

Business Responsibility and Sustainability Report

SECTION A:

GENERAL DISCLOSURES

I. Details of listed entity

1.	Corporate Identity Number (CIN) of the Company	L40101WB2002PLC095491
2.	Name of the Company	Shyam Metalics and Energy Limited
3.	Year of Incorporation	2002
4.	Registered Office Address	"Trinity Tower" 83 Topsia Road, 7 th Floor, Kolkata-700046
5.	Corporate Address	"Viswakarma Building" 86C, Topsia Road, Kolkata -700046
6.	Email Address	compliance@shyamgroup.com
7.	Telephone	+91-33 40164001
8.	Website	http://www.shyammetalics.com/
9.	Financial Year Reported	1 st April 2023 to 31 st March 2024
10.	Name of the Stock Exchanges where shares are listed	A. National Stock Exchange of India Limited (NSE) B. BSE Limited (BSE)
11.	Paid-up Capital	2,79,13,18,530
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Anindya Pal DGM ESG +91 - 9007038704 anindya.pal@shyamgroup.com
13.	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Consolidated basis*
14.	Name of assurance provider	Not Applicable
15.	Type of assurance obtained	

* This BRSR includes Shyam Metalics and Energy Limited (Sambalpur plant) and Shyam SEL and Power Limited (Jamuria plant, Mangalpur plant and Pakuria plant).

II. Products/Services

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

Sl. No.	Description of Main Activity	Business Activity Code	Description of Business Activity	% of turnover of the Company
1	Manufacturing	C7	Metal and metal products	99.76%
2	Trade	G1	Wholesale Trading	0.24%

17. Products/Services sold by the Company (accounting for 90% of the turnover)

Sl. No.	Product/Service	NIC Code	% of total turnover contributed
1	Ferro Alloys	24104	12.88%
2	Sponge Iron	24102	17.75%
3	TMT Bars and Long Products	24109	47.59%
4	Pellets	24109	6.99%
5	Billets	24109	4.98%
6	Others	24109	9.81%

III. Operations

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

Location	Number of plants	Number of offices	Total
National	7	17	24
International	-	-	-

19. Markets served by the Company

a. Number of locations

Locations	Number
National (No. of States)	30 (Including union territories)
International (No. of Countries)	28

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

9.98%

c. Types of customers

Shyam Metals and Energy Limited (SMEL) is renowned for its commitment to delivering high-quality long steel products and ferro alloys. Its strategic manufacturing facilities are located in West Bengal and Odisha, enabling it to serve customers across the southern, western, northern, and eastern regions of India. The Sambalpur plant caters to the southern and western markets, while the Jamuria and Mangalpur plants are dedicated to serving the northern and eastern regions.

Aluminium rolling mill at Pakuria, West Bengal dedicatedly engaged for production of different types of aluminium foils of food grade and pharma grade.

Shyam Metals and Energy Limited takes immense pride in its customer-centric approach. The company actively engages with its business customers, which include commercial and industrial consumers, to gain a deeper understanding of their unique requirements. This continuous dialogue allows Shyam Metals to enhance its services and provide tailored solutions that not only meet but exceed customer expectations. Through diverse business segments, including B2B, B2C, and B2D, Shyam Metals strives to build long-lasting relationships with its customers, ensuring excellence in every interaction.

IV. Employees

20. Details as at the end of Financial Year

a. Employees and workers (including differently abled):

Sl. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
EMPLOYEES						
1.	Permanent (D)	3474	3366	96.89%	108	3.11%
2.	Other than Permanent (E)	48	36	75%	12	25%
3.	Total employees (D+E)	3522	3402	96.59%	120	3.41%
WORKERS						
4.	Permanent (F)	5171	5164	99.9%	7	0.14%
5.	Other than Permanent (G)	7879	7876	99.96%	3	0.04%
6.	Total workers (F+G)	13050	13040	99.92%	10	0.08%

b. Differently abled Employees and workers:

Sl. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	No, differently abled employees are there in the current FY				
2.	Other than Permanent (E)					
3.	Total differently abled employees (D+E)					
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	No, differently abled workers are there in the current FY				
5.	Other than Permanent (G)					
6.	Total differently abled workers (F+G)					

21. Participation/Inclusion/Representation of Women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	12	1	8.33%
Key Management Personnel*	4	0	0

Note: * Key Managerial Personnel includes Vice-Chairman & Managing Director, Joint Managing Director, Chief Financial Officer and Company Secretary.

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

Particulars	FY2024			FY2023			FY2022		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	3%	0.2%	3.2%	2.69%	0	2.69%	6.21%	0	6.21%
Permanent Workers	2.5%	0.1%	2.6%	1.85%	0	1.85%	6.42%	0	6.42%

Note: This includes employees/workmen who have retired during the year.

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

23. Name of holding/subsidiary/associate companies/joint ventures

Sl. No.	Name of the holding/ subsidiary/associate companies/joint ventures (A)*	Indicate whether Holding/Subsidiary/ Associate/Joint Venture	% of shares held by the Company	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the Company (Yes/No)
1	Shyam SEL and Power Limited	Subsidiary	100.00%	Yes
2	Shyam Energy Limited	Subsidiary	86.46%	No
3	Shree Venkateshwara Electrocast Private Limited	Subsidiary	90.00%	No
4	Meadow Housing Private Limited	Subsidiary	71.43%	No
5	Whispering Developers Private Limited	Subsidiary	67.57%	No
6	Nirjhar Commodities Private Limited	Subsidiary	51.00%	No
7	Shree Sikhar Iron & Steel Private Limited	Subsidiary	99.91%	No
8	S S Natural Resources Private Limited	Subsidiary	60.00%	No
9	Shyam Metalics Flat Product Private Limited	Subsidiary	100.00%	No
10	Ramsarup Industries Limited	Subsidiary	60.00%	No
11	Shyam Metalics International DMCC	Subsidiary	100.00%	No
12	Taurus Estates Private Limited#	Subsidiary	89.29%	No
13	Meghana Vyapar Private Limited	Associate	33.51%	No
14	MJSJ Coal Limited	Joint Venture	9.00%	No
15	Kolhan Complex Private Limited	Associate	41.28%	No
16	Kalinga Energy & Power Limited	Joint Venture	50.00%	No

*Held directly or through subsidiary companies

#Ceased to be subsidiary w.e.f. March 31, 2024

VI. CSR Details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No) - **Yes**
- (ii) Turnover: **₹ 13,195.22 crore**
- (iii) Net worth: **₹ 8623.45 crore**

VII. Transparency and Disclosure Compliances

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

Stakeholder group from whom compliant is received	Grievance Redressal Mechanism in place (Yes/No) (If yes, then provide weblink for grievance redressal policy)	FY2024			FY2023		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	Yes, the Company has established a structured mechanism for engaging with community leaders, allowing us to comprehensively understand and promptly address any concerns they may have.	Nil	Nil	NA	NIL	NIL	NA
Investors and shareholders	<p>Yes, the Company has a comprehensive grievance redressal mechanism in place to address grievances of investors and shareholders.</p> <p>a) A Stakeholders Relationship Committee has been formed to oversee redressal of investor grievances and the company regularly submits details of investor complaints to the stock exchanges on a quarterly basis. https://www.shyammetalics.com/investors/investors-grievances-report/</p> <p>b). The Company also has a dedicated Registrar and Transfer Agent called KFin Technologies Limited to oversee the mechanism for investor grievances redressal https://scores.gov.in/scores/Welcome.html</p> <p>c). The Company has a dedicated investors relation team to address queries of the investors. https://www.shyammetalics.com/investors/investor-relations-contact/ Several Investors/ Analyst Meets including but not limited to one-to-one meetings, Earnings & update calls and Group meetings are being held on regular basis and the same are being uploaded on the website of the Company. https://www.shyammetalics.com/investors/investors-analyst-meet/</p>	27	0	All the complaints were disposed off during the year	50	0	All the complaints were disposed off during the year

