



**SANYO
SPECIAL
STEEL**



SANYO SPECIAL STEEL MANUFACTURING INDIA PVT. LTD.

ESG Report FY2024-25

INTRODUCTION

About The Report

At Sanyo Special Steel Manufacturing India Pvt. Ltd. (Hereafter referred to as SSML), sustainability is embedded in our business strategy and guides how we operate, grow, and create long-term value. We integrate environmental stewardship, social responsibility, and sound governance into our operations to ensure responsible and resilient growth. Our approach focuses on efficient resource utilization, reduction of environmental impacts, workplace safety, employee development, ethical business practices, and compliance with applicable laws and regulations, aligned with global best practices.

Stakeholder engagement is central to our sustainability journey. We actively engage with employees, customers, suppliers, communities, and regulators through structured communication channels to understand their expectations and concerns. Insights from these engagements inform our materiality assessment, enabling us to identify and prioritize the most significant sustainability impacts and risks relevant to our business and stakeholders. Through continuous improvement and responsible practices, SSML remains committed to contributing positively to society, the environment, and the long-term success of our stakeholders.

Reporting Principle

Our organization has adopted the updated GRI Standards for the financial year 2024-25. This report has been prepared in reference with GRI Universal Standards 2021, ensuring the quality, accuracy, and relevance of disclosed information. Accordingly, our disclosures on economic, social, governance and environmental performance are aligned with the standards prescribed by the Global Reporting Initiative (GRI).

Reporting Period

This is our 7th Annual Stand-alone Sustainability Report (2024-25), highlighting our sustainability commitments and performance for our valued stakeholders. The report covers the period from April 1, 2024, to March 31, 2025, and has been prepared in alignment with the GRI Sustainability Reporting Standards. The financial reporting period and sustainability reporting has been in alignment with the reporting period stated. This sustainability information in the form of ESG report is published on 31/03/2026 and available in the public domain via our website <https://www.sanyospecialsteel.in>

For further information related to the ESG disclosure users of this reporting information are advised to contact Mr. Satyajeet Kumar. Contact No.+91 8378962387/ 7600604084 and email Kumar.Satyajeet@sanyospecialsteel.in.

Assurance

External assurance of the report has been conducted by TUV, represented by TUV India Private Limited. Sanyo Special Steel Manufacturing India Pvt. Ltd. has no relationship with TUV beyond the engagement for independent assurance services. The assurance is performed by an external, third-party organization with no financial or managerial ties to the Company ensuring objectivity and impartiality. The highest governance body and senior executives are involved in defining the scope of assurance, reviewing the findings, and approving the disclosures to be included in the Sustainability Report. This ensures alignment with corporate strategy and accountability at the highest level. The assurance covered selected sustainability KPIs in accordance with recognized assurance standards, providing a Limited assurance. The Assurance Statement is provided in the annexure.

Message from Managing Director

Dear Stakeholders,

I am pleased to share our Sustainability Report for the Financial Year 2024–2025, which demonstrates our sustained commitment to ESG principles and our alignment with global climate and sustainable development objectives. This report reflects the dedication of our teams and the measurable progress made in embedding sustainability into our core business strategy.

Addressing climate change and driving sustainable development remain central to our long-term resilience and our ability to create meaningful, long-term value for our stakeholders.

SSMI is a leading producer of alloy and special steels serving a diverse range of industries, including automotive, bearings, power, engineering, railways, and oil & gas, across both domestic and global markets. Our strong technological foundation and operational excellence are driven by the rich legacy and technical expertise of our parent company, Sanyo Special Steel Co., Ltd., Japan, one of the world’s most respected specialty steel manufacturers. Beyond manufacturing excellence, sustainability is a core pillar of our business strategy. We firmly believe that long-term success can only be achieved through responsible environmental, social, and governance (ESG) practices. Our Sustainability Report for FY 2024–25 reflects the collective efforts of our teams embedding sustainability into every aspect of our operations.

In line with our vision, SSMI delivered strong progress in FY 2024-25 across environmental, social, governance and sustainability priorities. Through process improvements and the adoption of advanced manufacturing technologies, we enhanced energy efficiency and reduced our environmental footprint. Increased use of cleaner energy sources including fuel substitution with natural gas, captive solar power commissioning, and the signing of a long-term captive wind project has accelerated our transition toward renewable energy. Through these initiatives, we aim to achieve a 70% reduction in CO₂ emissions intensity from FY 2022 levels by 2031, advance our science-based targets, and reaffirm our commitment to achieving carbon neutrality by 2050. Our efforts have been further validated through leadership ratings from CDP across climate change and water security as well as GreenPro Ecolabel certification and industry recognition from CII, underscoring the strength of our environmental stewardship and governance practices. Our responsibility extends beyond our factory gates to the communities we serve. Through focused CSR initiatives in education, healthcare, women’s empowerment, and skill development, we aim to create meaningful and lasting social impact, ensuring inclusive and sustainable growth. In FY 2024–25, our CSR programs benefited 9,130 individuals, reflecting our strong commitment to community-centric development. Guided by our Zero Harm philosophy, we remain dedicated to responsible operations, employee safety, and community well-being. Sustainability at SSMI is integral to our long-term resilience and value creation, supported by policy on safety, health and environment (SHE), human rights, ethics, and transparency that foster a safe, inclusive, and performance-driven workplace.

I would like to sincerely thank our employees, partners, and stakeholders for their continued trust, collaboration, and commitment. As we move forward on our journey of innovation, operational excellence, and sustainable growth, I am confident that your experience at SSMI will reflect the passion, purpose, and responsibility that define our organization.



MR. DILIPKUMAR PACHPANDE

Managing Director

Sanyo Special Steel Manufacturing India Pvt. Ltd

About the organization

Sanyo Special Steel Manufacturing India Pvt. Ltd. (SSMI) is one of India's leading manufacturers of alloy and special steel products, serving a diverse range of industries with high-quality steel solutions. As a subsidiary of Sanyo Special Steel Co., Ltd., Japan, SSMI benefits from world-class technology, expertise, and the strong heritage of its parent company which is globally recognized for excellence in specialty steel manufacturing. SSMI is headquartered at Jagdish Nagar, Khopoli, Taluka Khalapur, District Raigad, Maharashtra – 410216, India, and it does not have operations listed in other countries under its own corporate structure. It operates as a manufacturer of specialty and alloy steel products serving various industrial sectors.

SSMI (Formerly - Mahindra Sanyo Special Steel Private Limited) [Formerly Known as Mahindra Ugine Steel Co] was established in 1962, with the principal objective of manufacturing tool, alloy & special steel in India through the Electric Arc Furnace ("EAF") Route.

The organization reports on a standalone basis in this Sustainability Report, and the disclosures cover only its own operations without including any subsidiaries, joint ventures, or associate entities. The audited consolidated financial statements of the Company are filed on public record for group reporting purposes; however, the information presented in this report is limited to sustainability-related disclosures.

We as Sanyo Special Steel Manufacturing India Pvt. Ltd., (SSMI) is a joint venture entered in September 2012 between Mahindra & Mahindra as a majority shareholder and Sanyo Special Steel Co., Ltd., Japan and Mitsui & Co., Ltd. Japan and now a wholly owned subsidiary of Sanyo Special Steel Co., Ltd. in India.

In March, 2019 the shareholding in the Company was changed with Sanyo Special Steel Co., Ltd. holding majority shares in the share capital of the Company.

With effect from June 23, 2022, the company name has been changed to Sanyo Special Steel Manufacturing India Pvt. Ltd. from Mahindra Sanyo Special Steel Pvt. Ltd.

On 27th April, 2023, Mahindra has sold and transferred its entire shareholding in the Company to Sanyo, Japan and has exited from the Joint venture and as shareholder of the Company. Pursuant to a special resolution passed by the shareholders at an Extraordinary General Meeting, and subsequent approval from the Union Government under Section 13 of the Companies Act, 2013, a fresh Certificate of Incorporation was issued by the Registrar of Companies, Ministry of Corporate Affairs, Government of India, on 23 June 2022. Accordingly, the name of the Company was changed from "Mahindra Sanyo Special Steel Manufacturing India Private Limited" to "Sanyo Special Steel Manufacturing India Private Limited", with effect from 23 June 2022.

On 24th May, 2024, Mitsui, Japan has sold and transferred its entire shareholding in the Company to Sanyo, Japan and exited from the joint venture and as shareholder of the Company.

Presently, Sanyo, Japan is holding entire shares in the share capital of the Company and SSMI is a subsidiary of Sanyo Special Steel Co. Ltd., and Nippon Steel Corporation, Japan is its Ultimate Holding Company.

SSMI is a well-established and respected player in India's alloy and special steel manufacturing sector. The Company is a preferred supplier to several leading domestic and international customers, including government entities, and serves key industries such as railways, automotive, and power generation.

Vision & Mission



VISION



- Maintaining a strong and stable profit base and quality competitiveness by boldly challenging new demand development.
- Contributing to the sound development of the Indian economy through initiatives to address environmental issues.
- Bringing trust to our employees and local communities by creating a workplace that is safe and respectful of diversity.



MISSION



- SSMI has the mission of contributing to the development of the Indian economy and society through the stable supply of steel products that are useful to society at large. As Sanyo Special Steel's manufacturing base in India and a Nippon Steel group company, SSMI respects and abides by relevant laws and regulations, international rules, and their spirit, both inside and outside India. SSMI thrives to fulfil its social responsibilities
- with high ethical standards toward the creation of a sustainable society.

"Sustainably contribute to the development of the Indian manufacturing industry by supplying the world's highest quality special steel as the Indian manufacturing base of Sanyo Special Steel."

Top management recognizes that it is their role to realize the spirit of this mission statement and takes the initiative to ensure its thorough implementation within the company, as well as to disseminate it to business partners. Additionally, we will establish effective governance by always listening to the voices both inside and outside the company and by establishing internal controls.

Key Highlights

Environment

1.

Reduction in Specific Energy Consumption through various energy conservation measures by 2.2%

2.

Utilization of renewable energy, with 57% of total electricity consumption sourced from wind and solar power in FY 2024–25.

3.

33% reduction in combined Scope1, Scope2 & Scope3 greenhouse gas emissions in FY 2024–25 compared to previous year.

4.

Achieving 100% composting of garden waste and ensuring all food waste was utilized as feedstock for a municipal biogas plant.

5.

Segregated and reused 1,182 MT of scrap from Ladle Furnace (LF) and Electric Arc Furnace (EAF) slag, as well as waste structural scrap, for melting operations, resulting in cost savings equivalent to ₹4.05 crore in FY 2024–25

6.

Generated ₹1.93 crore in revenue through waste disposal in FY 2023–24 and successfully completed the disposal and e-filing of hazardous waste returns, ensuring full regulatory compliance.

Note : All Financial figures are taken from the Financial Statement

Social, Health & Safety Practices

Benefited 9,130 individuals through CSR initiatives in FY 2024–25, including education (1,128), health (733), women empowerment (5,159), plantation (1,885), Swachh Bharat Mission (60), safety (55), and general activities (110).

Achieved a Safety Activity Rate of 18 in FY 2024–25 and recorded 348 Perfect Safety Days, with zero accidents or incidents on those days.

Conducted 135 safety “Gemba” visits involving the safety team and senior management, followed by systematic action tracking that resulted in 98.5% closure of identified observations.

Strengthened safety culture through training and awareness programs, including Behavior-Based Safety initiatives and on-the-job safety refresher training for all employees.

Corporate Governance

- Achieved strong climate and environmental recognition by receiving an “A–” Leadership Band rating in CDP Climate Change Disclosure 2024, reflecting high transparency and performance, along with a “B” Management Band rating in CDP Water Security 2024, demonstrating responsible water stewardship.
- Enhanced organizational awareness and governance practices by conducting structured training and awareness sessions on ethics, governance, sustainability, safety, energy, CSR, and environmental management across the organization.
- Received industry recognition for green products by being honored at the 7th CII GreenPro Summit 2024 and awarded a plaque by the CII–Green Products & Services Council for GreenPro Ecolabel certification of Automotive Steel Products.

Note : All Financial figures are taken from the Financial Statement

Activities and workers

Activities, value chain and other business relationships

Sanyo Special Steel Manufacturing India Pvt. Ltd. (SSMI) offers a comprehensive range of forged, rolled, and cast steel products in diverse shapes and specifications, designed to meet stringent industry and customer requirements. Guided by a corporate philosophy of innovation, customer satisfaction, and sustainable development, SSMI operates a domestic-focused supply chain, sourcing raw materials such as steel billets, alloying elements, and other inputs from trusted suppliers within India. Its products are trusted by a wide spectrum of domestic and multinational customers. SSMI serves primarily for the Indian operations of global firms as well as local industrial and manufacturing sectors companies. That includes automotive, bearings, engineering, oil & gas, and general machinery industries. SSMI's downstream entities use its steel products to manufacture components, machinery, vehicles, and industrial equipment, enabling the company's reach across critical industrial applications.

SSMI also has several business relationships with its industry peers and industry associations. The Company has established strong affiliations with organizations such as the Confederation of Indian Industry (CII) and the World Steel Association, among others. Through active participation in these platforms, SSMI engages in policy advocacy, industry collaboration, knowledge sharing, and the adoption of global best practices in sustainability, safety, and technological advancement. These associations enable the Company to remain aligned with evolving regulatory frameworks, industry benchmarks, and emerging trends within the steel sector.

There have been no significant changes in the sectors in which the company operates, its value chain, or other relevant business relationships compared to the previous reporting period.

Employees

i. Permanent employees, and a breakdown by gender and by region;

Male		Female	
FY 2024	FY 2025	FY 2024	FY 2025
836	819	11	11

All employee are from India region"

ii. Temporary employees, and a breakdown by gender and by region;

Male		Female	
FY 2024	FY 2025	FY 2024	FY 2025
968	913	1	-

iii. Full-time employees and a breakdown by gender and by region;

Male		Female	
FY 2024	FY 2025	FY 2024	FY 2025
836	819	11	11

iv. Part-time employees, and a breakdown by gender and by region;

Male		Female	
FY 2024	FY 2025	FY 2024	FY 2025
968	913	1	-

Employee data presented in the table is compiled on a headcount basis, representing the total number of individuals on the payroll as at the end of the reporting period. Each employee is counted as one person regardless of employment status or working hours, including full-time, part-time, temporary, and fixed-term employees. The figures are based on data extracted from the organisation's Human Resources Information System (HRIS).

The organisation maintains a structured manpower framework to support its operational and strategic objectives. The workforce is distributed across junior, middle, and senior management, as well as workmen and contractual categories, ensuring clear accountability, operational efficiency, and effective governance.

The age profile reflects a balanced mix of experience and continuity, with a majority of employees in the 30-50 years age group, supported by experienced senior personnel and emerging young talent. A combination of permanent, fixed-term, and contract employees provides flexibility while maintaining stability in core functions. Gender representation across management levels further demonstrates the organisation's commitment to inclusive and sustainable workforce development.

Other Workers

i. The total number of workers who are not employees and whose work is controlled by the organization

Male		Female	
FY 2024	FY 2025	FY 2024	FY 2025
12	9	-	-

There has been no significant year-on-year change in the total workforce of SSMI. The overall employee strength remained broadly stable during the reporting period, indicating consistent operational requirements and workforce planning. Minor variations observed are part of normal business fluctuations and do not represent any material shift in workforce composition or employment strategy.

Products offered by SSMI

Forged product :



SSMI manufactures a wide range of stainless-steel grades, designed to meet diverse dimensional and application requirements. The Company offers round bars with diameters ranging from 160 mm to 400 mm, known for their strength, durability, and versatility across multiple applications. For requirements involving a square cross-section, square bars are available in sizes ranging from 140 mm to 450 mm.

In addition, SSMI's product portfolio includes rectangular slabs with widths and thicknesses ranging from 140 mm to 355 mm. These slabs offer a high degree of customization, making them suitable for a broad spectrum of industrial and construction applications. Manufactured from high-quality stainless steel, SSMI's products deliver excellent corrosion resistance, high mechanical strength, and superior surface finish, ensuring reliable performance in demanding environments.

Rolled product :



SSMI's product portfolio includes a wide range of Special Steel and Alloy Steel engineered to meet precise dimensional requirements. Round bars are available in diameters ranging from 36 mm to 160 mm, offering strength, durability, and versatility across a variety of applications. In addition, round-corner square bars, with dimensions ranging from 48 mm to 340 mm, provide an alternative square cross-section to accommodate specific design and application needs.

The product range also comprises rectangular slabs with thicknesses between 65 mm and 150 mm and widths ranging from 150 mm to 360 mm, maintaining a maximum thickness-to-width ratio of 2:3. This balanced dimensional configuration ensures an optimal combination of strength and form, making the slabs suitable for a broad spectrum of industrial and construction applications.

Cast product :



SSMI's product portfolio includes bottom-poured ingots and continuous-cast (concast) blooms, both designed to meet precise dimensional and weight specifications. The concast blooms are available in sizes of 200 × 180 mm, 200 × 250 mm, and 220 × 260 mm, offering flexibility to address a wide range of industrial requirements. With their robust metallurgical properties, these blooms can be further processed into various stainless-steel products, enabling diverse design and application possibilities.

In addition, SSMI manufactures bottom-poured ingots with weights ranging from 3 to 17 tonnes, allowing manufacturers to select sizes best suited to their specific production processes. This range ensures adaptability, process efficiency, and consistent quality across downstream applications.

