







Business Responsibility and Sustainability Report

SDG	SDG Theme	Aligned BRSR Principle(s)	Indicators / KPIs to report
	No Poverty	P3, P8	<ul style="list-style-type: none"> 14,830 beneficiaries through CSR activities 46.57% workers earning more than minimum wage Employment generated for rural peoples through Skill development programmes
	Good Health & Well-being	P3, P6	<ul style="list-style-type: none"> 83% of employees and 63% of workers covered under medical insurance 0.94 Number of safety incidents (LTIFR) (Employee) 100% Occupational health surveillance coverage
	Quality Education	P5, P8	<ul style="list-style-type: none"> 1,490 beneficiaries on education initiatives Education support was provided to 21 schools across three Gram Panchayats
	Gender Equality	P3, P5	<ul style="list-style-type: none"> 1.6% women in workforce, leadership, board POSH training - 59.1% of female coverage Gross wages paid to females accounted for 1.32% of total wages
	Clean Water & Sanitation	P6	<ul style="list-style-type: none"> 0.000047 Water intensity (KL/₹ revenue) 100% water recycled & reused 2 systems implemented ZLD systems implementation 46,887 beneficiaries on clean water in villages through CSR
	Affordable & Clean Energy	P6, P2	<ul style="list-style-type: none"> 0.19% renewable energy in total energy use 24,276.02 GJ from renewable sources Rooftop and floating solar installations
	Decent Work & Economic Growth	P3, P1	<ul style="list-style-type: none"> 25,592 Total employment (direct & indirect) 26.4% permanent workers 35.91% of the total workforce earn more than the minimum wage 54% received skill upgradation training
	Industry, Innovation, and Infrastructure	P2, P6	<ul style="list-style-type: none"> Emission control technologies deployed Solar power 1.085 MWp installed
	Reduced Inequalities	P3, P5	<ul style="list-style-type: none"> Equal opportunity policy implementation Zero grievances on discrimination (reported & resolved) Gross wages paid to females constitute 1.32% of total wages

SDG	SDG Theme	Aligned BRSR Principle(s)	Indicators / KPIs to report
	Sustainable Cities and Communities	P6, P8	<ul style="list-style-type: none"> 11,309 benefitted on Urban planning support via CSR 3854 beneficiaries on safe housing, waste management or roads via CSR
	Responsible Consumption & Production	P2, P6	<ul style="list-style-type: none"> Dolochar 100% input materials recycled 53.37 MT Waste reused/recycled E waste recycled 11.32 MT
	Climate Action	P6	<ul style="list-style-type: none"> Scope 1 - 54,43,997.66 tCO₂e, Scope 2 - 3,84,366.40 tCO₂e 0.533 Emissions per tonne of product
	Life on Land	P6, P8	<ul style="list-style-type: none"> Biodiversity impact assessments - 70% survival rate of plants 6464 saplings planted plant premises converted into green cover
	Peace, Justice & Strong Institutions	P1	<ul style="list-style-type: none"> Zero complaints related to bribery/corruption Zero Whistleblower cases Anti-corruption policy & training coverage
	Partnerships for the Goals	P1, P9	<ul style="list-style-type: none"> 3 projects conducted for social infrastructure 9 Participation in industry coalitions

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	"P-19, (Plate No.: D-403), Taratala Road, CPT Colony, Kolkata, West Bengal 700088"
5.	Corporate Address	"P-19, (Plate No.: D-403), Taratala Road, CPT Colony, Kolkata, West Bengal 700088"
6.	Email Address	compliance@shyamgroup.com
7.	Telephone	+91 33 6521 6521
8.	Website	http://www.shyammetalics.com/
9.	Financial Year Reported	2024-2025
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	NA
15.	Type of assurance obtained	NA

II. Products/Services

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

Sl. No.	Description of Main Activity	Description of Business Activity	% of turnover of the Company
1.	Manufacturing	Metal and metal products (C7)	99.96%
2.	Trade	Wholesale Trading (G1)	0.04%

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	12.66%
2	Sponge Iron	24102	16.97%
3	TMT Bars & Long Products	24109	44.33%
4	Pellets	24109	4.80%
5	Billets	24109	4.58%
6	Stainless Steel	24109	7.34%
7	Aluminium	24202	4.73%
8	Others	24109	4.59%

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	8	17	25
International	0	0	0

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?

10.63%

c. Types of customers

Shyam Metalics and Energy Limited (SMEL) is well-regarded for its focus on delivering premium long steel products and ferro alloys. With strategically located manufacturing units in West Bengal and Odisha, Madhya Pradesh the company efficiently serves customers across India's southern, western, northern, and eastern regions. The Sambalpur facility supports the southern and western markets, while the Jamuria and Mangalpur plants cater to the northern and eastern zones. The aluminium rolling mill at Pakuria, West Bengal, is dedicated to producing various types of aluminium foils for food and pharmaceutical use.

Shyam Metalics places strong emphasis on a customer-focused approach. The company maintains active engagement with its business clients, including commercial and industrial users, to thoroughly understand their specific needs. This ongoing interaction enables SMEL to enhance its offerings and deliver customized solutions that not only meet but surpass customer expectations. Operating across B2B, B2C, and B2D segments, Shyam Metalics is committed to fostering long-term relationships and delivering excellence in every engagement.

IV. Employees

20. Details as at the end of Financial Year

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	4,593	4,439	96.65%	154	3.35%
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total employees (D + E)	4,593	4,439	96.65%	154	3.35%
WORKERS						
4.	Permanent (F)	5,545	5,530	99.73%	15	0.27%
5.	Other than Permanent (G)	15,454	15,208	98.41%	246	1.59%
6.	Total workers (F + G)	20,999	20,738	98.76%	261	1.24%

b. Differently abled Employees and workers:

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

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

	FY'2024-25			FY'2023-24			FY'2022-23		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	7.28%	0.10%	7.38%	3%	0.2%	3.2%	2.69%	0	2.69%
Permanent Workers	10.92%	0.15%	11.07%	2.5%	0.1%	2.6%	1.85%	0	1.85%

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%	Yes
2	Shyam Energy Limited	Subsidiary	87.12%	No
3	Shree Venkateshwara Electrocast Private Limited	Subsidiary	90%	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%	No
7	Shree Sikhar Iron & Steel Private Limited	Subsidiary	99.91%	No
8	S S Natural Resources Private Limited	Subsidiary	60%	No
9	Ramsarup Industries Limited	Subsidiary	60%	Yes
10	Shyam Metalics International DMCC	Subsidiary	100%	No
11	SMEEL Steel Structural Private Ltd.	Subsidiary	100%	No
12	Meghana Vyapar Private Limited	Associate	33.51%	No
13	MJSJ Coal Limited	Joint Venture	9%	No
14	Kolhan Complex Private Limited	Associate	41.28%	No
15	Kalinga Energy & Power Limited	Joint Venture	50%	No

