 lakh kilograms annually— equivalent to planting trees. Furthermore, investments in emission control technologies and the adoption of electric vehicles highlight their dedication to sustainability and environmental responsibility.	Negative, as the Company may incur higher costs due to the physical effects of climate change, such as damage to assets and disruptions in operations and supply chains.

Sr. 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)
8	Adoption of innovative, resource-efficient and low carbon technologies and solutions	Opportunity	Embracing innovative, resource efficient, and low-carbon technologies can enable the Company to enhance its environmental performance, lower costs, and seize emerging opportunities in the clean technology and renewable energy markets.		Positive, as it may allow the Company to decrease operating expenses through better resource efficiency, qualify for green financing and incentives, and create new revenue streams by offering clean technologies and services
9	Life cycle assessment of products and processes	Opportunity	Performing life cycle assessments (LCAs) of products and processes allows the Company to pinpoint opportunities for enhancing the environmental performance of its offerings, cutting resource consumption, and minimizing waste.		Positive, because it can help the Company lower costs related to resource use, waste management, and regulatory compliance, while also boosting market competitiveness by creating more sustainable products.
10	Sustainability in the supply chain	Opportunity	Encouraging sustainability practices across the supply chain helps the Company manage environmental and social risks, strengthen operational resilience, and support the overall sustainability of its business.		Positive, as it may enable the Company to lower costs linked to supply chain disruptions, regulatory compliance, and reputational damage

Sr. 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)
11	Water and effluents	Risk	Failure to responsibly manage water resources can result in operational disruptions, regulatory non-compliance, and damage to the Company's reputation.	The Company monitors and measures water consumption across all its locations and operations. Its commitment to water stewardship includes identifying opportunities for effective water conservation. Additionally, SMEL promotes the use of recycled water to reduce overall consumption. The Company also implements Zero Liquid Discharge (ZLD) systems at all plants to ensure thorough wastewater treatment in compliance with applicable standards and regulations.	Negative, as the Company may incur higher costs due to water scarcity—such as increased prices and supply interruptions—as well as expenses related to wastewater treatment and regulatory compliance.
12	Air pollution	Risk	Failure to effectively manage air emissions can lead to fines, legal issues, and community resistance to the Company's operations..	To address this, the Company actively maintains power equipment and regulates the air-to-fuel ratio. This approach helps reduce the production of Nitrogen Oxides (NOx), supporting more sustainable and environmentally friendly operations.	Negative, the Company may face higher costs related to air pollution control technologies, regulatory fines, penalties, and potential legal challenges.

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Section	P1	P2	P3	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)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c. Web Link of the Policies, if available	The policies related to the above-mentioned Principle (P1-P9) are accessible via the following link: P-6 Sustainability policy P-6 Energy policy P-6 Water Policy P-1 Terms and conditions for appointment of Independent Directors P-3 & 5 Anti-Sexual Harassment Policy P-1 Policy of Board Diversity P-1 Business Responsibility & Sustainability Policy P-2 & 9 Risk Management Policy P-1 Anti-Corruption and Anti Bribery Policy P-1 Dividend Distribution Policy P-3 Whistle Blower Policy P-1 Policy for Transactions with Related Parties P-7 Policy for Preservation of Documents P-5 Nomination and Remuneration Policy P-1 Code of Conduct for Directors and Senior Management Executives P-1 Familiarization Programme for Independent Directors P-8 Corporate Social Responsibility Policy P-2 Policy for Determining Material Subsidiaries P-1 Code of Conduct for Regulating, Monitoring and Reporting of Trading by Insiders P-2 Policy for Determination of Materiality of Events and Information for Disclosure to The Stock Exchange P- 1 & 5 Criteria for Making Payments to Non-Executive Directors								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4. Name of the national and international codes/certifications/labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, ISO450001, ISO, BIS) adopted by your entity and mapped to each principle	ISO 9001, ISO 14001, ISO 45001, BIS	ISO 45001, Green Pro certification of TMT & Structural Products		Indian labour codes	ISO 14001				
5. Specific commitments, goals and targets set by the entity with defined timelines, if any	The company is currently establishing targets for Sustainability Key Performance Indicators (KPIs) related to climate change, energy, water, waste, air emissions, and biodiversity. These targets encompass both short-term (2030) and long-term (2050) goals								
6. Performance of the entity against the specific commitments, goals, and targets along with reasons in case the same are not met.	The Company is actively establishing its goals, targets, and performance tracking mechanisms to fulfil its commitments								

Disclosure Section	P1	P2	P3	P4	P5	P6	P7	P8	P9
Governance, leadership, and oversight									
7. Statement by the director responsible for the business responsibility report, highlighting ESG-related challenges, targets, and achievements (listed entity has flexibility regarding the placement of this disclosure)	At Shyam Metals and Energy Limited (SMEL), our commitment to sustainable and ethical business practices remains steadfast. In the past year, we have continued to invest in resource efficiency, carbon footprint reduction, and responsible waste management. Our ongoing efforts toward renewable energy usage and inclusive workplace culture reflect our dedication to long-term value creation. Through robust CSR initiatives and continuous stakeholder engagement, we remain focused on building resilience across our operations. Kindly refer to the Management Messages in the non-statutory section for further details.								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).	Mr. Brij Bhushan Agarwal (DIN: 01125056) under the guidance of the Board of Directors and its Committees is responsible for implementation and oversight of the Business Responsibility policies								
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 Board of Shyam Metals has established several key committees responsible for sustainability-related policies: 1. Corporate Social Responsibility (CSR) Committee: The Company has a dedicated committee for Corporate Social Responsibility (CSR). Its responsibilities include formulating CSR policies, overseeing its implementation and ensuring compliance with relevant regulations. The CSR Committee collaborates with various stakeholders to create a positive impact on society and the environment. 2. Risk Management Committee: The Risk Management Committee assists the Board in identifying both internal and external risks faced by the company. These risks encompass financial, operational, sectoral, and sustainability-related aspects, with a particular focus on environmental, social, and governance (ESG) risks. Additionally, the committee addresses information security and cyber risks to safeguard the company's assets and reputation. 3. Stakeholder Relationship Committee: Responsible for maintaining positive relationships with security holders and ensures effective communication. It resolves grievances related to share transfers, non-receipt of Annual Reports, declared dividends, and issuance of new or duplicate certificates. Transparency during general meetings is a key priority for the Stakeholder Relationship Committee. 4. Audit Committee: The Committee monitors and provides effective supervision of the Management's financial reporting process, to ensure accurate and timely disclosures, with the highest levels of transparency, integrity and quality of financial reporting. Overseas the work carried out by the internal auditor, statutory auditor and cost auditor. 5. Nomination and Remuneration Committee: The Committee oversees the Company's nomination process including succession planning for the senior management and the Board to assist the Board to identify, screen and review individuals qualified to serve as Executive Directors, Non-Executive Directors and determine the role and capabilities required for Independent Directors consistent with the criteria approved by the Board. Assists the Board in discharging its responsibilities relating to compensation of the Company's Executive Directors, KMPs and Senior Management. 6. Executive Committee: The Company has also constituted an Executive Committee. The terms of reference of the Executive Committee are determined by the Board and are reviewed periodically to ensure their continued relevance. The Committee's primary responsibilities relate to financial and administrative matters, facilitating the efficient implementation of the Company's financial operational decisions.								

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.	The Company's policies are carefully crafted and approved by the esteemed Board of Directors. These policies undergo periodic reviews or are reassessed as needed, which plays a vital role in evaluating the organization's environmental, social, and governance (ESG) initiatives. During these comprehensive reviews, the effectiveness of each policy is rigorously assessed, and necessary amendments are implemented to ensure that the company's procedures remain aligned with its commitment to sustainable and responsible business practices.																	
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	The Company is committed to upholding standards of compliance, adhering to all applicable regulations and principles that govern its operations. The company takes a proactive approach to addressing any operational issues that may arise, promptly identifying and resolving them in an ongoing manner. No major non-compliance incidents, if any, are minimal and effectively managed, enabling the organization to maintain its reputation as a responsible and ethical corporate citizen.																	

