

Business Responsibility & Sustainability Report

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1	Corporate Identity Number (CIN) of the Listed Entity	L27100MH1973PLC016617
2	Name of the Listed Entity	Sarda Energy & Minerals Limited
3	Date of Incorporation	23-06-1973
4	Registered office address	73/A, Central Avenue, Nagpur (MH)-440018
5	Corporate address	Sarda Energy & Minerals Limited Industrial Growth Centre, Siltara, Raipur (Chhattisgarh) - 493111
6	E-mail	cs@seml.co.in
7	Telephone	+91 771-2216100
8	Website	www.seml.co.in
9	Financial year for which reporting is being done	2025-26
10	Name of the Stock Exchange(s) where shares are listed	1. BSE Limited 2. National Stock Exchange of India Limited
11	Paid-up Capital	₹ 35,23,81,270/-
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	BRSR Head Mr. Manoj Kumar Shah Head Operations mshah@seml.co.in +91 771-2216100
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Standalone Note: During FY 2025-26, the Company enhanced the scope and quality of its reporting including full year of information from SKS Power Generation (Chhattisgarh) Limited, whereas the previous reporting period reflected information of SKS only from 21st August 2024 onwards. The Company also strengthened its data tracking and reporting processes, resulting in revisions to certain calculation methodologies and disclosures. Selected metrics have been revised where appropriate to enhance consistency; however, prior period figures have not been fully restated for all reporting principles. Accordingly, the FY 2025-26 data may not be directly comparable with the previous year data. The Company will continue to refine its reporting framework to enhance consistency, transparency, and comparability in future reporting periods.
14	Name of Assurance Provider	Moore Singhi Advisors LLP
15	Type of Assurance obtained	Reasonable Assurance

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II. Products/services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacturing	Iron and steel	37.27%
		Ferro Alloys	14.12%
		Power	46.94%

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

Sl. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Power	35102	46.94%
2	Pellet	24109	9.88%
3	Sponge Iron	24102	8.09%
4	Steel Billets	24103	3.45%
5	Wire Rod / HB Wire	24105	15.85%
6	Ferro Alloys	24104	14.12%

III. Operations

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

Location	Number of plants	Number of offices	Total
National	5	3	8
International	-	-	-

19. Markets served by the entity

a. Number of locations

Locations	Number
National (No. of States)	12
International (No. of Countries)	8

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

0.60%.

c. A brief on type of customers

Iron ore pellet is supplied to sponge iron plants mostly located in nearby area. Our customers of Sponge Iron, Billets, Wire rods & HB Wires are mostly small and medium scale companies engaged in downstream products in vicinity. We supply ferro alloys mainly to large steel mills and some quantity to smaller steel mills also. In export market, we supply ferro alloys to large steel mills and multinational trading houses.

Eco bricks are supplied to end use customers including corporates in real estate sector and individuals.

Power is being sold mainly to state distribution utilities.

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IV. Employees

20. Details as at the end of Financial Year

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1	Permanent (D)	1517	1483	97.76%	34	2.24%
2	Other than Permanent (E)	59	53	89.83%	6	10.17%
3	Total employees (D+E)	1576	1536	97.46%	40	2.54%
WORKERS						
4	Permanent (F)	425	425	100.00%	0	0.00%
5	Other than Permanent (G)	3474	3365	96.86%	109	3.14%
6	Total workers (F+G)	3899	3790	97.20%	109	2.80%

b. Differently abled Employees and workers

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1	Permanent (D)	5	4	80.00%	1	20.00%
2	Other than Permanent (E)	0	0	0.00%	0	0.00%
3	Total differently abled employees (D+E)	5	4	80.00%	1	20.00%
DIFFERENTLY ABLED WORKERS						
4	Permanent (F)	0	0	0.00%	0	0.00%
5	Other than Permanent (G)	13	13	100.00%	0	0.00%
6	Total differently abled workers (F+G)	13	13	100.00%	0	0.00%

21. Participation/Inclusion/Representation of women:

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	9	1	11.11%
Key Management Personnel	1 ¹	0	0.00%

¹Excluding KMPs included in Board of Directors

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

	FY 2025-26 (Turnover rate in current FY)			FY 2024-25 (Turnover rate in previous FY)			FY 2023-24 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	7.28%	5.88%	7.25%	7.60%	0	7.60%	5.47%	1.00%	5.50%
Permanent Workers	2.82%	0.00%	2.82%	5.40%	0	5.40%	4.27%	0.00%	4.27%

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

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

S. No.	Name of the holding / Subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Sarda Metals & Alloys Limited	Subsidiary	100.00%	No
2	Sarda Energy & Minerals Hongkong Limited	Subsidiary	100.00%	No
3	Sarda Global Venture Pte Limited	Subsidiary	100.00%	No
4	Sarda Global Trading DMCC	Subsidiary	100.00%	No
5	Sarda Renewable Energy Limited	Subsidiary	100.00%	No
6	Kalyani Coal Mining Private Limited	Subsidiary	100.00%	No
7	Chhattisgarh Hydro Power LLP	Subsidiary	100.00%	No
8	Madhya Bharat Power Corporation Limited	Subsidiary	84.65%	No
9	Sarda Hydro Power Private Limited	Subsidiary	60.00%	No
10	Paratiya Power Limited	Subsidiary	51.00%	No
11	Bartunga Coal Private Limited	Joint Venture	67.00%	No
12	Shriram Electricity LLP	Joint Venture	51.00%	No
13	Raipur Infrastructure Company Limited	Joint Venture	33.33%	No
14	Madanpur South Coal Company Limited	Joint Venture	20.13%	No
15	Natural Resources Energy Private Limited	Subsidiary Joint Venture	51.00%	No

VI. CSR Details

24. Whether CSR is applicable as per section 135 of Companies Act, 2013: **Yes**

(i) Turnover in ₹ crore 4,333.69

(ii) Net worth in ₹ crore 6,713.16

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VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/ No/NA)	FY 2025-26 Current Financial Year			FY 2024-25 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes, Whistle blower policy Vigil Mechanism.pdf	0	0	-	0	0	-
Investors (other than shareholders)	Yes, Grievance Redressal Policy SEML - Grievance Redressal Policy.pdf	0	0	-	0	0	-
Shareholders	SCORES / SMART ODR	16 ²	3	Pending complaints resolved post 31st March 2026	12	1	Pending complaint resolved in April 2025
Employees and workers	Yes, Whistle blower policy Vigil Mechanism.pdf	0	0	-	0	0	-
Customers		18	0	-	34	0	-
Value Chain Partners		0	0	-	0	0	-
Other (please specify)		0	0	-	0	0	-

²Includes one complaint pending on March 31, 2025

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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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Occupational Health & Safety	R	Shopfloor-intensive operations involving heavy machinery, dust, heat exposure and material handling pose safety risks; stricter regulatory scrutiny and stakeholder expectations increase importance of robust safety systems.	Strengthening safety management systems through periodic risk assessments, digital incident tracking, enhanced PPE compliance, regular safety audits, behavioural safety training and preventive health check-ups.	Negative implications
2	Energy consumption	R	High dependence on conventional energy in manufacturing operations leads to increased operational costs and exposure to energy price volatility and carbon transition risks.	Improving energy efficiency through process optimization, adoption of energy-efficient equipment, gradual transition to renewable energy sources, and monitoring energy intensity KPIs.	Negative implications
3	Waste Management	O	Industrial processes generate recyclables and by-products which, if effectively utilized, can reduce disposal costs and improve circularity in operations.	NA	Positive implications
4	Emission control	R	Manufacturing activities result in air emissions and pollutants, leading to environmental impact and regulatory compliance risks, especially with tightening emission norms.	Installation and upgradation of air pollution control systems, continuous emissions monitoring, adoption of cleaner technologies and adherence to environmental standards.	Negative implications

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S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5	Water & Effluent Management	R	Water-intensive processes and effluent discharge obligations expose the company to resource scarcity risks and stricter water regulations, particularly in water-stressed regions.	Optimizing water consumption through recycling and reuse, implementation of Zero Liquid Discharge (ZLD) systems, strengthening STP/ETP infrastructure and periodic monitoring of discharge quality.	Negative implications
6	Responsible Investment	O	Integrating ESG considerations into investment decisions enhances long-term value creation, improves capital allocation efficiency and strengthens stakeholder confidence.	NA	Positive implications
7	Local Considerations	O	Business operations impact local communities; proactive engagement creates opportunities for community development and strengthens social license to operate.	NA	Positive implications
8	Human Capital Development	O	Skilled workforce is critical for operational efficiency and future growth; investment in employee training improves productivity, innovation and retention.	NA	Positive implications
9	Human Rights	R	Operations and value chain involve workforce and contractors, creating potential risks related to labor practices, workplace dignity and regulatory compliance.	Implementation of human rights policy, employee awareness programs, grievance redressal mechanisms, supplier due diligence and periodic compliance training.	Negative implications
10	Environmental Compliance	O	Strong compliance framework ensures alignment with evolving environmental regulations, avoiding penalties and enhancing corporate reputation.	NA	Positive implications