Bright & Peeled bar :

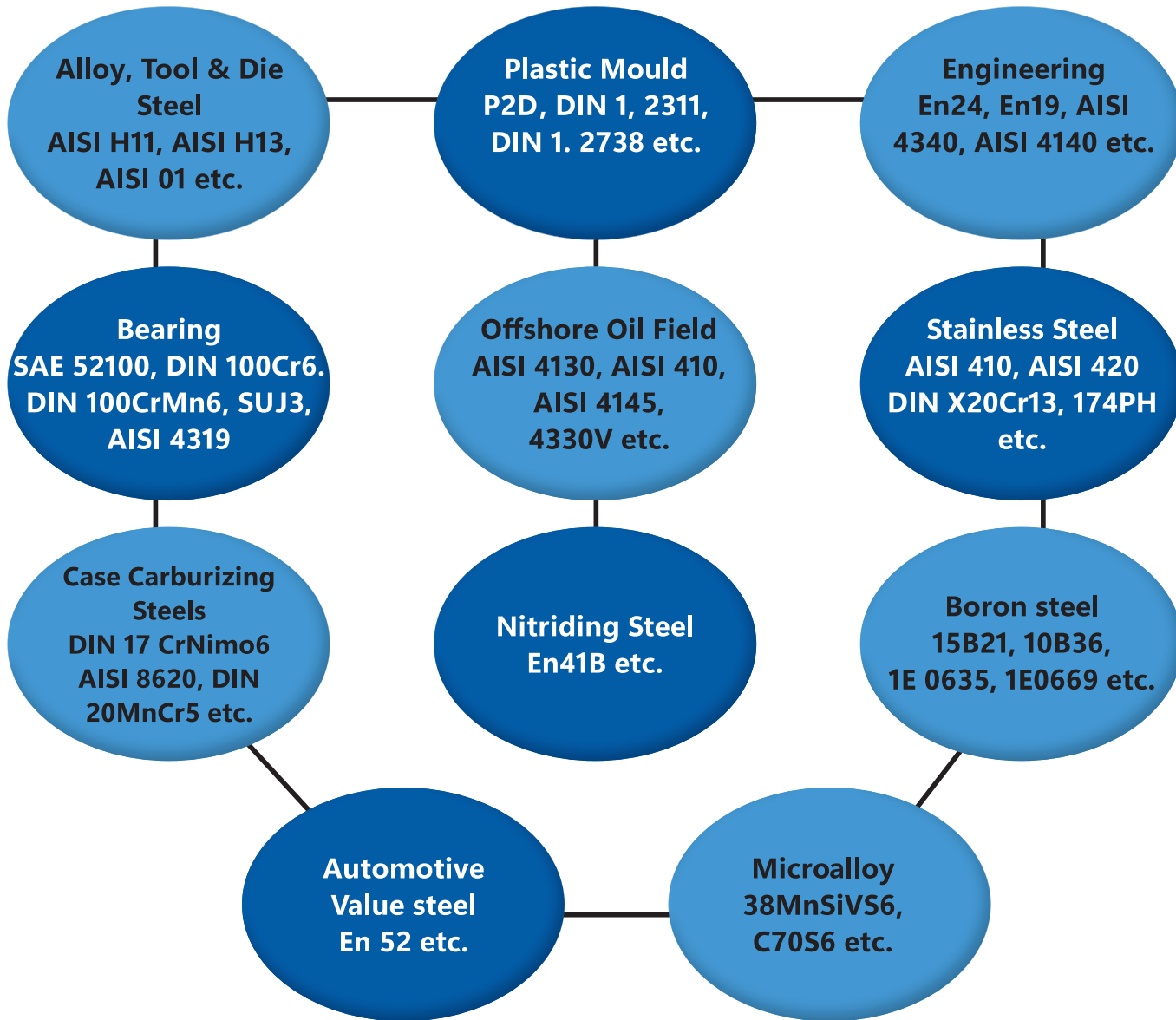


Within SSMI's product portfolio, the Bright & Peeled Bar range comprises a wide selection of precision-engineered stainless-steel products developed to meet stringent dimensional accuracy and surface finish requirements. Peeled Rounds, available in diameters ranging from 20 mm to 290 mm, undergo a controlled peeling process to achieve a smooth, polished surface that enhances both aesthetic appeal and corrosion resistance.

For applications requiring higher dimensional precision and superior surface quality, Peeled & Reeled Rounds are offered in sizes from 20.2 mm to 58 mm, combining the benefits of peeling and reeling processes to meet complex engineering demands. To cater to large-diameter requirements, SSMI also supplies Turned Rounds, with outsourced processing capabilities covering diameters from 280 mm to 400 mm, ensuring flexibility and reliability for specialized applications.

Product Range - Categories of Steel

CATEGORIES OF STEEL



Certifications

Certifications play a critical role in demonstrating SSMI’s commitment to quality, environmental stewardship, occupational health and safety, and energy performance. As a special steel manufacturer operating in a highly regulated and quality-sensitive industry, the Company maintains internationally recognized management system certifications to ensure operational discipline, risk control, and continuous improvement.



ISO 9001:2015
Quality Management System.



ISO 45001:2018
Occupational Health and Safety
Management System.



ISO 50001
Energy Management System



ISO 14001:2015
Environmental Management System.



IATF- 16949
Automotive Quality
Management System

Stakeholder Engagement

SSMI recognizes stakeholder engagement as a critical component of its sustainability and governance framework. The company proactively engages with key stakeholders including investors, employees, customers, suppliers, local communities, regulators and industry bodies to understand their expectations, address concerns, and incorporate relevant feedback into decision-making processes.

Engagement mechanisms include regular meetings, customer interactions, supplier assessments, employee communication forums, training programs, audits, and a structured grievance redressal system. Insights gathered through these engagements support continuous improvement, risk management, regulatory compliance, and the advancement of SSMI’s sustainability initiatives, ensuring long-term value creation for all stakeholders.

SSMI leverages insights from stakeholder engagements to identify risks and opportunities, strengthen its governance framework, and continuously improve ESG performance. Through open, transparent, and consistent engagement with stakeholders, the Company fosters trust, enhances accountability, and promotes shared value creation across its operations.

Table : Approach to Stakeholder Engagement

Category of Stakeholder	Identified Stakeholder	Frequency of meeting	Mode of communication	Topic of Engagement / Meeting
Internal	Employees	- Weekly, - Monthly, - Quarterly, - annually.	- Meetings at department level - one-to-one interaction, - emails - welfare programs	- Work performance - Employee and workers health and safety - Workplace grievances - Employee welfare and operational goals - Remuneration - Training and skill development.
	Top management	- Quarterly, - annually	- Meetings - Notified letter/ emails	Business growth, Sustainability initiatives and compliances
External	Customers	- Monthly, - Quarterly, - Annually.	- In- person visit - E-mails - surveys	Product quality, feedback, service improvement, customer satisfaction
	Community	- Monthly, - Quarterly, - Annually.	- As required (Half yearly visits)	Education and Employment, healthcare, infrastructure, sustainable livelihoods
	Suppliers and dealers	- Monthly, - Quarterly, - Annually.	- Meetings - E-mails - Survey	Product quality, cost, complaints, value creation
Regulatory bodies	Any Regulatory Authority	Annually	- Audit - E-mail	- Environmental compliance, audits - workplace safety, and all other compliances - applicable to the organisation and performance review
Industry	Value chain partners	- Quarterly - Annually	- In- person visit - E-mail - Survey	Supply chain performance, ESG initiatives and process optimization

Materiality Assessment

Process to determine material topics

At SSMI, the materiality assessment process is a key component of the Company’s sustainability and ESG strategy. It enables SSMI to identify, assess, and prioritize environmental, social, and governance (ESG) topics that have the most significant impact on business performance and are of highest importance to stakeholders. The assessment supports risk management, strategic planning, and long-term value creation while aligning with regulatory requirements and global reporting frameworks.

The materiality assessment is conducted through structured engagement with internal and external stakeholders, including investors, employees, customers, suppliers, communities, and regulators. The process included surveys of employees and external stakeholders to gather feedback on the topics they considered most material to the organization. Management reviewed the responses and consolidated the inputs, resulting in the identification of topics deemed material to SSMI and its external stakeholders.

Stakeholder inputs, combined with internal risk assessments and management reviews, are evaluated based on business impact and stakeholder relevance. The prioritized 12 material topics are reviewed by senior management and integrated into policies, operational controls, and sustainability initiatives, ensuring continuous improvement and alignment with SSMI’s commitment to responsible and sustainable growth. There were no changes to the list of material topics during the reporting period. The material topics remain consistent with the previous year, as they continue to reflect SSMI’s significant economic, environmental, and social impacts and stakeholder priorities.

Impact assessment

SSMI undertakes structured actions to manage its material topics and associated impacts across economic, environmental, and social dimensions. To prevent or mitigate potential negative impacts, the Company implements robust policies, risk assessments, compliance monitoring, and operational controls. In cases where actual negative impacts are identified, corrective and preventive actions are initiated promptly, including root cause analysis, stakeholder engagement, and, where applicable, remediation measures in coordination with relevant parties. Simultaneously, SSMI promotes positive impacts through continuous improvement initiatives, resource efficiency programs, employee development, community engagement, and responsible business practices, thereby strengthening long-term value creation for stakeholders.

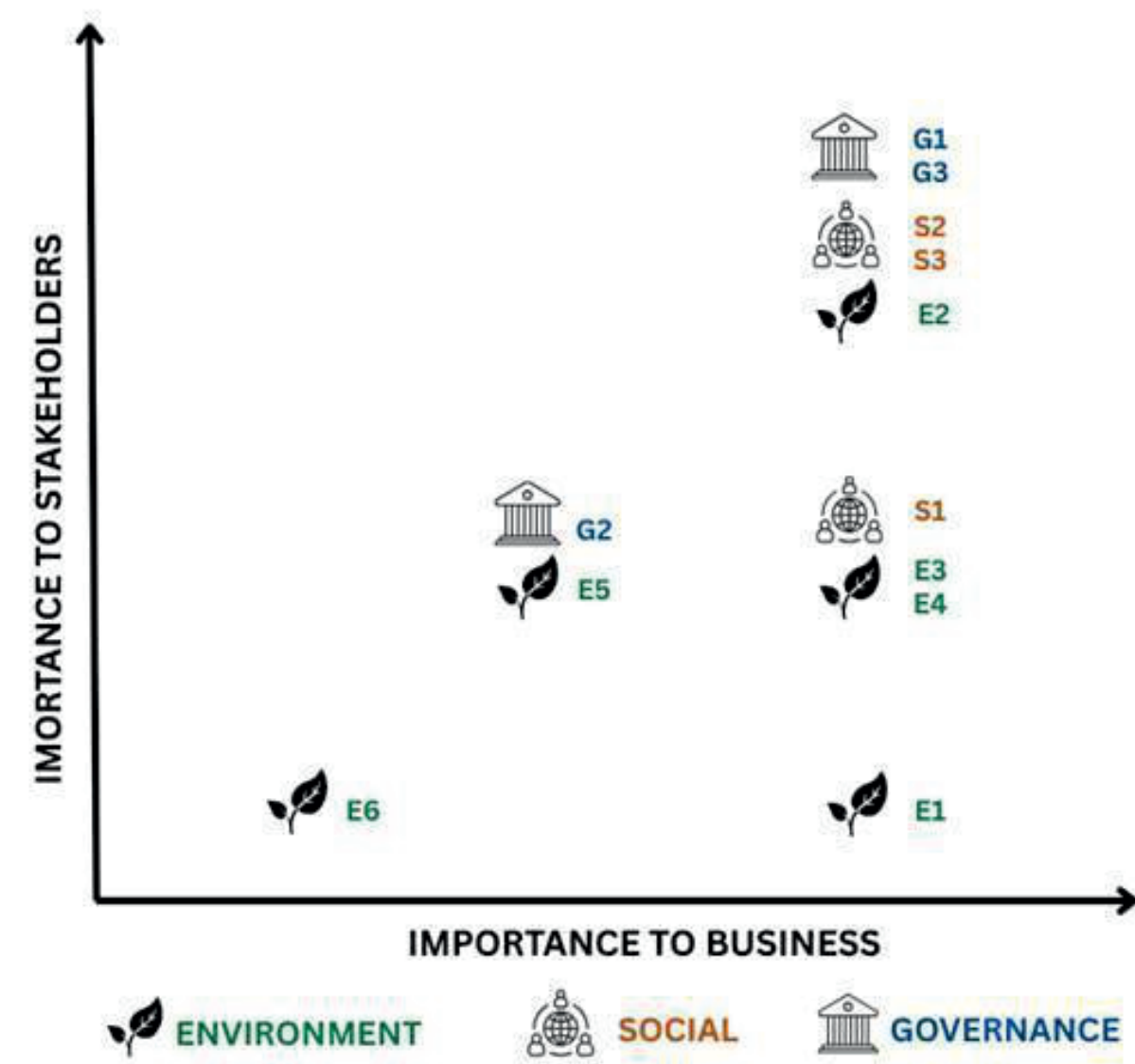


Table : Materiality Risk and Opportunity Evaluation Matrix

Material Topic	Risk / Opportunity	Rationale for Identification	Potential Financial Impact
Waste Management & Recycling (E1)	Opportunity	Effective waste management and increased recycling, reduce disposal costs and support circular economy practices in steel manufacturing.	Positive – Cost savings, improved resource efficiency, and reduced disposal liabilities.
Energy Efficiency & GHG Emissions (E2)	Opportunity	Reducing energy intensity and GHG emissions lowers operating costs and supports climate commitments and regulatory compliance.	Positive – Energy cost savings and potential carbon cost avoidance.
Water Conservation (E3)	Opportunity	Efficient water use ensures business continuity in water-stressed regions and supports sustainability objectives.	Positive – Reduced operational costs and improved water security.
Material Procurement & Supply Chain (E4)	Risk	Supply instability or unethical sourcing can disrupt operations and negatively impact reputation and compliance.	Negative – Increased procurement costs, supply delays, and reputational risks.
Green Materials (E5)	Opportunity	Development and use of environmental-friendly materials reduce lifecycle impacts and meet evolving customer and regulatory expectations.	Positive – Market differentiation, customer preference, and long-term revenue growth.
Biodiversity & Environmental Compliance (E6)	Opportunity	Proactive management of biodiversity and environmental impacts addresses regulatory expectations and stakeholder concerns.	Positive – Reduced compliance risk and enhanced corporate reputation.
Employee Health & Safety (S1)	Risk & Opportunity	Ensuring a safe workplace minimizes accidents and enhances productivity, engagement, and morale.	Positive – Reduced downtime and insurance costs; Negative – Higher costs in case of incidents.
Human Rights & Fair Labor Practices (S2)	Risk & Opportunity	Respecting human rights strengthens workforce stability and prevents legal or reputational issues.	Positive – Enhanced employer brand; Negative – Legal penalties if violated.
Product Quality & Safety (S3)	Risk & Opportunity	High product safety standards protect customers and brand value, while failures may lead to recalls or claims.	Positive – Customer trust and brand loyalty; Negative – Recall costs and legal exposure.
Ethical Business Practices & Anti-Corruption (G1)	Risk	Ethical breaches can lead to regulatory penalties, financial losses, and erosion of stakeholder trust.	Negative – Financial penalties, legal action, and investor distrust.
Supply Chain Governance (G2)	Risk & Opportunity	A responsible supply chain ensures compliance, quality, and ethical sourcing.	Positive – Stable operations; Negative – Disruptions or supplier violations.
Brand Reputation (G3)	Risk & Opportunity	A strong reputation attracts customers and investors, while negative publicity can harm value.	Positive – Market advantage; Negative – Loss of stakeholder trust.

Policies, actions

SSMI's material topics reflect its most significant actual and potential impacts on the environment and the economy. Environmental initiatives such as energy efficiency, GHG emissions reduction, waste management, water stewardship, biodiversity protection, sustainable procurement, and green material development contribute positively to cost optimization, regulatory preparedness, resource conservation, and long-term competitiveness. These efforts support climate transition readiness, circular economy practices, and operational resilience, particularly in resource-constrained regions. Conversely, inadequate management of emissions, waste, water, or supply chain sustainability could result in regulatory penalties, increased operating costs, operational disruptions, environmental degradation, and reputational damage, thereby affecting financial performance and enterprise value.

From a social and governance perspective, SSMI's focus on employee health and safety, human rights and fair labor practices, product quality, ethical business conduct, supply chain governance, and brand reputation directly influences workforce stability, customer trust, investor confidence, and long-term value creation. Strong safety and labor standards uphold workers' fundamental rights to safe working conditions, non-discrimination, and fair treatment, while robust product quality safeguards protect customers and downstream users. Effective governance frameworks mitigate corruption, legal exposure, and supply chain risks. However, failures in these areas may lead to workplace injuries, human rights violations, product recalls, financial penalties, litigation, and erosion of stakeholder trust, with material consequences for both people and business sustainability.

SSMI is committed to environmentally responsible and sustainable operations through policies addressing climate action, water stewardship, energy efficiency, waste management, and occupational health and safety, with a focus on reducing GHG emissions intensity through energy optimization and cleaner technologies, conserving and recycling water resources, minimizing waste through reduction and circular practices, and ensuring safe and healthy working conditions through strong HSE standards, regulatory compliance, continuous

monitoring, and ongoing improvement initiatives embedded across its operations.

To address actual negative impacts, SSMI implements timely corrective and preventive measures, including detailed incident investigations, root cause analysis, process optimization, strengthened monitoring controls, and active stakeholder communication. Where necessary, the Company collaborates with regulatory authorities and facilitates appropriate remediation actions such as environmental restoration, equipment rectification, and provision of medical care and support in the event of workplace incidents.

To further strengthen positive outcomes, SSMI continues to invest in cleaner and energy-efficient technologies, resource conservation initiatives, enhanced recycling practices, and programs that promote a strong safety culture. The Company also advances sustainable product innovation, reinforcing its environmental stewardship, safeguarding employee well-being, and supporting long-term economic resilience and value creation.

SSMI tracks the effectiveness of its environmental, safety, and governance actions through structured monitoring, internal controls, and periodic performance reviews. Key processes include real-time monitoring of energy, water, and emissions data; regular internal audits; management review meetings; incident reporting and investigation systems; and compliance assessments against applicable regulatory and internal standards. Performance data is reviewed by senior management to ensure accountability and timely corrective action.

Progress is evaluated against defined goals, targets, and key performance indicators (KPIs), such as reduction in GHG emissions intensity, improvement in energy efficiency, reduction in freshwater consumption, waste recycling rates, and occupational health and safety metrics including Lost Time Injury Frequency Rate (LTIFR). These indicators are benchmarked periodically to assess trends and alignment with strategic sustainability objectives. The Company has observed measurable improvements in resource efficiency, safety performance, and regulatory

compliance, reflecting the effectiveness of implemented measures.

Lessons learned from performance reviews, audits, and incident investigations are systematically documented and integrated into updated standard operating procedures (SOPs). Continuous feedback mechanisms enable SSMI to strengthen operational controls, enhance risk mitigation strategies, and embed a culture of continuous improvement across its operations and value chain.