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	P6	P7	P8	P9
Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
The Company's processes and compliances are subject to regular audit by internal auditors and regulatory bodies, ensuring adherence to industry standards. With a focus on best practices and risk mitigation, the various department and business heads collaborate to periodically evaluate and update the company's policies, seeking approval from the management or board. This collaborative effort ensures that Shyam Metalics' policies remain relevant and effective. Furthermore, to maintain transparency and accountability, the company's financial and non-financial performance, including its policies, undergo annual third-party verifications and audits, providing an independent and objective assessment of the company's results.									

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

Response: 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 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	Percentage of persons in respective category covered by the awareness programmes
Board of Directors	1	Code of Conduct	100%
Key Managerial Personnel	2	Code of Conduct	29%
Employees other than BoD and KMPs	486	Technical, Non-Technical & Safety	61%
Workers	385	Technical, Non-Technical & Safety	67.29%

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

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	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	Amount (In ₹)	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
	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.

Response: Yes, SMEL enforces a strict Anti-Corruption and Anti-Bribery Policy, ensuring all business operations are conducted with integrity and ethical responsibility. <https://shyam-metalics-documents.s3.ap-south-1.amazonaws.com/undefined/0d7591de-8df6-492e-a792-3365a8ec6199-Anti-Corruption-and-Anti-Bribery-Policy-.pdf>

Professional Conduct: The Company maintains a high standard of professionalism, fairness, and integrity in all its business relationships and dealings, regardless of the environment in which it operates. Robust Systems: To proactively prevent and address bribery and corruption, the Company has established strong internal systems and controls.

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 2025-26	FY 2024 -25
Directors	Nil	Nil
Key Managerial Personnel	Nil	Nil
Employees other than BoD and KMPs	Nil	Nil
Workers	Nil	Nil

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

	FY 2025-26		FY 2024 -25	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	NA	Nil	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	NA	Nil	NA

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.

Response: None corrective actions undertaken as there was no complaints in regard to Conflict of Interest.

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

	FY 2025-26	FY 2024-25
i) Accounts payable x 365 days	17,75,757.85	10,64,792.60
ii) Cost of goods/services procured	13,680.15	11,336.72
iii) Number of days of accounts payables	130	94

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 2025- 26	FY 2024-25
Concentration of Purchases	a. i) Purchases from trading houses	0.00	0.00
	ii) Total purchases	0.00	0.00
	iii) Purchases from trading houses as % of total purchases	0.00%	0.00%
	b. Number of trading houses where purchases are made	0	0
	c. i) Purchases from top 10 trading houses	0.00	0.00
	ii) Total purchases from trading houses	0.00	0.00
	iii) Purchases from top 10 trading houses as % of total purchases from trading houses	0.00%	0.00%
	a. i) Sales to dealer / distributors	1,339.93	1,529.88
	ii) Total Sales	18,552.21	15,158.63
Concentration of Sales	iii) Sales to dealer / distributors as % of total sales	7.22%	10.09%
	b. Number of dealers / distributors to whom sales are made	3,479	2,669
	c. i) Sales to top 10 dealers / distributors	376	551
	ii) Total Sales to dealer / distributors	1,339.93	1,529.88
	iii) Sales to top 10 dealers / distributors as % of total sales to dealer / distributors	28.06%	35.99%

Parameter	Metrics	FY 2025- 26	FY 2024-25
Share of RPTs in	a. i) Purchases (Purchases with related parties)	455.89	318.80
	ii) Total Purchases	5,038.81	4,479.71
	iii) Purchases (Purchases with related parties as % of Total Purchases)	9.05%	7.12%
	b. i) Sales (Sales to related parties)	627.27	485.90
	ii) Total Sales	6,992.98	6,479.36
	iii) Sales (Sales to related parties as % of Total Sales)	8.97%	7.50%
	c. i) Loans & advances given to related parties	0.13	0.13
	ii) Total loans & advances	0.13	0.13
	iii) Loans & advances given to related parties as % of Total loans & advances	100.00%	100.00%
	d. i) Investments in related parties	0.00	0.00
	ii) Total Investments made	0.00	0.00
	iii) Investments in related parties as % of Total Investments made	0.00%	0.00%

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	Percentage of value chain partners covered (by value of business done with such partners) under the awareness programmes
25	Code of Conduct, Company Induction & POSH	35%

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.

Response: Yes, the Company has robust processes in place to manage potential conflicts of interest involving members of its Board of Directors. The company requires all directors to disclose their interests, shareholdings, and associations with other companies or entities annually or whenever changes occur. Additionally, directors provide annual declarations confirming their commitment to acting in the company's best interests and avoiding any conflicts between their personal or business associations and Shyam Metallics' operations. The senior management also affirms annually that they have not engaged in any transactions that could potentially conflict with the company's interests. During Board meetings, directors abstain from participating in discussions where they may have a conflict of interest. Also, it conducts regular assessments at its sites to identify potential areas of conflict, engaging with internal and external stakeholders to ensure a comprehensive evaluation process.



PRINCIPLE 2

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

Essential Indicators:

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

	FY 2025-26	FY 2024-25	Details of improvements in environmental and social impacts
R&D	24%	15%	Initiatives undertaken include Online Vibration monitoring system for Critical Equipment at DRI, Aluminizing of DRI Cooler Shell to achieve Cooling efficiency, corrosion prevention improved and extending the life of Cooler Shell by up to another 10 years, Production of low-carbon steel for easy drawing applications, Installation of Air-Oil lubrication system in place of Grease lubrication, Conversion of process-generated cold billets into TMT Bars or Wire Rods by reheating in the Re-Heating Furnace
Capex	18%	11%	Capex includes investment done Expansion of solar power facilities (existing DC capacity 1.2 MWP(0.99MW) MW floating solar plant, proposed 3 MW(10.5 CR.) rooftop project) & Conversion of Direct Chute Feeder to Y Chute in AFBC Boiler

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

Response: Yes

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

Response: Yes, 15% the Entity is committed to building a sustainable supply chain. The Company is currently in the process of adopting a comprehensive policy for sustainable sourcing. Under this policy, all new and existing supply chain partners will undergo a mandatory evaluation based on criteria related to environmental protection, health and safety, and overall sustainability. This diligent assessment ensures that only those partners aligned with Shyam Metals' commitment to responsible business practices are on boarded.

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:**

Response:

- (a) Plastics (including packaging)** - Not applicable as plastic is not being used in packaging of the products.
- (b) E-waste** - All electronic waste produced by the Company is systematically channelled to certified recycling facilities. This approach reflects the Company's dedication to environmental sustainability and responsible waste management practices. The Company actively separates electronic waste and ensures its secure transport to appropriate recycling centres.
- (c) Hazardous Waste** - All hazardous waste produced by the Company is responsibly handled and directed to certified recycling facilities.
- (d) Other Waste** - Each facility within the Company is designed to minimize waste through internal reuse and recycling processes. This waste, rather than being disposed of, becomes a valuable resource through waste heat recovery systems. The Company has installed advanced boilers that convert this recovered heat into electricity, supporting the Company's energy requirements. This innovative strategy not only reduces the Company's environmental impact but also improves operational effectiveness.

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.**

Response: No, Extended Producer Responsibility (EPR) is not applicable to the Company's products

Leadership Indicators:

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

Response: Not conducted in this year.

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
TMT Bar/ Structural	A large proportion of environmental impacts are associated with the raw material Billet that is produced through DRI root.	The company is in the process of optimizing the DRI production process to increase efficiency and reduce waste. They are also exploring the increased use of scrap steel and implementing energy efficient technologies to lower their environmental footprint.