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S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
11	Materials	0	Efficient material usage and increased adoption of recycled inputs can reduce costs, improve sustainability performance and enhance resource efficiency.	NA	Positive implications
12	Life cycle Management of Assets	0	Lifecycle optimization of assets improves operational efficiency, reduces environmental footprint and lowers long-term capital and maintenance costs.	NA	Positive implications

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes									
1. a. Whether your entity's policy / policies cover each principle and its core elements of the NGRBCs. (Yes/No/NA)	Yes								
b. Has the policy been approved by the Board? (Yes/No/NA)	Yes								
c. Web Link of the Policies, if available	Policies are available under the Investors' Section on the website of the Company – Sarda Energy & Corporate Governance								
2. Whether the entity has translated the policy into procedures. (Yes / No/NA)	Yes								
3. Do the enlisted policies extend to your value chain partners? (Yes/No/NA)	No								
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, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	The entity has implemented ISO 45001:2018 (Occupational Health & Safety Management System) at its Raipur plant and ISO 9001:2015 (Quality Management System) across key manufacturing units to uphold workplace safety, maintain quality standards, and drive continuous improvement.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	✓ A new Producer Gas Plant (PGP) has been added to the pellet plant to generate clean producer gas for use as a fuel in the palletization process, thereby supporting process requirements and operational efficiency. ✓ To meet the prescribed environmental norms, two more additional field has been added to ESP-01 associated with FBC-1 in the power plant, thereby improving dust collection efficiency and reducing particulate emissions.								

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Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
	✓ To reducing fossil fuel consumption and environmental emissions, the Company has purchased 12 EV loaders, 5 EV trailers, and 1 EV forklift. This initiative helps decrease dependence on diesel fuel while contributing to lower greenhouse gas and air pollutant emissions.	✓ The Company has implemented an Occupational Health and Safety Management System, and its Raipur plant is certified to ISO 45001:2018. In addition, SEML holds ISO 9001:2015 certification across its key manufacturing units, demonstrating its commitment to operational excellence and continual improvement. Further, considering the organization's current energy requirements and recommendations emerging from external surveillance audits, JPC audit reviews, ESG commitments, and the Carbon Credit Trading Scheme (CCTS), the Company plans to implement and achieve certification to the ISO 50001:2018 Energy Management System standard in the coming years. The certification will provide a structured framework for continual improvement in energy performance, efficient resource utilization, and alignment with the Company's sustainability and carbon reduction 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 has made consistent progress against its commitments, with most initiatives (solar capacity, emission control upgrades, EV transition) under active execution and aligned with stated timelines.	✓ Water consumption increased, in line with increased operations, while zero liquid discharge practices continue across all plants.	✓ Circularity performance remained strong with ~1.94 lakh tonnes of waste recovered through recycling/reuse, along with continued 100% fly ash utilization, indicating sustained waste-to-wealth practices.	✓ Governance disclosures have improved visibly, with all key policies (Code of Conduct, anti-bribery, whistleblower, grievance mechanisms) now formally disclosed and accessible on the website, strengthening transparency.	✓ Compliance framework has matured with zero cases of corruption and structured handling of stakeholder grievances, indicating improved governance effectiveness.	✓ HR performance shows clear progress with employee welfare spend increasing to ₹ 4.50 Cr (vs ₹ 3.76 Cr) and continued 100% coverage of employees under health and accident insurance.	✓ Performance management systems strengthened significantly, with ~98% employees covered under performance reviews (vs ~77% YoY), reflecting improved HR processes.	✓ Training coverage and safety systems expanded, with high participation across safety, technical and behavioural programs and continued adherence to ISO 45001 standards.	

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Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Governance, leadership and oversight									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)	We have long recognized the importance of Environment, Social and Governance (ESG). We have worked upon bringing positive change, not just within the industry but also in the communities where we operate. We focus on waste recycling and run waste to wealth programmes to achieve 100% waste utilization. As the shift to a low-carbon economy is likely to unfold faster, the implications on steel & Power sector shall be profound. We take cognisance of reduction in pollution to meet the evolving stakeholder expectations. We continue to seek innovative ways for this transition, through experimentation and investment. While the Company explores sustainable alternatives to traditional steel production methods, it is concurrently investing in new and efficient production methods. We also ensure to safeguard the flora and fauna in the course of our operations. We endeavour to improve health and safety, and community wellbeing along with workforce diversity and inclusion. We follow high governance practices in our operations. We recognize the criticality of governance challenges relating to business ethics, ever-evolving compliance landscape, and the imperative of improved disclosures. To effectively mitigate these challenges, we have in place Code of Conduct for promoting transparency and accountability. Our efforts towards ESG serves as a catalyst for our long-term success and resilience in the face of evolving market dynamics.								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	The Chairman of the Company is the highest authority responsible for implementation of all policies in the Company. However, the Board of Directors of the Company is the highest authority responsible for the oversight of the implementation of 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, Risk Management Committee. The Risk Management Committee is further Supported by other Statutory Committees and Board.								

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10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow up action	Director									Annually								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Director									Quarterly								
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	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	No.								

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

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

SECTION C: PRINCIPLE WISE PERFORMANCE 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 No of Training & awareness Programmes held	Topics / principles covered under the training and its impact	% of persons in respective category covered by the awareness programmes
Board of Directors	5	Technical and Management	100%
Key Managerial Personnel	16	Technical and Management	100%
Employees	981	BBS Training, Safety, Health Awareness, Technical skill Development programme, Technical Skill upgradations	78.68%
Workers	334	Safety, Health Awareness, Technical Skill upgradations	24.24%

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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):

	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Monetary					
Penalty/ Fine	Principle 1	Goods and Services Tax (GST) Department	36,966	Short payment of Input Tax Credit (ITC) identified during assessment	No
	Principle 6	CECB Raigarh	30,000	Stack Emission Exceeding Norms for High Emission through Stack	No
	Principle 3	DDIH&S Raigarh	1,50,000	Occupational Health & Safety Unavailability of AFIH Doctor	No
	Principle 3	DDIH&S Raigarh	50,000	Occupational Health & Safety Unavailability of AFIH Doctor	No
	Principle 1	EPFO	71,025	Penalty for late payment of PF Late Payment of PF due to late registration of employee because of non-availability of Digital signature of SEML Authority	No
Settlement	All of the above				
Compounding fee	Nil	Nil	Nil	Nil	Nil
Non-Monetary					
Imprisonment	Nil	Nil	Nil	Nil	NA
Punishment	Nil	Nil	Nil	Nil	NA

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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
	Nil

4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.

Yes

SEML - Anti Bribery and Anti Corruption Policy.pdf

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

	FY 2025-26	FY 2024-25
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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	0	-	0	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	-	0	-

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.

- Vendor Blacklisted and all Ash vehicle IWMMS Portal registered for disposal of Ash.
- Controlled through necessary maintenance of Equipments linked to high Emission.
- AFIH Doctor as per requirement of factory Act Hired.
- Authorised personnel digital signature updated in portal.