VI. CSR Details**24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes**(ii) Turnover (in ₹): **15,137.5 Cr.**(iii) Net worth (in ₹): **10,553.33 Cr.****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 web link for grievance redressal policy)	FY'2024-25			FY'2023-24		
		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 put in place a structured mechanism to engage with community leaders, enabling a thorough understanding of their concerns and ensuring timely resolution.	Nil	Nil	NA	Nil	Nil	NA

Stakeholder group from whom compliant is received	Grievance Redressal Mechanism in place (Yes/No) (If yes, then provide web link for grievance redressal policy)	FY'2024-25			FY'2023-24		
		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
Investors and shareholders	<p>Yes, the Company has a robust grievance redressal system in place to address concerns raised by investors and shareholders.</p> <p>a) A Stakeholders Relationship Committee has been constituted to monitor and resolve investor grievances. The Company also submits quarterly updates on investor complaints to the stock exchanges. https://www.shyammetalics.com/investors/investors-grievances-report/</p> <p>b) KFin Technologies Limited has been appointed as the Company's dedicated Registrar and Transfer Agent to manage investor grievance redressal. https://scores.sebi.gov.in/scores-home/</p> <p>c) A dedicated Investor Relations team is available to respond to investor queries. https://www.shyammetalics.com/investors/investor-relations-contact/. The Company also conducts regular Investor/Analyst meetings—including one-on-one meetings, earnings and update calls, and group interactions—the details of which are made available on the Company's website. https://www.shyammetalics.com/investors/investors-analyst-meet/</p>	26	0	NA	27	0	All the complaints were disposed off during the year
Employees and workers	<p>The Company offers a one-stop solution for addressing all employee-related concerns through its dedicated HR-One portal, specifically designed to manage and resolve employee issues. https://shyam.hrone.cloud/Account/Index</p> <p>Additionally, the Company has implemented a Whistle-Blower Policy to handle grievances from all stakeholders, including employees. The policy is accessible on the Company's website at https://www.shyammetalics.com/wp-content/uploads/2025/04/Whistle-Blower-Policy.pdf</p>	22	0	NA	16	2	NA
Customers	<p>Yes, Shyam Metalics has a well-defined Customer Complaint Management System. https://www.shyammetalics.com/contact-us/</p>	26	0		36	7	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. https://www.shyammetalics.com/wp-content/uploads/2025/04/Whistle-Blower-Policy.pdf</p>	12	0		15	5	NA
Others	https://www.shyammetalics.com/wp-content/uploads/2025/04/Whistle-Blower-Policy.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 an essential process used to assess the potential environmental, economic, and social effects of a proposed project or development. Through a comprehensive EIA, the Company can recognize both positive and negative impacts and implement appropriate measures to maximize the benefits while minimizing any adverse effects. This approach supports the adoption of more sustainable and environmentally responsible business practices.		Positive, a well-conducted EIA offers significant advantages, as it can help the Company avoid expensive environmental remediation or legal issues, while also uncovering opportunities for cost savings and improved operational efficiency.
2	Anti-corruption practices of the company	R	Corruption poses serious legal and reputational risks, along with potential financial losses for the Company. Inadequate anti-corruption measures can leave the Company vulnerable to bribery, fraud, and other unethical conduct, potentially leading to fines, penalties, and a loss of stakeholder trust.	Corruption poses serious legal and reputational risks, along with potential financial losses for the Company. Inadequate anti-corruption measures can leave the Company vulnerable to bribery, fraud, and other unethical conduct, potentially leading to fines, penalties, and a loss of stakeholder trust.	Negative, failure to uphold these standards can have negative consequences, including substantial costs arising from legal actions, financial penalties, and missed business opportunities resulting from reputational harm.
3	Health & safety of employees	R	Failure to ensure a safe working environment can result in accidents, injuries, or fatalities, leading to legal liabilities, operational setbacks, and reputational harm.	To mitigate such risks, the Company has implemented a comprehensive occupational health and safety management system across all its facilities and work sites. Aligned with ISO 45001 standards, this system ensures compliance with legal requirements and promotes a safe and secure workplace for employees.	Negative, neglecting workplace safety can have adverse consequences, including expenses related to worker compensation claims, legal action, and reduced productivity due to work-related injuries or illnesses.
4	Development and well-being of local communities	O	Actively engaging with and supporting local communities enables the Company to build trust, strengthen its social license to operate, and contribute to the sustainable development of the regions where it functions.		Positive, as it can lead to better community relationships, lower operational risks, and an enhanced brand reputation.
5	Sustainability disclosures	O	Transparent and comprehensive sustainability disclosures enable the Company to showcase its dedication to environmental and social responsibility, build stakeholder trust, and appeal to investors focused on sustainability.		Positive, as it can help the Company secure sustainable financing, attract environmentally and socially responsible investors, and enhance overall financial performance through strengthened stakeholder confidence and brand reputation.
6	Environmental declaration of products	O	Offering environmental declarations for products allows the Company to showcase the sustainability of its products, comply with customer and regulatory expectations, and stand out in the marketplace.		Positive, because it can enable the Company to command premium pricing for its sustainable products, enter new markets, and boost its overall competitiveness.