Stakeholder group from whom compliant is received	Grievance Redressal Mechanism in place (Yes/No) (If yes, then provide weblink for grievance redressal policy)	FY2024			FY2023		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Employees and workers	<p>The Company has a one-stop solution for all employee issues. A dedicated HR-One portal has been designed to address all employees issues.</p> <p>https://shyam.hrone.cloud/Account/Index</p> <p>The Company has a Whistle-Blower Policy to redress grievances of all stakeholders, including employees. The Policy is available on the Company's website at https://www.shyammetalics.com/wp-content/uploads/2021/08/SMEL_PolicyDocs_WhistleBlower.pdf</p>	16	2	NA	NIL	NIL	NA
Customers	<p>Yes, Shyam Metalics has a well-defined Customer Complaint Management System.</p> <p>https://www.shyammetalics.com/contact-us/</p>	36	7	NA	NIL	NIL	NA
Value Chain Partners	<p>Yes, the Company has a balanced vendor grievance redressal mechanism. Several meets and interactive sessions are being held with the Value Chain Partners.</p> <p>https://www.shyammetalics.com/wp-content/uploads/2021/08/SMEL_PolicyDocs_WhistleBlower.pdf</p>	15	5	NA	NIL	NIL	NA
Others (Anonymous)	https://www.shyammetalics.com/wp-content/uploads/2021/08/SMEL_PolicyDocs_WhistleBlower.pdf	NIL	NIL	NA	NIL	NIL	NA

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

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Environmental Impact Assessment	O	Environmental Impact Assessment (EIA) is a crucial process that helps evaluate the likely environmental, economic, and social impacts of a proposed project or development. By conducting a thorough EIA, the company can identify potential positive and negative impacts, and take necessary measures to enhance the beneficial impacts and mitigate the adverse ones. This can lead to more sustainable and environmentally responsible business practices.		Positive, as a well-executed EIA can help the company avoid costly environmental remediation or legal challenges, and identify opportunities for cost savings and operational efficiencies.
2	Anti-corruption practices of the company	R	Corruption can lead to legal and reputational risks, as well as financial losses for the company. Weak anti-corruption practices can expose the company to bribery, fraud, and other unethical business practices, which can result in fines, penalties, and damaged stakeholder trust.	The Company has policy in place for anti-corruption and anti-bribery policy. This policy mandates the conduct of all business activities with honesty and adherence to ethical principles.	Negative, as the company may face significant costs related to legal proceedings, fines, and the loss of business opportunities due to reputational damage.
3	Health & safety of employees	R	Failure to maintain a safe work environment can lead to accidents, injuries, and even fatalities, which can result in legal liabilities, operational disruptions, and reputational damage.	The Company has a robust occupational health and safety management system covers all facilities and work sites. The system, based on ISO 45001, ensures legal obligations are met, providing a secure working environment for employees.	Negative, as the company may face costs related to worker's compensation claims, legal proceedings, and the loss of productivity due to work-related injuries or illnesses.
4	Development and well-being of local communities	O	Engaging with and supporting local communities can help the company build trust, enhance its social license to operate, and contribute to the sustainable development of the areas in which it operates.		Positive, as the company can benefit from improved community relations, reduced operational risks, and enhanced brand reputation.
5	Sustainability disclosures	O	Transparent and comprehensive sustainability disclosures can help the company demonstrate its commitment to environmental and social responsibility, enhance stakeholder trust, and attract investors who prioritize sustainability.		Positive, as the company may be able to access sustainable finance, attract environmentally and socially conscious investors, and improve its overall financial performance through enhanced stakeholder trust and brand reputation.

Sl. 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)
6	Environmental declaration of products	O	Providing environmental declarations for products can help the company demonstrate the sustainability of its offerings, meet customer and regulatory requirements, and differentiate itself in the market.		Positive, as the company may be able to command a price premium for its sustainable products, access new markets, and enhance its overall competitiveness.
7	GHG emissions and climate change	R	Greenhouse gas (GHG) emissions and climate change pose significant risks to the company's operations, supply chain, and reputation. Failure to mitigate and adapt to the impacts of climate change can lead to physical risks, such as extreme weather events and resource scarcity, as well as transition risks, such as changing regulations, market shifts, and reputational damage.	Shyam Metals is actively mitigating it through strategic initiatives. Their solarization project, with a capacity of 1.085 MWp, reduces CO2 emissions by 12.5 Lacs Kg annually—equivalent to planting trees. Additionally, investments in emission control technology and the introduction of electric vehicles demonstrate their commitment to sustainability and environmental responsibility.	Negative, as the company may face increased costs associated with the physical impacts of climate change, such as damage to assets and disruptions to operations and supply chains.
8	Adoption of innovative, resource-efficient and low carbon technologies and solutions	O	Adopting innovative, resource-efficient, and low-carbon technologies and solutions can help the company improve its environmental performance, reduce costs, and capitalize on emerging market opportunities in the clean technology and renewable energy sectors.		Positive, as the company may be able to reduce operating costs through improved resource efficiency, access green financing and incentives, and generate new revenue streams from the sale of clean technologies and services.
9	Life cycle assessment of products and processes	O	Conducting life cycle assessments (LCAs) of products and processes can help the company identify opportunities to improve the environmental performance of its offerings, reduce resource consumption, and minimize waste.		Positive, as the company may be able to reduce costs associated with resource use, waste management, and compliance, while also enhancing its market competitiveness through the development of more sustainable products.
10	Sustainability in the supply chain	O	Promoting sustainability practices throughout the supply chain can help the company mitigate environmental and social risks, enhance the resilience of its operations, and contribute to the overall sustainability of its business.		Positive, as the company may be able to reduce costs associated with supply chain disruptions, regulatory compliance, and reputational risks.

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
11	Water and effluents	R	Failure to manage water resources responsibly can lead to operational disruptions, regulatory non-compliance, and reputational damage.	The Company measures and monitors water consumption across all its business locations and operations. The company's commitment to water stewardship involves identifying areas where water conservation techniques can be effectively implemented. Additionally, SMEL actively promotes the use of recycled water to limit overall consumption. Also, The Company has Zero Liquid Discharge (ZLD) in all the plant to ensure rigorous treatment of wastewater from its facilities, adhering strictly to applicable standards and regulations.	Negative, as the company may face increased costs associated with water scarcity, such as higher prices and supply disruptions, as well as costs related to wastewater treatment and compliance with environmental regulations.
12	Air pollution	R	Failure to address air emissions can result in fines, legal challenges, and community opposition to the company's activities.	The company ensures the active maintenance of power equipment, coupled with the regulation of the air-to-fuel ratio. This strategic approach is instrumental in mitigating the generation of Nitrogen Oxides (NOx), thereby contributing to a more sustainable and environmentally-friendly operation.	Negative, as the company may face increased costs associated with air pollution control technologies, regulatory fines and penalties, and legal challenges.

SECTION B:

MANAGEMENT AND PROCESS DISCLOSURES

Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes										
1.	a. Whether the Company's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Weblink of the policies, if available	P-6 Sustainability policy P-6 Energy policy P-6 Water Policy P-1 Terms and conditions for appointment of Independent Directors P-3 & 5 Anti-Sexual Harassment Policy P-1 Policy of Board Diversity P-1 Business Responsibility Policy P-2 & 9 Risk Management Policy P-1 Anti-Corruption and Anti Bribery Policy P-1 Dividend Distribution Policy P-3 Whistle Blower Policy P-1 Policy for Transactions with Related Parties P-7 Policy for Preservation of Documents P-5 Nomination and Remuneration Policy P-1 Code of Conduct for Directors and Senior Management Executives P-1 Familiarization Programme for Independent Directors P-8 Corporate Social Responsibility Policy P-2 Policy for Determining Material Subsidiaries P-1 Criteria for Making Payments to Non-Executive Directors P-1 Code of Conduct for Regulating, Monitoring and Reporting of Trading by Insiders P-2 Policy for Determination of Materiality of Events and Information for Disclosure to The Stock Exchange P-5 Criteria for Making Payments to Non-Executive Directors								
2.	Whether the Company has translated the policy into procedures. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.	Do the enlisted policies extend to the Company's value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4.	Name of the national and international codes/certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by the Company and mapped to each principle.	ISO 9001, ISO 14001, ISO 45001, BIS Registration IS 1786 TMT and BIS Registration IS 2830 Billet	ISO 45001 Green Pro certification of TMT & Structural Products	-	Indian labour codes	ISO 14001	-	-	-	-
5.	Specific commitments, goals and targets set by the Company with defined timelines, if any.	The company is currently establishing targets for Sustainability Key Performance Indicators (KPIs) related to climate change, energy, water, waste, air emissions, and biodiversity. These targets encompass both short-term (2030) and long-term (2050) goals								
6.	Performance of the Company against the specific commitments, goals and targets along with reasons, in case the same are not met.	The Company is actively establishing its goals, targets, and performance tracking mechanisms to fulfil its commitments.								