Stakeholder engagement plays an integral role in informing SSMI's sustainability actions and assessing their effectiveness. Through structured interactions with employees, customers, suppliers, investors, local communities, and regulatory authorities, the Company gathers valuable feedback on operational risks, environmental and social concerns, compliance expectations, and areas for improvement. Insights from these engagements have contributed to strengthening safety practices, enhancing environmental management initiatives, improving product quality standards, and advancing transparency in ESG performance. The effectiveness of implemented actions is evaluated not only through internal performance indicators but also through stakeholder feedback, reduced grievances, improved audit results, and enhanced compliance outcomes. This continuous and responsive dialogue enables SSMI to refine its strategies, address emerging issues proactively, and ensure that its sustainability initiatives remain aligned with stakeholder and long-term value creation objectives.



Corporate Governance

Our Commitment

At SSMI, we are committed to conducting our business responsibly, ethically, and sustainably. We strive to deliver high-quality special steel products while upholding the highest standards of safety, environmental stewardship, and governance. Our commitment extends to creating value for our customers, employees, shareholders, and communities through operational excellence, innovation, and integrity.

We are dedicated to fostering a safe and inclusive workplace, minimizing our environmental impact, engaging transparently with stakeholders, and complying with all applicable laws and regulations. Guided by strong ethical principles and a culture of continuous improvement, SSMI remains focused on long-term sustainability and responsible growth.

A. Board of Directors

I. Governance Structure-

The highest governance body of SSMI is its Board of Directors. The Board is responsible for setting strategic direction, overseeing financial and operational performance, ensuring legal and regulatory compliance, and supervising risk management and sustainability performance. As a wholly owned subsidiary of Sanyo Special Steel Co., Ltd., SSMI's governance framework aligns with the broader group governance architecture while retaining operational accountability within India.

Given the Company's status as a private limited subsidiary, formal board committee structures such as those mandated for listed entities (e.g., independent audit committees or nomination committees under SEBI regulations) are not publicly disclosed. Governance oversight is exercised directly by the Board through structured meetings, performance reviews, and alignment with group-level governance policies. Where required, specific matters relating to finance, strategy, risk, compliance, and sustainability are reviewed either at the Board level or through functional leadership teams reporting to the Board.

While SSMI does not publicly disclose a separate committee structure comparable to listed companies, oversight of economic, environmental

and social impacts is embedded within the Board's governance processes and management reporting framework.

Economic Impacts

Economic performance, capital investment, operational efficiency, and market strategy are overseen by the Board, led operationally by the Managing Director. Financial performance, cost management, and long-term value creation are reviewed periodically at Board meetings.

Environmental Impacts

Environmental stewardship, including energy consumption, greenhouse gas emissions, resource efficiency, pollution control, and compliance with environmental regulations, is overseen by the Board through regular review of performance indicators and alignment with the sustainability commitments of the parent group. Environmental management systems and certifications provide structured monitoring mechanisms, with accountability resting at executive level and reporting to the Board.

Social Impacts (People)

Workplace safety, employee welfare, skill development, labour practices, and community engagement are supervised by executive leadership and reviewed by the Board. Health and safety performance, statutory compliance, and employee engagement indicators are periodically presented for governance oversight.

In the absence of formally designated standalone sustainability or CSR committees at the subsidiary level (as publicly disclosed), ESG-related oversight remains integrated within the Board's responsibilities and aligned with group-level governance mechanisms. This integrated model ensures that economic performance, environmental management, and social responsibility considerations are embedded into strategic and operational decision-making rather than treated as parallel structures.

II. Composition

The Board of Directors of SSMI holds ultimate responsibility for overseeing the Company's significant positive and negative impacts on

the economy, environment, and people. The Board of Directors is composed of five board members, led by a Chairman and including the Managing Director and other directors.

The Board integrates sustainability considerations into strategic decision-making and risk management processes.

The Board monitors mitigation measures for identified risks (including environmental and safety risks) and evaluates initiatives that create positive value, such as community development, resource efficiency, and responsible business practices. Regular reporting from management ensures informed decision-making and continuous improvement in managing ESG impacts.

During the reporting period, the Board did not include a female director. Gender diversity has been identified as an underrepresented area, and the company remains committed to strengthening Board diversity in future appointments.

III. Nomination Process:

The Board comprises executive and non-executive directors, including the Managing Director who oversees day-to-day operations. Non-executive directors, primarily nominee representatives of the parent company, provide strategic oversight and ensure alignment with group-level objectives, including long-term sustainability and responsible manufacturing.

IV. Chair Independence:

The Chair of the Highest Governance Body is Mr. Takashi Yatsunami (Chairman). He provides strategic leadership.

Mr. Dilipkumar Pachpande serves as the Managing Director (MD) of the Company. He is responsible for the overall leadership, strategic direction, and operational management of the Company, ensuring alignment with the Board's vision and long-term objectives. The MD oversees the execution of business strategies, drives operational excellence, and ensures sustainable growth while maintaining strong governance

standards.

Mr. Hirokazu Suzuki is designated as Executive Director. SSMI has established an Executive Officer system to clearly separate policy decision-making from operational management, enabling swift and effective responses to evolving business conditions. Corporate Auditors conduct audits in accordance with annual audit policies formulated by the Board of Corporate Auditors, covering directors' duties, risk management, compliance, and internal controls. Audit findings and recommendations are reported to the Representative Director and, where necessary, to relevant executive functions.

The role of Chairman primarily involves:

- Providing strategic direction and long-term vision aligned with group objectives
- Ensuring effective Board functioning and decision-making
- Overseeing governance standards, compliance culture, and performance oversight
- Facilitating coordination between SSMI and the parent company

The Chairperson does not engage in day-to-day operational management of SSMI. Operational authority rests with the Managing Director and executive leadership team in India. The Chair's involvement is strategic and supervisory rather than executive in the local operational sense.

Conflict of Interest Prevention & Mitigation

Although the Chair holds a senior executive role within the parent organization, several governance mechanisms mitigate potential conflicts of interest:

● Clear Role Delineation

Operational management authority is vested in the Managing Director. The Chair's role is supervisory and strategic, reducing overlap with executive decision-making at the subsidiary level.

● Collective Decision-Making

Board decisions are taken collectively, with participation from executive and non-executive directors. Major matters require formal Board approval, preventing unilateral influence.

● Disclosure Requirements

Directors are required to disclose any potential conflicts of interest in accordance with applicable company law and internal governance standards.

● Parent–Subsidiary Governance Protocols

Transactions between SSMI and the parent entity, if any, are governed by formal approval processes and documented through transparent reporting structures.

● Financial and Operational Reporting Controls

Periodic reporting, internal control systems, and statutory audits provide independent verification of financial and operational integrity.

Table : Composition of Board of Directors

Name	Role in SSMI	Executive / Non Executive	Independence Status	Competencies Relevant to SSMI's Impacts
Mr. Takashi Yatsunami	Chairman	Non Executive	Non-Independent (Parent Nominee)	• Global Steel Industry Leadership • International Operations Strategic Planning • Financial Oversight • Corporate Governance • Cross-border Management
Mr. Dilipkumar Pachpande	Managing Director	Executive	Non-Independent (Executive Director)	• Operations Management • Project Execution • Capacity Expansion • Process Engineering • Manufacturing Efficiency • Workplace Safety • Energy Optimisation
Mr. Hirokazu Suzuki	Executive Director	Executive	Non-Independent (Parent Nominee)	• Steel Marketing • Corporate Planning • Global Sales Strategy • Supply Chain Alignment • Market Risk Management
Mr. Yoshiro Hori	Director	Non Executive	Non-Independent (Parent Nominee)	• International Manufacturing Leadership • Strategic Transformation • Risk Oversight • Global Subsidiary Governance
Mr. Tetsuro Kariya	Director	Non Executive	Non-Independent (Parent Nominee)	• Materials Science Expertise • R&D Alignment • Corporate Planning • Technological Innovation • Sustainability Transition Strategy



Mr. Takashi Yatsunami
Chairman



Mr. Dilipkumar Pachpande
Managing Director



Mr. Hirokazu Suzuki
Executive Director



Mr. Yoshiro Hori
Director



Mr. Tetsuro Kariya
Director

II. Board Overseeing the ESG Impacts

In view of the rule 4(1) read with sub rule (2) of the Companies (appointment and qualification of Directors) Rules 2014 and Rule 6 of the Companies (meeting of Board and its powers) Rules 2014, the Company need not require appointing Independent Directors and not required to constitute an Audit Committee and the Nomination and Remuneration Committee of the Board.

The Board of Directors actively oversees stakeholder engagement processes and reviews their outcomes to ensure alignment with the Company's strategic and sustainability objectives. SSML engages with key stakeholders including employees, customers, suppliers, shareholders, regulators, and local communities on a monthly, quarterly, and annual basis through structured meetings, surveys, and continuous communication channels. Feedback received is evaluated by management and presented to the Board to support informed decision-making and strengthen the Company's economic, environmental, and social performance.

The Highest Governance Body is also responsible for reviewing and approving reported information, including the identification of material topics. The results of the materiality assessment and key disclosures are submitted to the Board for evaluation of their relevance, completeness, and strategic alignment prior to formal approval, ensuring transparency, accuracy, and accountability in sustainability reporting.

● RISK MANAGEMENT POLICY

In terms of the requirement of the Act, the Company has developed and implemented the Risk Management Policy, and the Board reviews the same periodically. The risk management policy sets out the objectives and elements of risk management within the organization and helps to promote risk awareness amongst employees and to integrate risk management within the organization's culture. The formulation and authorization of the risk policy illustrates executive management's commitment to implement and continuously develop risk management within the Company.

● CORPORATE SOCIAL RESPONSIBILITY INITIATIVES (CSR):

The provisions of the section 135 of Companies Act, 2013, is applicable to the Company. In terms of new section 135(9) of the Companies Act, 2013, which

provides that where the amount to be spent by a company under CSR activities does not exceed fifty lakh rupees, the requirement for constitution of the Corporate Social Responsibility Committee shall not be applicable and the functions of such Committee provided under this section shall, in such cases, be discharged by the Board of Directors of such company. Since the Company has carried forward losses and not having the profits to be spent towards CSR activities and in view of the above new Provisions, the CSR activities being discharged by the Board of the Directors of the Company.

Policy Commitments Business Ethics

At SSML, ethical conduct forms the foundation of the Company's business practices and decision-making processes. SSML is committed to operating with integrity, transparency, and accountability across all levels of the organization. The Company's Code of Conduct and governance framework guide employees, management, and business partners to uphold the highest standards of ethical behaviour, comply with applicable laws and regulations, and prevent conflicts of interest, bribery, and corruption in any form.

SSML fosters a culture of ethical awareness through regular training and communication on ethics, governance, and compliance. Robust policies, internal controls, and grievance redressal mechanisms including whistleblower provisions enable employees and stakeholders to raise concerns without fear of retaliation. By embedding ethical principles across its operations and value chain, SSML strengthens trust, protects stakeholder interests, and supports sustainable and responsible business growth.

Code of conduct

SSML, guided by the values and principles of the Sanyo Special Steel Group, conducts its business with a strong sense of social responsibility and high ethical standards. As a company operating in the basic materials industry, SSML is committed to supplying high-quality special steel products that contribute to societal development while earning the trust of customers and stakeholders through fair, transparent, and lawful business practices. The Company adheres to all applicable laws and regulations, respects

international rules, and upholds human rights across its operations and value chain.

SSML's Code of Conduct and Guidelines for Corporate Behaviour outline clear expectations for ethical conduct in business activities, including fair competition, responsible relationships with customers, suppliers, governments, and business partners, protection of intellectual property, and strict avoidance of bribery, corruption, and associations with antisocial forces. The Company emphasizes transparent disclosure of corporate information, protection of personal and customer data, and proactive engagement with society, while also taking the initiative in addressing environmental challenges and promoting sustainability. The company maintains a zero-tolerance policy toward corruption. During the reporting period, no incidents of corruption were identified or reported.

Equally important is SSML's commitment to its employees and communities. The Company fosters a safe, healthy, and inclusive work environment that respects individual dignity, diversity, and privacy, while prohibiting discrimination and harassment in any form. Through strong leadership accountability, internal controls, training, and continuous monitoring, SSML ensures effective implementation of its ethical framework, reinforces stakeholder trust, and supports sustainable and responsible long-term growth.

Conflict of interest

SSML ensures that all business decisions are taken in the best interests of the Company and its stakeholders. Employees, officers, and management are required to avoid and disclose any actual or potential conflicts of interest and to act with integrity, objectivity, and compliance with applicable laws and internal policies. The Company prohibits misuse of position, assets, or information for personal gain and requires employees to recuse themselves from decisions involving conflicts. Through clear guidelines and effective internal controls, SSML promotes transparency, accountability, and ethical conduct.

Economic Performance

During FY 2024 and FY 2025, SSMI generated substantial economic value through its core operations, with revenues of ₹13,310.33 million and ₹13,096.91 million respectively. The majority of the economic value generated was distributed towards operating costs, employee wages and benefits, finance costs, taxes, depreciation, and other operational expenses, reflecting the Company's contribution to suppliers, employees, capital providers, and the government. Employee benefits increased in FY 2025, demonstrating continued investment in workforce welfare, while operating and finance costs remained broadly stable, indicating disciplined cost management.

After distribution of economic value, SSMI retained ₹121.48 million in FY 2024 and ₹119.02 million in FY 2025 to support reinvestment, operational strengthening, and long-term growth. The stable retained value reflects the Company's focus on maintaining financial resilience while continuing to generate economic benefits for key stakeholders and contributing to broader economic development.

Table : Direct Economic Value Generated and Distributed

ECONOMIC VALUE GENERATED AND DISTRIBUTED (EV G&D)	FY 2024 (Rs.in million)	FY 2025 (Rs.in million)
ECONOMIC VALUE GENERATED (G)		
Revenues	13,310.33	13,096.91
ECONOMIC VALUE DISTRIBUTED (D)		
Operating costs	8,396.82	7,932.81
Employee wages and benefits	680.41	750.68
Finance costs	261.66	259.32
Payments to governments (Taxes)		
Depreciation and amortisation expense	234.26	221.80
Other expenses	3,615.71	3813.27
ECONOMIC VALUE RETAINED (G-D)	121.48	119.02

Proportion of spending on local suppliers

The company sources its raw materials from a combination of local markets (within a radius of 400 km) as well as suppliers located beyond the local region. A substantial proportion of the total raw material expenditure approximately 82% is allocated to local suppliers. This sourcing approach reflects the company's strategic focus on strengthening local supply chains, supporting regional businesses, and minimizing transportation-related environmental impacts such as fuel consumption and greenhouse gas emissions. By prioritizing local procurement, the company not only enhances supply reliability and responsiveness but also contributes to the economic development of the communities in which it operates.

ENVIRONMENTAL RESPONSIBILITY

Taking every step to ensure sustainable development

SSMI adopts globally recognized best practices to reduce and minimize the environmental impacts of its operations. The organization acknowledges climate change as one of the most significant challenges of the present era, while also recognizing the economic opportunities it creates. Sustainability is firmly integrated into SSMI's business strategy, shaping its commitment to responsible growth that protects the environment, strengthens social responsibility, and supports long-term economic progress.

The company has made consistent advancements toward a greener future by emphasizing low carbon operations and improving environmental performance across pollution control, waste management, water conservation, and energy efficiency. SSMI aims to substantially reduce its carbon footprint while fostering responsible practices throughout its operations.

Sustainable development is treated as a core business responsibility at SSMI, with dedicated resources allocated across functions to drive this agenda. Annual objectives are clearly defined at the beginning of each financial year, documented in this sustainability statement report, and reviewed periodically to track progress. The company has identified key environmental aspects including energy, water, waste, pollution control, and biodiversity and has developed rolling roadmaps for each to ensure continuous improvement.

Achievements

The company has major achievements in the field of environmental sustainability.

1. Carbon disclosure project (CDP)



SSMI continues to strengthen its climate and sustainability leadership, marked by its "A-" rating in the CDP Climate Change Disclosure 2024 and its strong environmental and social progress in FY 2024-25. The CDP recognition reflects SSMI's transparent climate reporting, robust governance, and commitment to managing environmental risks responsibly. Building on this momentum, the company has made substantial strides in FY 2024-25 by embedding sustainability into core business operations and advancing its environmental stewardship.

SSMI has maintained a consistent performance score for two consecutive years, demonstrating stability and sustained commitment to its sustainability objectives.

SSMI is committed to 70% reduction in CO₂ emissions from the FY 2022 baseline, set science-based targets, and reaffirmed its long-term commitment to carbon neutrality by 2050. With the commissioning of a captive solar power project in partnership with Tata Power Renewable Energy Limited and a signed agreement for a long-term wind energy project with Greenwin Energy Three LLP & Greenwin Energy Seven LLP, SSMI is accelerating its clean energy transition. The company's ongoing efforts in pollution control, water and waste management, energy efficiency, and its Zero Harm approach underscore its focus on responsible growth, employee well-being, and community safety. Sustainability at SSMI is fully integrated into strategic decisions, stakeholder engagement, and long-term business resilience, positioning the company to create sustained value for both society and the environment.

2. Green Pro certification:

SSMI is actively engaging with the GreenPro framework to validate the sustainability performance of its steel products. By aligning with GreenPro criteria, the company showcases its focus on responsible sourcing, efficient resource use, waste minimization, and environmentally sound production. This step strengthens SSMI's market credibility, supports green supply chains, and positions its products as environmentally preferable choices in line with industry-leading sustainability standards.



Production:

During the reporting period, detailed quantitative disclosure of materials used by weight or volume, categorized into renewable and non-renewable inputs, percentage of recycled input materials used, and Information regarding reclaimed products was not publicly disclosed. The Company primarily utilizes non-renewable raw materials inherent to special steel manufacturing, including iron-based inputs, alloying elements, and other metallurgical additives. However, specific segregation between renewable and non-renewable material categories has not been formally presented in the sustainability disclosures. The company observed a growth of 0.20 % from FY 2022-23 to FY 2023-24 and 4.26 % from FY 2023-24 to FY 2024-25.

Actual and Potential impacts:

The Company has not publicly described the actual or potential positive and negative impacts associated with material sourcing and usage. In the context of special steel manufacturing, potential material-related impacts may include:

- Resource depletion (iron ore and alloying metals)
- Upstream mining impacts
- Energy-intensive material processing
- Waste generation and scrap handling
- Opportunities for circular material use

Company's involvement in areas where negative environmental or social impacts may arise from material sourcing, including upstream supply chain impacts or raw material extraction risks.

While the Company engages stakeholders under broader governance and operational mechanisms, structured engagement specific to material impacts is yet to be publicly documented.