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)
7	GHG emissions and climate change	R	Greenhouse gas (GHG) emissions and climate change present substantial risks to the Company's operations, supply chain, and reputation. Without effective mitigation and adaptation, the Company may face physical risks like extreme weather events and resource shortages, as well as transition risks including evolving regulations, market changes, and reputational harm.	Shyam Metals is actively addressing these challenges through strategic initiatives. Their solarization project, with a capacity of 1.085 MWp, reduces CO2 emissions by 12.5 lakh kilograms annually—equivalent to planting trees. Furthermore, investments in emission control technologies and the adoption of electric vehicles highlight their dedication to sustainability and environmental responsibility.	Negative, as the Company may incur higher costs due to the physical effects of climate change, such as damage to assets and disruptions in operations and supply chains.
8	Adoption of innovative, resource-efficient and low carbon technologies and solutions	O	Embracing innovative, resource-efficient, and low-carbon technologies can enable the Company to enhance its environmental performance, lower costs, and seize emerging opportunities in the clean technology and renewable energy markets.		Positive, as it may allow the Company to decrease operating expenses through better resource efficiency, qualify for green financing and incentives, and create new revenue streams by offering clean technologies and services
9	Life cycle assessment of products and processes	O	Performing life cycle assessments (LCAs) of products and processes allows the Company to pinpoint opportunities for enhancing the environmental performance of its offerings, cutting resource consumption, and minimizing waste.		Positive, because it can help the Company lower costs related to resource use, waste management, and regulatory compliance, while also boosting market competitiveness by creating more sustainable products.
10	Sustainability in the supply chain	O	Encouraging sustainability practices across the supply chain helps the Company manage environmental and social risks, strengthen operational resilience, and support the overall sustainability of its business.		Positive, as it may enable the Company to lower costs linked to supply chain disruptions, regulatory compliance, and reputational damage
11	Water and effluents	R	Failure to responsibly manage water resources can result in operational disruptions, regulatory non-compliance, and damage to the Company's reputation.	The Company monitors and measures water consumption across all its locations and operations. Its commitment to water stewardship includes identifying opportunities for effective water conservation. Additionally, SMEL promotes the use of recycled water to reduce overall consumption. The Company also implements Zero Liquid Discharge (ZLD) systems at all plants to ensure thorough wastewater treatment in compliance with applicable standards and regulations.	Negative, as the Company may incur higher costs due to water scarcity—such as increased prices and supply interruptions—as well as expenses related to wastewater treatment and regulatory compliance.
12	Air pollution	R	Failure to effectively manage air emissions can lead to fines, legal issues, and community resistance to the Company's operations.	To address this, the Company actively maintains power equipment and regulates the air-to-fuel ratio. This approach helps reduce the production of Nitrogen Oxides (NOx), supporting more sustainable and environmentally friendly operations.	Negative, the Company may face higher costs related to air pollution control technologies, regulatory fines, penalties, and potential legal challenges.

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes									
1. a. Whether 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								

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
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								
Governance, leadership and oversight									
7. Statement by Director, responsible for the Business Responsibility Report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)	At Shyam Metalics and Energy Limited (SMEL), our commitment to sustainable and ethical business practices remains steadfast. In the past year, we have continued to invest in resource efficiency, carbon footprint reduction, and responsible waste management. Our ongoing efforts toward renewable energy usage and inclusive workplace culture reflect our dedication to long-term value creation. Through robust CSR initiatives and continuous stakeholder engagement, we remain focused on building resilience across our operations. Kindly refer to the Management Messages in the non-statutory section for further details.								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).	Mr. Brij Bhushan Agarwal (DIN: 01125056) under the guidance of the Board of Directors and its Committees is responsible for implementation and oversight of the Business Responsibility policies								
9. Does the Company have a specified Committee of the Board/Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes, The Board of Shyam Metalics has established several key committees responsible for sustainability-related policies: 1. Corporate Social Responsibility (CSR) Committee: <ul style="list-style-type: none">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. 2. Risk Management Committee: <ul style="list-style-type: none">The Risk Management Committee assists the Board in identifying both internal and external risks faced by the company.These risks encompass financial, operational, sectoral, and sustainability-related aspects, with a particular focus on environmental, social, and governance (ESG) risks.Additionally, the committee addresses information security and cyber risks to safeguard the company's assets and reputation. 3. Stakeholder Relationship Committee: <ul style="list-style-type: none">Responsible for maintaining positive relationships with security holders and ensures effective communication.It resolves grievances related to share transfers, non-receipt of Annual Reports, declared dividends, and issuance of new or duplicate certificates.Transparency during general meetings is a key priority for the Stakeholder Relationship Committee. 4. Audit Committee: <ul style="list-style-type: none">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.Oversees the work carried out by the internal auditor, statutory auditor and cost auditor. 5. Nomination and Remuneration Committee: <ul style="list-style-type: none">The Committee oversees the Company's nomination process including succession planning for the senior management and the Board to assist the Board to identify, screen and review individuals qualified to serve as Executive Directors, Non-Executive Directors and determine the role and capabilities required for Independent Directors consistent with the criteria approved by the Board.Assists the Board in discharging its responsibilities relating to compensation of the Company's Executive Directors, KMPs and Senior Management.								

10. Details of review of NGRBCs by the Company:

Subject for review	Indicate whether review was undertaken by Director/Committee of the Board/any other Committee									Frequency (Annually/Half yearly/Quarterly/ Any other – please specify)								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow up action																		
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances																		

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.	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9

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	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the Principle material to its business (Yes/No)									
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)									

Not Applicable

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE



Principle 1:

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

Essential Indicator:

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	1	Code Of Conduct	12.50%
Key Managerial Personnel	4	Code Of Conduct	83.30%
Employees other than Board of Directors and KMPs	349	Technical, Non-Technical & Safety	59.50%
Workers	180	Technical, Non-Technical & Safety	30.63%

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:

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine					
Settlement			Nil		
Compounding fee					
Non-Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions		Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment					
Punishment			Nil		

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
	NA

4. Does the 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 enforces a strict Anti-Corruption and Anti-Bribery Policy, ensuring all business operations are conducted with integrity and ethical responsibility.

Professional Conduct:

The Company maintains a high standard of professionalism, fairness, and integrity in all its business relationships and dealings, regardless of the environment in which it operates.

Robust Systems:

To proactively prevent and address bribery and corruption, the Company has established strong internal systems and controls.

Key Objectives of the Policy:**Compliance Measures:**

SMEL has instituted appropriate anti-bribery, anti-extortion, and anti-corruption mechanisms for itself and its subsidiaries to ensure full compliance with applicable laws and regulations. These measures align business practices with legal and ethical standards.

Employee Awareness and Guidance:

The Company educates its employees on relevant anti-bribery and anti-corruption laws, helping them avoid accidental violations and equipping them to identify and respond to potential issues in a timely manner.

Ethical Conduct:

SMEL promotes ethical behavior by strictly prohibiting direct or indirect involvement in bribery, kickbacks, or any other unethical actions. Employees and representatives are expected to reject opportunities that could compromise the Company's values or reputation. While some laws focus specifically on bribes to government officials, this policy also applies to all non-governmental business partners.