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

S. No.		FY 2025-26	FY 2024-25
i	Accounts payable (₹ in crore)	87.49	106.77
ii	Cost of goods/services procured (₹ in crore)	2,990.04	2,867.07
iii	Number of days of accounts payables	10.68 days	13.59 days

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:

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Parameter	Metrics	FY 2025-26	FY 2024-25
Concentration of Purchases	a) i Purchases from trading houses (₹ in Crore)	435.42	732.05
	ii Total Purchases (₹ in Crore)	2,990.04	2,867.07
	iii Purchases from trading houses as % of total purchases	14.56%	25.53%
	b) Number of trading houses where purchases are made from	700	599
	c) i Purchases from top 10 trading houses (₹ in Crore)	354.12	472.90
	ii Total Purchases from trading houses (₹ in Crore)	435.42	732.05
	iii Purchases from top 10 trading houses as % of total purchases from trading houses	81.33%	64.60%
Concentration of Sales	a) i Sales to dealers / distributors (₹ in Crore)	1,015.68	795.13
	ii Total Sales (₹ in Crore)	4,333.69	3,475.96
	iii Sales to dealers / distributors as % of total sales	23.44%	22.88%
	b) Number of dealers / distributors to whom sales are made	337	309
	c) i Sales to top 10 dealers/distributors (₹ in Crore)	461.50	270.77
	ii total sales to dealers / distributors (₹ in Crore)	1,015.68	795.13
	iii Sales to top 10 dealers/distributors as % of total sales to dealers / distributors	45.44%	34.05%
Share of RPTs in	a) i Purchases (Purchases with related parties) (₹ in Crore)	52.59	7.19
	ii Total Purchases (₹ in Crore)	2,990.04	1,582.77
	iii Purchases (Purchases with related parties/ total purchases)	1.8%	0.45%
	b) i Sales (Sales to related parties) (₹ in Crore)	30.75	54.40
	ii Total Sales (₹ in Crore)	4,333.69	3,475.96
	iii Sales (Sales to related parties / total sales)	0.71%	1.57%
	c) i Loans & advances (Loans & advances given to related parties) (₹ in Crore)	480.18	438.22
	ii Total loans and advances (₹ in Crore)	563.83	613.04
	iii Loans & advances (Loans & advances given to related parties / total loans and advances)	85.17%	71.48%
	d) i Investments (Investments in related parties) (₹ in Crore)	1,120.00	1,072.82
	ii Total Investments made (₹ in Crore)	2,289.20	1,428.94
	iii Investments (Investments in related parties / total investments made)	48.92%	75.08%

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Leadership Indicators

1. Awareness programs conducted for value chain partners on any of the Principles during the financial year

Total number of awareness programmes held	Topics / principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programmes
1	1. SEML Policy 2. MSME policy 3. HSE requirement 4. CSR Objectives 5. Quality management 6. Skill upgradation 7. Govt Schemes 8. Market Scenario upgradation	2%

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

Yes, the Company has a Code of Conduct for all members of the Board, which requires all Directors of the Company to always act in the interest of the Company and ensure that any other business or personal association which they may have does not involve any conflict of interest with the operations of the Company. In case of any actual or potential conflict of interest, the concerned Director is required to immediately report such conflicts and seek approvals as required by the applicable law and under Company's policies. The Company receives an annual declaration from its Board of Directors and senior executives confirming adherence to the Code of Conduct, which includes the provisions on dealing with conflict of interest.

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 2024-25	FY 2023-24	Details of improvements in environmental and Social impacts
R&D	Not quantified	Not quantified	The internal team continuously undertakes research and development (R&D) initiatives focused on optimizing power consumption, improving operational efficiency, and minimizing waste through effective utilization and recycling practices.
Capex	11.31%	9.66%	Reduction in environment pollution & Product carbon footprint, efficiency in production, reduction in water consumption.

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

Yes

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

90% of input material were sourced from suppliers who were empanelled offer verification of Statutory clearances, valid permits, and regulatory compliance requirement. This disclosure represents responsible sourcing based on legal and regulatory compliance of suppliers and does not imply certification of the environmental sustainability attributes of the Materials.

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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)	The Company has obtained authorization under Plastic Waste Management Rules as an importer and complies with Extended Producer Responsibility (EPR) requirements. The Company is regularly undertaking annual filings and ensuring compliance through authorized recyclers.
(b)	E-waste	E-waste generated from IT equipment, electrical components, and instruments is collected separately and stored safely to prevent damage and contamination. The entire quantity of e-waste is handed over only to CPCB-authorized dismantlers/recyclers for environmentally sound recycling. Proper records and documentation are maintained for compliance.
(c)	Hazardous waste	Hazardous waste such as used oil, coal tar, contaminated containers, empty barrels, phenolic water, and spent ion exchange resin is managed in accordance with statutory requirements. The waste is stored in designated hazardous waste storage areas with proper labelling and safety measures. Used oil, coal tar, contaminated containers, and empty barrels are handed over to authorized recyclers for environmentally sound recycling. Spent ion exchange resin is disposed of through co-processing in the power plant as per guidelines of the Central Pollution Control Board. Phenolic water is utilized for quenching in the ABC of the Sponge Iron Plant at Siltara premises, in accordance with the SOP of the Central Pollution Control Board. The Company follows the manifest system and submits annual returns (Form 4) to ensure full regulatory compliance.
(d)	other waste (Steel)	Other waste including fly ash, slag, and non-hazardous solid waste is effectively utilized or disposed of in an environmentally sustainable manner. Fly ash is supplied for cement manufacturing and brick making, while slag is used in brick plant. Domestic and biodegradable waste is managed through composting or municipal disposal systems.

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

Yes, EPR is applicable. The Company has obtained EPR authorization as an importer and is complying with the requirements.

Leadership Indicators

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

NIC Code	Name of Product /Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective /Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
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No Life Cycle Assessment has been conducted for this year

Business Responsibility & Sustainability Report

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
Environmental Concern: Fugitive emissions generated during operations and transportation activities may lead to air pollution and deterioration of ambient air quality.		
Action Taken: To control fugitive emissions and minimize air pollution, the company has engaged road sweeping machines, carried out regular water sprinkling, installed fog cannons and dust catchers, developed pucca roads, implemented wheel washing systems, and ensured proper covering of trucks with tarpaulin during transportation.		

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 2024-2025
Fly Ash/Bed Ash	11.11%	10.36%
Char/Dolochar	2.22%	1.30%
Silico Slag	6.16%	18.98%
MNO Slag	6.47%	4.39%
Induction Slag	7.06%	8.20%
Mill Scale	0.19%	0.20%
End Cutting Scrap	0.74%	0.78%

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 2024-2025		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastic (including packaging)	Not Applicable owing to nature of the business			Not Applicable owing to nature of the business		
E-Waste						
Hazardous Waste						
Other Waste						

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

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

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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	% of 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	1483	1483	100.00%	1472	99.26%	0	0.00%	0	0.00%	421	28.39%
Female	34	34	100.00%	34	100.00%	34	100.00%	0	0.00%	19	55.88%
Total	1517	1517	100.00%	1506	99.27%	34	2.24%	0	0.00%	440	29.00%
Other than Permanent employees											
Male	53	52	98.11%	52	98.11%	0	0.00%	0	0.00%	1	2.00%
Female	6	5	83.33%	5	83.33%	6	100.00%	0	0.00%	0	0.00%
Total	59	57	96.61%	57	96.61%	6	10.17%	0	0.00%	1	2.00%

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

Category	% of 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 Workers											
Male	425	425	100.00%	425	100.00%	0	0.00%	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	425	425	100.00%	425	100.00%	0	0.00%	0	0.00%	0	0.00%
Other than Permanent Workers											
Male	3365	3312	98.42%	696	20.68%	0	0.00%	0	0.00%	696	21.00%
Female	109	109	100.00%	54	48.54%	54	49.54%	0	0.00%	54	50.00%
Total	3474	3421	98.47%	750	21.59%	54	1.55%	0	0.00%	750	22.00%

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
i.	Cost incurred on wellbeing measures (well-being measures means well-being of the employees and workers (including male, female, permanent and other than permanent employees and workers) (₹ in crore)	4.16	2.77
ii.	Total revenue of the Company (₹ in crore)	4,333.69	3,484.17
iii.	Cost incurred on well- being measures as a % of total revenue of the Company	0.10%	0.08%

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2. Details of retirement benefits, For Current Financial year and Previous Financial year

Benefits	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 % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	99.18%	100.00%	Y	98.73%	100.00%	Y
Gratuity	96.00%	100.00%	Y	89.45%	100.00%	Y
ESI	14.53%	94.08%	Y	15.82%	89.31%	Y
Others, please specify						
NPS	7.61%	0.00%	Y	11.44%	0.00%	Y
Superannuation	29.31%	19.24%	Y	1.87%	0.00%	Y

Accessibility of Workplaces

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

Yes, Additional places are being covered, depending upon requirement.

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.