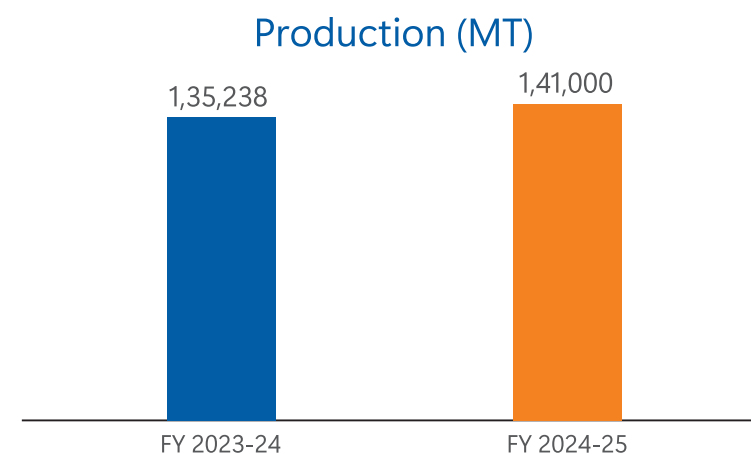


Fig: Production values of companies in FY 2023-24 and FY 2024-25



Energy

SSMI uses a mix of fuels across its operations, with a strong focus on transitioning from high emission fuels to cleaner alternatives. Low Sulphur Heavy Stock (LSHS), a low-sulphur heavy fuel oil with improved environmental performance compared to conventional furnace oil, is now used only in minimal quantities for specific reheating furnace operations where full natural gas substitution is still under progress. Furnace Oil (FO), a high-sulphur residual fuel, has been completely phased out and replaced with natural gas as part of SSMI's strategic fuel transition program. High Speed Diesel (HSD), a lighter and lower-sulphur fuel with higher calorific value, is used primarily for mobile equipment such as forklifts. The primary and most widely used fuel at SSMI is Natural Gas (NG), a clean methane-based gaseous fuel supplied through pipelines, offering low emissions, higher efficiency, and better temperature control. Most reheating furnaces and boilers have already shifted to natural gas, significantly reducing CO₂, SO_x, and NO_x emissions. Fuel consumption is recorded with the use of energy meters and verified with energy bills. This data is then used for calculation of energy consumption and GHG accounting.

Energy consumption from various sources including electricity, furnace oil, diesel, LPG, and other fuels has been converted into Gigajoules (GJ) using standard calorific values and conversion factors referenced from the Intergovernmental Panel on Climate Change (IPCC) 2006 Guidelines and nationally recognized energy conversion standards issued by the Bureau of Energy Efficiency (BEE), Government of India.

Energy consumption within organisation

During the reporting period, the organization revised its fuel mix as part of operational and efficiency considerations. Furnace Oil (FO) was phased out and replaced with Natural Gas (NG) and Low Sulphur Heavy Stock (LSHS). This transition was undertaken to improve combustion efficiency, enhance operational reliability, and reduce the environmental intensity associated with conventional liquid fuels.

Total energy consumption increased during the reporting year primarily due to a rise in production volumes, which directly influenced thermal energy demand.

The increase in coal consumption is attributable to higher production output rather than a decline in energy efficiency. Coal remains a significant component of the organization's energy mix due to its cost-effectiveness and process suitability in high-temperature applications.

Table : Fuel type and consumption by SSMI

Sr.No	Fuel Type	Unit	FY 2024	FY 2025
1	Liquid Fuel	KL	2,301	1,974
2	Solid Fuel	MT	1,868	2,260
3	Gaseous Fuel	SCM	1,24,77,513	1,39,60,519

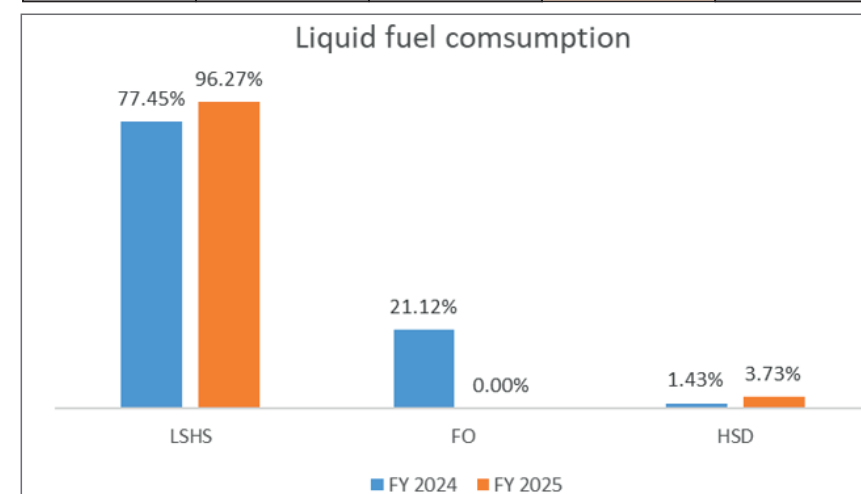


Fig: The Overall consumption of Liquid fuel has decreased by 16.52 % and within that the consumption of FO has been reduced to 0 KL.

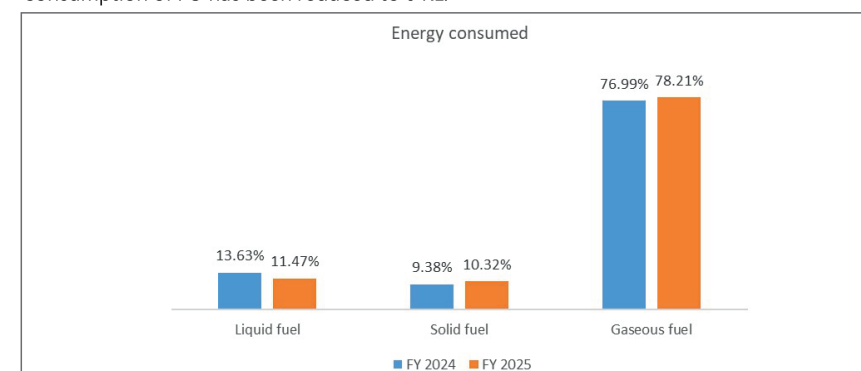


Fig: The total Energy consumption, in fuel type (liquid, solid and gaseous) for Sanyo, for FY 2024 and FY 2025

Total electrical energy consumption increased by 4.72% during the reporting period, primarily due to higher production volumes. However, renewable electricity consumption increased significantly by 25.16%, indicating a strategic shift toward cleaner energy sources. Although coal consumption rose in line with increased output, the replacement of Furnace Oil (FO) with

Natural Gas (NG) and Low Sulphur Heavy Stock (LSHS), combined with a higher share of renewable electricity, helped moderate overall emission intensity. As a result, while absolute energy use increased, the improved energy mix contributed to reducing the carbon intensity per unit of production and partially offset the potential rise in emissions.

Table: SSMI, electrical energy consumption source wise

Sr.No	Electrical Energy	Unit	FY 2024	FY 2025
1	Electricity From Conventional sources (Discoms + Other)	Kwh	7,44,46,284	6,10,09,638
2	Electricity from Non -Conventional Renewable Energy (Solar + wind)	Kwh	5,97,62,991	7,98,53,800
	Total	Kwh	13,42,09,275	14,08,63,438

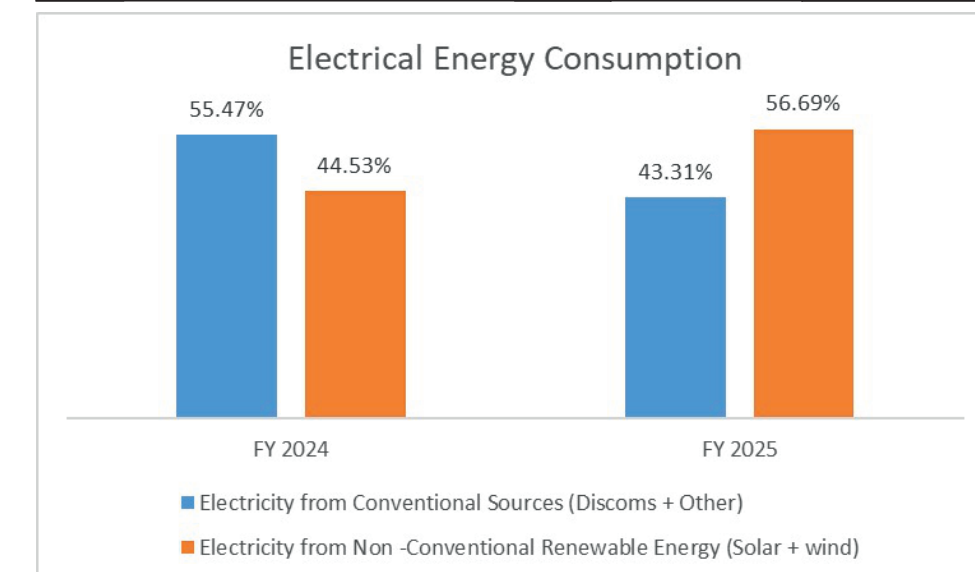


Table : Electrical energy consumption of SSMI for FY 2024 and FY 2025.

Table: Total energy consumption in GJ

Energy Source	Unit of Measurement	FY 2024	FY 2025
LSHS+ FO + HSD	GJ	86,888	71,350
COAL	GJ	59,803	65,235
NG	GJ	4,90,743	4,99,8
MSEDCL	GJ	2,67,875	2,19,527
Solar + wind	GJ	2,15,041	2,87,333
Total	GJ	11,20,352	11,43,317

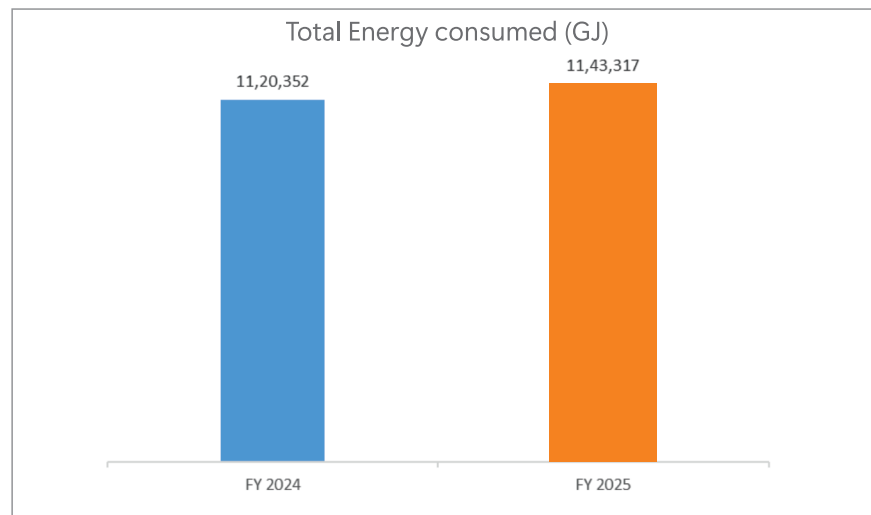


Fig: Annual energy consumed by SSMI

Renewable and Non Renewable energy consumption

For the purpose of emissions calculation and assessment of green benefits as defined in the agreement, only the portion of renewable electricity that directly contributes to eligible environmental attributes is considered. Based on the current allocation methodology, 57% of the total electricity generated qualifies as renewable units and is therefore included in the Scope 2 emissions reduction and green benefit computation. The remaining generated units are excluded from the calculation to avoid double counting and to ensure that emission reductions are attributed only to verified and contractually recognized renewable energy contributions.

Table: Total energy consumption in GJ

Energy Type	Unit	FY 2024	FY 2025
Non-renewable	GJ	9,05,311	8,55,984
Renewable	GJ	2,15,041	2,87,333
Total	GJ	11,20,352	11,43,317

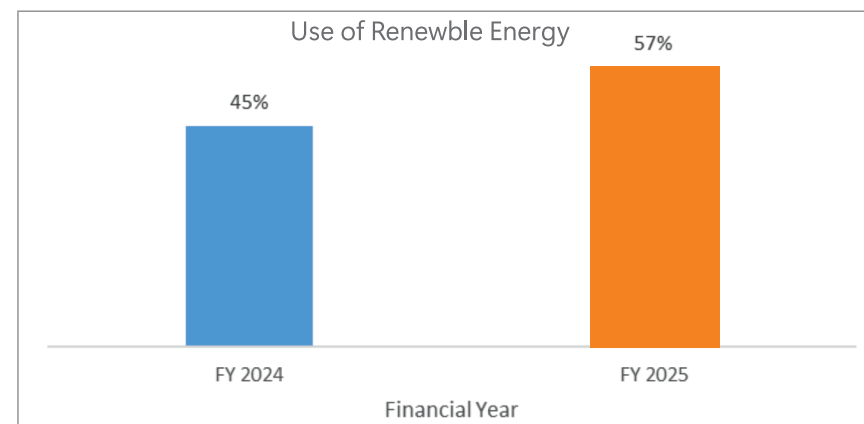


Fig : Share of renewable energy for FY 2024 & FY 2025.

Energy intensity

Table : Year-on-year Energy intensity of SSMI

Energy Type	Unit	FY 2024	FY 2025
Energy Intensity	GJ/MT	8.284	8.109

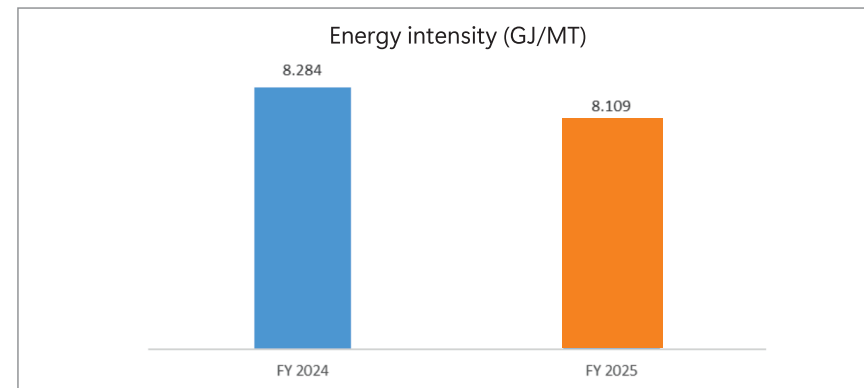


Fig : Energy intensity graph for FY 2024 & FY 2025.

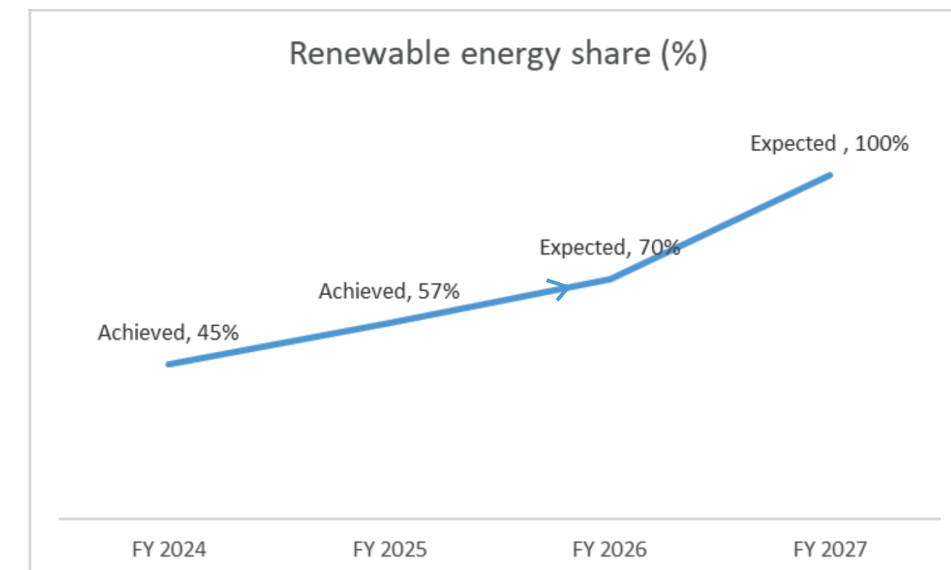


Fig : SSMI expected plan/trajectory of achieving 100% renewable energy by 2027.

Energy Conservation Measures Taken

Process Improvements

- Optimized charge scrap mix in the Electric Arc Furnace (EAF) to improve energy efficiency.
- Substituted furnace oil with natural gas in re-heating furnaces to reduce energy intensity and emissions.
- Enhanced combustion efficiency by optimizing the air-fuel ratio in the natural gas-fired re-heating furnace combustion control system.
- Upgraded the Bar Mill Main DC Drive with the latest high-efficiency version to improve operational efficiency.

Energy-Efficient Equipment

- Procured and deployed energy-efficient equipment such as LED lighting and high-efficiency electric motors.

Improvement Activities

- Revamped re-heating furnaces, heat-treatment furnaces, and controlled cooling pits to enhance energy performance.
- Implemented additional energy conservation measures through best practices, process improvements, operational efficiency enhancement, and capacity utilization optimization.

Water and effluents

Reduction in Energy requirement of Sold products:

●SSMI manufactures green steel products designed to enhance material efficiency and potentially reduce energy requirements during downstream processing and end use applications. While the Company has not yet quantified the lifecycle energy savings associated with these products, their improved material properties and optimized production processes are expected to contribute to reduced overall energy intensity across the value chain.

●The Company is exploring mechanisms to assess and quantify avoided energy consumption through lifecycle assessment methodologies in future reporting periods.

The above mentioned energy efficiency initiatives have been successfully implemented across operations. While quantitative impact assessment over a defined time period is currently under consolidation, the Company is in the process of strengthening its energy performance monitoring systems to enable time bound measurement and reporting of savings.

Going forward, SSMI intends to establish baseline benchmarks and track measurable improvements to enhance transparency and demonstrate continuous improvement in energy performance.

The company recognizes water as a shared and finite natural resource essential to both industrial operations and community well being. The Company primarily withdraws water from a nearby river source to support cooling systems, rolling operations, utilities, dust suppression, and domestic requirements.