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:

	FY'2024-25	FY'2023-24
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NIL	NIL

6. Details of complaints with regard to conflict of interest

	FY'2024-25		FY'2023-24	
	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:

	FY'2024-25	FY'2023-24
Number of days of accounts payables	94	90

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

Parameter	Metrics	FY 2024-25	FY 2023-24
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. Sales to top 10 dealers / distributors as % of total sales to dealer / distributors	NA	NA
Concentration of Sales	a. Sales to dealer / distributors as % of total sales	1,529.88	3,003.23
	b. Number of dealers / distributors to whom sales are made	2,669.00	2,443.00
	c. Sales to top 10 dealers / distributors as % of total sales to dealer / distributors	35.99%	32.08%

Parameter	Metrics	FY 2024-25	FY 2023-24
Share of RPTs in	a. Purchases (Purchases with related parties as % of Total Purchases)	7.12%	8.83%
	b. Sales (Sales to related parties as % of Total Sales)	7.51%	10.74%
	c. Loans & advances given to related parties as % of Total loans & advances	100%	100%
	d. Investments in related parties as % of Total Investments made	0	0

Leadership Indicators:

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

Total number of awareness programmes held	Topics/principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
3	Code of Conduct, Company Induction & POSH	90%

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:

- 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.**

Segment	FY'2024-25	FY'2023-24	Details of improvements in environmental and social impacts
R & D	15%	-	Initiatives undertaken include emission reduction, productivity enhancement, energy conservation, and decreased reliance on electricity from grid supply.
Capex	11%	-	Capex include investment done for best technologies to reduce environment footprint and development of social benefits.

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

Yes

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

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.

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

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

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.
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Not conducted in this FY .

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

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

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

Indicate input material	Recycled or re-used input material to total material #	
	FY'2024-25	FY'2023-24
Water	100%	100%
Dolochar from DRI and Bag filter dust from CPP	100%	31%
Fly Ash	98.85	80%

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

	FY'2024-25			FY'2023-24		
	Re-used	Recycled	Safely Disposed	Re-used	Recycled	Safely Disposed
Plastics (including packaging)	-	-	2.13	-	-	-
E-waste	-	11.32	-	-	10.83	-
Hazardous waste	-	-	791.12	-	-	-
Other waste	-	51.1	-	-	-	-

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

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



**Principle 3:**

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

Essential Indicator:**1. A. Details of measures for the well-being of employees:**

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	4439	4439	100%	4439	100%	0	0%	0	0%	0	0%
Female	151	151	100%	151	100%	151	100%	0	0%	0	0%
Total	4590	4590	100%	4590	100%	151	100%	0	0%	0	0%
Other than Permanent employees											
Male											
Female											
Total											

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	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Workers											
Male	5530	5530	100%	5530	100%	0	0%	0	0%	0	0%
Female	15	15	100%	15	100%	15	100%	0	0%	0	0%
Total	5545	5545	100%	5545	100%	15	0.27%	0	0%	0	0%
Other than Permanent Workers											
Male	15208	0	0%	0	0%	0	0%	0	0%	0	0%
Female	246	0	0%	0	0%	0	0%	0	0%	0	0%
Total	15454	0	0%	0	0%	0	0%	0	0%	0	0%

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

	FY'2024-25	FY'2023-24
Cost incurred on wellbeing measures as a % of total revenue of the company	0.043%	0.032%

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

Benefits	FY'2024-25			FY'2023-24		
	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	86%	97%	Y	80%	87%	Y
Gratuity	94%	98%	N	100%	100%	N

Benefits	FY'2024-25			FY'2023-24		
	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.)
ESI	15%	37%	Y	20%	49%	Y
Others- please specify (Medical Insurance)	83%	63%	N	80%	51%	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 this financial year, it 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 compliance with the Rights of Persons with Disabilities Act, 2016. This proactive approach ensures the Company's infrastructure is prepared to welcome and support employees 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 upholds the equal value of all individuals, irrespective of religion, gender, caste, or disability, and fosters an inclusive culture where everyone is empowered to succeed. Its Human Rights Policy protects fundamental freedoms and champions equality across the organization. Principles of equal opportunity are embedded in both its policies and day-to-day practices, as outlined in the Company's 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	100%	82%	100%	84%
Female	80%	82%	70%	84%
Total	90%	82%	85%	84%



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 implemented a strong grievance redressal mechanism to ensure timely and effective resolution of concerns raised by both workers and permanent employees. Workers can report their grievances to the Human Resources department or their respective reporting managers. Additionally, non-permanent workers may approach site engineers and managers with their issues. Permanent employees also have the option to escalate concerns to business leads. This multi-level structure ensures that all grievances are addressed professionally and every individual's voice is heard.
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	FY'2024-25			FY'2023-24		
	Total employees/ workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	%(B/A)	Total employees/ workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	%(D/C)
Total Permanent Employees	NIL			NIL		
- Male						
- Female						
Total Permanent Workers						
- Male						
- Female						

8. Details of training given to employees and workers:

Category	FY'2024-25					FY'2023-24				
	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	4439	881	19.85%	2337	52.65%	3366	2188	65%	2456	73%
Female	154	24	15.58%	143	92.86%	108	70	65%	56	52%
Total	4593	905	19.70%	2480	54.00%	3474	2258	65%	2512	72.30%
Workers										
Male	5530	879	15.90%	1162	21.01%	5164	4071	79%	3660	71%
Female	15	0	0.00%	1	6.67%	7	7	100%	7	100%
Total	5545	879	15.85%	1163	20.97%	5171	4078	78.86%	3667	70.91%

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

Category	FY'2024-25			FY'2023-24		
	Total (A)	No. (B)	%(B/A)	Total (C)	No. (D)	%(D/C)
Employees						
Male	4439	3489	78.60%	3366	3030	90%
Female	154	91	59.09%	108	89	82%
Total	4593	3580	77.94%	3474	3119	90%
Workers						
Male	5530	5040	91.14%	5164	5021	97%
Female	15	8	53.33%	7	7	100%
Total	5545	5048	91.04%	5171	5028	97%

10. Health and Safety Management System:

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

Yes, occupational health and safety management system has been implemented by the entity. It covers the entire operations covering all project sites, manufacturing units, industrial production facilities and offices.

The Company believes that a safe and healthy work environment is a pre-requisite for employee well-being, and the adoption of best practices in occupational health and safety have a direct impact on its overall performance. The coverage is 100% and includes all employees and workers. Moreover, the system is based on the ISO 45001 and is designed to ensure that the Company meets its legal obligations and provides a safe and healthy working environment for its employees.

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

The Company has in place systematic risk management process to identify and control all the hazards in construction project sites, manufacturing units, industrial production facilities and offices. Further, the system comprises followings safety processes for identifying Work related hazards and assess risks on routine and non-routine basis: Hazard Identification Risk Assessment and Risk Management (HIRA), Job Safety Analysis, Incident investigation, Safety Audit, Safety Inspections from previous incident, referring to manuals. The Company cares for its employees by diligently assessing both routine tasks and unusual situations for potential dangers.