Yes, SEML has an equal opportunity policy. The weblink is mentioned below SEML - Equal Opportunity Policy.pdf

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

	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	Not Applicable			
Female	100%	100%	0.00%	0.00%
Total	100%	100%	0.00%	0.00%

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes, The Company has grievance redressal mechanism for employees. There is also a grievance redressal procedure which includes subjects such as discharge/dismissed, misconducts, fines etc. The employees have the facility to raise their complaints at appropriate level and if not satisfied with the resolution may raise it to higher level and in appropriate case, to the Audit committee.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

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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	1517	0	0.00%	No employees or workers were part of any Association or Union		
Male	1483	0	0.00%			
Female	34	0	0.00%			
Total Permanent Workers	425	0	0.00%			
Male	425	0	0.00%			
Female	0	0	0.00%			

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 Up gradation		Total (D)	On Health and safety measures		On Skill Up gradation	
		No. (B)	% (B / A)	No (C)	% (C/A)		No. (E)	% (E / D)	No (F)	% (F/D)
Employees										
Male	1536	471	30.66%	1267	82.49%	1468	1289	87.81%	875	59.60%
Female	40	11	27.50%	31	77.50%	30	29	96.67%	13	43.33%
Total	1576	482	30.58%	1298	82.36%	1498	1318	87.98%	888	59.28%
Workers										
Male	3790	393	10.37%	3096	81.69%	3381	385	11.39%	258	7.63%
Female	109	38	34.86%	70	64.22%	111	0	0.00%	0	0.00%
Total	3899	431	11.05%	3166	81.20%	3492	385	11.03%	258	7.39%

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

	FY 2025-26			FY 2024-25		
	Total (A)	No (B)	% (B/A)	Total (C)	No (D)	% (D/C)
Employees						
Male	1536	1447	94.21%	1468	1434	97.68%
Female	40	38	95.00%	30	30	100.00%
Total	1576	1485	94.23%	1498	1464	97.73%
Workers						
Male	3790	3070	81.00%	3381	389	11.51%
Female	109	55	50.46%	111	0	0.00%
Total	3899	3125	80.15%	3492	389	11.14%

10. Health and safety management system:

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

Yes.

Occupational health and safety management system has been implemented by the Company. The Company endeavours to prevent all injuries and work-related illnesses. It recognizes health and safety as an integral part of its operations by promoting "Zero Incidents" in its operations. It aspires to set the highest standards required regarding statutory health and safety requirements. It provides appropriate trainings to employees, contractor workers to help them work safely. The system helps in assessing risks and provides controls hazards in plant operational activities. The systems ensures that incidents are reported timely, investigated for root causes and deployment of lessons learnt to avoid repetition.

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

A well-defined hazard identification and risk assessment procedures are in place. Some of them are enlisted below:

- Hazard Identification & Risk Assessment
- Quantitative risk assessment
- Inspections
- Audits
- Unsafe Observation identification (UA& UC)

Safety is reviewed as an important part of the operations review. The safety performance is reviewed on a continuous basis. The control measure is being put in place for each hazard as an elimination of hazard.

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

Yes.

The workers can report incidents and near-misses to their immediate reporting officers / Head of Fire & Safety and can also raise their safety concerns for routine and non-routine jobs. Trainings on Hazards & safety awareness are being provided to workers. The company also runs "Suggestion Scheme" and reward the workers for suggesting improvements to mitigate such risks.

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

Yes

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

Safety Incident/Number	Category ³	FY 2025-26	FY 2024-25
Lost Time Injury Frequency Rate (LTIFR)(per one million-person hours worked)	Employees	0	0
	Workers	0.85	0
Total recordable work-related injuries	Employees	0	0
	Workers	10	0
No. of fatalities	Employees	0	0
	Workers	2	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

³Including the Contract workforce

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

- Hazard identification, Risk Assessment is being done.
- Safety Committees are in place inside plant to review the adequacy of resources for safety and to provide support for safety management system.
- Periodic safety audits and inspections are being done across sites.
- We have carried out Medical Examination as per Form-21 of all the workers/employees through authorized diagnostic centre.
- Near miss reporting by any employee/contract worker is in practice.
- Safety committee meeting is done once in a month
- External safety audit is done once in a year.
- Mega TBT is done once in month, and TBT is done on daily basis at respective workplaces.

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

	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
Working Conditions	0	0	-	0	0	-
Health & Safety	0	0	-	0	0	-

14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100.00%
Working Conditions	100.00%

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

A detailed root cause investigation was conducted. Corrective and preventive actions were implemented based on the recommendations of DIHS and the independent safety assessment carried out by NIT Raipur.

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The effectiveness of the implemented actions was subsequently verified through follow-up inspections and compliance reviews to ensure sustained implementation and prevent recurrence of similar incidents. Learnings from the incident were communicated across the organization to strengthen the overall safety management system.

Leadership Indicators

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

Yes,

ESIC/GPA/GTL (for Permanent Employees)

ESIC/WC (For Workers)

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

Yes,

Final Bill is processed only after the submission of statutory dues paid supporting Documents. Duly Checked by HR and Finance. Non-complying value chain partners are blacklisted.

- 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 2025-26	FY 2024-25	FY 2025-26	FY 2024-25
Employees	0	0	0	0
Workers	2	0	0	0

- 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)

No

- Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100.00%
Working Conditions	100.00%

- 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.

All contract workers undergo annual occupational health examinations through an external empanelled medical agency using Form-21 in compliance with applicable statutory requirements. In addition, periodic health camps are organized through the on-site Occupational Health Centre. Vision examinations for crane operators and vehicle drivers are conducted through Form-35 at prescribed intervals. The plant also provides an in-house physiotherapy (F95) facility to support workers' physical fitness, early management of musculoskeletal discomfort, rehabilitation, and overall occupational well-being. Any observations identified during health assessments are addressed through appropriate medical advice, fitness evaluation, physiotherapy support, and timely follow-up, wherever required.

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

Essential Indicators

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

The Company maintains a dynamic and strategic stakeholder engagement process where it identifies key stakeholder groups from the larger universe of all possible stakeholders. This is done after considering the material influence each group has on the Company's ability to create value (and vice-versa).

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others	Frequency of engagement (Annually/Half Yearly/ Quarterly/ Others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Government and Regulatory Authorities	No	Regular filings, submissions, meetings, Regulatory audits/ inspections	As and when required	Discussions with regard to various regulations, tax matters, inspections, approvals, assessments and compliances.
Investors / Shareholders	No	Analyst meets, conference calls, Annual General Meeting, Official communication channels: Advertisements, publications, website, plant visits by analysts	Quarterly/Annually/as and when required	Equitable reach to the information and developments with transparency to enable them to take a considered call
Employees	No	Intranet portal, Emails and meetings, Training programs, Performance appraisal, Grievanceredressalmechanisms, Notice boards	Intranet -Daily / event based Emails – As and when required	To keep employees abreast of key developments happening in the Company and also addressing their grievances
Customers	No	Customer meets, Official communication channels: Advertisements, publications, website, conferences events, Phone calls, emails and meetings	Frequent and as and when required	To acquire new customers and service the existing ones. Grievance redressal.
Institutions & Industry Bodies	No	Networking through meetings, brainstorming sessions, discussions, etc.	As and when required	To discuss points of common interest and to interact with Regulators

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Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others	Frequency of engagement (Annually/Half Yearly/ Quarterly/ Others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Communities and Civil Society	No	Need assessment, meetings and briefings, Partnerships in community development projects, Training and workshops, Impact assessment surveys, Official communication channels: Advertisements, publications, website, Complaints and grievance mechanism	Frequent and as and when required	Community development through CSR projects. Impact assessment of our business. Upliftment of downtrodden.
Suppliers	No	Vendor assessment and review, seminars, Official communication channels, Exhibitions Advertisements, publications, website	As and when required	To make that part of our growth journey, new vendor / product development, Technical support. Grievance redressal

Leadership Indicators

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

The Company has delegated the consultation between the stakeholders and the Board on economic, environmental, and social topics to the Managing Director (MD) of the Company. MD and the senior management team of the Company regularly update the Chairman, Board and various Board Committees on relevant issues. These updates are provided during the Board meetings and separate meetings of various Board Committees.

The Company has put in place processes which ensure that feedback from key stakeholders are received by the management and presented to the Board and Board committees in their meetings.

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

Yes. The Company engages with various stakeholders in helping to ensure that every group's expectations are heard. Social development activities are carried which provides opportunities to communities for their holistic and inclusive development. The CSR activities of the Company focuses on largely on healthcare and quality education. Through continuous and purposeful engagement with the local communities, we work towards creating a value-based and empowered society. The CSR activities also collaborate with communities to facilitate them overcome various livelihood challenges and skill development opportunities. The various evolving aspects of ESG makes it a learning phase and hence stakeholder interactions remain vital for the Company.