Given its dependence on surface water, the Company acknowledges potential environmental and stakeholder impacts, particularly during lean seasonal flows. Key actual and potential impacts identified include:

- Reduction in downstream water availability
- The company does not operate in areas of water stress yet the risk of ecological stress on aquatic aquifers still prevails.
- Risk of water quality deterioration if effluent treatment systems underperform
- Potential leakages from aging infrastructure
- Increased regulatory scrutiny under evolving water compliance norms

To manage these interactions responsibly, SSMI has implemented:

- Closed-loop cooling systems to reduce freshwater abstraction
- Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP) systems
- Progressive strengthening of Zero Liquid Discharge (ZLD) practices
- Rainwater harvesting initiatives to supplement operational needs
- Periodic monitoring of abstraction and discharge parameters

Water governance is overseen at the plant management level, ensuring compliance with approved withdrawal permissions and discharge standards. Performance of treatment systems is regularly reviewed to mitigate environmental and community risks.

Further strengthening its water stewardship approach, the Company participates in the CDP Water Security disclosure program and secured a 'B' rating for both FY 2024 and FY 2025, reflecting structured water risk identification, management processes, and transparency practices.

Going forward, SSMI aims to enhance water intensity tracking (m³ per ton of steel produced), upgrade aging infrastructure to prevent leakages, and strengthen resilience against regulatory tightening and climate-related water variability.

Water Sources

- Freshwater is withdrawn only from the river water as authorized by the Government Authority.
- No freshwater is withdrawn for domestic utility purposes. Domestic wastewater is treated through the Sewage Treatment Plant (STP) and reused internally.

SSMI operates as a Zero Effluent Discharge (ZED) facility, meaning no industrial wastewater is released into the environment. All industrial water is fully contained within a closed loop system, eliminating environmental impact and minimizing freshwater withdrawal.



Fig: Incoming water meter photograph

The water is primarily used for de scaling, boiler, and domestic water needs, apart from direct use the water is also lost in evaporation, drift, minor seepage losses. The treated waste water is used in gardening and landscaping. During the flow the scale pits capture metallic pollutants before water re-enters the system. Also fully covered pipelines prevent contamination from oil, lubricants, or non-metallic pollutants. Apart from internal commitment towards water the company urges its vendor to sign the vendor code of conduct, adhering to water conservation, pollution prevention and responsible water practices.

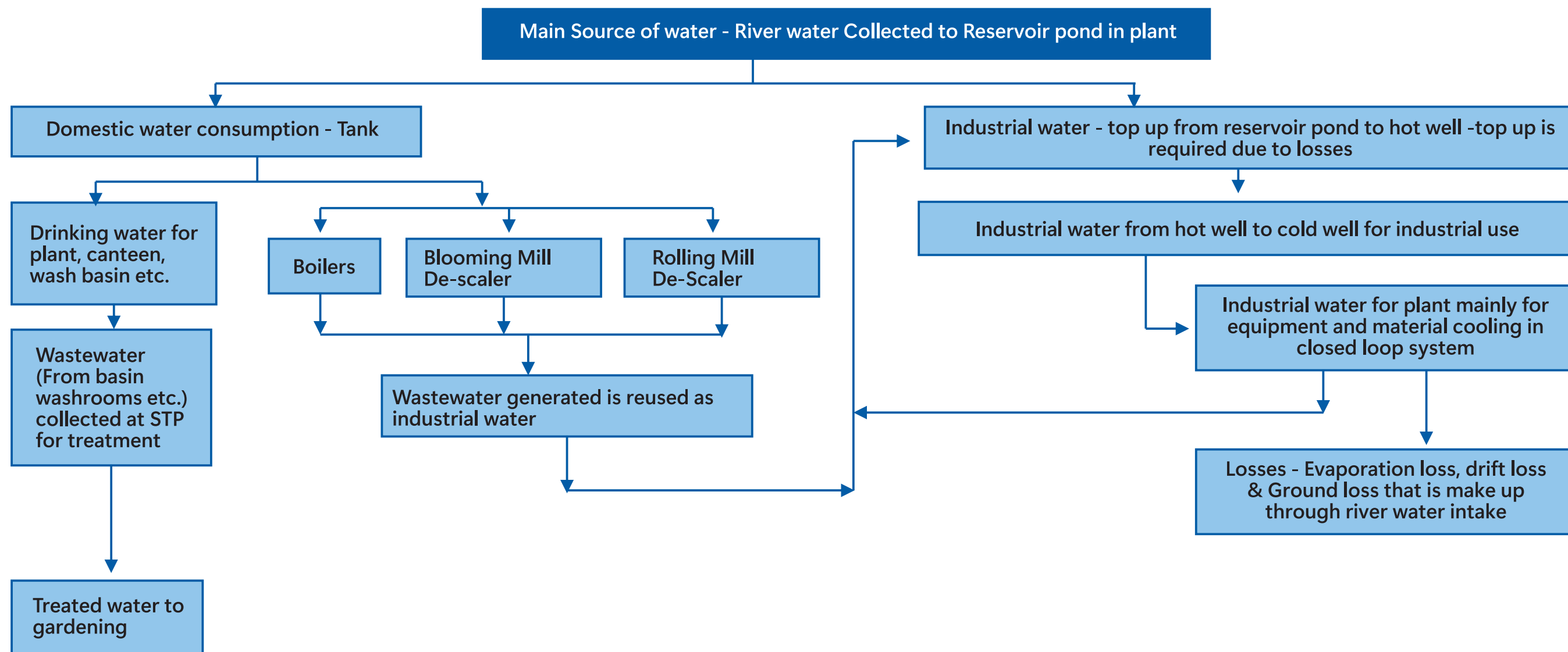


Fig: Water flow diagram inside the SSMI campus

Table: Water withdrawal, by SSMI

Year	FY 2024	FY 2025
Fresh water withdrawal from River (KL)	4,48,110	4,18,107

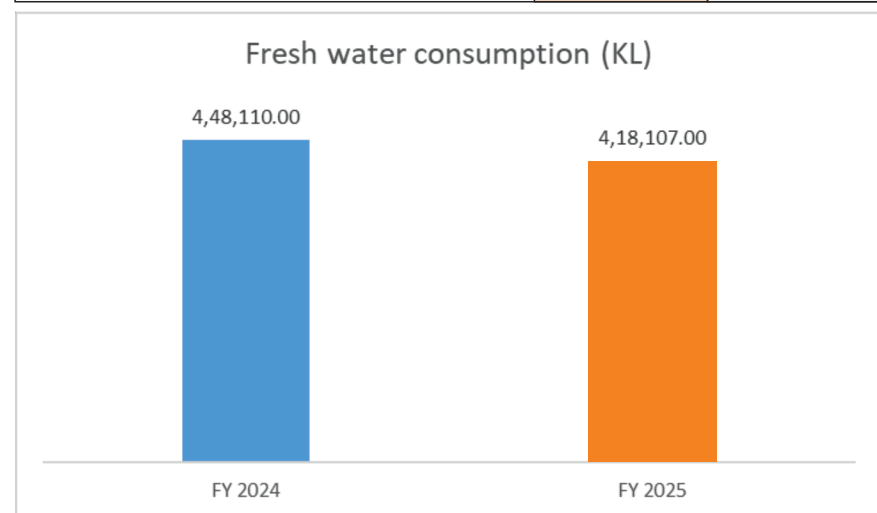


Fig: Fresh water withdrawal by SSMI

The company has installed water meters on critical points, river water intake, rolling mill de-scaler, boiler, STP, domestic water distribution system. This enables the company to know the total freshwater withdrawal, and the company also monitors the water quality parameters, pH, TSS, BOD, COD. The quantity of water withdrawal is monitored daily, the monitored values are verified with governmental monthly water bills. The STP water testing is ensured in line with MPCB and is safe to reuse. Further, the company plans to reduce dependency on freshwater year on year by increasing recycling efficiency.

Freshwater withdrawal decreased during the reporting year as a result of targeted water conservation measures. A key intervention included RCC flooring of the main water storage tank, which eliminated ground seepage and prevented water loss. This structural improvement strengthened water retention efficiency and contributed directly to reduced freshwater extraction, demonstrating improved water management performance within the facility.

During the reporting period, total water consumption decreased by 6.70% (in KL), while specific water consumption improved significantly by 10.51% (KL per MT of production). The sharper reduction in specific consumption indicates improved operational efficiency beyond the impact of production fluctuations. These improvements were achieved through targeted water conservation measures implemented at SSMI, leading to optimized process water use and enhanced resource efficiency.

Table: Waste water treated at SSMI

Year	FY 2024	FY 2025
Waste Water Treated (KL)	9,462	7,859

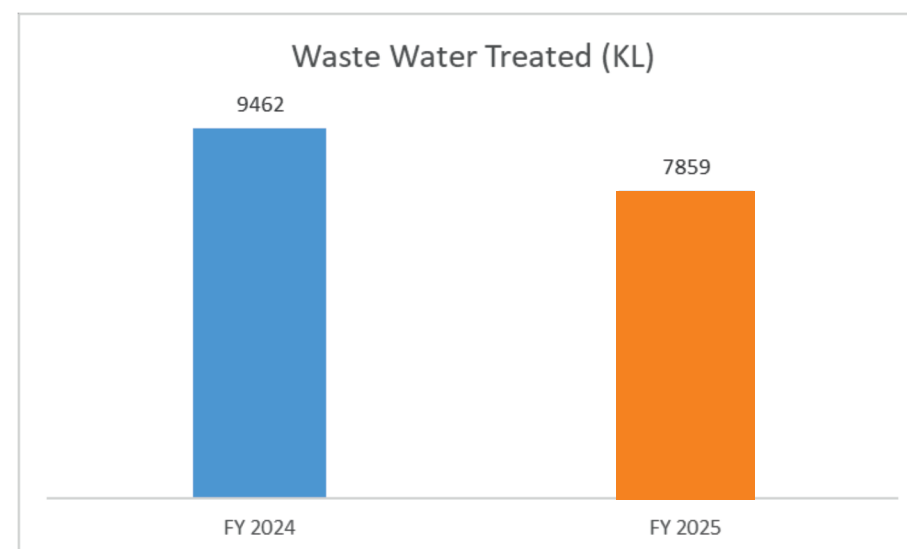


Fig: Waste water treated in SSMI for FY 2024 and FY 2025



Fig: STP plant on site and diagram of STP plant.

Table: The water intensity of SSMI for FY 2024 and FY 2025.

Year	FY 2024	FY 2025
water intensity (KL/MT)	3.313	2.965

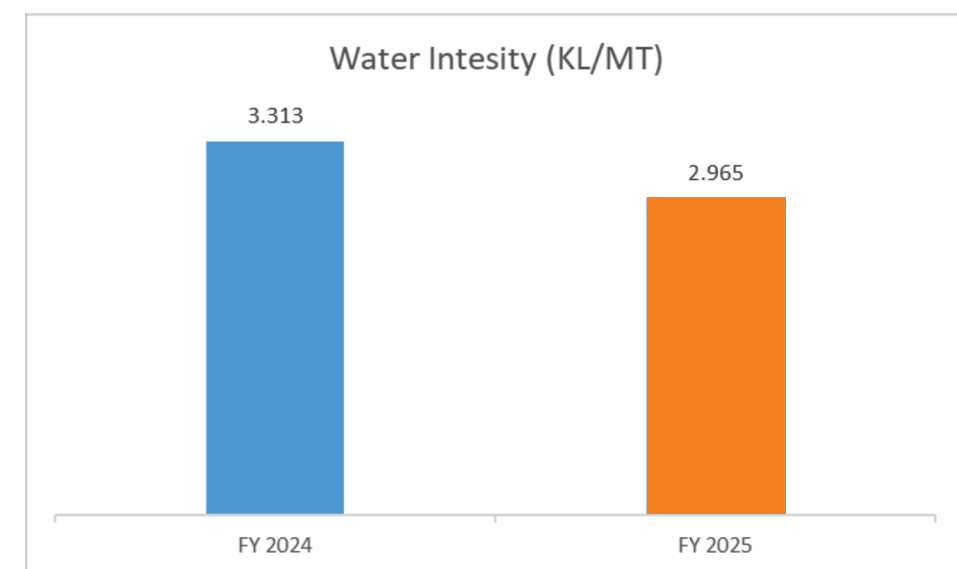


Fig: Water intensity of SSMI for FY 2024 and FY 2025.

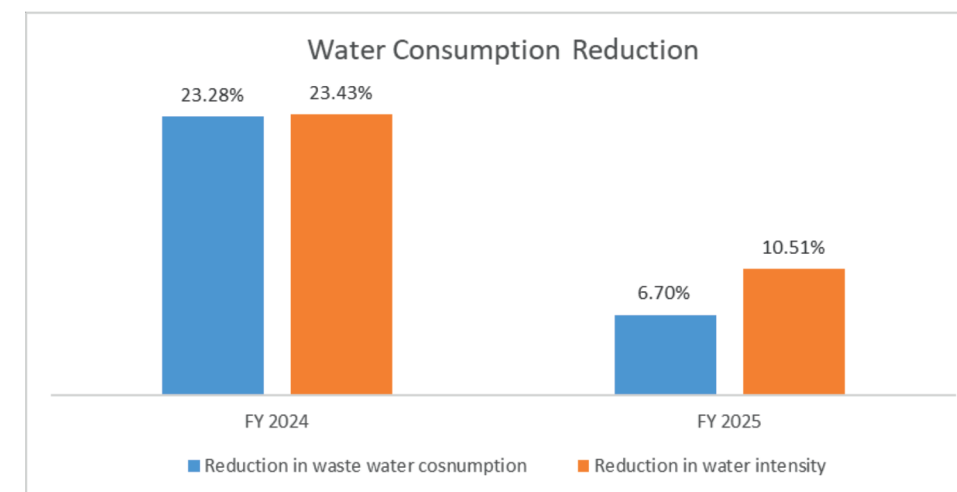


Fig: Water consumption reduction tread at SSMI, for FY 2024 and FY 2025.

Emissions

The steel industry is one of the most energy-intensive and emission-heavy sectors globally, contributing significantly to industrial CO₂ emissions due to high-temperature processes and heavy reliance on fossil fuels. Effective emissions control is essential not only to meet regulatory requirements but also to protect air quality, public health, and long-term environmental stability. Strong emissions management improves operational efficiency, reduces fuel consumption, enhances competitiveness, and supports global decarbonization pathways. With increasing expectations from customers, investors, and global supply chains, low-carbon steel production is becoming a critical differentiator. Controlling emissions also helps steel producers align with global climate targets, prepare for future carbon pricing mechanisms, and ensure long-term business resilience in a market shifting toward sustainable and circular manufacturing.

SSMI calculates its greenhouse gas emissions in accordance with ISO 14064-1:2018 using activity data such as fuel consumption and applying country-specific emission factors sourced from the India GHG Program and the IPCC 2006 Guidelines. Compliance with national regulations is ensured through adherence to the Carbon Credit Trading Scheme (CCTS) 2023, including the detailed procedures and rules published by the Bureau of Energy Efficiency (BEE) under the Ministry of Power, along with guidance from the Ministry of Environment, Forest and Climate Change.

SSMI reported only Market-Based Scope 2 emissions, as Location-Based emissions are not relevant to the company's operational reality. Market-Based reporting provides a more accurate reflection of purchased electricity emissions, aligned with actual contractual instruments. Scope 2 emission factors are taken from the Central Electricity Authority (CEA) User Guide Version 20 (December 2024), and emissions are calculated based on electricity purchased from the grid excluding renewable energy.

All emissions associated with raw material usage are categorized under Scope 1, and therefore not included in other emission categories. Emissions related to capital investments are calculated using the EEIO emission factor (Average Capital Goods EF: 0.999109661 kg CO₂e per USD) from the Carbon Trust EEIO Database, enabling accurate estimation of emissions attributed to CAPEX-related activities. SSMI refers to the UK Government GHG Conversion Factors for Company Reporting for relevant Scope 3 calculations, along with country-

specific regulatory guidance for Transmission & Distribution (T&D) losses where applicable. Scope 3 Category 5 (waste generated in operations) is currently under screening, and SSMI plans to disclose this category in future periodic reporting once data verification is complete.

For product-related emissions, the emission factor is calculated based on the carbon content in the output product, following the methodology prescribed under the Carbon Credit Trading Scheme (CCTS). The formula applied is: Emission Factor = Carbon Content × (44/12).

Capital goods-related emissions (Scope 3 Category 2) are not relevant, as CAPEX-related emissions have already been accounted for under the "Capital Goods" category using the EEIO methodology. All remaining Scope 3 categories are not applicable to SSMI based on current operational boundaries and relevance assessments.

Further, quantification, verification, and independent assurance of Scope 1, Scope 2, and Scope 3 emissions are carried out annually by an external accredited agency. The assessment follows recognized national and international standards, including ISO 14064-1, ISO 14064-2, ISO 14064-3. This ensures that SSMI's emission reporting is accurate, transparent, and fully aligned with regulatory and global best-practice requirements.

The organization has adopted the operational control and financial control approach for consolidation of greenhouse gas emissions. Under this approach, the Company accounts for 100% of GHG emissions from operations over which it has full authority to introduce and implement operating policies.

No biogenic emissions from operations within the organisational boundary. Also no biogenic emissions have been identified in the upstream and downstream supply chain. The emissions have been calculated only for the tCO₂ eq as other gases were not considered for emissions calculations.

In scope 3 no other emissions apart from the listed categories as per GHG protocol are mentioned by the company.

The company has no processes or operations where the emissions where there is emission of ozone depleting substances.

Certain emission boundary refinements were undertaken during the reporting period to improve accuracy and transparency. Scope 3 – Category 1 (Purchased Goods and Services) emissions have been consolidated within Scope 1 based on revised boundary interpretation and internal accounting alignment.

Scope 2 emissions recorded a reduction in FY 2024 and FY 2025, primarily driven by the continued increase in renewable energy consumption, in line with the projected trajectory outlined in the figure titled "SSMI Use of Renewable Energy and Predictions." The growing share of renewable electricity has directly lowered grid-related emission intensity.

Additionally, the base year for emissions benchmarking was revised from FY 2015–16 to FY 2021–22 to reflect methodological updates, improved data accuracy, and structural changes within operations. The revised base year provides a more reliable and comparable foundation for tracking future emission reduction performance.

Overall emissions have reduced by 30.01%, primarily driven by a substantial decline in Scope 3 emissions, which decreased by 56.47% and the increase in renewable energy usage has further contributed to the reduction in overall emissions by lowering dependence on conventional energy sources and improving the organization's overall energy mix. As Scope 3 represents the largest contributing category within SSMI's emissions inventory, this reduction has significantly lowered the company's overall emissions profile. The decrease reflects improved value chain data accuracy, supplier engagement, and refined boundary alignment.

