

JAYASWAL NECO INDUSTRIES LTD

CIN : L28920MH1972PLC016154

(FORMERLY JAYASWALS NECO LIMITED)

REGD. OFFICE : F-8, MIDC INDUSTRIAL AREA, HINGNA ROAD, NAGPUR - 440 016 (INDIA)

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2nd September, 2023

To
National Stock Exchange of India Limited
Scrip Symbol: JAYNECOIND

BSE Limited
Scrip code: 522285

Through: NEAPS

Through: BSE Listing Centre

Dear Sir/ Madam,

Subject: Business Responsibility and Sustainability Report ("BRSR") for the Financial Year 2022-23.

In compliance with Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Business Responsibility and Sustainability Report ("BRSR") of the Company for the Financial Year 2022-23. The BRSR also forms part of the Annual Report of the Company for the Financial Year 2022-23.

The BRSR is also being made available on the website of the Company www.necoindia.com.

We request you to take this on record.

Thanking you,

Yours faithfully,

For Jayaswal Neco Industries Limited

Ashish Srivastava
Company Secretary & Compliance Officer
Membership No. A20141



Encl.: A/a

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Business Responsibility and Sustainability Report

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

Sl. No.	Particulars	Company Information
1.	Corporate Identity Number (CIN) of the Listed Entity	L28920MH1972PLC016154
2.	Name of the Listed Entity	Jayaswal Neco Industries Limited (JNIL)
3.	Year of incorporation	1972
4.	Registered office address	F-8, MIDC Industrial Area, Hingna Road, Nagpur – 440 016
5.	Corporate address	F-8, MIDC Industrial Area, Hingna Road, Nagpur – 440 016
6.	E-mail	contact@necoindia.com
7.	Telephone	07104 - 237276, 237471, 237472
8.	Website	www.necoindia.com
9.	Financial year for which reporting is being done	FY 2022-23
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited and National Stock Exchange of India Limited
11.	Paid-up Capital (₹ in lakhs)	97,099.82
12.	Name and contact details (telephone, e-mail address) of the person who may be contacted in case of any queries on the BRSR report	Shri. Megh Pal Singh Executive Director (Steel) and COO (Steel Plant Division) Telephone number: 07721-264241 E-mail ID: meghpal.singh@necoindia.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).	On a standalone basis

II. Products/Services

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

Sl. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacturing of Iron and Steel	Metal and Metal Products	100

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

Sl. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Billets/ Rolled Products/ Pellet/ Pig Iron & Skull/ Sponge Iron	2410	90.67
2	Iron & Steel Castings	2431	9.33

III. Operations

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

Location	Number of plants	Number of offices	Total
National	5	13	18
International	0	0	0

17. Market Served by the entity:

a) Number of locations

Locations	Number
National (No. of States)	28 States and 8 Union Territories
International (No. of Countries)	8

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

0.58%

c) A brief on type of customers

Key Market Segments for 'NECO' products find applications majorly in automotive sector and auto components, engineering, power, railways and construction sectors. The products are mainly sold to Tire-2 Suppliers for supplies to Auto Component manufacturers approved by Original Equipment Manufacturers (OEMs).

The Company is primarily engaged in manufacturing alloy steels – wire rods, bars, bright bars along with steel billets, pig iron, sponge iron and pellets. Further, the Company is one of the largest Producers of Alloy Steel (Bar & Wire Rod Products) and one of the largest Ferrous Casters in India.

Engineering Casting and Automotive Casting Divisions of the Company cater to the product needs of the Tractor Industry, Construction Industry, Petroleum, Refineries, Irrigation, Railway and Commercial vehicles.

Further, 'NECO' products have been approved and used in many prestigious governments as well as private projects in India. Centricast and Construction Casting Division's customer base includes Government Departments, Semi-Government Departments, Public Sector Undertakings, Municipal Corporations, Corporate Clients, Plumbing Contractors, Service Lines, Irrigation, EPC Contractors, Builders, Developers, etc.

IV. Employees

18. Details as at the end of Financial Year:

a) Employees and workers (including differently abled):

Sl. No	Particulars	Total (A)	Male		Female	
			No.(B)	% (B/A)	No.(C)	% (C/A)
Employees						
1.	Permanent (D)	4252	4224	99.34%	28	0.66%
2.	Other than Permanent (E)	0	0	0.00%	0	0.00%
3.	Total employees (D+E)	4252	4224	99.34%	28	0.66%
Workers						
4.	Permanent (F)	0	0	0.00%	0	0.00%
5.	Other than Permanent (G)	4153	3997	96.24%	156	3.76%
6.	Total workers (F+G)	4153	3997	96.24%	156	3.76%

b) Differently Abled Employees and Workers:

Sl. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Differently Abled Employees						
1.	Permanent (D)	5	5	100.00%	0	0.00%
2.	Other than Permanent (E)	0	0	0.00%	0	0.00%
3.	Total differently abled employees (D+E)	5	5	100.00%	0	0.00%
Differently Abled Workers						
4.	Permanent (F)	0	0	0.00%	0	0.00%
5.	Other than Permanent (G)	0	0	0.00%	0	0.00%
6.	Total differently abled workers (F+G)	0	0	0.00%	0	0.00%

19. Participation/ Inclusion/ Representation of women:

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	12	1	8.33
Key Management Personnel	4	0	0.00

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

	FY 2022-23 (Turnover rate in current FY)			FY 2021-22 (Turnover rate in previous FY)			FY 2020-21 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	8.48%	7.27%	8.47%	6.33%	7.41%	6.33%	5.07%	0.00%	5.04%
Permanent Workers	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

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

21. (a) 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 listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Maa Usha Urja Limited	Associate	31.63%*	No

* 4,13,600 (5.17%) Equity shares of ₹ 10/- each are held by the Company jointly with Anurag Sales and Services Private Limited (the beneficial owner).