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

Yes. The reporting system for a near miss, unsafe acts & unsafe conditions is being implemented in all division are provided with targets to reports no. of U/A and U/C. SSPL Mangalpur, Sambalpur and Jamuria Plants follows a reporting & investigation process to identify the root causes of incidents. Corrective & preventive measures are then implemented to prevent the re-occurrence of similar incidents.

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

Yes, medical centres and first aid facilities are available for both employees and workers through on-site medical centers & First aid facilities. If more treatment is needed, a partnership with a multi-specialty hospital ensures everyone has access to top quality medical services.

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

Safety Incident /Number	Category	FY'2024-25	FY'2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.94	1
	Workers	2.68	1.5
Total recordable work-related injuries	Employees	49	30
	Workers	76	51
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	1	3
	Workers	3	2

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

Worker safety remains the highest priority, achieved through regular inspections, comprehensive training, and transparent communication. Alert teams quickly identify and address potential hazards, with supervisors having authority to stop unsafe work until risks are addressed. The Company collaborates with contractors who demonstrate a safety-first approach and conducts regular medical examinations to verify fitness for demanding tasks. Every life is considered invaluable, driving safety from policy development to daily operations.

Safety Measures and Improvements:

Operational Safety Measures: Monthly safety observations are shared with divisions ensuring corrective actions. All rotating parts are safeguarded with machine guards and platforms have handrails and toe guards. Regular housekeeping prevents slip, trip & fall incidents. Training programs and safety audits identify deviations with priority-based corrections. Incident investigations drive corrective actions while toolbox talks and SOP training enhance worker skills and safety awareness.

System Improvements: Work at Height Standard Operating Procedure awareness training is delivered to all employees at the Dam & Power House. The procedure includes 'Stop Work' authority for Supervisors, Engineers, Line Managers, and Department Heads when unsafe conditions exist at the site. Competency assessments are conducted for contractor personnel before vendor selection. All workers must complete medical fitness evaluations for elevated work.

Job-Specific Training: Scaffolding Inspector Certification Training is provided to 36 employees at the hydro plant through external agencies. Refresher Emergency Response training is delivered to site supervisory staff, including contractors.

Physical Improvements: The Company has acquired its own scaffolding materials for maintenance work, removing dependence on contractor equipment. Daily Tool Box safety discussions are conducted for all workers, particularly those performing elevated work.

Additional Safety Measures: Workers receive mandatory training for safely accessing elevated work platforms and properly using protective equipment. Managers utilize digital safety reporting systems for risk identification. Employees continuously enhance their safety knowledge to maintain hazard awareness. The Company prioritizes the welfare of its people.

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

	FY'2024-25			FY'2023-24		
	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	737	0	-	315	0	-
Health & Safety	309	0	-	5	0	-

During the financial year 2024–2025, Shyam Metalics & Energy Limited, along with its subsidiary companies, recorded an increase complaints compared to the previous financial year (2023–2024). This rise is primarily attributed to the commissioning and commencement of production at several new facilities, including the Sinter Plant, Coke Oven, Blast Furnace, and Cold Rolling Mill located in Jamuria, Pithampur, and Ramsarup Industries Limited (a subsidiary of Shyam Metalics & Energy Limited). These operational units have been brought under the scope of this financial year's accounting, thereby overall number of complaints has been increased from last FY.

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	100%

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

The company has taken several actions to address significant risks/concerns arising from assessments of health and safety practice and working conditions. Safety department has minimised accidents through various activities like tool box talk, safety training, fire training, emergency mock drill training, daily safety observation, road safety monitoring, making Do and Don't, conducting HIRA, near miss accident reporting system etc. Fire hydrant system installed in CPP and are under progress at SMS#2 and Ferro. Provision for safe guarding of rotating parts are under progress for the entire plant. Housekeeping is given utmost importance and is carried out by all the departments on priority. Much more emphasis is to improve the awareness level of workmen through trainings, mock drills. Currently, the company is installing lifelines above the EOT crane structure to ensure fall protection. This will allow employees to anchor their safety belts securely while working at height during maintenance activities.

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:
Workers: Yes

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:

	Total No. of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY'2024-25	FY'2023-24	FY'2024-25	FY'2023-24
Employees	NIL	NIL	NIL	NIL
Workers	NIL	NIL	NIL	NIL

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

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	100%
Working Conditions	100%

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.

Not Applicable



**Principle 4:**

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

Essential Indicator:**1. Describe the processes for identifying key stakeholder groups of the Company.**

Shyam Metalics maintains a dynamic and strategic stakeholder engagement approach. This process identifies key stakeholder groups that both influence and are affected by business success. The Company engages with communities, governments, and partners in a targeted manner, ensuring responsible operations.

Customers and suppliers play essential roles in this process, enabling value creation through their partnership with the Company. Various institutions provide necessary approvals, guidance, and oversight, ensuring operations align with industry standards and regulatory requirements. This institutional support is crucial for maintaining organizational credibility and operational integrity.

Most importantly, SMEL cultivates these relationships, recognizing their essential connection to mutual prosperity. The Company understands that these relationships extend beyond transactions and are fundamental to long-term success and sustainability.

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

Stakeholder Group	Whether identified as vulnerable & 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	Employee growth and benefits, their expectations, volunteering opportunities, career advancement, professional development and continuing education, skills enhancement, training and awareness programs.
Government & Regulatory authorities	No	Advertisements, publications, website and social media, Phone calls, emails and meetings, Regulatory audits/ inspections, Quarterly Results, Annual reports, Stock Exchange filings	As and when required	Strong ESG practices, regulatory framework changes, employment matters, environmental measures, reporting requirements, statutory compliance, and support from authorities.
Communities	Yes	Community visit and projects, local charities, volunteerism, seminars, CSR project	As and when required	Community development, self-sustainability, livelihood support, Sustainable Development Goals, building capacity of future leaders, CSR projects
Media	No	Press releases, Quarterly Results, Annual reports, AGM information and media interactions	As and when required	Performance reporting, Good practices, show cases, awards and achievements
Industry Association	No		As and when required	Networking to stay informed about new sector opportunities 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 set up dedicated governance committees to drive responsible growth across economic, social, and environmental dimensions. The CSR Committee, comprising both internal and independent members, leads community support and sustainability efforts to ensure broad societal impact. The Risk Management Committee, chaired by an Independent Director, focuses on safeguarding operations, while the Stakeholders' Relationship Committee—also led by an Independent Chair—strengthens essential stakeholder relationships. Regular performance reviews are conducted to align actions with stakeholder expectations, and quarterly Board updates ensure transparency and accountability. In addition to these formal bodies, the Company actively engages through interactive sessions to foster continuous improvement. Governance is treated as a shared responsibility, with every employee contributing to the Company's values and long-term success.