Emissions are calculated using a structured methodology based on recognized GHG accounting principles under the GHG Protocol, applying an operational control boundary. A management-control and risk-based approach is followed to identify material emission sources, prioritize high-impact categories, and strengthen data reliability. Internal data control mechanisms include standardized data collection templates, documented emission factors, cross-functional validation, and periodic internal reviews to ensure completeness and consistency. Emissions are reported using a location-based approach for electricity-related calculations.

Emission intensity in FY 2025 is lower compared to FY 2024, primarily due to the reduction in Scope 3 emissions during FY 2025. Intensity is calculated based on the net production quantity shipped by the company, ensuring that performance improvements reflect operational efficiency rather than absolute production fluctuations. This approach provides a more meaningful assessment of carbon efficiency per unit of output.

Table: Total emissions of SSMI for FY 2024 and FY 2025

Scope category	Unit	FY 2021-22 (Base year)	FY 2024	FY 2025
Scope 1	tCO ₂ eq	40,187	32,981	45,586
Scope 2	tCO ₂ eq	1,15,304	53,304	44,354
Scope 3	tCO ₂ eq	1,25,713	1,11,649	48,600
Total	tCO₂ eq	2,81,203	1,97,934	1,38,540

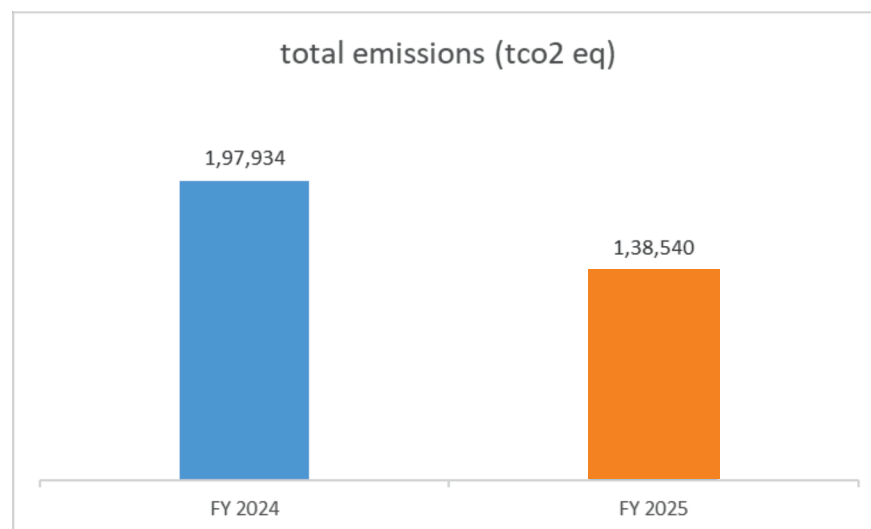


Fig: Total Emissions at SSMI for FY 2024 and FY 2025.

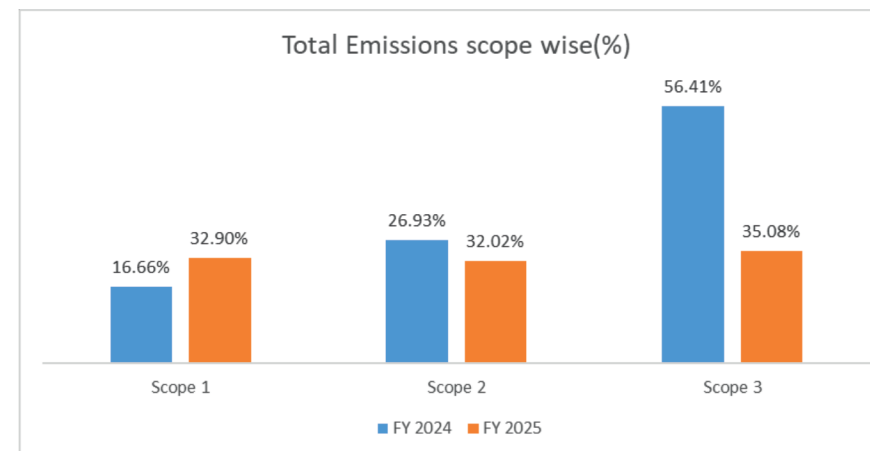


Fig: Total Emissions scope wise in percentage.

Table: Scope 2 break up for FY 2024 and FY 2025

Scope 2 Category	FY 2024 (tCo2 eg)	FY 2025 (tCo2 eg)
Scope 2 (Market-based)	53,304	44.354

Scope 3 Breakup:

Capital expenditure (CAPEX) in FY 2025 was lower compared to FY 2024, which directly influenced emissions under Scope 3 Category 1 (Purchased Goods and Services) and Category 2 (Capital Goods). The reduced procurement of capital equipment and related inputs resulted in lower embodied emissions during the reporting period.

For employee commuting, only transportation through company-arranged buses has been considered in the emissions calculation. Individual commuting modes (e.g., personal vehicles, public transport, two-wheelers) are currently excluded due to data availability constraints. This boundary limitation is disclosed to maintain transparency in Scope 3 accounting.

Downstream transportation and distribution emissions are demand-driven and vary based on the supply volume of finished goods during the year. Accordingly, fluctuations in downstream emissions reflect changes in sales dispatch volumes and market demand rather than operational inefficiencies.

Table: Breakup of Scope 3, for SSMI emissions for FY 2024 and FY 2025

Scope 3 category		Unit	FY 2024	FY 2025
UPSTREAM	category 1: Purchased goods and services	tCO ₂ e	67,030	0
	category 2: Capital goods	tCO ₂ e	11,584	860
	category 3: Fuel and energy related activities (not included in Scope 1 or 2)	tCO ₂ e	12,169	12,093
	category 4: Upstream transportation and distribution	tCO ₂ e	987	1,392
	category 5: Waste generated in operations	tCO ₂ e	0	0
	category 6: Business travel	tCO ₂ e	52	62
	category 7: Employee commuting	tCO ₂ e	307	294
	category 8: Upstream leased assets	tCO ₂ e	0	0
DOWNSTREAM	category 9: Downstream transportation and distribution	tCO ₂ e	8,977	32,169
	category 10: Processing of sold products	tCO ₂ e	11,457	1,730
	category 11: Use of sold products	tCO ₂ e	0	0
	category 12: End of life treatment of sold products	tCO ₂ e	914.6	0
	category 13: Downstream leased assets	tCO ₂ e	0	0
	category 14: Franchises	tCO ₂ e	0	0
	category 15: Investments	tCO ₂ e	0	0
Total		tCO₂e	1,11,649	48,600

Table: Specific emissions intensity of SSMI based Scope 1+2 and scope 1+2+3

Emissions intensity	Unit	FY 2024	FY 2025
Scope 1 and 2	t Co2 eg / MT	0.638	0.638
Scope 1, 2 and 3	t Co2 eg / MT	1.464	0.983

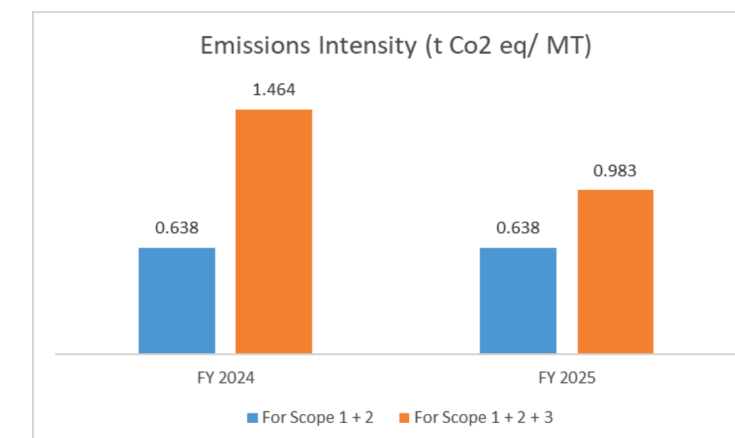


Fig: Emissions intensity based on scope 1+2 and Scope 1+2+3 for FY 2024 and FY 2025.

Specific Intensity:

The intensity reduction observed in FY 2024–25 is comparatively lower than in other years due to a boundary reclassification, wherein Scope 3 Category 1 emissions were consolidated under Scope 1. This structural adjustment affected year-on-year comparability, as a portion of emissions previously reported under Scope 3 was accounted for within direct operational emissions. As a result, the overall intensity improvement appears moderate for the year, not due to performance decline, but due to changes in emission categorization and reporting boundary alignment.

Table: Specific intensity reduction of SSMI for FY 2024 and FY 2025

Specific intensity reduction	FY 2024	FY 2025
scope 1 and 2	37.73%	0.02%
scope 1, 2 and 3	13.54%	32.87%

Emissions reduction:

With inclusion of solar energy and PPA agreements the company has reduced the emissions. The reductions are calculated with respect to base year, how much overall emissions have been reduced in the particular category.

Table: The Emissions reduction in each category as compared to the base year emissions.

Year	Unit	Scope-1 GHG emission	Scope-2 GHG emission	Scope-3 GHG emission	Total reductions w.r.t. base year
FY 2023-24	t Co2 eq	7,206	62,000	14,065	83,270
FY 2024-25	t Co2 eq	-5,399	70,950	77,115	1,42,665

Note: The “-” sign resembles the emissions in the particular category has increased as compared to base year.

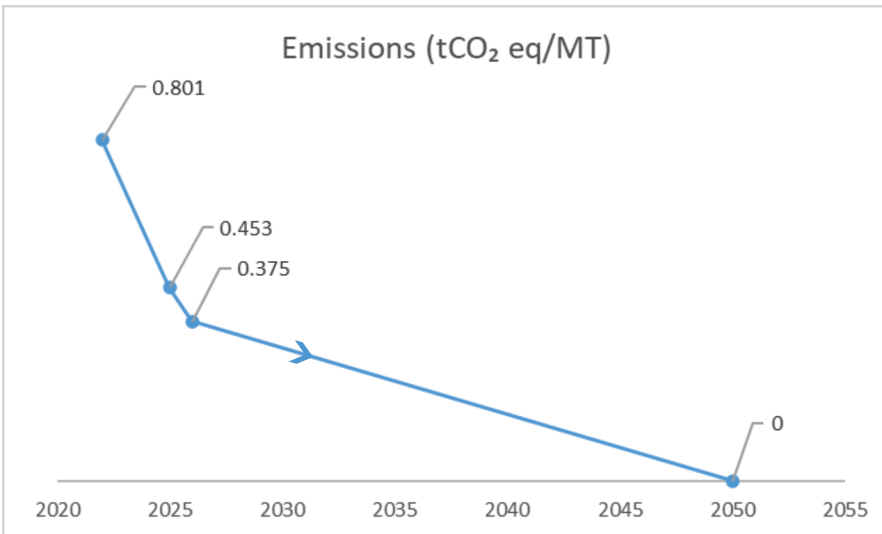


Fig: SSMI projected plan for carbon neutrality per tonnage of production

SSMI Green Steel Production Initiatives

SSMI is driving the transition toward green steel through a focused set of sustainability actions across its operations. Energy conservation remains a core priority, achieved through continuous process optimization, fuel substitution, equipment upgrades, and efficiency improvements that directly reduce energy intensity and emissions. The company is also strengthening its circular economy practices by maximizing recycling and reuse of slag, mill scale, refractory waste, and other by-products, along with promoting responsible waste management and biogas generation through food-waste processing. Complementing these initiatives is the adoption of renewable energy, including operational captive solar capacity and a long-term wind energy agreement, enabling a substantial shift away from fossil fuels and supporting lower-carbon steelmaking. Together, these initiatives form the foundation of SSMI’s green steel strategy and contribute to a cleaner, more sustainable production pathway.

Waste

At SSMI, environmental sustainability is a core priority, and we ensure that the majority of our industrial waste is recycled or reused to minimize environmental impact. Hazardous waste is managed strictly in compliance with Maharashtra Pollution Control Board (MPCB) guidelines and is handled, transported, and disposed of only through MPCB-authorized vendors. Similarly, non-hazardous waste is routed through authorized vendors to ensure safe handling and environmentally responsible processing. A dedicated team is allocated for tracking and monitoring waste. The waste generated is monitored on a daily basis by the EHS team. Further the company has established legal bonds with the waste handling parties, based on the engagement level and revenue generated. Zero spills reported in the reporting period.

The major non-hazardous waste streams generated at SSMI include various forms of slag and dust (EBT slag, LF slag, mixed soil with slag, slag boulders, mill scale, and flue dust) along with refractory waste.

- Slag & Dust / Dross:** Utilized for metal recovery and recycling, road and building construction, aggregate use, civil works, and controlled landfilling such as foundation backfilling.
- Mill Scale:** Recycled through metallic scrap recovery and used in steelmaking, sintering plants, and construction-related applications.
- Refractory Waste:** Repurposed for refractory reuse and applied in road construction and building foundation works.
- Food waste** generated from the canteen is segregated at source and handed over to Pune Municipal Corporation for processing at authorized biogas facilities. The waste is converted into biogas, which is utilized as a renewable source for electricity generation and supports local community energy needs. This approach prevents landfill disposal, reduces methane emissions, and promotes efficient resource utilization.

Waste related impacts in upstream and downstream

In the upstream supply chain, waste impacts are primarily linked to the extraction and processing of raw materials such as alloys, ferroalloys, and other inputs. Mining and primary processing activities may generate overburden, tailings, slag, and hazardous residues, which can contribute to land degradation, groundwater contamination, and ecological disturbance if not properly managed. Supplier manufacturing processes may also produce scrap rejects, packaging waste, and sludge. While these impacts occur outside the company’s direct control, they form part of the embedded environmental footprint of purchased materials and represent a supply chain risk area.

Within campus operations, waste generation is more direct and operationally significant. Steel manufacturing processes typically generate slag, mill scale, refractory waste, dust from air pollution control systems, oil-contaminated sludge, and other process residues. If mismanaged, these wastes can lead to soil contamination, groundwater pollution, air quality issues, and regulatory non-compliance. Hazardous waste streams such as used oil, ETP sludge, and chemical containers require proper storage, handling, and disposal through authorized recyclers to prevent environmental and safety risks. Additionally, domestic and administrative waste, though smaller in volume, reflects overall waste management discipline and compliance practices within the facility. In downstream activities, waste impacts are associated with fabrication scrap generated by customers during cutting and shaping of steel products. While steel is highly recyclable and contributes positively to circular economy practices, improper segregation or disposal at the end-of-life stage can lead to landfill burdens. Conversely, high recyclability rates and reuse of by-products such as slag in construction applications present significant environmental benefits, reducing virgin material demand and overall lifecycle waste impacts.

Overall, waste management across the value chain presents both environmental risks and opportunities. Effective recycling, authorized disposal of hazardous waste, by-product utilization, and responsible sourcing practices can substantially reduce negative impacts while strengthening environmental performance and stakeholder confidence.

Waste circularity measures

Waste circularity refers to transforming waste streams into reusable resources instead of treating them as materials for disposal. In a steel manufacturing setup, circularity can be embedded across process residues, hazardous waste, packaging, and end-of-life materials.

Within operations, process waste such as slag can be processed and utilized as a substitute material in cement production or road construction, reducing landfill disposal and replacing virgin raw materials. Mill scale generated during rolling operations can be collected and reintroduced into the furnace or sold for metal recovery, thereby retaining material value within the industrial loop. Dust from air pollution control systems may also be evaluated for metal recovery, depending on composition.

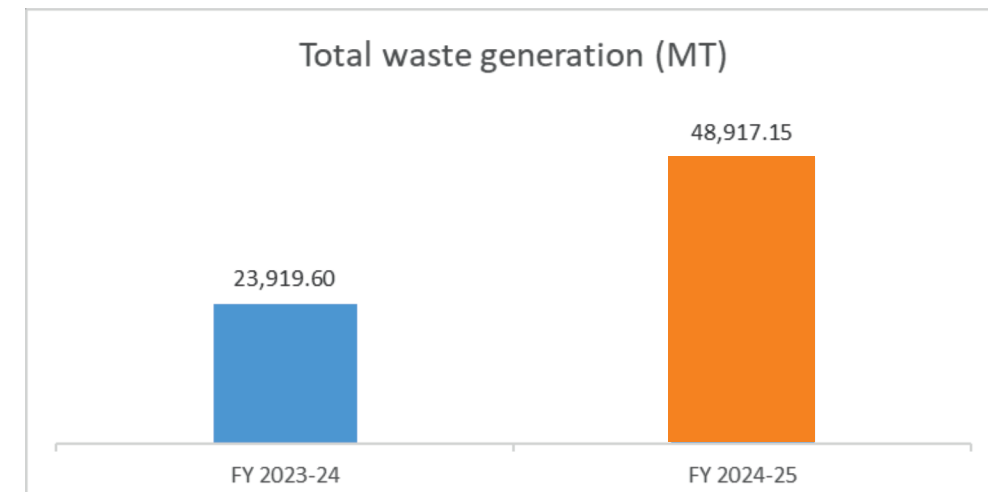
Hazardous waste streams, including used oil and lubricants, can be sent to authorized recyclers for re-refining and reuse, minimizing environmental risk and reducing the demand for fresh oil production. Effluent treatment plant (ETP) sludge, where feasible and compliant with regulations, can be co-processed in cement kilns instead of being landfilled.

Water circularity supports waste reduction by treating and reusing wastewater for dust suppression, cooling, or gardening applications. Closed-loop systems reduce discharge and prevent liquid waste generation.

In the supply chain, prioritizing higher recycled scrap content significantly enhances circularity by lowering the need for virgin material extraction. Downstream, encouraging customers to return fabrication scrap enables reintegration into the production cycle, creating a closed material loop.

Table: Total waste by category for FY 2024 and FY 2025

Waste category	Unit	FY 2024	FY 2025
Hazardous waste (MT)	MT	27	19
Non- Hazardous waste (MT)	MT	23,893	48,898
Total (MT)	MT	23,920	48,917



Hazardous waste

Table: Hazardous waste generated by category for FY 2024 and FY 2025

Hazardous Waste	FY 2024	FY 2025
Discarded Containers / Barrels	5.17	5.41
Discarded Glass Bottles / Cans	0.12	0.01
Used Oil / Waste Oil	13.93	0.21
Used Oily Rags/Oily Hand Gloves	5.59	6.44
Used Glass wool	2.16	6.42
e - Waste	0.00	0.94
Total	26.97	19.44

Fig: Total waste generated at SSMI, for FY 2024 and FY 2025.