* 21,16,400 (26.46%) Equity shares of ₹ 10/- each are held by the Company jointly with Nine Star Plastic Packaging Services Private Limited (the beneficial owner).

VI. CSR Details

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

(ii) Turnover (in ₹) - 6,342.86 crores

(iii) Net worth (in ₹) - 1,812.96 crores

VII. Transparency and Disclosure Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2022-23			FY 2021-22		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
The list of the stakeholders							
Communities	Yes www.necoindia.com/corporate-governance.php	Nil	Nil	Nil	Nil	Nil	
Investors (other than shareholders)	No	NA	NA	NA	NA	NA	
Shareholders	Yes www.necoindia.com/corporate-governance.php	Nil	Nil	Nil	Nil	Nil	
Employees and workers	Yes www.necoindia.com/corporate-governance.php	357	Nil	Nil	280	Nil	
Customers		208	Nil	Nil	290	Nil	
Value Chain Partners		Nil	Nil	Nil	Nil	Nil	
Other (please specify)		Nil	Nil	Nil	Nil	Nil	

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

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format

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.	Transparency, Accountability & Reporting	Risk	Risk: Lack of transparency raises suspicions and erodes trust among stakeholders, including customers, investors, employees and the general public. Negative perceptions can impact brand value, customer loyalty and overall business reputation. Transparency and accountability play a crucial role in attracting and retaining investors. Investors seek accurate and timely information about a company's financial performance, governance practices and risk management strategies. Failure to comply with legal and regulatory requirements can result in fines, penalties, lawsuits and even criminal charges. Non-compliance can harm the Company's financial stability and lead to legal liabilities.	The Company reports all desired mandatory disclosures and adheres to all regulatory requirements/ guidelines issued by the authorities & governing bodies.	Negative
2.	Business Ethics	Opportunity	Opportunity: The Company believes that running the business ethically helps the business in multiple ways like building loyalty with customers, perception in the minds of customers and trust amongst investors.	It enhances motivation among the employees and relevant stakeholders and builds trust.	Positive
3.	GHG Emission & Climate Change	Risk & Opportunity	Risk: The transition to a low-carbon economy in response to climate change can introduce risks to certain industries and businesses. Policy changes, regulations and shifts in consumer preferences towards sustainable products and services may render some business models non-viable. Failure to adapt to these changes can result in financial losses and reduced competitiveness. Changes in consumer preferences, technological advancements and stricter regulations can lead to reduced demand for high-emission goods or services. Opportunity: Implementing energy-efficient technologies and practices can lead to significant cost savings. By showcasing a commitment to reducing emissions, companies can attract environmentally conscious customers, gain market share and enhance their brand reputation.	The Company is continuously trying to be energy efficient across different processes and products. It is working on developing a long-term goals like net zero years etc.	Positive and Negative
4.	Occupational Health & Safety	Risk	Risk: The risks involve hazards caused in the working environment in the form of non-compliance with safety measures by employees and non-awareness of a safe and secure environment leading to injuries, accidents, illness and fatalities. These risks lead to interruptions in workplace operations and a higher attrition rate.	The Company has a health and safety policy in place to identify, mitigate and control potential hazards. There is an ongoing effort to improve the health and safety conditions across all our plants.	Negative
5.	Human Rights Practices	Risk	Risk: Human rights practices awareness eliminated all sorts of discrimination and empowers management to take action against any violations.	The Company has human rights policy and ensures that there is no discrimination in the workplace.	Negative

Sl. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6.	Water and Waste Water Management	Risk	Risk: The Company draws large quantities of water from multiple resources and it needs to maintain records and adherence to the environmental norms at the time of using this precious resource water.	The Company consumes water responsibly at all levels and ensures zero discharge plants. The team is committed to reducing its water footprints and reusing and recycling water is the core of the water strategy.	Negative
7.	Employee Well-being and Engagement	Risk & Opportunity	Risk: Steel mining locations are remote locations that have minimum access to urban infrastructure and large cities where skilled manpower is available. Opportunity: Skilled manpower and related motivation enable the Company to improve employee well-being and satisfaction.	The Company is striving to build caring relationships with employees who are considered its main assets. Employee well-being is one of the top priorities of the top management and various initiatives are taken for the same. The Company has achieved a great place to work award for the preceding last 2 years.	Positive and Negative
8.	Energy Management	Risk	Risk: Every year energy prices are continuously increasing and conventional energy is causing environmental footprints hence energy conservation initiatives are explored.	The Company has energy conservation initiatives and the same are undertaken to ensure efficient management of energy at all units.	Negative
9.	Sustainable Sourcing	Opportunity	Opportunity: The supply chain is an extension of business operations and key stakeholders of steel manufacturing business units. Sustainable sourcing practices help in creating a sense of responsibility in the entire value chain.	The Company has a supplier code of conduct and it empowers practices like sustainable sourcing.	Positive
10.	Employee Diversity	Opportunity	Opportunity: Diversity and equality are highly valued at the global level however due to the nature of business its implementation faces various challenges. Still the company is successfully managing diversity and equality amongst its employees.	The Company has an equality and diversity policy and it supports women empowerment practices at its workplaces.	Positive
11.	Employee Practices and Benefits	Risk	Risk: Employees are key assets and their efficiency and happiness is a key factor. The Company has adopted best HR practices for smooth & uninterrupted work to achieve planned production.	The Company has given employment opportunities to people from the local community and it follows best practices for employee management.	Negative