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9	
Governance, leadership and oversight										
7.	<p>Statement by Director, responsible for the Business Responsibility Report (BRR), highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)</p> <p>Shyam Metalics and Energy Limited is dedicated to conducting its business operations in an ethical and sustainable manner, thereby creating a positive impact on society and the environment. The Company is continuously engaged in efforts to minimize its carbon footprint through resource efficiency, operational enhancements, increased utilization of renewable energy, and the implementation of effective waste management systems.</p> <p>SMEL fosters an inclusive work environment and places significant emphasis on investing in human resources, with a focus on sustainability, innovation, and efficient systems. In addition, SMEL's Corporate Social Responsibility (CSR) initiative, plays a pivotal role.</p> <p>The Company is committed to building resilience within its business operations and among its stakeholders. This is achieved by diligently monitoring its activities and their environmental and social impacts to ensure that value is generated for all parties involved.</p> <p>In essence, SMEL is not just a business entity, but a responsible corporate citizen that is deeply invested in the well-being of society, the environment, and its stakeholders.</p>									
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).	Mr. Brij Bhushan Agarwal (DIN: 01125056) under the guidance of the Board of Directors and its Committees is responsible for implementation and oversight of the Business Responsibility policies								
9.	<p>Does the Company have a specified Committee of the Board/Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.</p> <p>Yes, The Board of Shyam Metalics has established several key committees responsible for sustainability-related policies:</p> <p>1. Corporate Social Responsibility (CSR) Committee:</p> <ul style="list-style-type: none"> o The Company has a dedicated committee for Corporate Social Responsibility (CSR). Its responsibilities include formulating CSR policies, overseeing their implementation, and ensuring compliance with relevant regulations. The CSR Committee collaborates with various stakeholders to create a positive impact on society and the environment. <p>2. Risk Management Committee:</p> <ul style="list-style-type: none"> o The Risk Management Committee assists the Board in identifying both internal and external risks faced by the company. o These risks encompass financial, operational, sectoral, and sustainability-related aspects, with a particular focus on environmental, social, and governance (ESG) risks. o Additionally, the committee addresses information security and cyber risks to safeguard the company's assets and reputation. <p>3. Stakeholder Relationship Committee:</p> <ul style="list-style-type: none"> o Responsible for maintaining positive relationships with security holders and ensures effective communication. o It resolves grievances related to share transfers, non-receipt of Annual Reports, declared dividends, and issuance of new or duplicate certificates. o Transparency during general meetings is a key priority for the Stakeholder Relationship Committee. <p>4. Audit Committee:</p> <ul style="list-style-type: none"> o The Committee monitors and provides effective supervision of the Management's financial reporting process, to ensure accurate and timely disclosures, with the highest levels of transparency, integrity and quality of financial reporting. o Oversees the work carried out by the internal auditor, statutory auditor and cost auditor. <p>5. Nomination and Remuneration Committee:</p> <ul style="list-style-type: none"> o The Committee oversees the Company's nomination process including succession planning for the senior management and the Board; o To assist the Board to identify, screen and review individuals qualified to serve as Executive Directors, Non-Executive Directors and determine the role and capabilities required for Independent Directors consistent with the criteria approved by the Board. o Assists the Board in discharging its responsibilities relating to compensation of the Company's Executive Directors, KMPs and Senior Management. 									

10. Details of review of NGRBCs by the Company:

Subject for review	Indicate whether review was undertaken by Director/Committee of the Board/any other Committee									Frequency (Annually/Half yearly/Quarterly/Any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	The Company's policies are carefully crafted and approved by the esteemed Board of Directors. These policies undergo periodic reviews or are reassessed as needed, which plays a vital role in evaluating the organization's environmental, social, and governance (ESG) initiatives. During these comprehensive reviews, the effectiveness of each policy is rigorously assessed, and necessary amendments are implemented to ensure that the company's procedures remain aligned with its commitment to sustainable and responsible business practices.																	
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The Company is committed to upholding standards of compliance, adhering to all applicable regulations and principles that govern its operations. The company takes a proactive approach to addressing any operational issues that may arise, promptly identifying and resolving them in an ongoing manner. No major non-compliance incidents, if any, are minimal and effectively managed, enabling the organization to maintain its reputation as a responsible and ethical corporate citizen.																	

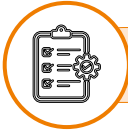
	P1	P2	P3	P4	P5	P6	P7	P8	P9
11 Has the entity carried out independent assessment /evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.	The Company's processes and compliances are subject to regular audit by internal auditors and regulatory bodies, ensuring adherence to industry standards. With a focus on best practices and risk mitigation, the various department and business heads collaborate to periodically evaluate and update the company's policies, seeking approval from the management or board. This collaborative effort ensures that Shyam Metalics' policies remain relevant and effective. Furthermore, to maintain transparency and accountability, the company's financial and non-financial performance, including its policies, undergo annual third-party verifications and audits, providing an independent and objective assessment of the company's results.								

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

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principle 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 Indicator:

100%

BoD and KMPs are trained on multiple trainings

Policy

On Anti-corruption and Anti-bribery

Nil

Disciplinary actions taken Against any director, kmp, Employee or workers during the reporting period

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	On going- Multiple trainings throughout the year	During the year, the Board of Directors of the Company (including its committees) has invested time on various updates comprising matters relating to and pertaining to the business, regulations, economy and environmental, social and governance parameters.	100%
Key Managerial Personnel	On going- Multiple trainings throughout the year	Topics pertaining to integrity and ethics, core values, code of conduct, and sustainability covered enabling KMPs to drive company's values, purpose and strategy in the business.	100%
Employees other than Board of Directors and KMPs	112	Safety, Technological Advancement, Values & Ethics, Own Rights and Policies.	65%
Workers	280	Skill Development - Technical & Functional Trainings, Safety Practices and Do's & Don't's, Ethics & Values.	70%

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:

(Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and as disclosed on the entity's website)

NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Monetary		Brief of the Case	Has an appeal been preferred? (Yes/No)
		Amount (In ₹)			
Penalty/ Fine Settlement	BSE Limited	11800		Non-Intimation of Fund-Raising Plan in Board Meeting under Regulation 29 of SEBI (LODR) Regulations, 2015	No
	National Stock Exchange Limited	11800			
Compounding fee		NIL			

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

3. Of the instances disclosed in Question 2 above, details of the Appeal/Revision preferred in cases where monetary or non-monetary action has been appealed.

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
	Not Applicable

4. Does the Company 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, SMEL maintains a stringent Anti-Corruption and Anti-Bribery Policy. The company conducts all business affairs with unwavering honesty and ethical standards. Specifically:

Professional Conduct: The Company acts professionally, fairly, and with integrity in all its business dealings and relationships, regardless of its operational context.

Effective Systems: The Company proactively implements and enforces robust systems to prevent and combat bribery and corruption.

Objectives for its anti-corruption and anti-bribery policy:

1. Compliance Measures:

- The company lays down appropriate anti-corruption, anti-extortion, and anti-bribery measures for itself and its subsidiaries. The goal is to prevent any violations of applicable laws and regulations.
- These measures ensure that business practices align with legal requirements and ethical standards.

2. Employee Awareness and Guidance:

- Shyam Metalics provides its employees with awareness and guidance regarding relevant anti-bribery and anti-corruption laws.
- The aim is to prevent inadvertent violations and enable timely recognition of potential issues for appropriate resolution.

3. Ethical Conduct:

- The company emphasizes ethical conduct by refraining from directly or indirectly influencing others through bribes, kickbacks, or any other unethical means.
- Employees and representatives are expected to decline opportunities that jeopardize the company's ethical principles and reputation.
- While certain laws specifically address bribes to government officials (both domestic and foreign), this policy extends to non-government business partners as well.