Non-hazardous waste

Table: Non – hazardous waste generated by category for FY 2024 and FY 2025

Waste type	2024	2025
Slag from (electric arc furnace)	19,852	48,142
Dust	130	19
Mill scale	3,515	314
Used refractory bricks	368	404
Used abrasive scrap	20	9
Waste paper, cardboards plastic	8	6
Electrical scrap	0	4
Total Non-Hazardous waste	23,893	48,898

Food waste

To strengthen our commitment to green and clean energy, SSMI has initiated a food-waste utilization program in partnership with Khopoli Municipal Corporation (KMC), enabling electricity generation from segregated food waste. The company produces 0.3 T food waste per day and sends it to the Municipal council and they extract the energy from it to light street bulbs. Waste generated from the canteen has not been considered in the assessment, as it is outsourced free of cost to the municipal corporation for power generation.

Steps Involved in the Treatment of Food Waste

1. Generation of Food Waste at the Canteen

Food waste is collected daily from the canteen as part of routine operations.

2. Collection and Segregation

The waste is gathered and properly segregated to ensure only biodegradable material is sent for further processing.

3. Transportation to Municipal Processing Facility

The segregated food waste is transported to the designated municipal waste-processing area by authorized personnel.

4. Processing at the Biogas Plant

The municipal facility sends the food waste to a biogas plant, where it undergoes anaerobic digestion to generate biogas.

5.Biogas Utilization in DG Set

The biogas produced is used as fuel in a DG (diesel generator) set, replacing conventional fossil fuel use.

6.Electricity Generation

The DG set generates electricity from the biogas, enabling renewable power production.

7.Utilization of Generated Electricity

The electricity produced is used to power street lighting, directly contributing to sustainable energy use and circular economy practices.

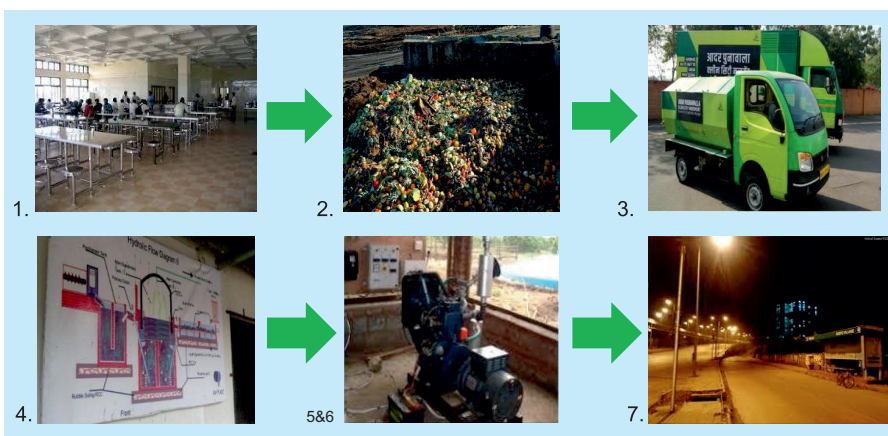


Fig: Food waste recycling diagram

Table: Total waste generated and recycled for FY 2024 and FY 2025

Year	FY 2024	FY 2025
Total waste generation (MT)	23,920	48,917
Waste recycled (MT)	22,020	45,080
Waste recycled in percentage (%)	92.06%	92.16%

Table: waste intensity measured in - MT / MT of Crude Steel production

Year	FY 2024	FY 2025
Waste Intensity	0.18	0.35

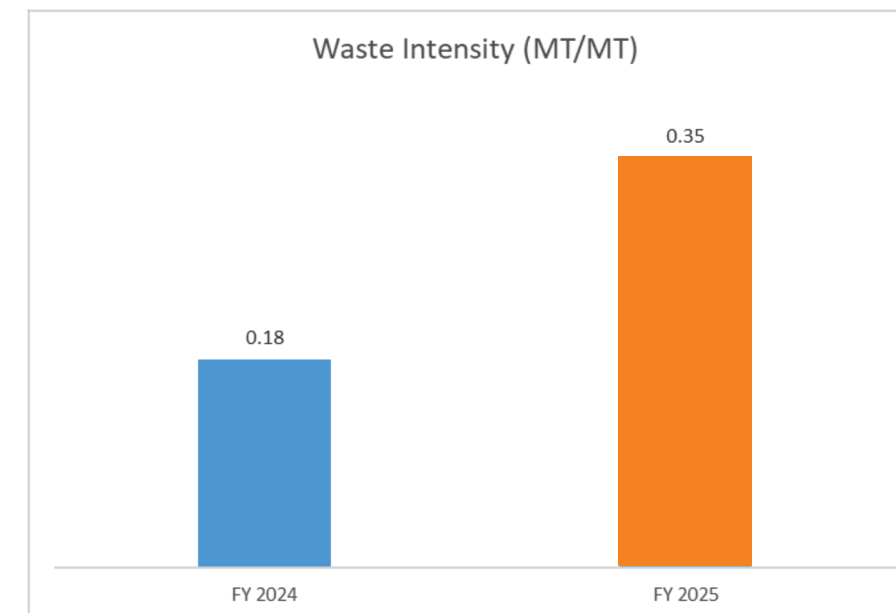


Fig: Waste intensity of SSMI for FY 2024 and FY 2025

Air pollution

SSMI maintains full compliance with MPCB norms and verifies its environmental performance through periodic third-party monitoring of air, water, and noise parameters. The steel industry is inherently emission-intensive, and SSMI approaches this challenge with a strict, engineering-driven environmental control system.

To safeguard air quality and ensure a healthy working environment, SSMI has installed emission-control hoods, multi-stage scrubbers, high-efficiency dust-filtration units, and fugitive-emission management systems across critical operations. These systems capture particulate matter, metallic dust, fumes, and gaseous pollutants released during steel melting, refining, and rolling processes.

The company monitors ambient air quality at the facility to assess the impact of its operations on the surrounding environment, with monitoring conducted thrice a year across key parameters including sulphur dioxide (SO₂), nitrogen dioxide (NO₂), particulate matter (PM₁₀ and PM_{2.5}), ozone, carbon monoxide (CO), ammonia, benzene, lead, benzo(a)pyrene (BaP), and nickel, using prescribed standard methods. The results consistently indicate that the concentrations of all tested parameters remain within the permissible limits designated by the Maharashtra Pollution Control Board (MPCB), with several pollutants recorded below detectable or quantification levels. In addition, regular stack monitoring along with on-site and off-site ambient air quality assessments ensures compliance with statutory emission standards and validates the effectiveness of installed pollution control systems, enabling early detection of deviations and timely corrective actions. Overall, these measures reflect the company's strong environmental management practices and continued commitment to regulatory compliance and safeguarding ambient air quality.

Table : Waste test report of STP inlet and outlet.

Parameter	Inlet	Outlet	Unit	Method
pH	6.96	7.6	–	IS 3025 (Part 11)
TSS	378	28	mg/L	IS 3025 (Part 17)
BOD (3 Days)	80	15	mg/L	IS 3025 (Part 44)
COD	270	50	mg/L	APHA 5220
TDS	214	80	mg/L	IS 3025 (Part 16)
Oil & Grease	BLQ (LOQ 1)	BLQ (LOQ 1)	mg/L	APHA 5520
Total Silica	BLQ (LOQ 0.04)	BLQ (LOQ 0.04)	mg/L	IS 3025

Note: The STP water test report has been conducted by a third party

SO_x and NO_x emissions are based on stack monitoring data verified through third-party environmental audits. No emission factors were applied for quantification, as emissions were determined through direct measurement in accordance with applicable regulatory monitoring protocols.

Adding to the same, the company is located in the MIDC area and no sites or operations are located in highly protected areas or biodiversity hotspots.

Parameter	Unit	Result
SPM	mg/m ³	0.146
SO ₂	mg/m ³	0.034
NO ₂	mg/m ³	0.026

Table : DG set test results

Supplier Assessment

SSMI recognizes that environmental impacts may arise not only from its own operations but also across its upstream supply chain, particularly in the sourcing of raw materials such as scrap, billets, alloys, fuels, and transportation services. The steel value chain is inherently energy intensive and may involve risks such as greenhouse gas emissions, air pollutants (SO_x, NO_x, particulate matter), water consumption, wastewater discharge, waste generation, and land degradation associated with mining-based inputs. Transportation and logistics activities may further contribute to fuel combustion emissions and spill related risks.

During the reporting period, the Company did not identify any material instances of significant environmental non-compliance within its immediate supplier base. However, it acknowledges the potential environmental risks embedded within upstream processes and continues to strengthen its oversight mechanisms. Environmental considerations are incorporated into vendor onboarding and evaluation procedures, including the review of statutory compliance documentation and supplier declarations. Preference is given to suppliers demonstrating adherence to environmental regulations and, where applicable, certified environmental management systems.

In cases where environmental concerns are identified, suppliers are required to undertake corrective actions, and continued engagement is subject to compliance improvements. The Company also promotes responsible sourcing practices, including increased utilization of recycled inputs and engagement with suppliers on energy-efficient and lower-emission production practices.

Going forward, SSMI aims to further enhance supply chain environmental risk screening, integrate ESG parameters into vendor performance assessment, and strengthen data collection related to upstream environmental impacts, including Scope 3 emissions.

Materials

During the reporting financial year, the Company procured a total of 170,347 MT of raw materials for its manufacturing operations. The material mix consisted of both virgin and recycled inputs. Virgin materials included 39,996 MT of Pig Iron and 5,530 MT of Ferro Alloys, while no DRI (Sponge Iron) was procured during the year. Recycled inputs comprised Light Scrap (Shredded), Heavy Scrap (HMS), Forging Flash, Graded Scrap, and Plant Return materials. Overall raw material procurement increased by 7.18% compared to the previous financial year, primarily due to higher production volumes and increased market demand.

Out of the total 170,347 MT of materials consumed, 124,821 MT were sourced from recycled inputs, accounting for 73% of total material procurement. The recycled stream includes externally sourced scrap as well as internally generated plant returns and forging flash that are reintegrated into the production process. Virgin materials constituted the remaining 27% of total inputs. The high proportion of recycled content reflects the Company's strong reliance on scrap-based production, which reduces dependency on primary raw materials and supports lower energy intensity and reduced environmental impact.

The Company actively reclaims and reuses internally generated process scrap, including plant returns and forging flash, totaling 30,124 MT during the reporting year. These materials are reintroduced into the manufacturing cycle, minimizing waste generation and improving resource efficiency. There were no externally reclaimed finished products reported during the year, and packaging material recovery is not material to the Company's core steel manufacturing operations. The internal recycling mechanism supports circular economy principles and enhances sustainable material management practices.

Table : Total material procured in FY 2024 and FY 2025.

Material Procured	FY 2023-24	FY 2024-25
Annual consumption (MT)	1,58,932	1,70,347
Recycled Content (%)	69.27%	73.27%
Locally sourced material (%)	79.16%	82.23%

Targets and way forward

As said by the company's leadership team "Sustainability is not just about compliance; it's about creating value for future generations" this philosophy drives SSML's commitment to integrating environmental responsibility into core business strategy, ensuring long-term value creation for all stakeholders through sustainable steel manufacturing practices.

- Implement the action plan to achieve GHG emission reduction targets, aligned with the company's long-term commitment to combating climate change by reducing or preventing greenhouse gas emissions.
- Drive the roadmap toward carbon neutrality by 2050 with a structured decarbonization strategy (by use of hydrogen, biomass).
- Maximize the use of renewable energy including wind and solar along with low-carbon fuels such as natural gas and future-ready options like green hydrogen.

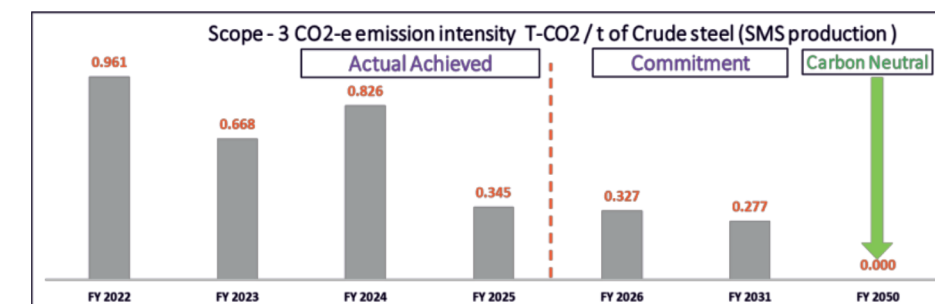


Fig: Scope 3 carbon neutrality targets.

- Execute the action plan to meet the Specific GHG Emission Reduction targets mandated under the Carbon Credit Trading Scheme (CCTS) 2023, introduced under the Energy Conservation (Amendment) Act, 2022, replacing the earlier PAT scheme of BEE.
- Review and revise the SBTi-approved targets to align with the 1.5°C pathway and the Net Zero Sectoral Decarbonization Approach (SDA) as per the latest SBTi guidelines.

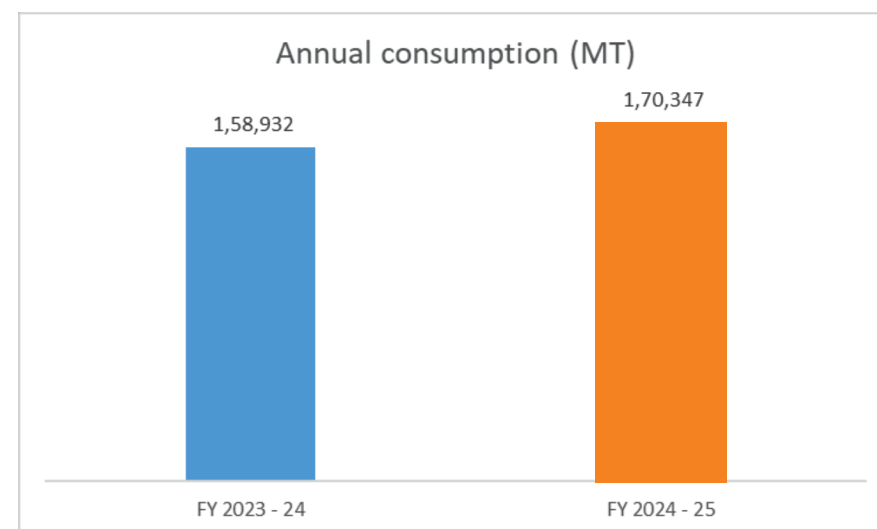


Fig: Total material procured for FY 2024 and FY 2025.

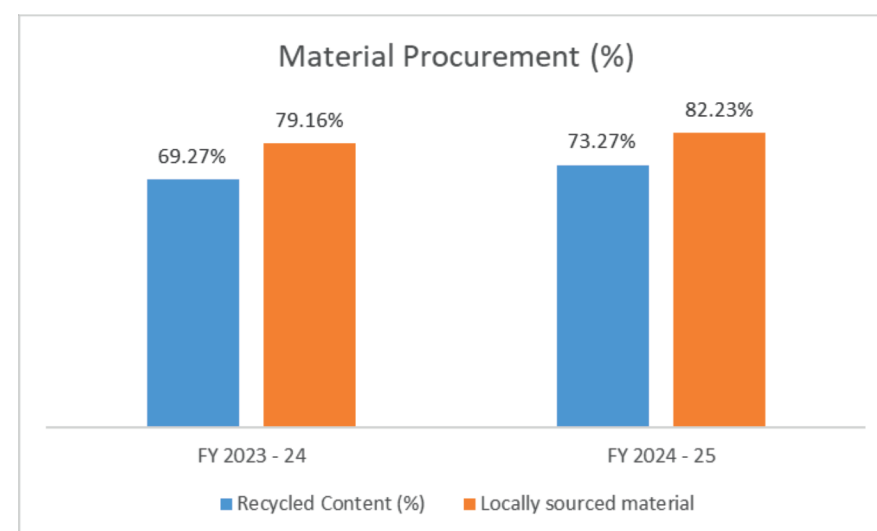


Fig: Total material procured by category a. recycled content and b. locally sourced (with in 400KM) for FY 2024 and FY 2025

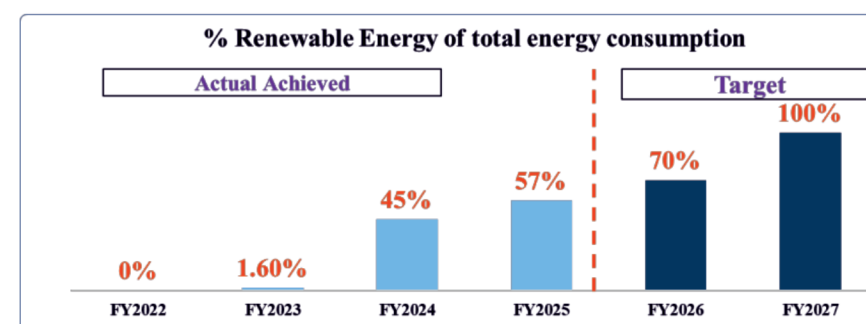


Fig: SSML use of renewable energy and predictions

- Promote energy substitution by shifting from high-carbon to lower-carbon or zero-carbon energy sources.
- Use carbon offsets strategically to close the remaining gap in achieving carbon neutrality by 2050.

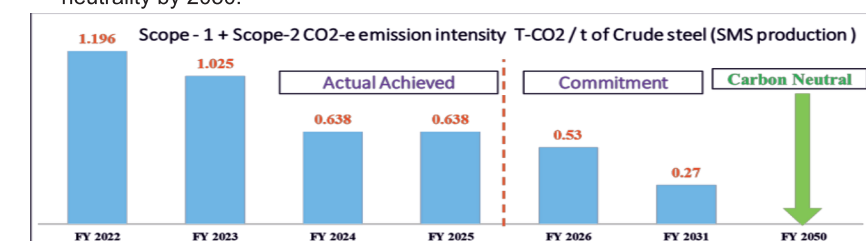


Fig: Scope 1 and scope 2 carbon neutrality targets.

Human Asset

SSMI considers its people as a core strategic asset and recognises that a diverse, equitable and inclusive workplace is fundamental to sustainable business performance. The Company fosters a culture that values diversity across gender, age, skills, experience and perspectives, while ensuring equal opportunity, fair treatment and merit-based growth for all employees. Through responsible employment practices, strong human rights commitments, continuous learning initiatives and robust health and safety systems, SSMI aims to create a respectful, safe and engaging work environment. This people-centric approach not only strengthens organisational resilience and innovation but also reinforces SSMI's broader social responsibility towards employees, communities and stakeholders.