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 2025-26	FY 2024-25
Water	100%	100%
Dolochar from DRI and Bag filter dust from CPP	100%	100%
Fly Ash	99.95%	98.85%

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 2025-26			FY 2024-25		
	Re-used	Recycled	Safely Disposed	Re-used	Recycled	Safely Disposed
Plastics (including packaging)	-	-	-	-	-	2.13
E-waste	-	12.70	-	-	11.32	-
Hazardous Waste	796.64	-	-	-	-	791.12
Other Waste	59,102	-	-	-	51.1	-

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:

Category	Percentage of Employees (Permanent and Other employees) covered by										
	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	4654	3895	83.69%	4654	100.00%			137	2.94%	0	0.00%
Female	191	128	67.02%	191	100.00%	0	0.00%			0	0.00%
Other	0	0	0.00%	0	0.00%	4	0.00%	0	0.00%	0	0.00%
Total	4845	4023	83.03%	4845	100.00%	4	0.08%	137	2.83%	0	0.00%
Other than permanent employees											
Male	0	0	0.00%	0	0.00%			0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0.00%			0	0.00%
Other	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

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

		Percentage of 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	5403	3682	68.15%	5403	100.00%			9	0.17%	0	0.00%
Female	16	1	6.25%	16	100.00%	0	0.00%			0	0.00%
Other	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	5419	3683	67.96%	5419	100.00%	0	0.00%	9	0.17%	0	0.00%
Other than 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%
Other	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0	0%	0	0%	0	0%	0	0%	0	0%

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format

	FY 2025-26	FY 2024-25
Cost incurred on well-being measures as a % of total revenue of the company	0.05%	0.04%

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

	FY 2025-26			FY 2024-25		
	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 percentage of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	85.50%	99.8%	Y	86%	97%	Y
Gratuity	100%	100%	N	94%	98%	N
ESI	10.90%	32.10%	Y	15%	37%	Y
Others - (Medical Insurance)	84%	67%	N	83%	63%	N

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.

Response: The Company remains committed to fostering an inclusive, equitable, and accessible workplace for all employees. Although there were no differently abled employees on the rolls during the reporting period, the Company continues to maintain infrastructure that is designed to support accessibility in line with the applicable provisions of the Rights of Persons with Disabilities Act, 2016. Its office premises and manufacturing facilities incorporate accessibility considerations to facilitate a safe and barrier-free work environment, reinforcing the Company's commitment to equal opportunity and workplace inclusion. Additionally, we have put in places steps like Lifts, Personal Assistance and Valet services.

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.

Response: Yes. The Company has a Human Rights Policy that outlines its commitment to respecting and upholding human rights across its operations. Any concerns or grievances related to human rights are addressed through a designated reporting mechanism, with the respective department heads and the Human Resources function responsible for reviewing, investigating, and resolving such matters in accordance with the Company's established procedures. It can be accessed through the Code of Conduct 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	100%	100%	100%	100%
Female	100%	100%	100%	100%
Total	100%	100%	100%	100%

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.

Category	Yes/No (If Yes, then give details of the mechanism in brief)	
Permanent Workers	HR One Portal	Shyam Metallics has setup a ticketing system for redressal of grievances. This helps in the tracking and closing of any grievances.
Other than Permanent Workers	CLMS	
Permanent Employees	HR One Portal	
Other than Permanent Employees	CLMS	

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

Category	FY 2025- 26			FY 2024-25		
	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						
Male	4654	0	0%	NIL		
Female	191	0	0%			
Total Permanent Workers						
Male	5403	2736	50.64%	NIL		
Female	16	12	75.00%			

8. Details of training given to employees and workers:

Category	FY 2025- 26					FY 2024-25				
	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	4521	1385	19%	2462	54%	4439	881	19.85%	2337	52.65%
Female	181	64	16%	178	98%	154	24	15.58%	143	92.86%
Total	4702	1449	19%	2640	56%	4593	905	19.70%	2480	54%
Workers										
Male	5533	2594	47%	1330	24%	5530	879	15.90%	1162	21.01%
Female	17	2	12%	9	53%	15	0	0	1	6.67%
Total	5550	2596	47%	1339	24%	5545	879	15.85%	1163	20.97%

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

Category	FY 2025-26			FY 2024-25		
	Total (A)	No.(B)	% (B/A)	Total (C)	No.(D)	% (D/C)
Employees						
Male	3773	178	5%	4439	3489	78.60%
Female	128	6	5%	154	91	59.09%
Total	3901	184	5%	4593	3580	77.94%
Workers						
Male	5116	325	6%	5530	5040	91.14%
Female	12	3	25%	15	8	53.33%
Total	5128	328	6%	5545	5048	91.04%

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?**

Response:

Yes, occupational health and safety management system has been implemented by the entity. It covers the entire operations covering all project sites, manufacturing units, industrial production facilities and offices. The Company believes that a safe and healthy work environment is a pre-requisite for employee well-being, and the adoption of best practices in occupational health and safety have a direct impact on its overall performance. The coverage is 100% and includes all employees and workers. Moreover, the system is based on the ISO 45001 and is designed to ensure that the Company meets its legal obligations and provides a safe and healthy working environment for its employees.

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

Response: The Company has in place a systematic risk management process to identify, assess, and control hazards across construction project sites, manufacturing units, industrial production facilities, and offices. The process encompasses a comprehensive set of safety practices for identifying work-related hazards and assessing risks associated with both routine and non-routine activities. These include Hazard Identification, Risk Assessment and Risk Management (HIRA), Job Safety Analysis (JSA), regular workplace and departmental safety inspections, periodic safety observations and walkthroughs by supervisors and safety officers, incident and near-miss reporting and investigation, safety audits, and learning from previous incidents and operational manuals. In addition, any changes to processes, equipment, or materials are evaluated through a structured change management review to identify and mitigate potential hazards before implementation. Through these proactive measures, the Company diligently identifies potential risks, implements appropriate control measures, and continually strengthens its safety management system to safeguard the health and well-being of its employees.

c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks.

Response: Yes. The Company has established formal procedures and reporting channels that enable all workers to promptly report work-related hazards, unsafe acts, unsafe conditions, and near-miss incidents. The reporting system is implemented across all divisions, with defined targets for reporting unsafe acts (UA) and unsafe conditions (UC) to encourage proactive hazard identification and foster a strong safety culture. The Company's manufacturing facilities, follow a structured reporting and investigation process to identify the root causes of incidents and near misses. Based on the findings, appropriate corrective and preventive actions are implemented to prevent recurrence of similar incidents. The reporting mechanism promotes open communication and ensures that employees can raise safety concerns without fear of retaliation.

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

Response: Yes. The Company provides access to both occupational and non-occupational medical and healthcare services through its established Occupational Health Centers (OHCs) located across major operational sites. These centers are staffed with qualified medical professionals and are equipped to address the health needs of employees and workers. In addition, on-site medical centers and first aid facilities are available to provide immediate medical assistance. Where specialized treatment is required, the Company has arrangements with multi-specialty hospitals to ensure timely access to quality healthcare services for all employees and workers.

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

Safety Incident/Number	Category	FY 2025-26	FY 2024-25
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.20	0.94
	Workers	1.40	2.68
Total recordable work-related injuries	Employees	59	49
	Workers	160	76
No. of fatalities	Employees	0	0
	Workers	1	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	1
	Workers	0	3

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

Response: Worker safety remains the highest priority, achieved through regular inspections, comprehensive training, and transparent communication. Alert teams quickly identify and address potential hazards, with supervisors having authority to stop unsafe work until risks are addressed. The Company collaborates with contractors who demonstrate a safety-first approach and conducts regular medical examinations to verify fitness for demanding tasks. Every life is considered invaluable, driving safety from policy development to daily operations. Safety Measures and Improvements: Operational Safety Measures: Monthly safety observations are shared with divisions ensuring corrective actions. All rotating parts are safeguarded with machine guards and platforms have handrails and toe guards. Regular housekeeping prevents slip, trip & fall incidents.