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

The villagers in remote and non-approachable areas are deprived of basic healthcare and basic education facility. Our Company has supported NGOs for 150 schools operating in such areas. We are also operating mobile hospitals with free medicines for such deprived / marginalized groups. We also support such groups for livelihood / alternate

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source of income through micro businesses such as tailoring, dairy farming, homemade food product through training and financial support.

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 (D)	% (D / C)
EMPLOYEES						
Permanent	1517	39	2.57%	1498	0	0.00%
Other than permanent	59	0	0.00%	0	0	0.00%
Total Employees	1576	39	2.47%	1498	0	0.00%
WORKERS						
Permanent	425	0	0.00%	407	0	0.00%
Other than Permanent	3474	59	1.70%	3085	0	0.00%
Total Workers	3899	59	1.51%	3492	0	0.00%

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)
Employees										
Permanent										
Male	1483	14	1.00%	1469	99%	1468	0	0.00%	1468	100.00%
Female	34	0	0.00%	34	100%	30	0	0.00%	30	100.00%
Other Than Permanent										
Male	53	25	47.00%	28	53.00%	0	0	0.00%	0	0.00%
Female	6	3	50.00%	3	50.00%	0	0	0.00%	0	0.00%
Workers										
Permanent										
Male	425	9	2.00%	416	98.00%	407	0	0.00%	407	100.00%
Female	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Other Than Permanent										
Male	3365	2723	81.00%	642	19.00%	2974	2374	79.83%	600	20.17%
Female	109	102	94.00%	7	6.00%	111	111	100.00%	0	0.00%

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

a. Median remuneration/wages:

	Male		Female		Other	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	8	27,70,000	1	20,10,000	-	-
Key Managerial Personnel	1	36,00,000	-	-	-	-
Employees other than BoD and KMP	1536	5,09,488	40	2,53,272	-	-
Workers	3790	1,72,800	109	1,34,160	-	-

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 (₹ in crore)	3.10	2.83
Total Wages (₹ In Crore)	183.98	162.10
Gross wages paid to females as % of total wages	1.69%	1.74%

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)

Yes. Human rights is a sensitive issue, and the Company has zero tolerance to Human Rights violation. Human Rights is one of the key focus areas for the Company. Any case of Human Rights violation, whenever reported, shall be investigated by Head HR reporting directly to Managing Director.

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

The Company has established a grievance redressal process for the investigation and resolution of employee concerns. All employees can register their grievances with the HR department, where issues are duly reviewed and addressed. Depending on the nature of the grievance received, a committee is formed to investigate the matter. The committee reviews the grievance along with the relevant facts and evidence and submits a report for further action, subject to the approval of the competent authority. The company also has various rules and policies in place that clearly define employee responsibilities and acceptable standards of conduct.

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

	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	NA	NA	0	NA	NA
Discrimination at workplace	0	NA	NA	0	NA	NA
Child Labour	0	NA	NA	0	NA	NA
Forced Labour/ Involuntary Labour	0	NA	NA	0	NA	NA
Wages	0	NA	NA	0	NA	NA
Other Human rights related issues	0	NA	NA	0	NA	NA
Others	0	NA	NA	0	NA	NA

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
i) Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	-
ii) Complaints on POSH as a % of female employees / workers	0	-
iii) Complaints on POSH upheld	0	-

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

The company has formed a whistle Blower Policy which contains sufficient safe guards to prevent adverse consequences to the complaint.

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

Yes. The business agreements and contracts do include Company's expectations to promote sustainability, fair competition and respect for human rights.

10. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100% Company's plant and offices are assessed for compliance on human rights issues by internal team.
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	

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

Not Applicable

Business Responsibility & Sustainability Report

Leadership Indicators

- Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.
Not required.
- Details of the scope and coverage of any Human rights due diligence conducted.
None
- Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?
Yes, Additional places are being covered, depending upon requirement.
- Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	0
Discrimination at workplace	0
Child Labour	0
Forced Labour/Involuntary Labour	0
Wages	0
Others – please specify	0

- Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.
Not Applicable

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

Note:

- During the reporting year, the reporting boundary for Principle 6 disclosures has been expanded to include all manufacturing locations and both mining operations. Consequently, the corresponding previous year's figures have also been restated, wherever applicable, to ensure comparability and consistency with the revised reporting boundary and methodology.
- Given the nature of the business, which encompasses both power generation and metal production, intensity ratios for all environmental indicators i.e total energy, water, emissions, and waste are reported per MWh of power generated and per MT of metal produced.

Essential Indicators

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

Parameter	FY 2025-26	FY 2024-25
From renewable sources		
Total electricity consumption (A)	439.01	539.01
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total energy consumed from renewable sources (A+B+C)	439.01	539.01
From Non-Renewable sources		
Total electricity consumption (D)	1,33,969.03	1,10,595.81
Total fuel consumption (E)	8,88,09,306.97	3,72,92,694.32

Business Responsibility & Sustainability Report

Parameter	FY 2025-26	FY 2024-25
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewable sources (D+E+F)	8,89,43,276	3,74,03,290.49
Total energy consumed (A+B+C+D+E+F)	8,89,43,715.01	3,74,03,829.14
Energy intensity per rupee of turnover (Total energy consumed / Turnover in ₹)	0.00205	0.00107
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Turnover adjusted for PPP in ₹)	0.04175	0.02218
Energy intensity in terms of physical output - Production (Total energy consumed / Total production)(GJ/MT)	24.66426	22.99769
Energy intensity in terms of physical output - Power Generation (Total energy consumed / Total power generation)(GJ/MWh)	21.40602	16.71127
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

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

Yes, Moore Singhi Advisors LLP

- 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.

Yes, our manufacturing facility is identified as DC for PAT CYCLE – VII A. Notified target is under PAT scheme – 0.5802 TOE/Tonne & company has achieved – 0.5788 TOE/Tonne.

- 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	1,28,76,243	82,71,693
(ii) Groundwater	11,43,271.10	3,12,638.28
(iii) Third party water	24,246	25,356
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	1,40,43,760.10	86,09,687.28
Total volume of water consumption (in kilolitres)	1,36,47,499.10	86,09,687.28
Water intensity per rupee of turnover (Total water consumption / turnover in ₹)	0.000315	0.000239
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Turnover adjusted for PPP in ₹)	0.00641	0.00511
Water intensity in terms of physical output - Production (Total water consumption / Total production)(KL/MT)	3.78448	5.29365
Water intensity in terms of physical output - Power Generation (Total water consumption / Total power generation)(KL/MWh)	3.28453	3.86463
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

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

Yes, Moore Singhi Advisors LLP

Business Responsibility & Sustainability Report

4. Provide the following details related to water discharged:

Parameter	FY 2025-26	FY 2024-25
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	NA	NA
- No treatment		
- With treatment – please specify level of treatment		
(ii) To Groundwater	NA	NA
- No treatment		
- With treatment – please specify level of treatment		
(iii) To Seawater	NA	NA
- No treatment		
- With treatment – please specify level of treatment		
(iv) Sent to third-parties	NA	NA
- No treatment		
- With treatment – please specify level of treatment		
(v) Others (Municipal Sewers)	NA	NA
- No treatment		
- With treatment – please specify level of treatment		
Total water discharged (in kilolitres)	-	-

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

Yes, Moore Singhi Advisors LLP

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

Yes. The Company recognizes the need for the efficient management of water resources within and outside its operating sites. Efforts are made to increase water use efficiency, while also ensuring its availability for all stakeholders. All plants are based on the principle of 'ZERO LIQUID DISCHARGE'. Wastewater is treated and re-cycled in the water use cycle or diverted for horticulture / dust suppression use.

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 ⁴
NO _x	mg/Nm ³	5,617.92	5,318.60
SO _x	mg/Nm ³	10,148.31	8,203.30
Particulate matter (PM)	mg/Nm ³	749.99	760.78
Persistent organic pollutants (POP)	NA	NA	NA
Volatile organic compounds (VOC)	NA	NA	NA
Hazardous air pollutants (HAP)	NA	NA	NA
Others – please specify	NA	NA	NA

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

No

Business Responsibility & Sustainability Report

⁴Until the Previous year (PY), the data was reported in the unit Tonnes/day. From FY 26 onwards, the reporting unit has been revised to mg/Nm³, and the PY data has been restated accordingly to ensure comparability.