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 used to identify significant sustainability concerns for the Company. Subsequently, strategies are developed through cross-collaborative processes, with a primary focus on individual wellbeing. These shared objectives are then converted 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 CSR initiatives are designed to address the world's most pressing challenges and support the most underprivileged, young, and female populations. The Company considers the requirements and interests of its key stakeholders while conducting business in an ethical, profitable, socially and environmentally responsible manner.

**Principle 5:**

Business should respect and promote human rights

Essential Indicator:

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

Category	FY'2024-25			FY'2023-24		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
Employees						
Permanent	4593	735	16%	3474	1866	53%
Other than Permanent	0	0	0	0	0	0
Total Employees	4593	735	16%	3474	1866	53%
Workers						
Permanent	5545	55	1%	5171	3810	74%
Other than Permanent	15,454	0	0	7879	0	0
Total Workers	20999	55	0.26%	13050	3810	29.20%

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

Category	FY'2024-25					FY'2023-24				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent										
Male	4439	157	4%	4282	96%	3366	4	0.12%	3362	99.9%
Female	154	14	9%	140	91%	108	1	0.93%	107	99.1%
Other than Permanent										
Male	NA									
Female										
Workers										
Permanent										
Male	5530	658	12%	4872	88%	5164	309	5.9%	4855	94%
Female	15	10	67%	5	33%	7	1	14%	6	86%
Other than Permanent										
Male	15208	10341	68%	4867	32%	NIL				
Female	246	209	85%	37	15%					

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	13,000,000	0	-
Key Managerial Personnel	289	2,400,000	1	2,100,000
Employees other than BoD and KMP	4146	418,056	150	300,000
Workers	5530	308,100	15	188,772

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

	FY'2024-25	FY'2023-24
Gross wages paid to females as % of total wages	1.32%	1.53%

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 implemented a strong grievance redressal mechanism to effectively address employee concerns. A detailed Code of Conduct sets clear expectations regarding responsibilities and acceptable behavior. Employees can file written grievances through their respective HR departments. Upon registration, each case is carefully investigated by a designated High-Level Committee. Grievances are promptly handled by the concerned Project Managers, Unit Heads, or Admin teams in coordination with HR. Every issue is examined thoroughly, appropriate actions are taken to resolve the matter, and disciplinary measures are applied where necessary. If required, assistance is sought from relevant regulatory authorities to ensure proper resolution.

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

The details are provided below:

Category	FY'2024-25			FY'2023-24		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
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 FY 2025 or FY 2024.

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

	FY'2024-25	FY'2023-24
i) Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
ii) Complaints on POSH as a % of female employees / workers	0	0
iii) Complaints on POSH upheld	0	0

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

The Company is providing safe, inclusive, and respectful workplace where employees can report incidents of discrimination or harassment without fear of retaliation. To uphold this commitment, the following mechanisms have been established:

- **Non-Retaliation Policy:** A formal non-retaliation clause is embedded within the Company's internal grievance and anti-harassment policies. It explicitly prohibits any form of retaliation—direct or indirect—against complainants, witnesses, or participants in investigations.
- **Confidentiality Assurance:** The identity of individuals reporting misconduct is protected to the maximum extent possible throughout the complaint handling and investigation process, ensuring discretion and safeguarding privacy.
- **Independent Investigation Process:** All complaints are addressed by trained internal committees or external experts to ensure impartiality, fairness, and the absence of bias or undue influence.
- **Whistleblower Protection:** The Company's whistleblower policy empowers employees to report dishonest or improper conduct through anonymous or confidential channels. This policy not only protects the complainant but also reinforces the organization's commitment to ethical standards and financial integrity.

- **Location-Based Committees:** Dedicated committees are established at each location, particularly focused on protecting women in the workplace. These committees manage grievance procedures, investigate complaints, and ensure appropriate remedial actions are taken.
- **Awareness and Training:** Regular training sessions are conducted for all employees, including leadership, to reinforce understanding of workplace conduct, anti-discrimination, harassment, and non-retaliation policies.
- **Monitoring and Follow-up:** Post-resolution follow-ups are conducted to ensure that no retaliation or continued hostility occurs toward the complainant. Additional corrective measures are implemented if any issues are identified.

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

The Company's contracts clearly express a strong commitment to sustainability, fairness, and respect for human rights. It actively follows the United Nations Global Compact principles, embedding human rights standards in its dealings with suppliers and partners. Additionally, these principles are reinforced throughout the supply chain via a detailed Code of Conduct tailored 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	100%

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

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 FY'2024-25 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:

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

Parameter	FY'2024-2025 (GJ) (Current Financial Year)	FY'2023-24 (GJ) (Previous Financial Year)
From renewable sources		
Total electricity consumption (A)	24,276.02	8,415
Total fuel consumption (B)	NIL	NIL
Energy consumption through sources (C)	NIL	NIL
Total energy consumed from renewable sources (A+B+C)	24,276.02	8,415
From non-renewable sources		
Total electricity consumption (D)	19,03,327.78	22,56,076.249
Total fuel consumption (E)	1,06,98,181.95	1,96,84,738.02
Energy consumption through sources (F)	NIL	NIL
Total energy consumed from non-renewable sources (D+E+F)	1,26,01,509.72	2,19,40,814.27
Total energy consumed (A+B+C+D+E+F)	1,26,25,785.75	2,19,49,229.27
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	0.000083	0.0016
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	0.0017	0.0331
Energy intensity in terms of physical output	1.15	2.50
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

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

No

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

Yes. Shyam Sel & Power Limited, Jamuria Plant and Mangalpur plant is a designated consumer (DC) under the PAT scheme of the Government of India. The entity is currently under PAT cycle 7 with registration numbers INS0093WB and INS0095WB respectively. For registration number INS0095WB, the specific energy consumption of the entity is 0.5898 TOE/Tonne of equivalent product with an equivalent major product output of 224492 tonnes, and the target for specific energy consumption is 0.3881 TOE/Tonne of equivalent product. For registration number INS0093WB, the specific energy consumption of the entity is 0.5436 TOE/Tonne of equivalent product with an equivalent major product output of 224492 tonnes, and the target for specific energy consumption is 0.5436 TOE/Tonne of equivalent product. The entity is working efficiently to achieve the desired targets across both registrations.