Training programs and safety audits identify deviations with priority-based corrections. Incident investigations drive corrective actions while toolbox talks, and SOP training enhance worker skills and safety awareness. System Improvements: Work at Height Standard Operating Procedure awareness training is delivered to all employees at the Dam & Powerhouse. The procedure includes 'Stop Work' authority for Supervisors, Engineers, Line Managers, and Department Heads when unsafe conditions exist at the site. Competency assessments are conducted for contractor personnel before vendor selection. All workers must complete medical fitness evaluations for elevated work. Job-Specific Training: Scaffolding Inspector Certification Training is provided to 36 employees at the hydro plant through external agencies. Refresher Emergency Response training is delivered to site supervisory staff, including contractors. Physical Improvements: The Company has acquired its own scaffolding materials for maintenance work, removing dependence on contractor equipment. Daily Toolbox safety discussions are conducted for all workers, particularly those performing elevated work. Additional Safety Measures: Workers receive mandatory training for safely accessing elevated work platforms and properly using protective equipment. Managers utilize digital safety reporting systems for risk identification. Employees continuously enhance their safety knowledge to maintain hazard awareness. The Company prioritizes the welfare of its people.

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

	FY 25 - 26			FY 24-25		
	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	11	0	-	737	0	-
Health and Safety	2	0	-	309	0	-

14. Assessments for the year:

Percentage 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 and safety practices and working conditions.

Response:

The Company has taken several actions to address significant risks and concerns arising from assessments of health and safety practices and working conditions. It continuously strengthens its safety management system through initiatives such as toolbox talks, safety and fire safety training, emergency mock drills, daily safety observations, road safety monitoring, display of safety do's and don'ts, Hazard Identification and Risk Assessment (HIRA), and a near-miss reporting system. Fire hydrant systems have been installed in the CPP, with installations under progress at SMS 2 and Ferro units. Safeguarding of rotating parts across the plant is being enhanced, while housekeeping is accorded the highest priority across all departments. To improve fall protection, the Company is installing lifelines above EOT crane structures, enabling employees to securely anchor their safety harnesses while performing maintenance work at height.

In addition, the Company has implemented several engineering controls to mitigate machine-specific risks, particularly in the Wire Drawing Mill (WDM), Jamuria. These include 360° guarding of drums to prevent wire from ejecting unexpectedly, installation of proximity sensors during closing operations for automatic machine stoppage, provision of sliding guards alongside HB machines to prevent entanglement, and modification of the feeding end table into a sensor-based platform to eliminate entrapment risks by replacing the existing operator seating arrangement. The Company also continues to enhance employee awareness through regular safety training and mock drills to reinforce safe work practices and prevent workplace incidents.

Leadership Indicators:

1. Does the entity extend any life insurance or any compensatory package in the event of death of: PH*

(a) Employees (Y/N): Yes

(b) Workers (Y/N): Yes

The Company extends life insurance coverage for work related death of its employees and workers.

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

Response: The Company cares for its people by properly paying all employee taxes and social benefits. Equally, contractors must uphold their end of contracts to support workers. Trust and care for one another drive legal compliance. Challan System available for statutory deductions and payments, the Company values each person and acts accordingly.

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

	Total no. of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 25 - 26	FY 24-25	FY 25-26	FY 24-25
Employees	NIL	NIL	NIL	NIL
Workers	NIL	NIL	NIL	NIL

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

Response:

Yes. The Company sees each employee's growth as its own. It invests in continuous learning to help people reach their full potential. By embracing the latest ideas and self-betterment, it nurtures an inspired culture. Most of all, empowering individuals spurs the collective forward.

5. Details on assessment of value chain partners:

Percentage of value chain partners (by value of business done with such partners) that were assessed	
Health and safety practices	100%
Working Conditions	

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:

Response: Not Applicable



PRINCIPLE 4

Businesses should respect the interests of and be responsive to all its stakeholders.

Essential Indicators:

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

Response: The Company adopts a structured and inclusive stakeholder engagement approach to build strong, transparent, and long-term relationships with stakeholders who influence, or are impacted by, its operations and business performance. Regular engagement with employees, customers, suppliers, local communities, government authorities, investors, and business partners enables the Company to understand evolving expectations, address material concerns, and create shared value.

Customers and suppliers remain integral to the Company's value chain, fostering collaboration, innovation, and responsible business practices. The Company also works closely with regulatory bodies, industry associations, and statutory authorities to ensure compliance with applicable laws, align with industry's best practices, and strengthen governance standards. By maintaining open dialogue and meaningful engagement with all stakeholder groups, the Company reinforces trust, supports informed decision-making, and advances its commitment to sustainable and responsible growth.

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
Investor	No	Conference calls, Annual General Meeting, Official communication channels: Advertisements, publications, Website and social media, Investor meetings, Email, Stock Exchange (SE) intimations, Investor/Analyst meet/ Conference calls, Annual Report, Quarterly results, Media releases, Company website	Frequent and as and when required	Share price appreciation, dividend distribution, profitability achievement, and financial stability maintenance. Additionally, the Company places strong emphasis on Environmental, Social, and Governance performance, recognizing its significance in today's business environment. Other growth opportunities are also evaluated, ensuring the Company's continued advancement and success
Customers	No	Customer meets, Official communication channels: Advertisements, publications, website and social media, Conferences events, Phone calls, emails and meetings, Business interaction, Customer plant visit, helpdesk, conferences	Frequent and as and when required	To acquire new customers and serve existing ones through customer satisfaction and feedback, product quality, availability, delivery and timelines, and after-sales service. To inform customers about new developments in techniques and products.
Suppliers & Transporters	No	Regular supplier/contractors meet, Plant visit, MoU and agreements, Training workshops, seminars and meetings, surveys, Supplier audits, Official communication channels: Advertisements, publications, website and social media	Frequent and as and when required	Service existing business requirements, needs and expectation schedules, supply chain matters, training and compliance, quality delivery and payments, ISO standards.

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	Emails and meetings, Employee engagement initiatives, Performance appraisal, HR Connect, Grievance redressal mechanisms, Notice boards Circular and messages from corporate and line management, Employee Referral policy, HR-one portal helpdesk, Welfare initiatives for employees and their families.	Daily Newsletter – Quarterly Emails – As and when required	Employee growth and benefits, their expectations, volunteering opportunities, career advancement, professional development and continuing education, skills enhancement, training and awareness programs.
Government & Regulatory authorities	No	Advertisements, publications, website and social media, Phone calls, emails and meetings, Regulatory audits/ inspections, Quarterly Results, Annual reports, Stock Exchange filings	As and when required	Strong ESG practices, regulatory framework changes, employment matters, environmental measures, reporting requirements, statutory compliance, and support from authorities.
Communities	Yes	Community visit and projects, local charities, volunteerism, seminars, CSR project	As and when required	Community development, self- sustainability, livelihood support, Sustainable Development Goals, building capacity of future leaders, CSR projects
Media	No	Press releases, Quarterly Results, Annual reports, AGM information and media interactions	As and when required	Performance reporting, Good practices, show cases, awards and achievements
Industry Association	No	Website	As and when required	Networking to stay informed about new sector opportunities and drive change

Leadership Indicators:

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

Response:

The Company has established a robust governance framework to oversee its economic, environmental, and social commitments and to promote responsible business conduct. Key Board level committees, including the Corporate Social Responsibility (CSR) Committee, Risk Management Committee, and Stakeholders' Relationship Committee, provide strategic direction and oversight within their respective areas of responsibility. The CSR Committee steers community development and sustainability initiatives, while the Risk Management Committee oversees enterprise-wide risks and strengthens business resilience. The Stakeholders' Relationship Committee focuses on addressing stakeholder concerns and fostering transparent and constructive engagement.

These committees periodically review performance, monitor the implementation of key initiatives, and provide recommendations to the Board to ensure alignment with stakeholder expectations and the Company's long-term objectives. Regular updates to the Board enhance transparency, accountability, and informed decision-making. Beyond the formal governance structure, the Company encourages active participation from employees at all levels through regular interactions, awareness programmes, and feedback mechanisms, reinforcing a culture where responsible governance and sustainable growth are shared responsibilities.