7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & 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, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	84,78,540.95	16,17,121.47
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)	tCO ₂ e	26,421.67	22,334.21
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Turnover in ₹)	tCO ₂ e/₹	0.000196	0.000046
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Turnover adjusted for PPP in ₹)	tCO ₂ e/PPP	0.00399	0.00097
Total Scope 1 and Scope 2 emission intensity in terms of physical output – Production (Total Scope 1 and Scope 2 GHG emissions / Total production)	tCO ₂ e/MT	2.35844	1.00802
Total Scope 1 and Scope 2 emission intensity in terms of physical output – Power Generation (Total Scope 1 and Scope 2 GHG emissions / Total power generation)	tCO ₂ e/MWh	2.04688	0.73248
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-

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

Yes Moore Singhi Advisors LLP

8. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details.
 1. The Company is adding a new ESP (two fields) in FBC Boiler 1 to avoid forced outages and to improve ESP availability to reduce the emission further.
 2. The Company has replaced the CE (Collecting Electrodes) and DE (Discharge Electrodes) of the old ESPs in FBC 1 and FBC 2 to improve efficiency, avoid forced outages, and enhance ESP availability as per environmental norms.
 3. The Company has installed an STP (Sewage Water Treatment Plant) with a capacity of 140 KL/day to comply with the conditions of EC and CTO.
 4. The Company has decided to install a 50 MW (DC) solar power plant. The installation has already been completed, and tentative power generation is expected to begin by November 26.
 5. The Company is adding additional bag filters at SID for capturing additional dust generated out of the process.
 6. The Company adding additional gas cleaning and cooling system for ferro alloys furnaces.

Business Responsibility & Sustainability Report

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)	0.01	1.00
E-waste (B)	10.68	7.27
Bio-medical waste (C)	0.01	0.03
Construction and demolition waste (D)	0.00	0.00
Battery waste (E)	4.81	7.13
Radioactive waste (F)	0.00	0.00
Other Hazardous waste		
Please specify, if any. (G)	2300.27	2258.73
Other non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) ⁵	85,09,496.58	15,48,357.94
Total (A+B + C + D + E + F + G + H)	85,11,812.36	15,50,632.1
Waste intensity per rupee of turnover (Total waste generated / Turnover in ₹)	0.000196	0.000043
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Turnover adjusted for PPP in ₹)	0.00399	0.00092
Waste intensity in terms of physical output – Total production (Total waste generated / total production)(MT/MT)	2.36034	0.95340
Waste intensity in terms of physical output – Total Power generation (Total waste generated / total power generation)(MT/MWh)	2.04853	0.69279
Waste intensity (optional) – the relevant metric may be selected by the entity	-	-
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	1,64,363.38	1,73,570.00
(ii) Re-used	27,517.00	27,656.00
(iii) Other recovery operations	0	12.24
Total	1,91,880.38	2,01,238.24
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0.00	0.00
(ii) Landfilling	11,81,535.90	0.00
(iii) Other disposal operations	7,28,430.55	4,11,759.00
Total	19,09,966.45	4,11,759.00

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 Moore Singhi Advisors LLP

Business Responsibility & Sustainability Report

⁵Note - The reported quantity of non hazardous waste generation comprises overburden (OB) and tailings waste. Both OB and tailings were backfilled within the designated premises of the mining area. No OB or tailings were sent to external landfills or disposed of at unauthorized locations.

The mines are operated and monitored in accordance with the approved Mining Plan, Environmental Clearance conditions and Rule 37 of the Mineral Conservation and Development Rules, 2017.

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

The Company has promoted waste management practices aimed to achieve maximum waste utilization/ recycling for sustainable and responsible business operation. The major waste stream at Power Plant is ash (fly ash + bottom ash) and the Company has achieved 100% fly ash utilization in FY 25-26. The slag generated in production of steel and ferro alloys is also used in brick making and road construction. Details attached in annexure -1 sheet

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:

Sl. 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
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Not Applicable

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

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

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

Sl. 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
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Yes, Compliant with applicable environmental law / regulations / guidelines in India.

Business Responsibility & Sustainability Report

Leadership Indicators

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

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

(i) Name of the area	Raigarh
(ii) Nature of operations	Thermal Power Plant

(iii) 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	1,04,41,701.00	-
(ii) Groundwater	0.00	-
(iii) Third party water	0.00	-
(iv) Seawater / desalinated water	0.00	-
(v) Others	0.00	-
Total volume of water withdrawal (in kilolitres)	1,04,41,701.00	-
Total volume of water consumption (in kilolitres)	1,00,45,440.00	-
Water intensity per rupee of turnover (Total water consumption / turnover in ₹)	0.00023	-
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Turnover adjusted for PPP in ₹)	0.00471	-
Water intensity in terms of physical output - Production (Total water consumption / Total production) (KL/MT)	2.78562	-
Water intensity in terms of physical output - Power Generation (Total water consumption / Total power generation) (KL/MWh)	2.41763	-
Water intensity (optional) - the relevant metric may be selected by the entity	-	-
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water	NA	NA
-No treatment		
-With treatment - please specify level of treatment		
(ii) Into Groundwater	NA	NA
-No treatment		
-With treatment - please specify level of treatment		
(iii) Into Seawater	NA	NA
-No treatment		
-With treatment - please specify level of treatment		
(iv) Sent to third parties	NA	NA
-No treatment		
-With treatment - please specify level of treatment		
(v) Others	NA	NA
-No treatment		
-With treatment - please specify level of treatment		

Business Responsibility & Sustainability Report

Parameter	FY 2025-26	FY 2024-25
Total water discharged (in kilolitres)	NA	NA

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

No

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

Parameter	Unit	FY 2025-26	FY 2024-25
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	tCO2e	Not yet assessed	Not yet assessed
Total Scope 3 emissions per rupee of turnover (Total Scope 3 emissions / Turnover in ₹)	tCO2e/₹		
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	-		
Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency		No	

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

NA

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:

Sl. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Upgradation of FAD Furnace E GCP	In Furnace E GCP Cooler tube assembly Initiative taken to replace the heat exchanger cooler tube bundle assembly & modify our ducting system from furnace hood to FD cooler with castable work inside the duct	To improve the furnace flue gas evacuation and reduce the deformation of duct line
2	Water conservation	Installation of 20 KLD STP at Ferro Alloys Division	The filter water used for gardening and planation work
3	Water conservation	Installation of 20 KLD STP at Power plant	The filter water used for gardening and planation work
4	Water Conservation	Installation of 40 KLD STP at Pellet plant	The filter water used for gardening and planation work
5	Reduction in fugitive emission	Installation of new Centralised Bag Filter at 500 TPD Product house	Clean environmental benefit, safety & legal obligation
6	Water Conservation	Installation of 10 KLD STP at Corporate office	The filter water used for gardening and planation work
7	Replacement of Turbine and generator	Old TG is being replaced with energy efficient new turbine and generator	Will reduce energy consumption and increase power generation

Business Responsibility & Sustainability Report

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

Yes

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.

A substantial part of power is generated using thermal coal. We are replacing on e TG set with energy efficient TG. We are also installing 50 MW solar power plant to reduce adverse impact to environment arising from consumption of grid power.

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

Not yet evaluated

8. How many Green Credits have been generated or procured:

a. By the listed entity	3,104 green credits and 1,25,280 kWh generated through solar power
b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners	Not Assessed

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
19
- b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National/ International)
1	Entrepreneurs Organization (EO)	International
2	Confederation of Indian Industries (CII)	National
3	Federation of Indian Chamber of Commerce & Industries (FICCI)	National
4	ASSOCHAM	National
5	Pellet Manufacturer's Association of India (PMAI)	National
6	Sponge Iron Manufacturer Association (SIMA)	National
7	Indian Ferro Alloys Producers' Association (IFAPA)	National
8	Chhattisgarh Sponge Iron Manufacturer Association	State
9	Federation of Indian Minerals Industries	National
10	Chhattisgarh Steel Re-Rollers Association	State

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

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

Business Responsibility & Sustainability Report

Leadership Indicators

- Details of public policy positions advocated by the entity

SI No	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (yes/no)	Frequency of review by Board	Wen link, if available
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NA

PRINCIPLE 8 Businesses should promote inclusive growth and equitable development

Essential Indicators

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

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web Link
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NIL

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

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

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

Grievances may be submitted via email to surendra.kl@seml.co.in or communicated directly to the Plant In-Charge, who is responsible for initiating appropriate action. All grievances received are systematically assessed and escalated to the relevant level based on their nature, complexity, and potential impact.

A structured resolution process is followed to ensure timely and effective redressal. The status and outcomes of all grievances, along with the actions taken, are periodically reviewed by senior management at the highest level to ensure accountability, transparency, and continuous improvement in grievance handling mechanisms.