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1. a) Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b) Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c) Web-link of the Policies, if available	Policies covering these principles are available on the Company's website under the policy section and the link is https://necoindia.com/corporate-governance.php								
2. Whether the entity has translated the policy into procedures. (Yes/No)	Yes								
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes. The Company's policies encourage stakeholders and business partners to follow these desired principles and the detailed roadmap for execution is in the process.								
4. Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	The Company strongly believes in international standards and following certifications are received 1) ISO 14001:2015 (Environment Management System) 2) ISO 9001:2015 (Quality Management System) 3) ISO 45001:2018 (Occupational Health and Safety Management System) 4) IATF 16949:2016 (Automotive Quality Management System) 5) First Stage Assessment of Total Productive Maintenance (TPM) award by Japan Institute of Plant Maintenance.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	Environmental commitments: The Company has mapped its baseline footprints in the current year and is in the process of framing a long-term roadmap towards becoming a net zero, water-positive, optimum energy utilisation, workplace safety, etc. Social commitments: The Company is committed to engage with a local community which is mainly (>90%) from marginalised and vulnerable class through its CSR programmes and generation of employability. Governance related commitments: To increase transparency and fairness with key stakeholders with more disclosures and reporting. Use of automation and digital technology to create an interface with key stakeholders.								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	The Company has started its journey towards long-term sustainability goals with the initial steps as follows: (1) Energy-saving initiatives are undertaken at various locations viz. energy-efficient equipment, LED lighting, etc. (2) Company has implemented Waste Water Treatment Plant, Effluent Treatment Plant and Sewage Treatment Plant towards its goal to achieve Zero Waste Water Discharge. (3) Company is timely disposing its plant's waste through robust systems which includes recyclers, incineration, landfilling and third-party disposal process. (4) Company has managed its CSR budget by engaging with the local community and positively impacted around 1.9 lakh beneficiaries from vulnerable and marginalised class.								
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)	To produce the alloys steel with quality products & a lesser carbon footprints. We are rising upon sustainability by controlling the emissions, improving resource consumptions, reducing the waste by using better available technologies. It helps us to improve the present efficiency.								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	The Board is the highest authority responsible for the implementation and oversight of the Business Responsibility policies. The person responsible for oversight of the Business Responsibility Policy(ies): Shri. Megh Pal Singh Executive Director (Steel) and COO (Steel Plant Division) Telephone number: 07721-264241 E-mail ID: meghpal.singh@necoindia.com								

9. Does the entity have a specified Committee of the Board/ Director responsible for decision-making on sustainability related issues? (Yes/No). If yes, provide details. Yes. The Board is overall responsible for decision-making on sustainability-related issues and an integrated approach for data management is followed with the support of respective functions. The Company has (1) Corporate Social Responsibility Committee, (2) Risk Management Committee and (3) Stakeholder Relationship Committee for regular due diligence and sustainability compliance.

10. Details of Review of NGRBCs by the Company:

Subject of Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee	Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
		P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	The Company has appointed a dedicated and reputed agency for conducting Materiality Assessment Survey for determining topics from the ESG framework relevant to the Iron and Steel producing industry along with industry best practices to identify the potential materiality topics for the Company. The Board of the Company has adopted the policies for nine BRSR principles mandated by NGRBC. The Company ensures the adoption of best practices and complies with the terms of reference of said policies. With respect to the above, for the first time, the Company has prepared and approved a comprehensive BRSR report in the format mandated by SEBI.									Annually
Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances	Operational issues as and when identified are addressed in line with the policies on the above principles.									Annually

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

	P1	P2	P3	P4	P5	P6	P7	P8	P9
Yes.									
Care Edge Advisory Research and Training Limited, has mapped the existing policies and procedures against the requirements of BRSR and accordingly suggested improvements to bridge it with the BRSR requirements.									

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

a) The entity does not consider the Principles material to its business (Yes/No)	
b) The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	
c) The entity does not have the financial or/human and technical resources available for the task (Yes/No)	Not applicable
d) It is planned to be done in the next financial year (Yes/No)	
e) Any other reason (please specify)	

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorised as “Essential” and “Leadership”.

While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities that aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

PRINCIPLE 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	4	Ongoing awareness sessions and orientation are organised regularly addressing issues related to occupational, health and safety, environment, etc. SEBI's guidelines and BRSR policy-related matters are discussed in the board meetings. Detailed orientation is also given to the new independent directors. Regular sessions on Operational and Financial performance, Budget Vs. Actual performance, Industry outlook and future projections are conducted as and when required.	100%
Key Managerial Personnel	4	The Company has identified key material areas for awareness sessions like transparency accountability, good governance practices, human rights and business ethics, etc. and various policy documents are drafted. Various procedures and practices ensure the implementation of these policies to meet the KPIs.	100%
Employees other than BoD and KMPs	69	The Company's HR function identifies various training as per the needs viz. training on Health & Safety, Skill Development, Human Rights, Personality Development, TPM, etc. These trainings are delivered as per the plan.	94.59%
Workers	49	The Company's HR function identifies various training as per the needs viz. training on Health & Safety, Skill Development, Industrial Relations, Personality Development, TPM, etc. These trainings are delivered as per the plan.	99.45%

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

Monetary

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

Non- Monetary

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

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

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

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

Yes. The Anti-Corruption and Anti-Bribery Policy of the Company reflects the management's commitment to high ethical standards, conducting open and fair business to improve corporate culture, following best corporate governance practices and supporting the Company's reputation at all levels. The policy is available on the Company website at: www.necoindia.com/corporate-governance.php

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 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

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

	FY 2022-23 (Current Financial Year)		FY 2021-22 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	NA	Nil	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	NA	Nil	NA

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

Not applicable.

Leadership Indicators

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

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

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

Yes. The Company has framed the Code of Conduct for its Directors and Senior Management Personnel on the principles of integrity, transparency and business ethics and to set up standards for compliance with Corporate Governance.

The Company receives an Annual Declaration from its Board of Directors and Senior Management confirming adherence to the Code of Conduct which includes the provisions on dealing with Conflict of Interest.