- 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.**

Response:

Yes. The outcomes of the Company's materiality assessment and stakeholder engagement processes serve as key inputs in identifying and prioritizing material sustainability topics. Insights gathered from internal and external stakeholders were evaluated to understand emerging risks, opportunities, and stakeholder expectations. Based on these findings, cross-functional teams develop appropriate strategies, policies, and action plans to effectively address material issues while supporting the well-being of employees, business resilience, and sustainable value creation. Progress against these priorities is periodically reviewed to ensure continued alignment with the Company's sustainability objectives and stakeholder expectations.

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

Response:

The Company's Corporate Social Responsibility (CSR) initiatives are guided by its commitment to creating sustainable and inclusive value for society. CSR programmes are designed to address priority social and developmental needs, with a focus on supporting underserved communities, women, children, youth, and other vulnerable groups. While planning and implementing these initiatives, the Company considers the expectations and interests of key stakeholders and aligns its efforts with local community needs and their development priorities. Through responsible business practices, the Company strives to create long-term positive social, environmental, and economic impact while conducting its operations in an ethical and accountable manner.



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 2025 - 26			FY 2024-25		
	Total (A)	No. of Employees/ Workers covered (B)	% (B/A)	Total (C)	No. of Employees/ Workers covered (C)	% (C/A)
Employees						
Permanent	4606	2856	62%	4593	735	16%
Other than Permanent	96	21	22%	0	0	0
Total	4702	2877	61%	4593	735	16%
Workers						
Permanent	5550	1315	24%	5545	55	1%
Other than Permanent	3140	2420	77%	15,454	0	0
Total	8690	3735	43%	20,999	55	0.26%

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

Category	FY 2025-26					FY 2024-25				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No.(C)	% (C/A)		No.(E)	% (E/D)	No.(F)	% (F/D)
Permanent Employees										
Male	4279	3	0.07%	4276	99.93%	4439	157	4%	4282	96%
Female	145	1	0.69%	144	99.31%	154	14	9%	140	91%
Other than Permanent Employees										
Male	83	01	1.20%	82	98.80%	NA				
Female	01	00	0.00%	01	100.00%					
Permanent Workers										
Male	5700	194	3.40%	5506	96.60%	5530	658	12%	4872	88%
Female	58	2	20.69%	46	79.31%	15	10	67%	5	33%
Other than Permanent Workers										
Male	83	1	1.02%	82	98.80%	15208	10341	68%	4867	32%
Female	1	0	0.00%	1	100.00%	246	209	85%	37	15%

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

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)*	10	36,50,000	1	00
Key Managerial Personnel	6	82,72,206	00	00
Employees other than BoD and KMP	4,294	4,69,779	148	4,06,611
Workers	5,403	3,33,048.00	16	2,40,000

*The Chairman & Managing Director and Deputy Managing Director receive remuneration, which is mentioned in the KMP Row.

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

	FY 2025-26	FY 2024-25
Gross wages paid to females	4.16	6.60
Total wages	211.00	500.00
Gross wages paid to females (Gross wages paid to females as % of total wages)	1.97%	1.32%

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)

Response: Yes

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

Response: Shyam Metalics have put in place a structured mechanism to address human rights issues in the organization. Here, they have setup dedicated SPOCs with Structured framework for addressing Human Rights grievances at Plant Location and at the HO.

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

Particulars	FY 2025-26			FY 2024-25		
	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	-	There were no complaints filed by employees and workers on any human rights related issues, including sexual harassment, discrimination at workplace, child labor, forced labor/ involuntary labor, wages, or other human rights related matters, during FY 2025		
Discrimination at workplace	0	0	-			
Forced Labour/Involuntary Labour	0	0	-			
Wages	0	0	-			
Other human rights related issues	0	0	-			

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

	FY 2025-26	FY 2024-25
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 complainant in discrimination and harassment cases.

Response:

The Company is committed to providing a safe, inclusive, and respectful workplace where all employees can raise concerns related to discrimination, harassment, or inappropriate conduct without fear of retaliation. To uphold this commitment, the Company has established a robust grievance redressal framework supported by the Internal Complaints Committee (ICC) constituted in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and a dedicated POSH governance framework across the Group.

Key measures include:

- **Internal Complaints Committee (ICC):** An ICC has been constituted to receive, investigate, and resolve complaints of sexual harassment in a fair, confidential, and time-bound manner.
- **POSH Governance Framework:** The Company implements a structured Group-level POSH framework that provides clear procedures for complaint reporting, investigation, resolution, and monitoring, while ensuring confidentiality and protection against retaliation.
- **Whistleblower and Grievance Mechanisms:** Employees can report concerns related to unethical conduct, discrimination, harassment, or other workplace issues through established grievance and whistleblower channels, including confidential reporting mechanisms.
- **Confidentiality and Non-Retaliation:** The Company maintains strict confidentiality throughout the investigation process and prohibits any form of retaliation against complainants, witnesses, or individuals participating in investigations.
- **POSH Awareness Programmes:** Regular Group-level awareness programmes, training sessions, and sensitization workshops are conducted to educate employees on respectful workplace behaviour, prevention of sexual harassment, reporting mechanisms, and individual responsibilities under the POSH framework.
- **Review and Monitoring:** Complaints and corrective actions are periodically reviewed to ensure timely resolution, effectiveness of the grievance process, and continuous strengthening of the Company's workplace culture.

Through these measures, the Company continues to foster a workplace built on dignity, mutual respect, equal opportunity, and accountability.

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

Response: Yes

10. Assessments for the year:

Percentage of your plants and offices that were assessed (By entity or statutory authorities or third parties)	
Child Labour	0%
Forced/involuntary labour	0%
Sexual harassment	0%
Discrimination at workplace	0%
Wages	0%
Others – please specify	0%

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

Response: NA

Leadership Indicators:

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

Response:

No, N/A for the reporting year.

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

Response: NA

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?

Response: Yes, all our office is accessible for differently abled visitors.

4. Details on assessment of value chain partners:

Percentage of your plants and offices that were assessed (By entity or statutory authorities or third parties)	
Sexual harassment	At present, the Company has not undertaken a formal assessment of its value chain partners on this aspect. However, it has established a Supplier/Vendor Code of Conduct (SCoC) that sets out the minimum expectations relating to ethical business practices, legal compliance, human rights, health and safety, environmental responsibility, and responsible sourcing. Acceptance of and adherence to the SCoC is a mandatory prerequisite for all suppliers and vendors engaging with the Company. The Company expects its business partners to comply with the requirements of the SCoC and remains committed to strengthening responsible supply chain practices through continued engagement and oversight.
Discrimination at workplace	
Child Labour	
Forced/involuntary labour	
Wages	
Others – please specify	

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

Response: N/A



PRINCIPLE 6

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

Essential Indicators:

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

Parameter	FY 2025- 26 (GJ)*	FY 2024-25 (GJ)
Revenue from operations	18,55,21,00,000.00	1,51,58,63,00,000
From renewable sources		
Total electricity consumption (A)	20,637.75	14,276.02
Total fuel consumption (B)	NIL	NIL
Energy consumption through other sources (C)	NIL	NIL
Total energy consumption from renewable sources (A+B+C)	20,637.75	14,276.02
Total electricity consumption (D)	33,95,01,853.24	19,03,327.78
Total fuel consumption (E)	11,21,32,606.22	1,06,98,181.95
Energy consumption through other sources (F)	NIL	NIL
Total energy consumed from non-renewable sources (D+E+F)	45,16,55,097.21	1,26,01,509.72
Total energy consumed (A+B+C+D+E+F)	45,16,75,734.96	1,26,25,785.75
Energy intensity per million rupees of turnover (GJ/million ₹) (Total energy consumption/million ₹ turnover in rupees)	0.0018	0.000083
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (GJ/million US\$) (Total energy consumed (GJ)/revenue from operations adjusted for PPP (million US\$))	0.037	0.0017
Energy intensity in terms of physical output (total energy consumed in GJ/ count of products manufactured during the fy) (GJ/product)	27.96	21.15**

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, Independent assurance has been carried out by BDO India Services Private Limited on BRSR Core indicators

* The rise in energy consumption is due to the addition of 4 new manufacturing sites in the boundary of Shyam Metallics.