Web-link: [Anti-Corruption and Anti-Bribery Policy](#)

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

Particulars	FY2024	FY2023
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NIL	NIL

6. Details of complaints with regard to conflict of interest

	FY2024		FY2023	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	NIL	NA	NIL	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	NIL	NA	NIL	NA

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

- Not Applicable

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

	FY2024	FY2023
Number of days of accounts payables	75	56

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

Parameter	Metrics	FY2024	FY2023
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	NA	NA
	b. Number of trading houses where purchases are made from	NA	NA
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	NA	NA
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	22.76%	15.97%
	b. Number of dealers / distributors to whom sales are made	2443	1827
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	32.08%	27.52%
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	8.83%	5.94%
	b. Sales (Sales to related parties / Total Sales)	10.74%	9.07%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	100%	100%
	d. Investments (Investments in related parties / Total Investments made)	NIL	NIL

Leadership Indicators

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

Total number of awareness programmes held	Topics/principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
10	Change in Management, Code of Conduct, Ethics & Values, Technological Advancement- SAP, HRoNE, Contract Labour Management System (CLMS)	65%

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 robust processes in place to manage potential conflicts of interest involving members of its Board of Directors. The company requires all directors to disclose their interests, shareholdings, and associations with other companies or entities annually or whenever changes occur. Additionally, directors provide annual declarations confirming their commitment to acting in the company's best interests and avoiding any conflicts between their personal or business associations and Shyam Metalics' operations. The senior management also affirms annually that they have not engaged in any transactions that could potentially conflict with the company's interests.

During Board meetings, directors abstain from participating in discussions where they may have a conflict of interest.

Also, It conducts regular assessments at its sites to identify potential areas of conflict, engaging with internal and external stakeholders to ensure a comprehensive evaluation process.



**PRINCIPLE
2**

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

Essential Indicator:

LCA

Conducted for TMT Bar / Structural

80%

Fly-Ash Re-used as input material

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

	FY2024	FY2023	Details of improvements in environmental and social impacts
R & D	-	-	-
Capex	-	-	For more details on steps taken and efforts made towards conservation of energy, utilising alternate sources of energy, technology absorption and expenditure incurred on Research and Development, refer to the "Disclosure on Conservation of Energy and Technology Absorption" forming part of the Report of the Board of Directors for F.Y 2023-24.

Note: The Company conducts R&D linked to environmental and social initiatives. However, Quantification of the % of expenditure incurred to improve the environment and social impact of the product and processes are not tracked..

- 2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)**
- Yes, the Entity is committed to building a sustainable supply chain. The Company is currently in the process of adopting a comprehensive policy for sustainable sourcing. Under this policy, all new and existing supply chain partners will undergo a mandatory evaluation based on criteria related to environmental protection, health and safety, and overall sustainability. This diligent assessment ensures that only those partners aligned with Shyam Metalics' commitment to responsible business practices are on boarded.
- b. If yes, what percentage of inputs were sourced sustainably?**
- The entity is planning to assess the inputs which are sourced sustainably.
- 3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.**

(a) Plastics (including packaging)	Not applicable as plastic is not being used in packaging of the products
(b) E-waste	All electronic waste generated by the company is systematically directed towards certified recycling units. This process is part of the company's commitment to environmental sustainability and responsible waste management. The company actively segregates the e-waste and ensures its safe transportation to the recycling facilities.
(c) Hazardous waste	All hazardous waste generated by the company is responsibly managed and directed towards certified recycling units.
(d) Other waste	Every unit within the company is designed to minimize waste by reusing or recycling it in-house. This waste, far from being discarded, is transformed into a valuable resource through a process of waste heat recovery. The company has installed state-of-the-art boilers that convert this waste heat into electricity, contributing to the company's energy supply. This innovative approach not only reduces the company's environmental footprint but also enhances its operational efficiency.

- 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.**

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

Leadership Indicators

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

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.
24109	TMT Bar / Structural	47.59%	Cradle-to-gate with end-of-life	Yes	Yes

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

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

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

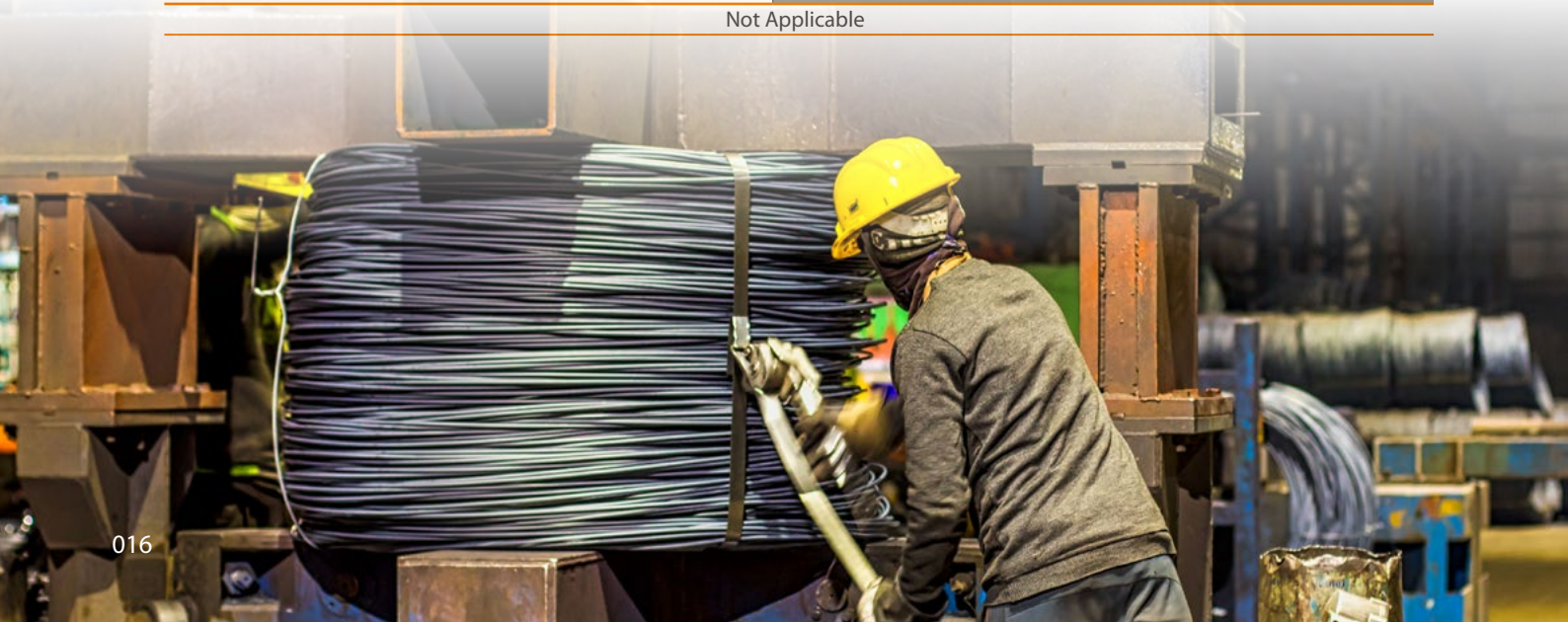
Indicate input material	Recycled or re-used input material to total material	
	FY2024	FY2023
Water	100%	21%
Dolochar from DRI and Bag filter dust from CPP	31%	-
Fly Ash	80%	10%

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:

	FY2024			FY2023		
	Re-used	Recycled	Safely Disposed	Re-used	Recycled	Safely Disposed
Plastics (including packaging)	Nil	Nil	Nil	-	10	-
E-waste	-	10.83	-	-	57.12	-
Hazardous waste	-	-	-	-	-	-
Battery waste	-	-	-	-	-	-

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

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





**PRINCIPLE
3**

Business should respect and promote the wellbeing of all employees, including those in their value chains

Essential Indicator:

100%

Maternity Benefits

4.20 Crore

Spend on well-being of employees and workers

Zero

Fatalities at work reported

100%

Plants and offices were accessed on Health and safety and working condition

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	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent employees											
Male	3366	3366	100%	-	-	-	-	-	-	-	-
Female	108	108	100%	-	-	108	100%	-	-	-	-
Total	3474	3474	100%	-	-	108	100%	-	-	-	-
Other than Permanent employees											
Male	36	36	100%	-	-	N.A.					
Female	12	12	100%	-	-						
Total	48	48	100%	0	0						

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent Workers											
Male	5164	5164	100%	-	-	-	-	-	-	-	-
Female	7	7	100%	-	-	7	100%	-	-	-	-
Total	5171	5171	100%			7	100%				
Other than Permanent Workers											
Male	7876	6610	83.93%	7768	99%	N.A.					
Female	3	3	100%	-	-						
Total	7879	6613	83.93%	7768	99%						

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

	FY2024	FY2023
Cost incurred on well- being measures as a % of total revenue of the company	0.032%	0.023%

Note: The Company spend 4.20 crore and 2.90 crore on well-being of employees and workers during the FY2024 and FY2023 respectively.