- 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	14.40	6.04
Directly from within India	93.74	90.74

Business Responsibility & Sustainability Report

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

Location	FY 2025-26	FY 2024-25
Rural		
i. Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis)	54.40	24.75
ii. Total Wage Cost	183.98	122.30
iii. % of Job creation in Rural areas	29.57%	20.24%
Semi-urban		
i. Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis)	0.76	14.42
ii. Total Wage Cost	183.98	122.30
iii. % of Job creation in semi-urban areas	0.41%	11.80%
Urban		
i. Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis)	127.04	82.00
ii. Total Wage Cost	183.98	122.30
iii. % of Job creation in urban areas	69.05%	67.05%
Metropolitan		-
i. Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis)	1.78	1.14
ii. Total Wage Cost	183.98	122.30
iii. % of Job creation in metropolitan areas	0.97%	0.93%

(Place categorized as per RBI Classification System – rural / semi-urban / urban / metropolitan)

Leadership Indicators

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

Details of negative social impact identified	Corrective action taken
Nil	

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

S. No.	State	Aspirational District	Amount spent (₹)
1.	Chhattisgarh: Flood Relief	Bastar	51,000
2.	Chhattisgarh: Ekal Vidyalaya of FTS	Rajnandgaon	45,00,000
3.	(a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/ No)	Yes	

Business Responsibility & Sustainability Report

(b) From which marginalized /vulnerable groups do you procure?	As part of its commitment to responsible sourcing and inclusive development, the Company engages with Self-Help Groups (SHGs), local micro-enterprises, and other community-based suppliers from vulnerable and underserved sections, wherever feasible.
(c) What percentage of total procurement (by value) does it constitute?	<5%

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

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
Not Ascertained				

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

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

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Project	% of beneficiaries from vulnerable and marginalized group
1	Project: Niramaya Thru Niramaya Cancer Foundation	48	100% (Total Bene. 48 No.)
2	Project: Netritva by Netritva Sadhna Kendra Foundation	123	100% Total 125: (SC/ST -68, Gen:9, OBC-48)
3	Project: Smile by Spreading Smile Charitable Trust	1795	100% War victim families and children
4	Support to Specially Able Child Kopalwani (Deaf & dumb School)	19	100% SC/ST :3, OBC:14, Gen:- 2
5	Support to SOS Children village for the study	1	100% (No Parents)
6	Project: Sarthi (Udyanchal Trust Super speciality & Eye Care Hospital	5000	100% (Rajnandgaon)
7	Project: Netra Seva Karyakram : Drishti on Wheels (Community Eye Health Camp through Ambulance)	8144	60% (City & Villages)
8	Project: Saksham (Physiotherapy Camp by F95)	902	40% (OBC 60% & SC /ST -40%)
9	Project: Antariksha Sangwari Kendra (By IDYMS)	1800	100%
10	Project: Vidya (Higher Education Scholarship)	12	100% (Prathmikta Card: OBC-10 No. Gen-2 No.)
11	FTS (Ekal Vidyalaya) 150 Ekal Schools	30000	100%
12	Project Prayas (Teacher Support for school)	13	50%
13	Mobile Medical Unit: Project "Seva"	10265	100%
14	Nirdhan Kanya Vivah Yojna ABVM	20	100% ((BPL) Prathmikta Card holder)

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

Essential Indicators

- Describe the mechanisms in place to receive and respond to consumer complaints and feedback.
 - Customer Complaints are received through mails.
 - Review Contracts & record the customer complaints, based on the nature of complaints, whether it's quality or commercial complaints, Commercial is attended by MKTG department & quality related immediately referred to the concerned QA department.
 - Get the complaint analysed by Quality & Production Managers.
 - If required our technical representative visit the customer's site for the sampling and further analysis, based on the result obtained decision taken, to either give the replacement or customer accepts the material
 - Find the Root Cause and take corrective action through Fault Analysis Report.
 - Evaluate the effectiveness of the corrective action.
 - Discuss in Management Review Meeting
 - To inform the customer about the corrective action in our organization to avoid such complaint (if asked by customer).
 - Feedback / customer perception. Feedback is in the form of verbal as well as via formal feedback form & repeated orders from same customers considered as customer is satisfied with our products /Services.
- Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:

	As a percentage of turn over
Environmental and social parameters relevant to the product	The Company's products are not subject to any mandatory labelling requirements. Accordingly, no such labelling information is displayed on the products.
Safe and responsible usage	
Recycling and/or safe disposal	

- Number of consumer complaints in respect of the following:

Category	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	0	0	-	0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of Products	0	0	-	0	0	-
Quality of Products	18	0	-	34	0	-
Restrictive Trade Practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-	0	0	-
Other	0	0	-	0	0	-

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

Category	Number	Reasons for Recall
Voluntary recalls	NIL	NA
Forced recalls	NIL	NA

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

Yes. Data Privacy and Protection Policy / Information and Cyber Security Policy

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

No major issues related to advertising, delivery of services, cyber security, or data privacy were reported during the financial year. Therefore, no corrective actions were required.

7. Provide the following information relating to data breaches:

- Number of instances of data breaches - **0**
- Percentage of data breaches involving personally identifiable information of customers - **0%**
- Impact, if any, of the data breaches - **Not applicable**

Leadership Indicators

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

Product specifications are clearly written on our website also (www.seml.co.in)

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

- Although our products are not hazardous, still we packed the materials in such a manner that it can be handled by customers in a safe manner.
- In export shipments we provide the MSDS sheet to the customers for the safe handling of the products

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

- In case of any major breakdown, intimation is sent to the customer immediately regarding supply disruption.
- While in case of planned shutdown, stock is accumulated in advance for the shutdown period to ensure there is no disruption in material supply.
- In case of any supply disruption caused by logistical issues, the same is intimated & restored immediately after the issue is resolved.

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)

- Not applicable

Annexure – 1

Hazardous Waste	
Tarry residues waste	Sold to Authorized Vender/Recycler & Co-processing in cement kiln
Used / Spent Oil	Sold to Authorized Vender/Recycler
Spent iron exchange resin containing toxic metal	Utilization for energy recovery in boiler for steam or power generation.
Non-Hazardous Waste	
Char & Dolochar	The Dolochar is used as fuel in our power plant for power generation. The balance amount of Dolochar is sold to various parties. Char is also sold to various parties. No dumping or storage of Char/Dolochar is practiced.
Dust collected from Pollution Control Units / Equipments	ESP dust of WHRB is mixed with fly ash and utilized for Bricks manufacturing in our bricks plant. Dust generated from various bag houses in the plant is also being used for making of bricks, tiles, blocks, etc. within the plant premises. The dust collected in bag house of ferro alloys plant is recycled by making sinter for recovery of manganese.
Fly ash and bottom ash	The fly ash is being utilized for bricks, tiles, blocks etc. and is also sold to cement plants.
Slag from process	We are producing both Ferro Manganese and Silico-Manganese; the Ferro Manganese slag is being utilized as raw material for production of Silico-Manganese in the Ferro Alloys Plant. Silico slag is used in brick making.
iron slag	The iron slag is crushed and magnetic slag is separated for recycling in steel making. Residue is used in bricks, blocks and tiles making as replacement of sand / sold in the market. Slag is also regularly lifted by local road contractor.
Mill Scale	Recycled for recovery of iron in manufacturing process.
End Cutting / Misrole (Cobble)	Used as a raw material for small rolling mills or fed into our Induction Furnaces for remelting.
Hot Out	Reused in the Rolling Mill

Independent Assurance Report

To
The Board of Directors,
Sarda Energy & Minerals Limited,
Industrial Growth Centre, Siltara, Raipur,
Chhattisgarh- 493111.

Subject: Independent Reasonable Assurance Report on BRSR Core KPIs/Metrics in the Business Responsibility and Sustainability Report (BRSR) of Sarda Energy & Minerals Limited for the Financial Year 2025-26.

1. Introduction and Scope

Moore Singhi Advisors LLP ("Moore Singhi" or "we" or "us") has been engaged by Sarda Energy & Minerals Limited ("the Company" or "SEML") to provide independent reasonable assurance on Key Performance Indicators (KPIs) or Metrics under nine (9) ESG attributes (listed in Annexure 1) that form part of Business Responsibility and Sustainability Report ("BRSR Core").