**There is a change in the calculation methodology of last year, hence there is a restatement for the said calculation for FY 2024-25.

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.**

Response: Yes.

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

Parameter	FY 2025- 26*	FY 2024-25
Water withdrawal by source (in kilolitres)		
(i) Surface water (Ponds, lakes and rivers)	49,36,277	41,74,955.15
(ii) Groundwater (Borewell)	44,462	NIL
(iii) Third party water (Tanker water and Municipal Supply)	5,87,300	NIL
(iv) Seawater / desalinated water	NIL	NIL
(v) Bottled water	NIL	NIL
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	55,68,039.26	41,74,955.15
Total volume of water consumption (in kilolitres)	52,90,210	41,74,955.15
Water intensity per Million rupee of turnover (Water consumed/Million ₹ turnover) (KL per Million ₹)	0.000029	0.000047

Parameter	FY 2025- 26*	FY 2024-25
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (KL/Million US\$) (Total water consumption/Revenue from operations adjusted for PPP (KL/Million US\$))	0.00058	0.00097
Water intensity in terms of physical output (Total water consumption in KL/ Count of products manufactured during the year) (KL/product)	0.44	0.66

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, Independent assurance has been carried out by BDO India Services Private Limited on BRSR Core Indicators

* The rise in water consumption is due to the addition of 4 new manufacturing sites in the boundary of Shyam Metalics.

4. Provide the following details related to water discharged:

Parameter	FY 2024-25	FY 2024-25
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment	All the plants practice Zero water Discharge	
- With treatment – please specify level of treatment		
(ii) To Groundwater		
- No treatment	All the plants practice Zero water Discharge	
- With treatment – please specify level of treatment		
(iii) To Seawater		
- No treatment	All the plants practice Zero water Discharge	
- With treatment – please specify level of treatment		
(iv) Sent to third-parties		
- No treatment	All the plants practice Zero water Discharge	
- With treatment – please specify level of treatment		
(v) Others		
- No treatment	All the plants practice Zero water Discharge	
- 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 Yes, Independent assurance has been carried out by BDO India Services Private Limited by BRSR Core indicators

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

Response: Yes, the Company has fully adopted the Zero Liquid Discharge (ZLD) approach and operates two Wastewater Treatment Plants with capacities of 3000 KLD and 4000 KLD. Water used in various processes is treated in these plants and then either reused within the company or used for gardening purposes. This initiative underscores the Company's commitment to responsible water management both on-site and for the broader community. By prioritizing water efficiency and ensuring availability, the Company strictly follows the ZLD principle, ensuring all wastewater is effectively treated and recycled, leaving no discharge or waste behind.

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

Parameter	Please specify unit	FY 2025-26*	FY 2024-25
NOx	(µg/m3)	30.9	17
SOx	(µg/m3)	8.73	3.3
Particulate Matter (PM10)	(µg/m3)	47.85	39
Particulate Matter (PM2.5)	-	-	-
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-

* The rise in air emissions is due to the addition of 4 new manufacturing sites in the boundary of Shyam Metalics.

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

Parameter	Unit	FY 2025-26*	FY 2024-25
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, FCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	1,19,97,316.96	54,43,997.66
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	6,69,57,309.95	4,55,602.06
Total Scope 1 and Scope 2 emissions intensity per Million rupees of turnover	Metric tonnes of CO ₂ equivalent per Million ₹	0.00043	0.000038
Total Scope 1 and Scope 2 emissions per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 & 2 emissions/Revenue from operations adjusted for PPP)	Metric tonnes of CO ₂ equivalent per Million US\$	0.01	0.00079
Total Scope 1 and Scope 2 emission intensity in terms of physical output	Metric tonnes CO ₂ e/ ton	6.50	4.53**

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, Independent assurance has been carried out by BDO India Services Private Limited for BRSR Core indicators

* The rise in GHG emissions is due to the addition of 4 new manufacturing sites in the boundary of Shyam Metallics.

** There is a change in the calculation methodology of last year, hence there is a restatement for the said calculation.

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

Response: Yes.

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

Parameter	FY 2025-26*	FY 2024-25
Total Waste generated (in metric tonnes)		
Plastic waste (A)	0.0	2.13
E-waste (B)	12.7	11.32
Bio-medical waste (C)	0.06	0.11
Construction and demolition waste (D)	0	0
Battery waste (E)	5.31	8
Radioactive waste (F)	NIL	NIL
Other Hazardous waste. (Used Oil, Coolant mixed water, ETP Sludge, Paint sludge/ lacquer waste, Sludge from wet scrubber, Phosphate sludge, Oily soaked clothes, Used Filter, Empty Container, Electronic Waste, Battery Waste) (G)	14,125.22	791.12
Other Non-hazardous waste generated (Metal waste, STP Sludge, Poly Bag, Wood, Solder Dross, Corrugated Boxes) (H).	5,43,538.62	54,231.42
Total waste generated (A+B+C+D+E+F+G+H)*	5,57,681.91	55,044
Waste intensity per million rupees of turnover (MT/Million Rs) (Total waste generated per million rupees of turnover)	0.0000030	0.0000036
Waste intensity per rupee of turnover adjusted for purchasing power Parity (PPP) (MT/Million US\$) (Total waste generated (MT)/revenue from operations adjusted for PPP (Million US\$))	0.000061	0.000074
Waste intensity in terms of physical output (total waste generated/count of products manufactured during the FY) (MT/product)	0.0459	0.0050
For each category of waste generated, total waste recovered through recycling, reusing or other recovery operations (in metric tonnes)		
(i) Recycled	64.03	51.1
(ii) Re-used	503,758.08	1.52
(iii) Other recovery operations	722.69	0.75
Total	5,04,544.80	53.37
For each category of waste generated, total waste disposed of by nature of disposal method (in metric tonnes)		
(i) Incineration	82.73	-
(ii) Landfilling	-	-
(iii) Other disposal operations	2,797.97	791.12
Total	2,797.98	791.12

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, Independent assurance has been carried out by BDO India Services Private Limited for BRSR Core indicators.

* The rise in waste generation is due to the addition of 4 new manufacturing sites in the boundary of Shyam Metallics.

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

Response:

The facility actively recycles and repurposes solid waste materials to promote sustainability. Middling and rejects from the coal washery serve as fuel for the FBC Boiler, while ash, accretion, and Dolchar from the DRI kilns are used in the captive brick-making unit and as additional boiler fuel. Dedusting dust is redirected to the Pellet plant, and tar from the PGP plant is sent to authorized recyclers. Slag and dust generated during steelmaking contribute to reclaiming abandoned mines, and fly ash from boilers is used to fill old stone quarries. Slag from the Ferro alloy plant is utilized in concrete works or as landfill. Hazardous waste such as used oil and spent resin is disposed of responsibly through authorized channels, demonstrating the company's commitment to environmentally sound waste management and circular economy principles.

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:

Sr. 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.
1.	21°41'4.78"N to 21°39'36.36"N 84° 1'29"E to 84° 2'51.64"E	Integrated steel unit	Yes, the conditions given in the EC Letter are being complied with

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

Response: Not Conducted for current year

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:

Sr. 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
Yes, all entities are in compliance with the applicable environmental laws, regulations, and guidelines in India, including the Water (Prevention and Control of Pollution) Act, the Air (Prevention and Control of Pollution) Act, the Environment (Protection) Act, and the rules framed thereunder.				