The Code of Conduct is available at: www.necoindia.com/corporate-governance.php

PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe

Essential Indicators

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

	Current Financial Year	Previous Financial Year	Details of improvements in environmental and social impacts
R & D	100%	100%	1. Optimisation of resource utilisation. 2. Productivity, quality and cost optimisation through process efficiency improvements. 3. Recycling and reuse of process waste and conservation of natural resources.
Capex	1.09%	0.12%	Implementation of BEST AVAILABLE TECHNOLOGIES (BAT) & environment sustainable interventions.

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

Yes, the Company has framed policies for sustainable sourcing and is in the process of preparing procedures for the implementation of those policies.

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

Not available.

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	Not applicable
(d) other waste.	

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.

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.
					No

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

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

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year
Nil	Nil	Nil

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 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	NA	NA	NA	NA	NA	NA
E-waste	NA	NA	NA	NA	NA	NA
Hazardous waste	NA	NA	NA	NA	NA	NA
Other waste	NA	NA	NA	NA	NA	NA

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

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

PRINCIPLE 3: Businesses should respect and promote the well-being of all employees, including those in their value chains

Essential Indicators

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

Category	Total (A)	% of employees covered by									
		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	4224	942	22.30%	3285	77.77%	NA					
Female	28	3	10.71%	10	35.71%	28	100.00%	Not applicable	Not applicable		
Total	4252	945	22.22%	3295	77.49%	28	0.66%				
Other than Permanent employees											
Male	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

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

Category	Total (A)	% of workers covered by									
		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	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other than Permanent workers											
Male	3997	2402	60.10%	2402	60.10%	NA					
Female	156	71	45.51%	71	45.51%	156	100.00%	Not applicable	Not applicable		
Total	4153	2473	59.55%	2473	59.55%	156	3.76%				

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

Benefits	FY 2022-23			FY 2021-22		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/ N/ N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/ N/ N.A.)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI	100%	100%	Y	100%	100%	Y

3. Accessibility of workplaces

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

Yes.

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

Yes, www.necoindia.com/corporate-governance.php

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				
Female	Not applicable		Not applicable	
Total				

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 immediate supervisor/ senior personnel of the aggrieved worker/ employee is expected to look into and deal with the grievance of any worker/ employee under her/ his administrative control within one week, consistent with the policies of JNIL.
Other than Permanent Workers	
Permanent Employees	If the supervisor/ senior personnel feels that the matter of the complainant does not fall within her/his authority, she/he shall discuss the grievance raised by the worker/employee with her/his senior to get it resolved at the earliest.
Other than Permanent Employees	In case the grievance is against the immediate supervisor/ senior personnel, the aggrieved worker/employee may take up her/ his grievance to the Executive Director/ President concerned.

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

Category	FY 2022-23			FY 2021-22		
	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	4252	135	3.17%	4113	130	3.16%
Male	4224	130	3.08%	4086	125	3.06%
Female	28	5	17.86%	27	5	18.52%
Total Permanent Workers	0	0	0.00%	0	0	0.00%
Male	0	0	0.00%	0	0	0.00%
Female	0	0	0.00%	0	0	0.00%

8. Details of training given to employees and workers:

Category	FY 2022-23					FY 2021-22				
	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	4224	1484	35.13%	2667	63.14%	4086	1310	32.06%	2554	62.51%
Female	28	18	64.29%	14	50.00%	27	8	29.63%	12	44.44%
Total	4252	1502	35.32%	2681	63.05%	4113	1318	32.04%	2566	62.39%
Workers										
Male	3997	3459	86.54%	1725	43.16%	3871	1719	44.41%	3145	81.25%
Female	156	90	57.69%	75	48.08%	153	71	46.41%	64	41.83%
Total	4153	3549	85.46%	1800	43.34%	4024	1790	44.48%	3209	79.75%

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No.(B)	% (B/A)	Total (C)	No.(D)	% (D/C)
Employees						
Male	4224	3591	85.01%	4086	3572	87.42%
Female	28	21	75.00%	27	20	74.07%
Total	4252	3612	84.95%	4113	3592	87.33%
Workers						
Male	3997	0	0.00%	3871	0	0.00%
Female	156	0	0.00%	153	0	0.00%
Total	4153	0	0.00%	4024	0	0.00%

10. Health and safety management system:

- a) **Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?**
 Yes. The IMS Audit System (ISO 9001, 14001 & 45001), 5S and TPM system followed and covers all regular and contract workers including all transporters, visitors and suppliers.
- b) **What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?**
- Hazard Identification And Risk Analysis (HIRA) has been prepared for all routine activities.
 - For any new activity Job Safety Analysis is prepared.
 - Hazards identification through Safety Inspections, Safety Surveys and Cross-Functional Audits.
 - Third-Party Safety Audits.
 - Near Miss capturing.
 - Safety Suggestion Drop Boxes.
 - Work Permit System.
 - Accident Investigation.
- c) **Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Y/N)**
 Yes.
- Roko-Toko: It means "Stop & Counsel". Whenever any unsafe act or condition is observed by an employee/workman, then he shouldn't walk past. Rather, stop him/her and counsel about the safe practice/advice for correction of unsafe conditions. It is done to safeguard the workmen.
 - Safety Suggestion Drop Boxes: Safety suggestion drop boxes are kept at selected locations, so that any workman who wants to share any issue regarding his own safety or the safety of his co-workers about any unsafe act/situation, then he can report through these drop boxes, with/without mentioning his name.
 - Leadership Safety Walk: This is done by the head of the department with all key persons together going on a safety walk in their area & interact with bottom-line workmen to know and resolve issues by taking decisions instantly and mitigating the issues.
 - Safety interaction: It is a successful method of identifying unsafe acts and practices using 6 category tools, such as Plant-up Keep, Positions of People, PPE, Procedures, Reactions of People & Tools/Equipment.
 - Departmental Safety Meetings: These enable discussion of the pending issues on people's safety and health risks and any action plan needs to be taken with delegating responsibilities and target time and being followed up periodically.
- d) **Do the employees/worker of the entity have access to non-occupational medical and healthcare services? (Yes/No)**
 Yes.