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

Benefits	FY2024			FY2023		
	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	80%	87%	Y	78%	89%	Y
Gratuity	100%	100%	N	100%	100%	N
ESI	20%	49%	Y	27%	69%	Y
Others- please specify (Medical Insurance)	80%	51%	N	73%	31%	N

3. Accessibility of workplaces

Are the premises/offices of the Company 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 Company in this regard.

While the company currently does not have any differently-abled employees during the current financial year, the company remains committed to fostering an inclusive and accessible workplace. Most of Shyam Metalics' permanent office buildings and manufacturing facilities are designed to accommodate differently-abled individuals, in accordance with the Rights of Persons with Disabilities Act, 2016. This proactive approach ensures that the company's infrastructure is prepared to welcome and support employees and workers with diverse abilities.

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

The Company values all people equally, regardless of religion, gender, caste or disability. It nurtures a culture of inclusiveness where everyone can thrive. The Company's Human Rights Policy safeguards basic freedoms and promotes equality within the organization. Equal opportunity principles guide policies and daily actions covered as part of our Code of Conduct.

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

Gender	Permanent Employees		Permanent Workers	
	Return to work rate	Retention Rate	Return to work rate	Retention Rate
Male	0	0	0	0
Female	1	100%	-	-
Total	1	100%	-	-

Note: All HR, Reporting managers, Site engineers, managers, Business Leads have set grievance handling mechanism.



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

	Yes/No (If yes, then give details of the mechanism in brief)
Permanent workers	Yes, The Company has established a robust grievance redressal procedure to ensure the concerns of both workers and permanent employees are addressed promptly and effectively. Workers have the option to report their grievances to the Human Resources department or their respective reporting managers. In addition to these channels, non-permanent workers can also bring their issues to the attention of site engineers and managers. Permanent employees, on the other hand, have the added avenue of escalating their concerns to business leads. This multi-tiered approach ensures that every voice is heard and every concern is addressed in a timely and professional manner.
Other than permanent workers	
Permanent employees	
Other than permanent employees	

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

Category	FY2024			FY2023		
	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)	% (B/A)
Total Permanent Employees	Nil The Company recognizes and upholds the right to freedom of association, even though it does not have any employee associations.					
- Male						
- Female						
Total Permanent Workers						
- Male						
- Female						

8. Details of training given to employees and workers:

Category	FY2024					FY2023				
	Total (A)	On health and safety measures		On skill upgradation		Total (D)	On health and safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	3366	2188	65%	2456	73%	3401	1862	54.75%	2014	59.22%
Female	108	70	65%	56	52%	102	36	35.29%	18	17.65%
Total	3474	2258	65%	2512	72.30%	3503	1898	54.2%	2032	58.00%
Workers										
Male	5164	4071	79%	3660	71%	5765	3682	63.87%	3784	65.64%
Female	7	7	100%	7	100%	61	21	34.43%	24	39.34%
Total	5171	4078	78.86%	3667	70.91%	5826	3703	63.56%	3808	65.36%

Note: Previous year, The Company provided the number of employees and workers in cumulative basis however for current financial year, the company has disclosed the information in segregation on Male and Female.

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

Category	FY2024			FY2023		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	3366	3030	90%	3401	2673	79%
Female	108	89	82%	102	47	46%
Total	3474	3119	90%	3503	2720	78%
Workers						
Male	5164	5021	97%	5765	4365	76%
Female	7	7	100%	61	31	51%
Total	5171	5028	97%	5826	4396	75%

10. Health and Safety Management System:

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

- Yes, the safety and health of every employee is a top priority across all of the Company's operations. A comprehensive occupational health and safety management system covers all facilities and work sites. The Company cares deeply about creating secure working conditions to protect employee wellbeing. This commitment stems from the belief that safeguarding the workforce enables greater prosperity. Dedication to international best practices makes health and safety a reality for 100% of personnel. Investing in people underpins the Company's pursuit of excellence. Moreover, the system is based on the ISO 45001 and is designed to ensure that the Company meets its legal obligations and provides a safe and healthy working environment for its employees.

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

- The Company prioritizes the safety of all personnel by proactively identifying and controlling hazards. A comprehensive risk management system covers constructions sites, factories and offices. Various processes like Hazard Assessments, Job Safety Analysis, Incident Investigation and Safety Audits systematically pinpoint risks. Learning from past incidents and adhering to best practices manual prevents injury. The Company cares for its people by diligently assessing both routine tasks and unusual situations for potential dangers. This ongoing commitment to safety gives employees peace of mind in their workplace.

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

- Yes. The company has implemented a reporting system for near misses, unsafe acts, and unsafe conditions across all divisions. Each division is assigned targets for reporting the number of unsafe acts (U/A) and unsafe conditions (U/C). Additionally, Shyam Metalics follows a rigorous reporting and investigation process to identify the root causes of incidents. Corrective and preventive measures are then implemented to prevent the recurrence of similar incidents.

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

- Yes, the health of every employee is cared for through on-site medical centers and first aid facilities. An around-the-clock dispensary staffed by devoted pharmacists and doctors provides trusted care. If more treatment is needed, a partnership with a multi-specialty hospital ensures everyone has access to top-quality medical services. At the heart lies a commitment to each person's wellbeing.

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

Safety Incident /Number	Category	FY2024	FY2023
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	1	1.01
	Workers	1.5	1.97
Total recordable work-related injuries	Employees	30	5
	Workers	51	46
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	3	1
	Workers	2	3

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

Worker safety is a top priority, ensured through regular inspections, comprehensive trainings, and open communication. Observant teams promptly identify and rectify potential hazards. Lessons from past incidents lead to new preventative measures. Supervisors have the authority to halt any unsafe work until risks are mitigated. The company partners with contractors who uphold a safety-first commitment. Regular medical check-ups confirm fitness for challenging tasks such as working at height. Above all, every life is deemed invaluable, driving safety from policy level to everyday tasks. Despite the complexity of these systems, they are underpinned by a simple principle of human care.

Safety Measures and Improvements:

System Improvements:

Work at Height Standard Operating Procedure (SOP) awareness training is provided to all employees at the Dam & Power House. The SOP includes a 'Stop Work' authorization for Supervisors, Engineers, Line Managers, and Heads of Departments in case of unsafe situations at the site. A competency evaluation is conducted for contractor workmen before vendor selection. All workers are required to undergo a medical fitness check for work at height.

Job-Specific Trainings:

Scaffolding Inspector Certificate Training is provided to 36 employees at the hydro plant through an external agency. Refresher Emergency Response training is provided for site supervisory staff, including contractors.

Physical Improvements:

The company has procured its own scaffolding material for maintenance work, eliminating reliance on contractor's material. Daily Tool Box talks on safety are conducted for all workmen, especially those engaged in work at height.

Additional Safety Measures:

Workers receive compulsory training for safely accessing high work platforms and using protective gear properly. Managers participate in digital safety reporting tools for risk identification. Employees continually update their safety knowledge to maintain hazard vigilance. The company prioritizes the wellbeing of its people.

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

The details are provided below:

Benefits	FY2024			FY2023		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Working Conditions	315	Nil	-	481	11	-
Health & Safety	5	Nil	-	294	3	-

14. Assessments for the year:

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

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.

External safety experts actively assess worksite hazards and protective measures across all Company facilities. While already compliant, auditors recommend swift enhancements, which are promptly implemented. Minor gaps, such as installing fire hydrants and safeguarding machinery, receive immediate attention. The Company prioritizes housekeeping to prevent slips and falls, fostering vigilance among all teams. Safety awareness is a top priority, with additional time invested in training and drills to maintain risk visibility and readiness. Workers acquire skills to protect themselves and others, driving continuous improvement beyond basic compliance.

Implementation of OFIs (Opportunities for Improvement)

The majority of OFIs have been successfully implemented at site locations. However, some OFIs remain in progress at our plant facilities. Notable achievements include the installation of fire hydrant systems in the CPP (Combined Power Plant), with ongoing work at SMS#2 and Ferro. Additionally, efforts are underway to safeguard rotating parts throughout the entire plant. Housekeeping practices are diligently upheld by all departments, emphasizing cleanliness and safety. Furthermore, the Company places significant emphasis on enhancing workmen's awareness through training and mock drills.