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:

- Name of the area: Jamuria, Mangalpur, Pakuria, Jharkand, Kharagpur, Pithampur (Unit I & II)
- Nature of operations Steel manufacturing
- Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2025-26	FY 2024-25
Water withdrawal by source (in kilolitres)		
(i) Surface water	67,09,752	71,74,955.15
(ii) Groundwater (Borewell)	22,231	NIL
(iii) Third party water (Municipal Supply + Tanker)	6,12,648	NIL
(iv) Seawater / desalinated water	NIL	NIL
(v) Others	NIL	NIL
Total volume of water withdrawal (in kilolitres)	73,44,631	71,74,955.15
Total volume of water consumption (in kilolitres)	73,44,631	71,74,955.15
Water intensity per million rupees of turnover (KL/Million ₹) (water consumed (KL)/turnover rupee (Million ₹))	0.000036	0.000047
Water intensity (optional) – the relevant metric may be selected by the entity (KL/product) (Total water consumption in KL in areas of water stress/ count of products manufactured during the FY)	-	-

Parameter	FY 2025-26	FY 2024-25
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water	N/A	N/A
- No treatment		
- With treatment – please specify level of treatment		
(ii) Into Groundwater		
- No treatment		
- With treatment – please specify level of treatment		
(iii) Into Seawater		
- No treatment		
- With treatment – please specify level of treatment		
(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)		

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

Parameters	Unit	FY 2025-26	FY 2024-25
Total Scope 3 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	The Company is currently in the process of calculating Scope 3 emissions and shall report on them next year.	
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		

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.

Response: Currently, the Company is in the process of assessing any such impact on Biodiversity.

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	Outcome of the initiative
1	Waste to Resource Model	The company has adopted a Waste to Resource strategy by repurposing fly ash into eco-friendly bricks and using slag for cement and road construction. Structured handling of hazardous and solid waste has also been implemented for compliance and traceability.	Reduced environmental impact through increased recycling; lower landfill use; improved circular economy alignment.
2	Zero Liquid Discharge (ZLD)	All manufacturing units operate ZLD systems with 3,000 KLD and 4,000 KLD wastewater treatment plants. Treated water is recycled for internal operations or used for landscaping, reducing freshwater dependence.	Achieved water reuse across facilities; eliminated discharge of untreated water; reduced freshwater intake.
3	Renewable Energy Deployment	Installation of 63.976 MW solar power (rooftop and floating); investment in wind energy capacity underway. Energy generated supports internal consumption, reducing dependency on fossil fuels.	Generated 6,27,96,611 MJ of renewable energy; reduced GHG emissions and operational costs.

Sr. No.	Initiative undertaken	Details of the initiative	Outcome of the initiative
4	Waste Heat Recovery Systems	Deployment of waste heat recovery systems (WHRS) and Dolo char-based captive power plants to capture thermal energy from production processes.	Improved energy efficiency; reduced thermal losses; enhanced captive power contribution to 83% of total energy use.
5	Advanced Pollution Control Devices	Use of Electrostatic Precipitators (ESPs) and other APCDs across all production units. Air quality monitored in real time to ensure emission norms are met.	Reduced particulate and gaseous emissions; ensured regulatory compliance; improved workplace and community air quality.
6	Industry 4.0 and Digital Integration for Efficiency	Adoption of IoT, AI-enabled systems, SAP S/4HANA and predictive maintenance tools to optimise operations, reduce energy and material waste, and improve equipment efficiency.	15% increase in output, 20% reduction in labour costs, 30% reduction in inventory holding; improved responsiveness and resource utilisation.
7	Top Gas Pressure Recovery Turbine (TRT)	Installed 18 MW TRT at Jamuria plant to recover energy from blast furnace gas and convert it into electricity.	Enhanced energy efficiency by 10%; reduced carbon intensity of steel production.
8	Aluminium Scrap Recycling	Integrated aluminium scrap into foil manufacturing to promote circularity and reduce reliance on virgin materials.	Promoted circular economy; lowered raw material cost and environmental footprint in aluminium value chain.
9	Cooling System Optimisation	New cooling system at Jamuria reduced water and electricity usage, contributing to process optimisation and sustainability.	Achieved 20% reduction in water and electricity use; supported ZLD and energy efficiency goals.

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

Response: No.

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.

Response: No, adverse impacts.

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

Response: Currently, the company is in the process of assessing value chain partners for environmental impacts

8. How Many green credits have been generated or produced?

Response: 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.**

Response: 9

- 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	Bengal chamber of Commerce (BCC)	State
2	Merchant Chamber of Commerce (MCC)	State
3	Bharat Chamber of Commerce (BCC)	National
4	Indian Chamber of Commerce (ICC)	National
5	Federation of Indian Chambers of Commerce & Industry (FICCI)	National
6	Confederation of Indian Industry (CII)	National
7	Steel Mint	National
8	Pellet Manufacturers' Association of India	National
9	Agri Horticultural Society	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.**

Response: Nil, There have been no adverse orders against the Company pertaining to anti-competitive conduct from regulatory bodies

Leadership Indicators:

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

Sr. 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
	Shyam Metalics works closely with industry/trade associations in evolving policies that govern the functioning and regulations of the Indian Steel sector.				



PRINCIPLE 8

Businesses should promote inclusive growth and equitable development.

Essential Indicators:

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

Response: Not Applicable.

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

Response: Not applicable

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

Response:

The Company has established structured mechanisms to receive and address community grievances across its operating locations. Dedicated Industrial Relations (IR) Committees and a structured hearing process at plant locations provide formal channels for community members to raise concerns, which are reviewed and resolved in a timely manner. In addition, the CSR team and Shyam Metals Foundation (SMF), through regular engagement with local communities, Panchayats, Self-Help Groups, and village representatives, identify and address community issues while ensuring continuous dialogue and effective grievance redressal.

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

	FY 2025-26	FY 2024-25
Directly sourced from MSMEs/ small producers	10.89%	6.31%
Sourced directly from within the district and neighbouring districts	98.18%	93.69%

- 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 2025- 26	FY 2024-25
1. Rural		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis)	74,85,04,582.00	34,29,52,129.00
ii) Total Wage Cost	3,95,95,63,712.00	3,58,97,41,279.00
iii) % of Job creation in Rural areas	18.90%	9.55%
2. Semi-urban		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis)	20,59,34,678.00	16,44,23,798.00
ii) Total Wage Cost	46,58,36,557.00	41,57,23,158.00
iii) % of Job creation in Semi-Urban areas	44.21%	39.55%
3. Urban		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis)	5,90,49,160.00	5,72,84,159.00
ii) Total Wage Cost	32,72,28,922.00	30,14,87,256.00
iii) % of Job creation in Urban areas	18.05%	19.00%
4. Metropolitan		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis)	36,55,04,910.00	24,78,12,459.00
ii) Total Wage Cost	1,04,40,34,107.00	87,84,12,576.00
iii) % of of Job creation in Metropolitan area	35.01%	28.21%

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):

Response: Not Applicable

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

Name of implementation of Agency	Project Title	Schedule 7	Project Location/s (State)	Project Location/s (District)	Total Amount Spent (In lacs)
NA	Healthcare Promotion & Medical Facilities Skill Development Environment Sustainability Social Infrastructure Projects	Healthcare, Hunger & Sanitation Education & Skill Development Environment Sustainability Rural Development Projects	Odisha	Sambalpur	939.00
NA	Healthcare & Medical Facilities Skill Development & Livelihood Enhancement Social Welfare Program Environment Sustainability Rural Development Projects	Healthcare, Hunger & Sanitation Education & Skill Development Environment Sustainability Rural Development Projects	West Bengal	Paschim Bardhaman	1223.00

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No):

Response: : No, there is no such policy yet, however the entity is working on a responsible sourcing policy

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

Response: N/A

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

Response: N/A

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:

Sr. 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

Sr. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Construction of community hall, schools, roads, club, stage & Community water body i.e. pond renovation and cleaning.	9462	41
2	Drinking Water arrangement in Nearby villages/ Schools, Mobile Health Unit for health services / Homeopathy service, Animal health camp with collaboration of Animal Husbandry Dept.& Construction of community toilet & bathroom/WASH activities.	78834	56
3	Skill Development training on computer and Tailoring & Jute product making, Mushroom harvesting training, Provide education support to the Govt. authorised school.	7964	38
4	Cloths distribution, health camp, blood donation camp, Fire tender services, Organised various Community Awareness Program in nearby villages & Promotion of Female/Women Sports group.	78810	87



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.