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

Safety Incident/Number	Category	FY 2022-23	FY 2021-22
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	1.76	1.01
	Workers	4.51	7.56
Total recordable work-related injuries	Employees	18	10
	Workers	45	73
No. of fatalities	Employees	0	0
	Workers	0	1
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	2
	Workers	1	1

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

- Hazard Identification before the commencement of activity has been made mandatory.
- Height Work Procedure and issuing of Height Pass to workers for work at height implemented.
- 5S practices implemented in all work areas of the plant.
- Yearly Health Checkup of all employees and workers is being conducted and free medical camps are organised inside the plant for employees & workers.
- Management had arranged for the vaccination of most of the employees, workers along with their family members
- Permit to Work System.
- Preventive Maintenance System.
- Training & Awareness on Safety.
- People's involvement in safety campaigns.

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

	FY 2022-23			FY 2021-22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	313	0	Resolved	252	0	Resolved
Health & Safety	44	0	Resolved	28	0	Resolved

14. Assessments for the year:

% of your plants and offices that were assessed (by entity or statutory authorities or third parties)	
Health and safety practices	100% of our plants and offices are assessed internally by the company
Working Conditions	

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

- Conveyor Belts survey conducted, reports communicated and discussed in weekly plant safety review meeting.
- Guardings of all grinding machines have been implemented.
- Hydra Crane survey was conducted and findings were communicated to the concerned and rectification was done.
- Train the trainer programme conducted and developed 293 trainers across the site to train their department employees on critical risks and safety standards.
- Established hazard reporting culture and created awareness of reporting unsafe acts, conditions and near-miss incidents.
- Proactive approach in the form of hazard prediction methodology (KYT-a Japanese hazard control system) has been initiated and going on at the site.

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

Yes.

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

This is checked during the Pre-qualification process of the contractors as a part of the due diligence process.

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

	Total no. of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2022-23	FY 2021-22	FY 2022-23	FY 2021-22
Employees	0	2	0	2
Workers	1	2	1	2

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

No.

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	No assessment carried out.
Working Conditions	No assessment carried out.

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

No assessment carried out.

PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders**Essential Indicators****1. Describe the processes for identifying key stakeholder groups of the entity**

Basis the inputs from various departments and after due deliberations, the Company has identified its key stakeholders which includes Shareholders, Customers, Suppliers, Employees, Communities, Lenders, Media and Government.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (E-mail, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ Others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
1 Shareholders	No	E-mail/ newspaper/ meetings	Quarterly/ half yearly/ annually/ as and when required	Update on business performance
2 Customers	No	E-mail/ newspaper/ con-call/ meetings	As and when required	Update on business performance and new product development/initiatives
3 Suppliers	No	E-mail/ newspaper/ con-call/ meetings	As and when required	Update on business performance and new product development/initiatives
4 Employees	No	E-mail/ con-call/ meetings	Ongoing and daily engagement	Update on policies/achievement/awards/ employee engagement initiatives/ training
5 Communities	Yes	Meetings	As and when required	Carrying out CSR Projects
6 Lenders	No	Meetings	Monthly/ quarterly/ annually	Business Performance, Cash Flow, Capital Expenditure and Financial Projections
7 Media	No	Engagement as per the requirement	As and when required	To leverage the reach to share the business story with stakeholders
8 Government	No	Engagement as per the requirement	As and when required	Engagements in forums to strengthen the relationship with Government and provide input into legislative development processes that affects the economy and the Company's operations.

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 conducted the Materiality Assessment Survey for stakeholders for their views on ESG topics. The outcome of the survey is submitted to the Board for necessary action.

Apart from this, regular interaction with stakeholders is carried out through various regulatory disclosures/meetings.

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

Yes. Through the Materiality Assessment Survey, the Board has reached out to the stakeholders for their views on the potential materiality topics under the ESG framework. The inputs received from stakeholders are suitably incorporated into the policies.

As the process of consultation is continuous, the regular updation in the policies is done from time to time.

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

The Company addresses the concerns of the vulnerable/ marginalised stakeholder groups through CSR Projects (like Health Care, Environmental Sustainability, Education and Rural Development Projects) in the peripheral areas of plant/mines.

PRINCIPLE 5: Businesses should respect and promote human rights**Essential Indicators****1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:**

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. of employees/ workers covered (B)	% (B / A)	Total (C)	No. of employees/ workers covered (D)	% (D / C)
Employees						
Permanent	4252	399	9.38%	4113	263	6.39%
Other than permanent	0	0	0.00%	0	0	0.00%
Total Employees	4252	399	9.38%	4113	263	6.39%
Workers						
Permanent	0	0	0.00%	0	0	0.00%
Other than permanent	4153	773	18.61%	4024	485	12.05%
Total Workers	4153	773	18.61%	4024	485	12.05%

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

Category	FY 2022-23					FY 2021-22				
	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	4252	158	3.72%	4094	96.28%	4113	143	3.48%	3970	96.52%
Male	4224	151	3.57%	4073	96.43%	4086	136	3.33%	3950	96.67%
Female	28	7	25.00%	21	75.00%	27	7	25.93%	20	74.07%
Other than permanent	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Male	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Workers										
Permanent	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Male	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Other than permanent	4153	1507	36.29%	2646	63.71%	4024	1588	39.46%	2436	60.54%
Male	3997	1451	36.30%	2546	63.70%	3871	1528	39.47%	2343	60.53%
Female	156	56	35.90%	100	64.10%	153	60	39.22%	93	60.78%

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

	Male		Female	
	Number #	Median remuneration/ salary/ wages of respective category (₹ in lakhs on per annum basis)	Number	Median remuneration/ salary/ wages of respective category (₹ in lakhs on per annum basis)
Board of Directors (BoD)*	13	1.15	1	1.00
Key Managerial Personnel	6	75.72	0	0
Employees other than BoD and KMP	4570	3.74	30	2.91

*In case of Independent and Nominee Directors sitting fees paid is considered as remuneration.