Leadership Indicators

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

Employees: Yes

Workers: Yes

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

2. Provide the measures undertaken by the entity to ensure payment of statutory dues by the value chain partners.

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

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

Particulars	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	
	FY2024	FY2023	FY2024	FY2023
Employees	Nil	All the employees and workers who suffer from work related injuries are suitably compensated following applicable regulation and company policy	Nil	All the employees and workers who suffer from work related injuries are suitably compensated following applicable regulation and company policy
Workers	Nil		Nil	

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

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

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	<p>The Company holds its value chain partners to the highest standards, expecting them to adhere to all existing regulations, including those pertaining to health and safety practices and working conditions. These expectations are not merely implied, but are explicitly outlined in the procurement contracts.</p> <p>The Company's commitment to these standards is evident in its rigorous performance monitoring system. This system evaluates various parameters, with a special emphasis on adherence to health and safety practices and working conditions regulations.</p> <p>While no specific assessment focusing solely on health and safety practices and working conditions of value chain partners has been conducted, the company ensures the maintenance of these standards through periodic inspections of material value chain partners.</p>
Working Conditions	

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

Shyam Metalics has taken several actions to address significant risks/concerns arising from assessments of health and safety practices and working conditions.



**PRINCIPLE
4**

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

Essential Indicator:

8

Key stakeholder groups identified

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

Shyam Metallics has a dynamic and strategic stakeholder engagement process. This process is designed to identify key stakeholder groups that both impact and are impacted by the success of the business. The Company engages with communities, governments, and partners in a focused manner, ensuring operations are conducted responsibly.

Customers and suppliers play a crucial role in this process, enabling value creation through their collaboration with the company. Various institutions provide the necessary permissions, guidance, and oversight, ensuring the company’s operations align with industry standards and regulatory requirements. This institutional support is vital for maintaining the organization’s credibility and operational integrity.

Most importantly, SMEL nurtures these connections, recognizing their vital link to shared prosperity. The Company understands that these relationships are not merely transactional, but are integral to its long-term success and sustainability.

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

Stakeholder Group	Whether identified as vulnerable & marginalised group (Yes/No)	Channels of communication (Emails, SMS, Newspapers, Pamphlets, Advertisements, 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
Investors	No	Conference calls, Annual General Meeting, Official communication channels: <ul style="list-style-type: none"> • Advertisements, publications, Website and social media, Investor meetings, Email, Stock Exchange (SE) intimations, Investor/Analyst meet/ Conference calls, Annual Report, Quarterly results, Media releases, Company website 	Frequent and as and when required	The appreciation of share price, distribution of dividends, achievement of profitability, and maintenance of financial stability. Additionally, the company places a high emphasis on ESG (Environmental, Social, and Governance) performance, recognizing its importance in today’s business landscape. Other growth prospects are also considered, ensuring the company’s continued progress and success.
Customers	No	Customer meets, Official communication channels: Advertisements, publications, website and social media, Conferences events, Phone calls, emails and meetings, Business interaction, Customer plant visit, helpdesk, conferences	Frequent and as and when required	To acquire new customers and service the existing ones through Customer satisfaction and feedback, Product quality, availability, delivery and timeline, aftersales service. To make the customer aware of the new developments in techniques and products
Suppliers & Transporters	No	Regular supplier/contractors meet, Plant visit, MoU and agreements, Training workshops, seminars and meetings, surveys, Supplier audits, Official communication channels: Advertisements, publications, website and social media	As and when required	Service existing business, Need and expectation schedule, supply chain issue, training and compliance, Quality delivery and payments, ISO standards.

Stakeholder Group	Whether identified as vulnerable & marginalised group (Yes/No)	Channels of communication (Emails, SMS, Newspapers, Pamphlets, Advertisements, 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
Employees	No	Emails and meetings, Employee engagement initiatives, Performance appraisal, Grievance redressal mechanisms, Notice boards Circular and messages from corporate and line management, Employee Referral policy, HR-one portal helpdesk, Welfare initiatives for employees and their families.	Daily Newsletter – Quarterly Emails – As and when required	Employees’ growth and benefits, their expectation, volunteering, career growth, professional development and continuing education, skill, training and awareness.
Government & Regulatory authorities	No	Advertisements, publications, website and social media, Phone calls, emails and meetings, Regulatory audits/ inspections, Quarterly Results, Annual reports, Stock Exchange filings	As and when required	Strong ESG practices, changes in regulatory framework, employment, environmental measures, reporting requirement, statutory compliance, support from authority.
Communities	Yes	Community visit and projects, local charities, volunteerism, seminars, CSR project	As and when required	Community development, self-sustainability, livelihood support, Sustainable Development Goals, building capacity of future leaders, CSR projects
Media	No	Press releases, Quarterly Results, Annual reports, AGM information and media interactions	As and when required	Performance reporting, Good practices, show cases, awards and achievements
Industry Association	No		As and when required	Networking so as to be abreast of new opportunities in sector and drive change

Leadership Indicators

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

The Company has established various governance committees dedicated to guiding responsible growth - economically, socially and environmentally. The CSR Committee steers community support and sustainability initiatives. With both internal and independent members, it ensures programs benefit society broadly. The Risk Management Committee safeguards operations, overseen by an Independent Director. The Stakeholders’ Relationship Committee also has an Independent Chair, nurturing connections vital to shared success. Additionally, groups conduct regular performance reviews to reconcile activities with stakeholder needs and expectations. Quarterly updates to the Board provide comprehensive accountability. Beyond standing committees, the Company proactively listens through engagement sessions to keep improving. Ultimately, good governance stems from every employee owning a collective duty to realize the Company's highest potential. Careful policies manifest shared values into action across the company.

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 results of the materiality assessment and stakeholder engagement exercise are utilized to pinpoint significant sustainability concerns for the company. Subsequently, strategies are developed through a process of cross-collaboration, with a central focus on the wellbeing of individuals. These shared objectives are then transformed into actionable policies and goals, driving positive change within the company.

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

All of the CSR initiatives are geared toward solving the world's most pressing issues and providing for the most underprivileged, young, and female populations. The Company takes into account the requirements and interests of its important stakeholders while conducting business in a way that is moral, profitable, socially and environmentally responsible.



**PRINCIPLE
5**

Business should respect and promote human rights

Essential Indicator:

Zero

Complaints filed by employees and workers on any human rights related issue

Policy

On Human Rights

100%

Assessment of the Company's plants and offices on Human rights issues

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

Category	FY2024			FY2023		
	Total (A)	No. of employees /workers covered (B)	% (B/A)	Total (C)	No. of employees /workers covered (D)	% (D/C)
Employees						
Permanent	3474	1866	53%	3503	1854	53%
Other than Permanent	48	-	-	-	-	-
Total Employees	3522	1866	53%	3503	1854	53%
Workers						
Permanent	5171	3810	74%	5826	2759	47%
Other than Permanent	7879	-	-	-	-	-
Total Workers	13050	3810	29.20%	5826	2759	47%

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

Category	FY2024					FY2023				
	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	3474	5	0.14%	3469	99.9%	3503	269	7.68%	3496	99.80%
Male	3366	4	0.12%	3362	99.9%	3401	262	7.70%	3394	99.79%
Female	108	1	0.93%	107	99.1%	102	7	6.86%	102	100%
Other than Permanent	Not Applicable									
Male										
Female										
Workers										
Permanent	5171	310	5.9%	4861	94%	5826	256	4.39%	5570	96%
Male	5164	309	5.9%	4855	94%	5765	229	3.97%	5536	96%
Female	7	1	14%	6	86%	61	27	44%	34	56%
Other than Permanent	Nil					Nil				
Male										
Female										

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

a. The details are provided below:

	Male		Female	
	Number	Median remuneration/ salary/wages of respective category	Number	Median remuneration/ salary/wages of respective category
Board of Directors (BoD)*	6	1,02,81,660	0	0
Key Managerial Personnel (KMP)	4	48,31,188	0	0
Employees other than BoD and KMP	3356	3,95,523	108	2,91,132
Workers	5164	2,57,820	7	1,46,976

*Independent Directors are excluded.

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

	FY2024	FY2023
Gross wages paid to females as % of total wages	1.5%	1.9%

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

The Company is having human rights policy for handling the human rights matters through a single point of contact. But the chief of the corresponding department and HR are in charge of handling the same.

Web-link of the Human rights Policy: <https://www.shyammetalics.com/wp-content/themes/shyam/assets/HR/Human-Rights-Policy.pdf>

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

The Company has established a robust grievance redressal process to address employee concerns. A comprehensive Code of Conduct outlines employee responsibilities and acceptable conduct. Employees may submit written grievance letters through their respective HR departments. Once registered, issues are thoroughly investigated by a High-Level Committee specifically constituted for this purpose. Every grievance is handled as soon as it is received by the relevant Project Managers, Unit Heads, or Admin, working with HR as needed. Every complaint is thoroughly looked into, and the relevant steps are done to address the problem or complaint. Discipline is applied as necessary, and help from the appropriate regulatory body is requested.