The reporting criteria, chosen by the company, for this engagement comprise the following (collectively, the "Criteria", and the SEBI circulars referenced below, the "Circulars"):

- Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.
- SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated July 12, 2023 on BRSR Core - Framework for assurance and ESG disclosures for value chain.
- SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 dated January 30, 2026 titled Master Circular for compliance with the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 by listed entities, read with Chapter IV-B thereof (dealing with BRSR disclosures)
- Industry Standards on Reporting of BRSR Core issued vide SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177 dated December 20, 2024.

Our engagement has been conducted in accordance with the terms of the engagement letter dated 22 April 2026.

Our assurance on disclosures is for the period starting from April 1, 2025, to March 31, 2026. We have not performed any procedures for the earlier periods or any other elements included in the BRSR report, and therefore do not express any opinion thereon.

2. Boundary

The reporting boundary for the BRSR disclosures is on a standalone basis, covering SEML's operations across its five facilities in Chhattisgarh at Raipur (Siltara and Corporate Office), Raigarh (Binj Kot, Gare Palma, and Rajnandgaon). An on-site verification was conducted at Siltara, Binj Kot, and the Corporate Office.

3. Management Responsibilities

The Company's management is responsible for the selection of the reporting criteria, reporting period, reporting boundary, preparation, and disclosure of BRSR information and the BRSR Core KPIs/Metrics under the nine attributes as per "Format of BRSR Core" of the aforesaid Circulars. This responsibility includes stakeholder engagement, designing, implementing and maintaining adequate internal controls, including relevant policies and procedures, maintaining adequate records, performing appropriate calculations, and making estimates that are reasonable in the circumstances, and ensuring that they are free from material misstatement, whether due to fraud or error. The management and Board of Directors of the Company are also responsible for overseeing the Company's compliance with the requirements of LODR Regulations and the SEBI Circulars in relation to the BRSR. Moore Singhi was not involved in the preparation of the BRSR report, BRSR Core KPIs/Metrics and/or related backup data.

4. Moore Singhi's Responsibilities

Moore Singhi's responsibility is to provide reasonable assurance on the BRSR Core KPIs/Metrics based on the procedures we have performed and the evidence we have obtained from the Company. We do not accept or assume any responsibility for any other purpose or to any other person or organization. We have considered quantitative materiality and qualitative factors in (i) planning the scope of our work and evaluating the results of our work, and (ii) evaluating the effect of any identified misstatements in the BRSR Core. Moore Singhi expressly disclaims any liability or co-responsibility for any decision a person or entity would make based on this assurance statement and for any damages in case erroneous data is reported. This assurance engagement relies on the assumption that all data and information provided by SEML is accurate and complete.

We conducted this engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised): Assurance Engagements other than Audits or Reviews of Historical Financial Information, and the International Standard on Assurance Engagements (ISAE) 3410: Assurance Engagements on Greenhouse Gas Statements, as well as the terms of our engagement as agreed with the Company in the engagement letter dated 22 April 2026.

Those standards require that we plan and perform our engagement to obtain reasonable assurance about whether, in all material respects, the KPIs/Metrics presented to us are prepared in accordance with the Criteria chosen by the Company as per the aforementioned Circulars.

A reasonable assurance engagement includes performing procedures to obtain sufficient and appropriate evidence assessing the risk of material misstatement of the KPIs/Metrics disclosed in BRSR Core. In this connection, our procedures included:

- Performing process walkthroughs at selected locations to understand controls relevant to data capture, validation, and reporting of KPIs.
- Understanding and assessing data collection, aggregation, and reporting processes across divisions.
- Evaluating whether the methodologies, assumptions, and calculation approaches adopted by the Company are consistent with the Criteria.
- Conducting interviews with management and operational personnel responsible for BRSR Core data.
- Performing sample-based testing of underlying data and supporting documents across all nine attributes.
- Performing recalculations of selected KPIs, including verification of arithmetic accuracy, consistency of formulas with the methodology adopted.
- Obtaining written management representations confirming completeness, accuracy, and consistency of the reported information and related matters.

Exclusions:

- An opinion on the overall design, implementation, or operating effectiveness of the Company's internal control framework or IT general controls, beyond procedures performed as part of this assurance engagement.
- The Company's statements that describe expressions of opinion, belief, aspiration, expectation, aim, or future intentions, including forward-looking statements.
- Independent verification of the economic and/or financial performance indicators, which are derived from the Company's audited financial statements.

5. Inherent Limitations

The reliability of assurance on non-financial information is subject to uncertainties inherent in the assurance process. The lack of a significant universal body of established practice for measuring and evaluating non-financial information allows for different, but acceptable, measures and measurement techniques, potentially affecting comparability between entities. Specifically, the uncertainties in greenhouse gas (GHG) emissions estimation arise due to incomplete scientific knowledge, limitations in quantification models, and the assumptions or

conversion factors used to arrive at results. Due to these inherent limitations, there is a possibility that material misstatements in the BRSR Core KPIs/Metrics in the Report may remain undetected. The application of this assurance statement is limited to the aforementioned Circulars.

6. Opinion

Based on the procedures performed and evidence obtained, as described in Section 4, and on the information and explanations provided to us, including written management representations, we are of the opinion that the BRSR Core KPIs/Metrics mentioned in Annexure 1 of our report are prepared, in all material respects, in accordance with the Criteria chosen by the Company as per the aforementioned Circulars.

7. Restriction on Use

Our work was performed solely to assist management in meeting their responsibilities in relation to SEML's assurance requirements as per the Circulars. The report is addressed and provided to the Board of Directors of the Company, solely for the purpose of enabling it to comply with the aforementioned requirements of the Circulars. Accordingly, we do not accept or assume any liability or duty of care to any person other than the Board of Directors of the Company in connection with this report. Other than as described in Section 1, which sets out the scope of our engagement, we did not perform any assurance procedures on the remaining information. Accordingly, we do not express an opinion on that information.

8. Statement of Independence, Impartiality, and Competence

Moore Singhi is a professional services firm offering a range of services in assurance and advisory to both domestic and international clients across industries. We have complied with independence and ethical requirements, which are founded on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. This assurance engagement was conducted by a multidisciplinary team of professionals with deep knowledge in sustainability, ESG reporting principles and standards, and related assurance standards.

For and on behalf of Moore Singhi Advisors LLP,

Ravi Sankar Nori

Chief Operating Officer (ESG Services)

Date: August 01, 2026

Annexure 1

Sr. No.	Attribute	Parameter	BRSR Indicator
1	Greenhouse gas (GHG) footprint	Total Scope 1 emissions	Principle 6, Question 7 of Essential Indicators
		Total Scope 2 emissions	
		GHG emission intensity (Scope 1 + 2) based on revenue, PPP and physical output	
2	Water footprint	Total water consumption	Principle 6, Question 3 of Essential Indicators
		Water consumption intensity based on revenue, PPP and physical output	
		Water Discharge by destination and levels of Treatment	Principle 6, Question 4 of Essential Indicators
3	Energy footprint	Total energy consumed	Principle 6, Question 1 of Essential Indicators
		% of the energy consumed from renewable sources	
		Energy intensity based on revenue, PPP and physical output	
4	Embracing circularity - details related to waste management by the entity	Plastic waste, e-waste, bio-medical waste, construction and demolition waste, battery waste, radioactive waste, other hazardous waste, and other non-hazardous waste generated	Principle 6, Question 9 of Essential Indicators
		Total waste generated	
		Waste intensity based on revenue, PPP and physical output	
		Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations	
		For each category of waste generated, total waste disposed by nature of disposal method	
5	Enhancing Employee Wellbeing and Safety	Spending on measures towards well-being of employees and workers – cost incurred as a % of total revenue of the company	Principle 3, Question 1(c) of Essential Indicators
		Details of safety related incidents for employees and workers (including contract workforce e.g. workers in the company's construction sites)	Principle 3, Question 11 of Essential Indicators
6	Enabling Gender Diversity in Business	Gross wages paid to females as % of wages paid	Principle 5, Question 3(b) of Essential Indicators
		Complaints on POSH	Principle 5, Question 7 of Essential Indicators
7	Enabling Inclusive Development	Input material sourced from following sources as % of total purchases – Directly sourced from MSMEs/ small producers and from within India	Principle 8, Question 4 of Essential Indicators
		Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non-permanent /on contract) as % of total wage cost	Principle 8, Question 5 of Essential Indicators
8	Fairness in Engaging with Customers and Suppliers	Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events	Principle 9, Question 7 of Essential Indicators
		Number of days of accounts payable	Principle 1, Question 8 of Essential Indicators
9	Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties	Principle 1, Question 9 of Essential Indicators