*The number of BoD, KMP and Employees considered for median calculation includes left BoD, KMP and Employees respectively.

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

Yes.

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

The Company has Policy on Human Rights, where employees are free to raise their grievances. In case it has not been addressed or not satisfied, employees may approach to the Top Management for redressal of their grievances.

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

	FY 2022-23			FY 2021-22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	Nil	0	0	Nil
Discrimination at workplace	0	0	Nil	0	0	Nil
Child Labour	0	0	Nil	0	0	Nil
Forced Labour/Involuntary Labour	0	0	Nil	0	0	Nil
Wages	0	0	Nil	0	0	Nil
Other Human rights related issues	0	0	Nil	0	0	Nil

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

The Company has a mechanism to raise their grievances and registers are kept in all the departments for the purpose of raising complaints. Due care is taken so that Complainants shall not be discriminated against or harassed at any point of time.

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

No.

9. Assessments for the year:

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

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

No significant risk/concerns identified, however due action is taken wherever required.

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

No such modifications were carried out.

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.

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	Nil
Discrimination at workplace	Nil
Child Labour	Nil
Forced Labour/Involuntary Labour	Nil
Wages	Nil
Others – please specify	Nil

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

Nil.

PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment**Essential Indicators****1. Details of total energy consumption (in Giga Joules) and energy intensity, in the following format:**

Parameter	FY 2022-23	FY 2021-22
Total electricity consumption (A) GJ	7,27,391	7,47,385
Total fuel consumption (B) GJ	2,97,88,288	3,04,09,090
Energy consumption through other sources (C)	-	-
Total energy consumption (A+B+C) - GJ	3,05,15,679	3,11,56,475
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)- GJ/Rupee	0.00048	0.00052
Energy intensity (optional) – the relevant metric may be selected by the entity (Total energy consumption/ production in Tonne) - GJ/Tonne	19.09	21.38

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency - Yes. CareEdge Advisory has evaluated and reconfirmed Energy Consumption and Carbon Footprints.

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

Yes. The Company is currently running in PAT Cycle VII applicable to it.

In PAT cycle-1, the Company achieved the target and received 1505 positive Escerts from (Bureau of Energy Efficiency) BEE.

In PAT cycle-2, the Company received 5370 positive Escerts from BEE.

In both PAT cycles, it achieved more than the target.

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

Parameter	FY 2022-23	FY 2021-22
Water withdrawal by source (in kilolitres)		
(i) Surface water	52,06,722.00	40,66,473.00
(ii) Groundwater	73,772.00	73,768.00
(iii) Third party water (tanker)	681.04	3,948.95
(iv) Seawater/desalinated water	-	-
(v) Others: Water from municipal corporation	58,615.00	67,121.00
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	53,39,790.04	42,11,310.95
Water Recycled/Reused	16,86,049.00	16,85,845.00
Total volume of water consumption (in kilolitres)	70,25,839.04	58,97,155.95
Water intensity per rupee of turnover (Water consumed/turnover) (litre/rupee)	0.11	0.10
Water intensity (optional) – the relevant metric may be selected by the entity (Water consumed (in Kilolitre)/production in tonne)	4.39	4.05

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency - Yes. CareEdge Advisory has evaluated and reconfirmed Water Footprints.

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

Yes. Steel Plant Division (SPD) has two wastewater treatment plants for treating blowdown water and other wastewater, they do not take any freshwater makeup in the pellet plant, for quenching operation in coke ovens and slag granulation process in a blast furnace, the plant uses the reject/wastewater.

Centricast Division (CD) has an effluent treatment plant and a sewage treatment plant. The water from the effluent treatment plant is treated and again used for cooling pipe of moulds during the production by centrifugal process. The treated water of the sewage treatment plant is used for in-house gardening purposes.

In other foundry units: Engineering Castings Division and Automotive Castings Division, STP / ETP plants are installed for treatment of waste/sewage water. The treated water is re-used for operations and gardening purposes.

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

Parameter	Please specify unit	FY 2022-23	FY 2021-22
NOx	Tonnes	796.99	756.18
Sox	Tonnes	1159.86	1185.03
Particulate matter (PM)	Tonnes	1,335.84	1,375.96
Persistent organic pollutants (POP)		NA	NA
Volatile organic compounds (VOC)		NA	NA
Hazardous air pollutants (HAP)		NA	NA
Others – please specify		NA	NA

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency - Yes. CareEdge Advisory has evaluated and reconfirmed air emissions.

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

Parameter	Unit	FY 2022-23	FY 2021-22
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)	Tonnes of CO ₂	1909699	2077819
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)	Tonnes of CO ₂	167704	172314
Total Scope 1 and Scope 2 emissions per rupee of turnover	Tonnes of CO ₂ / rupees	0.000033	0.000038
Total Scope 1 and Scope 2 emission intensity (CO ₂ (in tonnes)/ production in tonne)	Tonnes of CO ₂	1.30	1.54

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency - Yes. CareEdge Advisory has evaluated and reconfirmed Energy Consumption and Carbon Footprints.

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

Yes. The Company has measured its Carbon Footprints for Scope 1 and 2 emissions. Next year Company has a plan to measure Scope 3 emissions. Once the same is done, the roadmap for the GHG reduction will be articulated using the following techniques/initiatives:

- Focus on Energy and Process Efficiency
- Energy Transition for De-carbonisation
- Improving the raw material quality
- Material circularity through increased usage of scrap
- Alternative fuel sources.