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

The details are provided below:

Category	FY2024			FY2023		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual Harassment Discrimination at workplace Child Labour Forced Labour/ Involuntary Labour Wages Other Human rights related issues	There were no complaints filed by employees and workers on any human rights related issues, including sexual harassment, discrimination at workplace, child labor, forced labor/involuntary labor, wages, or other human rights related matters, during FY2024 or FY2023.					

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

Particulars	FY2024	FY2023
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees / workers	0	0
Complaints on POSH upheld	0	0

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

The Company's whistle-blower policy encourages staff to report any dishonest or improper activities without worrying about retaliation. It ensures that the organization's financial health and reputation are protected. Employees are also reminded to act and work according to the company's ethical guidelines. In addition, the company maintains committees dedicated to the protection of women in the workplace at each location. These committees oversee grievance procedures, investigate complaints, and take appropriate action. Whistle-blower Policy

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

Yes, The Company's contractual agreements explicitly articulate a dedication to sustainability, equitable practices, and the respectful treatment of human rights. The Company actively adheres to the principles outlined by the United Nations Global Compact, seamlessly integrating human rights provisions into its interactions with suppliers and partners. Furthermore, these principles permeate the supply chain through a comprehensive Code of Conduct specifically designed for suppliers and vendors.

10. Assessment for the year:

	% of the Company's plants and offices that were assessed (by the Company or statutory authorities or third parties)
Child Labour	100%
Forced Labour/Involuntary Labour	100%
Sexual Harassment	100%
Discrimination at workplace	100%
Wages	100%
Other- please specify	-

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

There were no significant risks or concerns identified hence Not Applicable.

Leadership Indicators

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

No complaint received in FY24 for human rights violation. The Company is in process of formulating its Supplier/Vendor Code of Conduct (SCoC) including human rights compliance requirements for value chain partners

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

Nil

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

Yes, all premises and offices are accessible to differently abled visitors.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	At present, an assessment is not underway. However, the Supplier/Vendor Code of Conduct (SCoC) of the Company addresses numerous aspects. It is mandatory for all suppliers to sign the SCoC as a prerequisite for conducting business with the Company. Compliance with the stipulations of the SCoC is expected from all suppliers.
Discrimination at workplace	
Child Labour	
Forced Labour/Involuntary Labour	
Wages	
Others – please specify	

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

Not Applicable



**PRINCIPLE
6**

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

Essential Indicator:

8415 GJ

Renewable energy used from Solar and Wind in FY 2024

ZLD

In all plants

12.5 Lacs Kg

CO2 Emission Reduction in current Financial Year

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

Parameter	FY2024 (GJ)	FY2023 (GJ)
From renewable sources		
Total electricity consumption (A) (Solar & Wind)	8415	NIL
Total fuel consumption (B)	NIL	NIL
Energy consumption sources (C)	NIL	NIL
Total energy consumed from renewable sources (A+B+C) (GJ)	8415	NIL
From non-renewable sources		
Total electricity consumption (D) (GJ)	22,56,076.249	63,20,219.34
Total fuel consumption (E) (GJ)	1,96,84,738.02	2,59,40,807
Energy consumption sources (F)	NIL	NIL
Total energy consumed from non-renewable sources (D+E+F) (GJ)	2,19,40,814.27	3,22,71,026.91
Total energy consumed (A+B+C+D+E+F) (GJ)	2,19,49,229.27	3,22,71,026.91
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	0.0016	0.0025
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	0.380	0.585
Energy intensity in terms of physical Output	2.50	19.98

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

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

Yes. The SMEL Sambalpur and Jamuria Plant are recognized as designated consumers (DC) under the PAT scheme instituted by the Government of India. The Company had participated in the PAT cycle 3 in the fiscal year 2022. Currently, the entity is engaged in PAT cycle 7, with the registration numbers INS00097OR and INS0093WB respectively. The entity is actively working towards the efficient achievement of the set target.



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

Parameter	FY2024	FY2023
Water withdrawal by source (in kilolitres)		
(i) Surface water	23,88,449	85,84,945
(ii) Groundwater	NIL	NIL
(iii) Third party water	32,34,368	NIL
(iv) Seawater / desalinated water	Nil	NIL
(v) Others	-	-
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	56,22,817	85,84,945
Total volume of water consumption (in kilolitres)	56,22,817	85,84,945
Water intensity per rupee of turnover (Total water consumption / Revenue from operations)	0.00042	0.00068
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	0.0098	0.0155
Water intensity in terms of physical output	0.64	5.31

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

No

4. Provide the following details related to water discharged:

Parameter	FY2024	FY2023
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	All the plants practice Zero waste Discharge.	All the plants practice Zero waste Discharge.
- No treatment		
- With treatment – please specify level of Treatment		
(ii) To Groundwater		
- No treatment		
- With treatment – please specify level of Treatment		
(iii) To Seawater		
- No treatment		
- With treatment – please specify level of Treatment		
(iv) Sent to third-parties		
- No treatment		
- With treatment – please specify level of Treatment		
(v) Others		
- No treatment		
- With treatment – please specify level of Treatment		
Total water discharged (in kilolitres)		

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

No

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

Yes, The Company has fully embraced the Zero Liquid Discharge (ZLD) approach. It operates two Waste Water Treatment Plants with capacities of 3000 KLD and 4000 KLD. The water used in various processes is purified in these plants. After treatment, it's either reused within the company or utilized for gardening purposes. This initiative highlights the company's commitment to responsible water management both within its premises and for the wider community. By prioritizing water efficiency and ensuring its availability, the company adheres strictly to the ZLD principle, making sure that all used water is effectively treated and recycled, leaving no waste behind.

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

Parameter	Unit	FY2024	FY2023
NOx	(µg/m ³)	25	28.8
SOx	(µg/m ³)	8	10.8
Particulate matter (PM)	(µg/m ³)	76	80.5
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-

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

No

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

The details are provided below:

Parameter	Unit	FY2024	FY2023
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	37,29,472.08	46,71,629.94
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	4,48,708.4985	4,74,325.39
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes CO ₂ / Rupee of turnover	0.00032	0.00041
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 / Revenue from operations adjusted for PPP)	Metric tonnes CO ₂ / Rupee of turnover	0.0072	0.0093
Total Scope 1 and Scope 2 emission intensity in terms of physical output	Metric tonnes CO ₂ e/ ton	0.476	3.18
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.
No

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

Shyam Metals has undertaken a significant project aimed at reducing greenhouse gas emissions. Here are the details:

Solarization Project:

- Capacity: The solarization project has a capacity of 1.085 MWp and wind mill has a capacity of 5.1 MW.
- Company Profile: Shyam Metals, India's largest Commercial & Industrial Solar Developer, boasts a total asset base of approximately 750 MW across 24 states and 7 countries.

Benefits of the Project:

- CO₂ Emission Reduction: The project results in an annual reduction of 12.5 Lacs Kg of CO₂ emissions.
- Equivalent to Tree Planting: The CO₂ reduction achieved is equivalent to planting 57,500 trees each year.

Furthermore, the company has invested in technology to control PM10 and PM2.5 emissions, aligning with standard limits. Recently, Shyam Metals introduced three new electric vehicles (EVs) at the Jamuria Plant, demonstrating their commitment to sustainability and innovation. Excitingly, Shyam Metals has received GreenPro certification, reinforcing our dedication to eco-friendly production practices.