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

Parameter	FY'2024-2025 (GJ) (Current Financial Year)	FY'2023-24 (GJ) (Previous Financial Year)
Water withdrawal by source (in kiloliters)		
(i) Surface water	71,74,955.15	23,88,449
(ii) Groundwater	NIL	NIL
(iii) Third party water	NIL	32,34,368
(iv) Seawater / desalinated water	NIL	NIL
(v) Others	NIL	NIL
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	71,74,955.15	56,22,817
Total volume of water consumption (in kilolitres)	71,74,955.15	56,22,817
Water intensity per rupee of turnover (Total water consumption / Revenue from operations)	0.000047	0.00042
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	0.00097	0.0098
Water intensity in terms of physical output	0.66	0.64
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

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

No

During the financial year 2024–2025, Shyam Metalics & Energy Limited, along with its subsidiary companies, recorded a notable increase in fresh water consumption compared to the previous financial year (2023–2024). This rise is primarily attributed to the commissioning and commencement of production at several new facilities, including the Sinter Plant, Coke Oven, Blast Furnace, and Cold Rolling Mill located in Jamuria, Indore, and Ramsarup Industries Limited (a subsidiary of Shyam Metalics & Energy Limited). These operational units have been brought under the scope of this financial year's accounting, thereby contributing to the overall increase in water usage.

4. Provide the following details related to water discharged:

Parameter	FY'2024-2025 (GJ) (Current Financial Year)	FY'2023-24 (GJ) (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment		
- With treatment – please specify level of treatment		
(ii) To Groundwater		
- No treatment		
- With treatment – please specify level of treatment		
(iii) To Seawater		
- No treatment		
- With treatment – please specify level of treatment		
(iv) Sent to third-parties		
- No treatment		
- With treatment – please specify level of treatment		
(v) Others		
- No treatment		
- With treatment – please specify level of treatment		
Total water discharged (in kiloliters)		

All the plants practice Zero waste Discharge

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

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

Parameter	Unit	FY'2024-25	FY'2023-24
NOx	(µg/m ³)	17	25
SOx	(µg/m ³)	3.3	8
Particulate matter (PM)	(µg/m ³)	39	76
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:

Parameter	Unit	FY2024-2025 (Current Financial Year)	FY'2023-24 (Previous Financial Year)
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	54,43,997.66	37,29,472.08
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	3,84,366.40	4,48,708.4985
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	0.000038	0.00032
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	0.00079	0.0072
Total Scope 1 and Scope 2 emission intensity in terms of physical output	Metric tonnes CO ₂ e/ ton	0.533	0.476
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.

In the financial year 2024–2025, Shyam Metals & Energy Limited, along with its subsidiary companies, has reported a higher level of greenhouse gas (GHG) emissions compared to the previous financial year (2023–2024). This increase is primarily due to the commissioning and commencement of production at several new facilities, including the Sinter Plant, Coke Oven, Blast Furnace, and Cold Rolling Mill located in Jamuria, Pithampur, as well as operations under Ramsarup Industries Limited (a subsidiary of Shyam Metals & Energy Limited). These newly operational units have been incorporated into the current financial year's reporting, thereby contributing to the overall rise in GHG emissions.

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

Yes, the organization has collectively 6464 No. of saplings/plants planted in the current year FY24-25. The plantation of local species is carried out every year with a survival rate of more than 70 %. The area in the plant premises has been converted into the green cover and development of the green belt has been carried out to achieve the desired targets apart from the plantation drive.

The entity is shifting more towards renewable sources of energy. Shifting from the conventional sources of energy, the entity is producing 2.83 MW solar energy through floating & roof top Solar Panels. In this financial year Shyam Sel & Power Ltd. Jamuria Plant introduced 10 no. of EVs for travelling purposes, to fulfil their commitment to sustainability & environmental protection.

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

Parameter	FY'2024-2025 (GJ) (Current Financial Year)	FY'2023-24 (GJ) (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	2.13	0
E-waste (B)	11.32	10.83
Bio-medical waste (C)	0.11	0.000093
Construction and demolition waste (D)	0	0
Battery waste (E)	8.00	0.25
Radioactive waste (F)		0
Other Hazardous waste. Please specify, if any. (G)	791.12	25.53
Other Non-hazardous waste generated (H). (Compostable bio Biodegradable food waste)	54,231.42	52,196.75
Total (A+B + C + D + E + F + G + H)	55,044.1	52,233.36
Parameter		
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.0000036	0.000004
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.000074	0.00008
Waste intensity in terms of physical output	0.0050	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	51.1	10.83
(ii) Re-used	1.52	-
(iii) Other recovery operations	0.75	-
Total	53.37	10.83
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 (Hazardous waste disposed through authorized recycler / vender)	791.12	25.53
Total	791.12	25.53

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

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

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

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

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

If not, provide details of all such non-compliances, in the following format:

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

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

Parameter	FY'2024-2025 (KL) (Current Financial Year)	FY'2023-24 (KL) (Previous Financial Year)
Water withdrawal by source (in kiloliters)		
(i) Surface water	71,74,955.15	23,88,449
(ii) Groundwater	NIL	NIL
(iii) Third party water	NIL	32,34,368
(iv) Seawater / desalinated water	NIL	NIL
(v) Others	NIL	NIL
Total volume of water withdrawal (in kiloliters)	71,74,955.15	56,22,817
Total volume of water consumption (in kiloliters)	71,74,955.15	56,22,817
Water intensity per rupee of turnover (Water consumed / turnover)	0.000047	0.00042
Water intensity (optional) – the relevant metric may be selected by the entity	-	-
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water	NA	NA
- No treatment		
- With treatment – please specify level of treatment		
(ii) Into Groundwater		
- 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	FY'2024-2025	FY'2023-2024
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 of 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.

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

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:

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Waste to Resource Model	The company has adopted a Waste to Resource strategy by repurposing fly ash into eco-friendly bricks and using slag for cement and road construction. Structured handling of hazardous and solid waste has also been implemented for compliance and traceability.	Reduced environmental impact through increased recycling; lower landfill use; improved circular economy alignment.
2	Zero Liquid Discharge (ZLD)	All manufacturing units operate ZLD systems with 3,000 KLD and 4,000 KLD wastewater treatment plants. Treated water is recycled for internal operations or used for landscaping, reducing freshwater dependence.	Achieved water reuse across facilities; eliminated discharge of untreated water; reduced freshwater intake.
3	Renewable Energy Deployment	Installation of 63.976 MW solar power (rooftop and floating); investment in wind energy capacity underway. Energy generated supports internal consumption, reducing dependency on fossil fuels.	Generated 24,276 GJ renewable energy; reduced GHG emissions and operational costs.
4	Waste Heat Recovery Systems	Deployment of waste heat recovery systems (WHRS) and dolochar-based captive power plants to capture thermal energy from production processes.	Improved energy efficiency; reduced thermal losses; enhanced captive power contribution to 83% of total energy use.
5	Advanced Pollution Control Devices	Use of Electrostatic Precipitators (ESPs) and other APCDs across all production units. Air quality monitored in real time to ensure emission norms are met.	Reduced particulate and gaseous emissions; ensured regulatory compliance; improved workplace and community air quality.
6	Industry 4.0 and Digital Integration for Efficiency	Adoption of IoT, AI-enabled systems, SAP S/4HANA and predictive maintenance tools to optimise operations, reduce energy and material waste, and improve equipment efficiency.	15% increase in output, 20% reduction in labour costs, 30% reduction in inventory holding; improved responsiveness and resource utilisation.
7	Top Gas Pressure Recovery Turbine (TRT)	Installed 18 MW TRT at Jamuria plant to recover energy from blast furnace gas and convert it into electricity.	Enhanced energy efficiency by 10%; reduced carbon intensity of steel production.
8	Aluminium Scrap Recycling	Integrated aluminium scrap into foil manufacturing to promote circularity and reduce reliance on virgin materials.	Promoted circular economy; lowered raw material cost and environmental footprint in aluminium value chain.
9	Cooling System Optimisation	New cooling system at Jamuria reduced water and electricity usage, contributing to process optimisation and sustainability.	Achieved 20% reduction in water and electricity use; supported ZLD and energy efficiency goals.

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

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.

8. How Many green credits have been generated or produced

a By the listed entity

Nil

b By the top ten (in terms of value of purchase and sales respectively) value chain partners

Nil



**Principle 7:**

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

Essential Indicator:

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.

S. 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:

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



Principle 8:

Businesses should promote inclusive growth and equitable development.

Essential Indicator:

- 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					

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

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

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

Local committees from districts, panchayats, and villages play a vital role in voicing community concerns to the CSR department, where each issue is carefully reviewed and addressed. The Shyam Metals Foundation (SMF) engages dedicated CSR Volunteers who work closely with Women's Self-Help Groups and various village collectives. These volunteers serve as a bridge between the foundation and the community—conveying SMF's goals while also actively listening to local needs and prioritizing their resolution. In addition, community members may report grievances directly to the HR or Administration teams at any plant, ensuring prompt and effective handling of their concerns.

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

	FY'2024-2025	FY'2023-2024
Directly sourced from MSMEs/small producers	6.31%	4.66%
Sourced directly from within India	93.69%	79.60%

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

Location	FY 2024-25	PY 2023-24
Rural		
of Job creation in Rural areas	73.97%	73.46%
Semi-urban		
of Job creation in Semi-urban areas	8.8%	5.0%
Urban		
of Job creation in Urban areas	2.57%	6.63%
Metropolitan		
% of Job creation in Metropolitan areas	14.61%	14.69%

(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
Not Applicable	

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

S. No	State	Aspirational District	Amount spent (In INR)
1	WEST BENGAL	Jamuria	56791000
2	WEST BENGAL	Mangalpur	1195000

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized/vulnerable groups?

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

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

NA

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

NA

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:

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

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

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

6. Details of beneficiaries of CSR Projects:

Particulars	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized group
Social Infrastructure	Construction of community hall, schools, roads, club & stage	4985	35
	Pond Renovation in 5 villages of 3 Gram Panchayats	6324	90
	Road construction from Nishanbhanga village chowk to Jharmunda	3521	70
	Village chowk		

Particulars	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized group
Sehat	Drinking Water arrangement in Near by villages/ Schools	8490	60
	Mobile Health Unit for health services / Homeopathy service	14769	50
	Animal health camp with collaboration of Animal Husbandry Dept.	410	20
	Construction of community toilet & bathroom/WASH activities	333	80
	Drinking water support in summer season to 71 habitations	38397	80
	(including Revenue villages and hamlets) of 5 Gram Panchayats		
Sustainability	Mobile Health Unit support to 18 villages of 3 Gram Panchayats	25253	85
	Water harvesting Structure	420	80
	Plantation	14255	70
	Solar street light	570	65
	Seed distribution	470	75
	Awareness program	993	65
Skill Development	Education & Computer training center	223	70
	Sewing, jute & Mushroom training	515	55
	Education support to 21 schools of 3 Gram Panchayats	1147	65
	Support to Dr. Isac Santra Bal Ashram	50	100
	Skill Development training on computer and Tailoring	120	70
welfare	Cloths distribution, health camp, blood donation camp, Fire tender services	8114	85
	Community Awareness Program in 9 villages of 4 Gram Panchayats	4431	80
Sprots, Art & Culture	Promotion of sports activities in 11 villages and one municipality	10000	50
	Promotion of Cultural activities in 11 villages and one municipality	30000	50
	Sports promotion	80	90



**Principle 9:**

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

Essential Indicator:**1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.**

The Company has implemented a comprehensive customer feedback system that provides multiple accessible channels for communication. Customers can share their feedback or lodge complaints through email, phone, the company website, social media platforms, feedback forms, letters, and direct verbal interactions with project management teams. Furthermore, a dedicated toll-free number and a specific email address are available on the company's website to ensure prompt and effective resolution of customer concerns.

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	
Safe and responsible usage	Nil
Recycling and/or safe disposal	

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

Number of consumer complaints in respect of the following:	FY'2024-25		Remarks	FY'2023-24		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	Nil			Nil		
Advertising						
Cyber-security						
Delivery of essential services						
Restrictive Trade Practices						
Unfair Trade Practices						
Other						

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

	Number	Reasons for recall
Voluntary recalls	Nil	
Forced recalls		

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 on the Company's website <https://www.shyammetalics.com/wp-content/uploads/2025/08/ISMS.42-Data-Protection-Privacy-Policy.pdf>

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

Nil

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 upholds product safety and regulatory compliance by strictly following industry standards. Each product is equipped with clear labeling, detailed usage instructions, and necessary precautionary warnings to ensure safe handling by consumers. Through educational initiatives—such as user manuals, instructional videos, and digital resources—the Company empowers users with the knowledge to operate products safely and effectively. Furthermore, a strong emphasis is placed on sustainability throughout the product lifecycle, including responsible waste management and a transparent approach to addressing data privacy concerns.

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

NA

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 goes beyond regulatory requirements by prominently displaying the GreenPro Ecolabel on applicable products. The Company also provides customers with comprehensive test certificates that detail mechanical and chemical properties, enabling informed purchasing decisions. Shyam Metalics stands at the forefront of environmental certification within the Indian steel industry. Its leadership is reflected in the GreenPro certification awarded by the Confederation of Indian Industry (CII) for key product lines, including (a) Hot Rolled Medium and High Tensile Structural Steel, and (b) High Strength Deformed Steel Bars.