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

Parameter	FY 2022-23	FY 2021-22
Total Waste generated (in metric tonnes)		
Plastic waste (A)	0.00	0.00
E-waste (B)	2.29	0.00
Bio-medical waste (C)	0.10	0.10
Construction and demolition waste (D)	0.00	0.00
Battery waste (E)	18.02	0.00
Radioactive waste (F)	0.00	0.00
Other Hazardous waste (Oil-soaked cotton waste, DG filters, paint cans, chemical cans, paint residue, oil sludge, DG chimney soot, coolant oil and used oil). Please specify, if any. (G)	41.80	3.37
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	508735.11	505375.61
Total (A+B + C + D + E + F + G + H)	508797.32	505379.08
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	0.00	0.00
(ii) Re-used	0.00	0.00
(iii) Other recovery operations	0.00	0.00
Total	0.00	0.00
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0.55	1.33
(ii) Landfilling	169621.33	145912.61
(iii) Other disposal operations	337957.61	349514.89
Total	507579.49	495428.83

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency- Yes. CareEdge Advisory has evaluated and reconfirmed waste generation details.

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

Our waste management approach is based on the philosophy of Reduce, Reuse and Recycle. With our efforts, we contribute to a circular economy and convert waste into resources. Solid wastes generated from various units are being utilised 100%.

- a) Slag generated from Blast Furnace is being sent to cement industries.
- b) Flue dust of SMS and GCP sludge from the blast furnace is being utilised in the sinter plant.
- c) Coke breeze is used in the sinter plant.
- d) SMS slag is used for road compacting/concreting after metal recovery.
- e) Fly ash and Bed ash are used in brick plants.
- f) Char & Dolochar generated from DRI are being used in power plants as fuel.

No such hazardous chemical or toxic chemical is being used only the lubricant oil/transformer oil, grease is used. The generated waste/spent oil is being sold to the authorised recycler only.

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

Sl. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval/clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any
1	Chhotedongar Iron Ore Mine, Village Chhotedongar, Tehsil & District Narayanpur, State - Chhattisgarh	Open Cast Iron Ore Mining	Yes
2	Metabodeli Iron Ore Mine, Village Metabodeli, Tehsil Bhanupratappur, District Kanker, State - Chhattisgarh	Open Cast Iron Ore Mining	Yes

11. 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
Expansion and Modernisation of existing integrated steel Plant with Expansion & Modernisation of Existing Steel Plant Blast Furnace – 0.75 MnTPA to 2.00 MnTPA (0.75 MnTPA to 1 MnTPA through modernisation) Sinter Plant – 0.80 MnTPA to 2.80 MnTPA, Pellet Plant – 1.5 MnTPA to 3.0 MnTPA, Coke Oven -0.20 MnTPA to 1.10 MnTPA, Air Separation unit (Oxygen Plant) – 510 TPD to 1500 TPD, Steel Melt Shop -1.20 MnTPA to 2.40 MnTPA, Rolling Mill – 1.20 MnTPA to 2.40 MnTPA, Cement Grinding unit–2.40 MnTPA, Producer Gas Plant -1,16,000 Nm ³ /hr., Power Plant – 26 MW to 130 MW and DRI Plant to 0.35 MnTPA.	EIA Notification 2006	14 th September, 2006	Yes	Yes	https://enviscecb.org/ph_464.html

12. 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).

Yes.

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

Sl. No.	Specify the law/ regulation/ guidelines which was not complied with	Provide details of the noncompliance	Any fines/ penalties/ action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
1	All Complied	NA	0	NA

Leadership Indicators

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Parameter	FY 2022-23	FY 2021-22
From renewable sources		
Total electricity consumption (A)	-	-
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total energy consumed from renewable sources (A+B+C)	-	-
From Non-renewable sources		
Total electricity consumption (D) - GJ	7,27,391	7,47,385
Total fuel consumption (E) - GJ	2,97,88,288	3,04,09,090
Energy consumption through other sources (F)	-	-
Total energy consumed from non renewable sources (D+E+F) - GJ	3,05,15,679	3,11,56,475

Note: Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. Yes. CareEdge Advisory has evaluated and reconfirmed Energy Consumption and Carbon Footprints.

2. Provide the following details related to water discharged:

Parameter	FY 2022-23	FY 2021-22
(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 kilolitres)		

All plants of the company are zero discharge plants.

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

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

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

- (i) Name of the area - Not Applicable
- (ii) Nature of operations - Not Applicable
- (iii) Water withdrawal, consumption and discharge in the following format - Not Applicable

Parameter	FY 2022-23	FY 2021-22
Water withdrawal by source (in kilolitres)		
(i) Surface water		
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater/desalinated water		
(v) Others		
Total volume of water withdrawal (in kilolitres)		
Total volume of water consumption (in kilolitres)		
Water intensity per rupee of turnover (Water consumed/turnover)		
Water intensity (optional) – the relevant metric may be selected by the entity		
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water		
No treatment		
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)		

None of the plants of the company are located in water stress areas.

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

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

Parameter	Unit	FY 2022-23	FY 2021-22
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)		Not available	Not available
Total Scope 3 emissions per rupee of turnover		Not available	Not available
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity		Not available	Not available

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

The said mines are not located in ecologically sensitive areas. Mines are located in a forest area and for which Forest Clearance has been obtained from Forest Department. No endangered flora and fauna are found in this area.

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

Sl. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	Installed Waste Water treatment Plant with RO of 70 cum/hr capacity	To minimise water consumption WWTP with RO has been installed for the treatment of waste water and to make it reusable in the process again.	Approximately 1700 cum water per day is recycled and reused in the process which reduces the fresh water consumption.
2.	Installed 7 Nos. of STP of 5 KLD capacity each	For treatment of domestic effluent, STP plants have been installed. The treated sewage water is being used in horticulture/plantations	The treated sewage water is being used in horticulture/plantations which reduces fresh water consumption.
3.	Installed 1 Nos. of ETP 110 CMD	For the treatment of trade effluent, ETP plants have been installed. The treated water is being reused.	The treated water is being reused which reduces the fresh water consumption.
4.	Installed 1 Nos. of STP 40 CMD	For the treatment of domestic effluent, an STP plant has been installed. The treated water is being reused.	The treated water is being reused for gardening purposes after treatment.
5.	Installed 2 Nos. of STP 60 CMD	For the treatment of waste water, STP plants have been installed. The treated water is being reused.	The treated water is being reused which reduces the fresh water consumption.