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

The required details are provided below:

Parameter	FY2024	FY2023
Total Waste generated (in metric tonnes)		
Plastic waste (A)	0	10
E-waste (B)	10.83	57.12
Bio-medical waste (C)	0.000093	-
Construction and demolition waste (D)	0	34
Battery waste (E)	0.25	0.7
Radioactive waste (F)	0	-
Other Hazardous waste. Please specify, if any. (G)	25.53	11
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	52,196.75	2,82,144
Total (A+B + C + D + E + F + G + H)	52,233.36	2,82,257
Waste intensity per rupee of turnover (Total waste generated Revenue from operations)	0.000004	0.00002
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.00009	0.0005
Waste intensity in terms of physical output	0.0059	-
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	10.83	67.12
(ii) Re-used	-	-
(iii) Other recovery operations	-	-
Total	10.83	67.12
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	-	-
(ii) Landfilling	-	-
(iii) Other disposal operations	-	-
Total	-	-

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

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

The facility actively recycles and repurposes solid waste materials. Middling and rejects from the coal washery serve as fuel for the FBC Boiler. Additionally, ash, accretion, and Dolchar from the DRI kilns find new life in the captive brick-making unit and contribute to boiler fuel. The facility redirects dedusting dust to the Pellet plant, while tar from the PGP plant is sent to authorized recyclers. Slag and dust generated during the steel-making process creatively contribute to reclaiming abandoned mines, and fly ash from the boiler fills old stone quarries. The slag from the Ferro alloy plant serves in concrete works or acts as landfill, ensuring that every by-product has a purpose. The facility also responsibly disposes of hazardous waste such as used oil and spent resin through authorized channels, emphasizing their commitment to a process free of toxic chemicals.

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

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

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
No environmental impact assessment conducted for financial year.					

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

If not, provide details of all such non-compliances

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
The company is compliant with all the laws and regulations				

Leadership Indicators

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

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

- (i) Name of the area - **Jamuria, Mangalpur, Sambalpur**
- (ii) Nature of operations – **Steel manufacturing**
- (iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY2024	FY2023
Water withdrawal by source (in kilolitres)		
(i) Surface water	23,88,449	85,84,945
(ii) Groundwater	19,132	NIL
(iii) Third party water	32,34,368	NIL
(iv) Seawater / desalinated water	Nil	NIL
(v) Others	-	-
Total volume of water withdrawal (in kilolitres)	56,41,949	85,84,945
Total volume of water consumption (in kilolitres)	56,41,949	85,84,945
Water intensity per rupee of turnover (Water consumed / turnover)	0.00042	0.00068
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	Not Applicable, As all the plants have facilities of "Zero Liquid Discharge"	Not Applicable, As all the plants have facilities of "Zero Liquid Discharge"
- No treatment		
- With treatment – please specify level of treatment		
(ii) Into Groundwater		
- No treatment		
- With treatment – please specify level of treatment		
(iii) Into Seawater		
- No treatment		
- With treatment – please specify level of treatment		
(iv) Sent to third-parties		
- No treatment		
- With treatment – please specify level of treatment		
(v) Others		
- No treatment		
- With treatment – please specify level of treatment		
Total water discharged (in kilolitres)		

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	FY2024	FY2023
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	The Company is in process to calculating their Scope-3 emissions. Active initiatives are in progress to systematically monitor and document this information, with the intention of providing comprehensive data in the forthcoming years.		
Total Scope 3 emissions per rupee of turnover			
Total Scope 3 emission intensity			

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

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

- Currently, the Company is in the process of assessing any such impact on Biodiversity

4. If the entity provided below taken 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
The Company is in process of collecting data on such specific initiatives			

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

- No

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

- No adverse impact identified.

7. % of Value chain partners (by value of business done with such partners) that were assessed for Environmental Impacts?

- Currently, the company is in the process of assessing value chain partners for environmental impacts.





PRINCIPLE
7

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

Essential Indicator:

9

Number of trade and industry chambers/associations

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

9

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

Sl. No.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (State/ National)
1	Bengal chamber of Commerce (BCC)	State
2	Merchant Chamber of Commerce (MCC)	State
3	Bharat Chamber of Commerce (BCC)	National
4	Indian Chamber of Commerce (ICC)	National
5	Federation of Indian Chambers of Commerce & Industry (FICCI)	National
6	Confederation of Indian Industry (CII)	National
7	SteelMint	National
8	Pellet Manufacturers' Association of India	National
9	Agri Horticultural Society	National

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

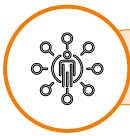
Name of the authority	Brief of the case	Corrective action taken
There have been no adverse orders against the Company pertaining to anti-competitive conduct from regulatory bodies.		

Leadership Indicators

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

Sl. No.	Public Policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/ No)	Frequency of Review by Board (Annually/ Half yearly/Quarterly/ Others- please specify)	Web Link, if available
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Shyam Metals works closely with industry/trade associations in evolving policies that govern the functioning and regulations of the Indian Steel sector.



**PRINCIPLE
8**

Businesses should promote inclusive growth and equitable development.

Essential Indicator:

73%

Job Creation in Rural areas

79.60%

Sourced directly from within India

19.22 Crore

Amount spent in the designated aspirational districts

1. Details of Social Impact Assessments (SIA) of projects undertaken by the Company, 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
Not Applicable					

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by the Company, 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 ₹)
Not Applicable						

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

Local committees from districts, panchayats, and villages relay their concerns to the CSR department, where each issue undergoes careful consideration before being addressed. The Shyam Metallic Foundation (SMF) employs CSR Volunteers who engage directly with Women's Self-Help Groups and various village collectives. These volunteers not only communicate the objectives of SMF but also actively listen to and prioritize resolving the community's issues. Moreover, community grievances can be directed to any plant's HR or Administration teams for efficient resolution.

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

	FY2024	FY2023
Directly sourced from MSMEs/small producers	4.66%	4.34%
Directly from Within India	79.60%	77.24%

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	FY2024	FY2023
Rural	73%	78%
Semi-urban	5%	1%
Urban	7%	6%
Metropolitan	15%	16%

(Place to be 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 the Company in the designated aspirational districts as identified by government bodies:

Sl. No.	State	Aspirational District	Amount spent (In ₹)
1	Odissa	Sambalpur	9,41,73,109
2	West Bengal	Jamuria	9,80,78,316

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized/vulnerable groups? (Yes/No) -
No, There is no such policy yet, but the entity is working on a responsible sourcing policy.
- (b) From which marginalized/vulnerable groups do you procure? – Not Applicable
- (c) What percentage of total procurement (by value) does it constitute? – Not Applicable

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

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

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:

Sl. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized group
1	Skill Development & Education/Sports	3006	By virtue of working in areas with predominantly rural communities, the programs by default reach out largely to the vulnerable and marginalised communities.
2	Social Infrastructure	28755	
3	Welfare Program	22413	
4	Sehat	52031	
5	Sustainability	54764	





**PRINCIPLE
9**

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

Essential Indicator:

Zero

Consumer complaints

Product safety

By adhering to industry standards and regulations

Nil

Instances of product voluntary and forced recalls

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

The Company has established a comprehensive system for handling customer feedback, offering various channels for customers to reach out. These include email, phone, the company website, social media platforms, feedback forms, letters, and direct verbal communication with project management teams. Additionally, customers have the option to use a toll-free number or an email address listed on the company's website for complaints.

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

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

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

Number of consumer complaints in respect of the following:	FY2024			FY2023		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	There have been no consumer complaints received in respect of these points.			There have been no consumer complaints received in respect of these points.		
Advertising						
Cyber-security						
Delivery of essential services						
Restrictive Trade Practices						
Unfair Trade Practices						
Other						

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

	Number	Reasons for recall
Voluntary recalls	NIL	NIL
Forced recalls	NIL	NIL

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

The Company has a formal policy on Information security Management and a manual of all the relevant policies is available in the Company .

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

None

7. Provide the following information relating to data breaches:

	Provide the following information relating to data breaches:
a. Number of instances of data breaches along-with impact	NIL
b. Percentage of data breaches involving personally identifiable information of customer	NIL
c. Impact, if any, of the data breaches	NIL

Leadership Indicators

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

- All information regarding the business of SMEL can be accessed through the Company's website www.shyammetalics.com and in its periodic disclosures such as the annual report.

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

The Company actively ensures product safety and compliance by adhering to industry standards and regulations. Clear labeling, comprehensive instructions, and precautionary warnings accompany products, empowering consumers to use them safely. The Company's consumer education programs, including user manuals, videos, and online resources, provide valuable insights into product features and safe practices. Additionally, we prioritize sustainability throughout the product lifecycle, managing waste responsibly and addressing privacy concerns transparently.

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

- Not Applicable

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 whole? (Yes/No)

Yes, SMEL surpasses mandated requirements by displaying the GreenPro Ecolabel where applicable. Additionally, the company provides customers with test certificates that capture both mechanical and chemical properties, ensuring informed decision-making.

Shyam Metalics leads the Indian Steel Industry in environmental certification for its products. To date, the Confederation of Indian Industry has conferred GreenPro certification on the following product lines:

- Hot Rolled Medium and High Tensile Structural Steel
- High Strength Deformed Steel Bars