Response: The Company has established multiple customer grievance and feedback channels including email, phone, website, social media platforms, feedback forms, toll-free support, direct interaction with sales/project teams, and dealer networks to ensure timely resolution of complaints and customer concerns. Company is also implementing Salesforce for better tracking and process optimization.

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

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

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

	FY 2025-26			FY 2024-25		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	Nil	Nil		Nil	Nil	
Advertising						
Cyber-security						
Delivery of essential services						
Restrictive Trade Practices						
Unfair Trade Practices						
Other						

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

	Number	Reasons for recall
Voluntary recalls	Nil	Nil
Forced recalls	Nil	Nil

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

Response: The Company has a formal policy on Information security management, and a manual of all the relevant policies is on the Company's website <https://www.shyammetals.com/wp-content/uploads/2025/08/ISMS.42-Data-Protection-Privacy-Policy.pdf>

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.

Response: NA

7. Provide the following information relating to data breaches:

a. Number of instances of data breaches

Response: 0

b. Percentage of data breaches involving personally identifiable information of customers

Response: 0

c. Impact, if any, of the data breaches

Response: NA

Leadership Indicators:

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

Response: Company Website: Shyam Metalics Official Website, Product brochures/catalogues, Dealer & distributor network, Customer support channels, Sales and marketing teams

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

Response: The Company educates customers through product specifications, technical documentation, quality certifications, dealer interactions, customer engagement programs, product labelling, and guidance provided by sales and technical support teams

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

Response: : Customers are informed through direct communication by sales teams, distributors, email notifications, order coordination channels, and official communication platforms in case of any potential supply disruption or delay

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)

Response: The Company displays product specifications, grade details, quality certifications, usage information, and compliance details in addition to mandatory statutory requirements through labels, test certificates, brochures, and technical documents. The Company conducts customer interaction and feedback activities through dealer networks, market surveys, customer engagement, and direct feedback mechanisms to assess customer satisfaction and improve product/service quality

INDEPENDENT ASSURANCE STATEMENT

Shyam Metalics and Energy Limited,

P-19, (Plate No.: D-403), Taratala Road CPT Colony,
Kolkata, West Bengal 700088

BDO India Services Private Limited
Magnum Global Park, Floor 21
Sector 58, Golf Course Extension Road
Gurugram, Haryana 122011

Independent Assurance Statement on Business Responsibility and Sustainability Report (BRSR) disclosures for the Financial Year 2025-26.

Introduction and objective of engagement

Shyam Metalics and Energy Limited (the 'Company') has developed its Business Responsibility and Sustainability Report ('BRSR') including the BRSR Core Indicators¹, based on the BRSR reporting guidelines prescribed by SEBI for listed entities. The reporting criteria have been derived from the Principles of National Guidelines on Responsible Business Conduct, 2018 (NGRBC), and Greenhouse Gas (GHG) Protocol - A Corporate Accounting and Reporting Standard.

BDO India Services Private Limited (BDO) was engaged by the Company to provide independent assurance on select non-financial sustainability disclosures in the BRSR (the 'Report') for the period 1st April 2025 to 31st March 2026.

The Company's responsibilities

The content of the Report and its presentation are the sole responsibilities of the Management of the Company. The Company's Management is also responsible for the design, implementation, and maintenance of internal controls relevant to the preparation of the Report, so that it is free from material misstatement.

BDO's responsibility

BDO's responsibility, as agreed with the Management of the Company, is to provide assurance on the BRSR Core Indicators as described in the 'Scope, boundary and assurance criteria' section below. We do not accept or assume any responsibility for any other purpose or to any other person or organization. Any reliance a third party may place on the Report is entirely at its own risk.

Assurance standard

We conducted our assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), "Assurance Engagements Other than Audits or Reviews of Historical Financial Information", and ISAE 3410, "Assurance Engagements on Greenhouse Gas Statement", issued by the International Auditing and Standards Board.

Scope, boundary and assurance criteria

We have assured the non-financial BRSR Core Indicators¹ presented in the BRSR 25-26 pertaining to the Company's performance for the period 1st April 2025 through

31st March 2026. The reporting scope and boundary cover the Company's India operations.

We applied the criteria of '**Reasonable**' Assurance for non-financial Core Indicators of BRSR (Business Responsibility & Sustainability Report).

Assurance methodology

Our assurance process entailed conducting procedures to gather evidence regarding the reliability of the disclosures covered in the assurance scope. Verification on sample basis was carried out at select plants and offices.

We conducted a review and verification of data collection, collation, and calculation methodologies, and a general review of the logic of inclusion/ omission of relevant information/ data in the Report. We used our professional judgement as Assurance Provider for selection of sample of non-financial information for the verification. Our review process included:

- Evaluation of appropriateness of the quantification methods used to arrive at the non-financial/sustainability information of the BRSR Core Indicators;
- Review of consistency of data/information within the Report as well as between the Report and source;
- Engagement through discussions with personnel at both corporate and plant/facility levels who are accountable for the data and information presented in the Report;
- Execution of an audit trail of claims and data streams, to determine the level of accuracy in collection, transcription, and aggregation;
- Review of data collection and management procedures, and related internal controls.

Limitations & exclusions

There are inherent limitations in assurance engagement, including, for example, the use of judgment and selective testing of data. Accordingly, there are possibilities that material misstatements in the sustainability information of the Report may remain undetected.

The assurance scope specifically excludes:

- Data and information outside the defined reporting period (1st April 2025 to 31st March 2026);
- Review of the 'economic and/or financial performance indicators' included in the Reports, specifically, the financial information based on which such indicators are reported; we have been informed by the Company that these are derived from the Company's audited financial records;

- The Company's statements and claims related to any topics other than those listed in the 'Scope, boundary and assurance criteria';
- The Company's statements that describe qualitative/quantitative assertions, expression of opinion, belief, inference, aspiration, expectation, aim or future intention.

Our observations

The sustainability disclosures of the Company, as defined under the scope and boundary of assurance, have been prepared, in all material respects, in accordance with the applicable reporting framework. During the course of our assurance procedures, we observed a few inconsistencies relating to collation and compilation of data, which were subsequently corrected by the Company. The Company may further strengthen its non-financial data management processes and the comprehensive availability of supporting documentation to further enhance the auditability, accuracy and completeness of the reported information.

Our conclusions

Based on the procedures performed and the evidence obtained, we conclude that the non-financial sustainability disclosures

relating to the BRSR Core Indicators, as described in the 'Scope, Boundary and Assurance Criteria', are fairly reliable.

Our assurance team and independence

BDO India Services Private Limited is a professional services firm providing services in Advisory, Assurance, Tax, and Business Advisory Services, to both domestic and international organizations across industry sectors. Our non-financial assurance practitioners for this engagement are drawn from a dedicated Sustainability and ESG Team in the organization. This team is comprised of multidisciplinary professionals, with expertise across the domains of sustainability, global sustainability reporting standards and principles, and related assurance standards. This team has extensive experience in conducting independent assurance of sustainability data, systems, and processes across sectors and geographies. As an assurance provider, BDO India is required to comply with the independence requirements set out in the International Federation of Accountants (IFAC) Code of Ethics for Professional Accountants. Our independence policies and procedures ensure compliance with the Code.

For **BDO India Services Private Limited**

Indra Guha

Partner-Sustainability & ESG
Business Advisory Services Gurugram, Haryana
31 July, 2026