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

Yes. The On-Site Emergency Plan/Disaster Control Plan is a statutory requirement under Section 41- B of the Indian Factories Act,1948, which provides for the compulsory disclosure of information for the Factory involving a hazardous process/ area/ materials, by the Occupier of a Factory to The Chief Inspector of Factories.

JNIL has an approved Onsite Emergency/Disaster Control Plan.

The disaster control procedure lays down the efforts to be made to prevent fatal accidents, physical harm or injury to personnel, and damage to equipment facilities or materials. It requires a coordinated effort of all employees to control and eliminate a disastrous situation. The objectives of preparing this plan are to provide the factory authority to take appropriate and effective actions in the event of an emergency situation in order to:-

- Protect factory personnel inside and public outside the factory.
- Protect property and minimise loss.
- Protect the work environment and outside environment.
- Effective rescue and proper treatment of casualties.
- Bring the situation under control.
- Ensure rapid return to normal operation.
- Preserve relevant records and equipment for subsequent inquiry.

8. 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

Not available.

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

Not available.

PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent**Essential Indicators****1. a) Number of affiliations with trade and industry chambers/ associations.**

The Company is affiliated with ten trade and industry chambers/ associations.

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

Sl. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1.	Confederation of Indian Industry	National
2.	Alloy Steel Producers Association of India	National
3.	Federation of Indian Mineral Industries	National
4.	Export Credit Guarantee Corporation of India Limited	National
5.	Engineering Export Promotion Council of India	National
6.	The Institute of Indian Foundrymen	National
7.	Sponge Iron Manufacturers Association	National
8.	Pellet Manufacturers Association of India	National
9.	MIDC Industries Association	State
10.	Vidarbha Industries Association	State

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

Name of authority	Brief of the case	Corrective action taken
Nil	Nil	Nil

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

Sr. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly/ Others – please specify)	Web Link, if available
1	The Company from time to time shares its concerns and views related to the challenges faced by Steel and Casting Industry and discusses feasible solutions through meetings with various National Forums for ease of doing business and bringing transparency in regulatory disclosures.				

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development**Essential Indicators****1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.**

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web-link
Not Applicable					

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

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

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

The Company has a CSR Policy. This CSR policy is a guideline to the CSR team which is deeply intertwined with communities and panchayats, wherein there are continuous one-to-one interactions between communities and the team. The team interacts with communities and stakeholders on the ground to implement the Corporate Social Responsibility initiatives of the Company. This enables continuous feedback on work done to flow back to the team, including any grievances that communities may have. In most cases, the concerns are addressed swiftly to the satisfaction of the relevant community. The team ensures project execution as per plan and Company allocates a budget to implement these social programmes.

CSR team members also regularly interact with community members during their visits to villages where Company runs various Corporate Social Responsibility programmes. There is an in-built mechanism in the working of the teams where the field staff, the programme team and the Unit Heads regularly speak with individuals and groups within the communities, as well as with various stakeholders, to ensure that any grievances reach the attention at the senior most level and get appropriately redressed. This is further supported through regular interactions between the communities and other stakeholders.

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

Parameter	FY 2022-23	FY 2021-22
Directly sourced from MSMEs/small producers	21.71%	9.12%
Sourced directly from within the district and neighbouring districts	53.89%	49.84%

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	Not Applicable

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

Sl. No.	State	Aspirational District	Amount spent (In INR)
1.	Chhattisgarh	Kanker	1.40 crores
2.	Chhattisgarh	Narayanpur	1.61 crores

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

No.

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

No.

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

No.

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

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

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

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

6. Details of beneficiaries of CSR Projects: -

Sl. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalised groups
1.	Health Care, Sanitation & Drinking Water Facilities	56,530	
2.	Education and training	1,036	
3.	Sports	200	
4.	Women empowerment	547	90%
5.	Environmental sustainability	35,400	
6.	Promotion and development of traditional art and culture, Community Welfare	18,000	
7.	Rural development projects	78,300	

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

Essential Indicators

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

The Company has a procedure in place for handling customer complaints under "JNIL/CC/IMSP" and for customer satisfaction measurement under "MKTSL/IMSP/02".

The modality for the above is already defined in the system and effectively implemented.

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	Not Applicable as Company's business is B2B (Business to Business) and products are manufactured as per the requirement of the customers.
Safe and responsible usage	
Recycling and/or safe disposal	

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

	FY 2022-23		Remarks	FY 2021-22		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	0		0	0	
Advertising	0	0		0	0	
Cyber-security	0	0		0	0	
Delivery of Products	0	0	Nil	0	0	Nil
Restrictive Trade Practices	0	0		0	0	
Unfair Trade Practices	0	0		0	0	
Other	0	0		0	0	

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

	Number	Reasons for recall
Voluntary recalls		
Forced recalls	Nil	Not Applicable

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

Yes, www.necoindia.com/corporate-governance.php

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

There have been no such instances which have occurred during FY 2022-23.

Leadership Indicators

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

Foundry Division: <https://www.jayaswalneco.com>

Steel Plant Division: <https://www.necoindia.com>

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

Test certificate issue along with each & every material supply & Material Safety Data Sheet (MSDS) also provided to the customers as & when required.

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

The Company has a mechanism in place for informing about the disruption/discontinuation of essential services.

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

Yes. The product information as per the requirement of customers is displayed along with the product.

The customer satisfaction survey is being taken on a quarterly basis.

5. 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 customers

Nil.