Diversity Equity and Inclusion

SSMI is committed to promoting diversity, equity, and equal opportunity across its workforce and governance structures. The Company values diversity in terms of gender, age, experience, skills, and perspectives and recognizes that an inclusive and diverse workforce contributes to improved decision-making, innovation, and organizational performance. Diversity considerations are integrated into people management practices, including recruitment, talent development and succession planning in line with applicable laws and internal policies.

The Company promotes equitable and fair employment practices and strives to ensure equal remuneration for work of equal value. Compensation structures are designed to be role-based and performance-driven, with periodic reviews to support fairness and transparency across genders. Equal access to training, learning, and career advancement opportunities is provided to all employees, ensuring that merit and capability remain the primary criteria for professional growth.

SSMI maintains a strict non-discrimination approach and provides a respectful and inclusive work environment free from discrimination or harassment. Clear policies, grievance redressal mechanisms, and open communication channels are in place to address any concerns related to discrimination. During the reporting period, no material incidents of discrimination were reported, and no corrective actions were required.

Prevention of Child Labor and Forced or Compulsory Labor

SSMI maintains a zero-tolerance approach towards child labor and all forms of forced, bonded, or compulsory labor across its operations and supply chain. The Company complies with applicable labour laws and regulatory requirements related to minimum age of employment and ensures robust age-verification procedures during recruitment to prevent any incidence of child labor. Employment is freely chosen, and all employees are engaged in accordance with applicable laws and employment contracts, with safeguards in place to ensure fair wages, regulated working hours, and freedom of movement.

The Company also communicates its expectations on ethical labour practices to suppliers, contractors, and business partners and seeks compliance with relevant legal and contractual obligations. During the reporting period, no operations or suppliers were identified as having a significant risk of child labor or forced or compulsory labor.

The Company respects the rights, dignity, and cultural heritage of indigenous and local communities and is committed to conducting its operations in a socially responsible manner. SSMI operates in compliance with applicable laws and regulations related to land use, community engagement, and human rights.

SSMI recognizes the importance of respecting human rights in all security-related activities. Security personnel deployed at Company locations are contracted through authorized agencies and are expected to perform their duties in a professional and lawful manner. The Company ensures security arrangements. Where applicable, security personnel are sensitized to appropriate conduct, employee rights, and the responsible use of authority to ensure a safe and respectful working environment.

Manpower Overview

The organisation maintained a stable and well-balanced workforce during FY 2024-25. The total manpower stood at 1,752 employees, compared to 1,827 employees in the previous year, reflecting operational optimisation while retaining core talent.

The age-wise distribution continues to show a healthy mix of experience and continuity, with a strong concentration in the 30-50 age group, ensuring leadership depth and operational stability. Representation across junior, middle and senior management levels remained consistent, supporting effective governance and decision-making.

The company also maintained a structured mix of permanent employees, workmen, fixed-term and contract workforce, enabling flexibility while ensuring business continuity. Overall, the manpower profile demonstrates a sustainable workforce structure aligned with the organisation's long-term growth and efficiency objectives.

Table : Manpower details for FY 2023-24 and FY 2024-25.

Employee Category	Gender	Age Group						Grand Total (FY 2024)	Grand Total (FY 2025)
		<30 (FY 2024)	<30 (FY 2025)	30 to 50 (FY 2024)	30 to 50 (FY 2025)	> 50 (FY 2024)	> 50 (FY 2025)		
Jr. Mgmt	Female	7	5	1	3	1	1	9	9
	Male	92	76	411	421	25	33	528	530
Middle Mgmt	Female	0	0	2	2	0	0	2	2
	Male	1	1	49	52	30	24	80	77
Sr. Mgmt	Male	0	0	6	4	14	12	20	16
	Total	100	82	469	482	70	70	639	634
Workmen	Male	0	0	94	83	114	113	208	196
Fixed Term Contract	Female	0	0	1	0	0	0	1	0
	Male	0	0	1	1	8	7	9	8
	Total	0	0	2	1	8	7	10	8
Other	Male	10	7	2	2	0	0	12	9
	Total	10	7	2	2	0	0	12	9
Contract	Male	282	244	559	545	117	116	958	905
Grand Total	Total	392	333	1126	1113	309	306	1827	1752

Note: All Employees belongs to India Region

Training, Learning and Development

The organization continued to strengthen employee capabilities through structured, role-based, and safety-focused training programs across all categories of the workforce. SSMI implements structured programs to upgrade employee skills and support capability enhancement across the workforce. Skill development initiatives are delivered through a combination of classroom training, on-the-job learning and specialised technical sessions, enabling employees to strengthen functional competencies, improve productivity and adapt to evolving operational requirements. Classroom training modules primarily focus on knowledge enhancement, behavioural skills and technical upskilling, while on-the-job training supports practical learning and continuous improvement. Where required, employees are provided guidance and support to transition into new roles or responsibilities through targeted training interventions and supervisory coaching. These initiatives ensure employees remain future-ready and contribute effectively to organisational performance while supporting long-term career development.

During FY 2023-24, the organization delivered 15,342 training manhours, equivalent to 1,917.75 mandays, covering Contract Labour, Executives, Workers, and Trainees. Training interventions were implemented consistently throughout the year, with focused emphasis on skill development and workplace safety. Trainees recorded the highest average training mandays per employee, reflecting targeted learning initiatives for capability enhancement.

In FY 2024-25, training efforts were significantly enhanced, with 1,490 training programs conducted across EHS-related (583), on-the-job (890), and classroom training modules (17). These initiatives resulted in 31,772 training hours and 3,972 training mandays, supported by an average workforce strength of 1,792 employees. The average training mandays per employee increased to 2.23 and Average hrs of training per employee is 17.8 hrs for this reporting period, demonstrating improved depth and reach of learning interventions. On-the-job training formed the largest share, reinforcing operational efficiency, while EHS training strengthened the organization's safety culture and risk awareness.

The year-on-year increase in training coverage and intensity reflects the organization's ongoing commitment to continuous learning, skill enhancement, and employee well-being, in alignment with statutory requirements and global sustainability frameworks.

Employee Benefits

SSMI values its employees and workers as key stakeholders and is committed to supporting their well-being, motivation and work-life balance through structured employee benefit practices. The Company provides statutory and company-defined leave benefits, including earned leave, casual leave, sick leave and paid holidays, enabling employees to effectively manage personal and professional responsibilities. In addition, maternity leave and related benefits are extended in accordance with applicable laws, supporting women employees during important life stages. Medical support and employee welfare facilities are provided as part of overall employee care, along with access to periodic health check-ups facilitated in line with applicable standards.

The Company further ensures timely payment of wages and salaries, statutory social security benefits and welfare amenities, fostering a supportive and inclusive work environment. These employee benefit initiatives are designed to enhance employee satisfaction, engagement and retention, and reflect SSMI's commitment to responsible employment practices and people-centric growth.

Employee engagement activities

SSMI actively promotes employee engagement by fostering an inclusive, vibrant and collaborative workplace culture through a range of employee-centric activities. Various cultural and festival celebrations are organised across the year to encourage participation, strengthen team bonding and celebrate diversity among employees. The Company conducts competitions, sports activities and team-based events that promote physical well-being and a sense of belonging.

SSMI also recognises and appreciates employee contributions through awards and recognition programmes, motivating employees and reinforcing a culture of performance and appreciation. These engagement initiatives provide employees with opportunities to interact beyond work roles, enhance morale and build stronger workplace relationships. Through such activities, SSMI reinforces its commitment to employee engagement, motivation and overall organisational well-being.



Ganpati Celebration



Independence Day



Navratri celebration



Diwali Celebration



Sports Day

Other Safety Initiatives :

1. Emphasis on Road Safety awareness amongst employees and general public:

The SSMI celebrates Road safety week from 11th to 17th January each year. This year the 36th National Road Safety Month has been celebrated with enthusiastic participation of all employees. On Indian Road, 1 person dies in every 3 minutes so the motto behind this event was to raise awareness on Road Safety amongst employees & General Public. The celebration started with Bike Rally & Road Safety "Street play" at Khopoli & Alibag.

The Bike Rally with proper PPE's was conducted in various areas of Khopoli to raise awareness on Road safety among the public. The SSMI Team performed Road safety "Street play" at Khopoli bus station which was witnessed by a lot of school, College students and public. The DYSP personally witnessed the street play and appreciated our efforts taken towards creating Road Safety Awareness among the public.

Our team were specially invited by the Superintendent of Police for performing our impactful "Street Play" on Road Safety which was witnessed by thousands of College student, Police & traffic Department dignitaries at RCF hall, Alibaug & Reliance hall Nagothane.

The basic aim behind these events was to spread an awareness of Road Safety and for retaining our motto of keeping the process of imparting education continue amongst employees and the general public.

On the occasion of Road Safety month 2025, The SSMI has also arranged blood donation camp on 23rd January 2025 in association with M/s Red plus blood centre, Pune.



Grievance Mechanism and Mechanism for Raising Concerns

SSMI has established a structured and transparent grievance redressal mechanism to enable employees and workers to raise concerns, seek advice and report workplace-related issues in a safe and confidential manner. The mechanism provides multiple channels for reporting grievances, ensuring accessibility and fairness in addressing concerns. All grievances are reviewed objectively and resolved in a timely manner, with appropriate corrective actions taken where required. SSMI ensures protection against retaliation and encourages open communication to promote a respectful and ethical work environment. This mechanism reflects the Company's commitment to ethical conduct, employee well-being and responsible people management practices.

6. Occupational Health & Safety

SSMI has established a structured occupational health and safety (OHS) management system to ensure a safe and healthy working environment for employees and workers. The OHS management system includes defined roles, responsibilities and procedures for hazard identification, risk assessment and incident investigation across operations.

Regular workplace risk assessments are conducted to identify potential hazards, and appropriate control measures are implemented to mitigate occupational health and safety risks. Occupational health services, including access to medical support and periodic health check-ups, are provided to promote worker well-being and prevent work-related ill health.

Worker participation is encouraged through safety meetings, consultations and regular communication on occupational health and safety matters. Employees and workers receive appropriate training and awareness programmes on occupational health and safety practices relevant to their roles.

SSMI actively promotes worker health through preventive measures, health awareness initiatives and compliance with applicable statutory and internal requirements. The Company also extends occupational health and safety expectations to contractors and other business relationships to prevent and mitigate OHS impacts linked to business operations.

All employees and workers at SSMI are covered under the occupational health and safety management system. During the reporting year FY 2024-25 One work-related injury, and zero fatalities or cases of work-related ill health were reported, reflecting SSMI's commitment to effective OHS management and continuous improvement in workplace health and safety performance.

Environment, Health and Safety Education and Training Initiatives:

The SSMI focuses on employee education and training with the aim of preventing work-related accidents. In terms of matters related to environment, safety and health, SSMI provides various types of audio-visual education, including small group workplace safety meetings. SSMI creates environmental awareness among employees during training programs. The current environment concerns like Global warming, Climate change, Increased Pollution effects, Carbon emission etc. are briefed in training sessions.

Major Initiatives to Prevent Work-Related Accidents:

SSMI Developed real time near miss alert to concern department, alert goes through email to concern. Additionally, when workers notice a potential hazard, they are obligated to report on it as a near miss case. Through near miss analysis, the risk factors are identified. SSMI tries to avert accidents by implementing countermeasures to these risks based on hazard levels and reducing the degree of risk posed accordingly. Analysis of near miss & its communication to concern a responsible person. Information on these risks and the corresponding countermeasures are shared across the plant through email.

In addition to GEMBA visits conducted at each shop and other regular safety patrols of each shop by the cross functional team, daily patrols are conducted by employees to inspect and correct potential hazards and unsafe behaviours in the workplace, aiming at realization of higher levels of safety and health.

Awareness about Environment through Environment day celebration:

The “World Environment Day” is an annual event celebrated on the 5th of June in SSMI to raise awareness about the importance of preserving and enhancing our environment. Established by the United Nations in 1972, World Environment Day serves as a global platform for fostering environmental action and engaging communities in sustainable living.

The SSMI has recently celebrated “World Environment Day” with enthusiastic participation of employees. A total of 151 tree saplings have been planted on this occasion.

The company has an immense response of employees in Plantation activities so the purpose of arranging this event has served to a great extent.



Media Coverage



Addressed by Sr. Manager
Mr. Prashant Jagadale



Plantation By Managing Director
Mr. Dilipkumar Pachpande



Plantation By Executive Director
Mr. Hirokazu Suzuki



Plantation By COO Mr. Mishima
Kazuya

Engaging Business Partners

SSMI recognises the importance of engaging business partners and suppliers as part of building a responsible and sustainable supply chain. The company is committed to ethical sourcing and encourages its suppliers and business partners to comply with applicable environmental, social and governance requirements. Supplier engagement is guided through defined procurement practices and a Supplier Code of Conduct, which outlines expectations related to ethical conduct, labour practices, environmental responsibility and regulatory compliance.

New suppliers are screened using environmental and social criteria and ESG considerations are progressively integrated into supplier evaluation processes. SSMI promotes local sourcing and, during the reporting period, 82% of procurement spend was with local suppliers, supporting local businesses and contributing to regional economic development. Through continuous engagement and communication, SSMI seeks to strengthen supplier relationships and enhance sustainability performance across the value chain.

Tree Plantation & Green Area Developments

As part of its ongoing commitment to environmental sustainability, SSMI carried out an extensive plantation program in the nearby Khopoli area as part of its CSR initiatives. The program aimed to enhance green cover, promote ecological balance, and raise awareness on environmental conservation among the local community. Suitable native tree species were selected to ensure long-term environmental benefits and improved biodiversity. Participants from nearby communities, employees, and students actively contributed to the plantation efforts, making the event both impactful and inclusive.

SSMI actively participated in the Swachh Bharat Abhiyan, including community cleanliness drives and awareness programs on hygiene and waste management, to promote healthier and cleaner surroundings.

Through this initiative, SSMI reinforced its dedication to supporting a cleaner and greener environment while aligning with national sustainability goals.

Customer Health & Safety :

SSMI assesses the health and safety impacts of its products across all significant product categories (100%) as part of its quality assurance and customer relationship management processes, with product safety considerations integrated into product design, procurement and production stages and supported by internal quality controls and customer feedback mechanisms. Through structured customer engagement and continuous monitoring of product performance, the Company identifies opportunities for improvement and ensures compliance with applicable regulatory requirements and industry standards. During the reporting period, SSMI recorded zero incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of its products and services, including zero incidents resulting in fines or penalties, zero warnings, and zero cases of non-compliance with voluntary codes. No incidents were identified where the company was found to be at fault, and no material cases relating to prior reporting periods were noted. These outcomes reflect SSMI's commitment to maintaining high product safety standards, robust quality management systems and proactive customer communication practices.

Corporate Social Responsibility

At SSMI, we envision a future where industrial excellence is matched by an equally strong commitment to society and the environment. SSMI's CSR initiatives are designed not only to create meaningful change, but also to uplift communities, encourage responsible growth, and build a more sustainable world for future generations. By investing in education, health and safety awareness, Swachh Bharat, plantation drives, women empowerment and community development, we aim to address real needs on the ground and support long-term social progress. Through these efforts, we strive to be a catalyst for positive transformation and a trusted partner in shaping a better, more inclusive tomorrow.

Our Khopoli plant carries out various CSR activities under the guidance of the SSMI policy. As per the annual CSR master plan, these activities are conducted throughout the year in collaboration with the Nagar Parishad, villagers, government departments, NGOs, SSMI Hospital, and CSR volunteers. All CSR initiatives are executed in alignment with government CSR guidelines.

Details of Total Beneficiaries for FY2024-25:

Table: CSR and Beneficiaries in FY 2025

Category	Beneficiaries
Education	1,128
Health	733
Women Empowerment	5,159
Plantation	1,885
Swachh Bharat	60
Safety	55
General Activities	110
Total	9,130



English speaking training



School Awareness Program



Children Day



Celling fans donated to ITI.Lowjee



Donated water cooler & RO to Lowjee



Donated soil to new ITI, Mahad



Eye check up camp



Thyroid check up camp

Customer Relationship Management

SSMI places high importance on maintaining strong, transparent and long-term relationships with its customers. The Company follows structured customer relationship management practices to address customer requirements, ensure product quality and respond to customer feedback in a timely manner. Customer data and information are handled responsibly, with due regard to confidentiality and privacy.

During the reporting period, no substantiated complaints concerning breaches of customer privacy or loss of customer data were reported. SSMI is in the process of implementing relevant ISO standards related to information security and data protection, which will further strengthen customer data privacy and information management practices. These measures reflect SSMI's commitment to customer trust, ethical business conduct and responsible data governance.



Diabetes awareness program



Community place cleaning activity



Khopoli railway station



Team building



Successful Entrepreneurship-
Restaurant opening



Marketing and selling techniques



Entrepreneurship development
training

Strengthening Learning Opportunities

SSMI implements a wide range of educational initiatives aimed at enhancing knowledge, skills, and awareness within the community. These include computer and English-speaking training, school awareness programs, road safety education, career counselling, and guidance on government schemes. Together, these programs contribute to the educational and developmental growth of the community.

With a special focus on empowering rural women and promoting their inclusion in the broader development process, SSMI plays a pivotal role by providing educational support at all necessary levels.

In addition to its educational efforts, SSMI emphasizes donation-driven initiatives to assist communities in need. The organization regularly visits local schools and educational centers to distribute essential daily supplies, ensuring students and staff have access to basic necessities that support learning and well-being. Through these targeted efforts, SSMI addresses immediate needs while simultaneously reinforcing its commitment to the long-term development and welfare of the communities it serves. SSMI actively supports Entrepreneurship Development Programs aimed at fostering entrepreneurial skills and promoting self-reliance within the community. These programs provide training, guidance, and mentorship to aspiring entrepreneurs, helping them develop business ideas, acquire essential skills, and understand market opportunities. By facilitating access to resources and knowledge, SSMI empowers individuals particularly women and youth to establish sustainable ventures, generate employment, and contribute to local economic growth.

Promoting Community Health and Well-being

SSMI regularly conducts a wide range of health initiatives, including community health awareness and medical check-up camps, mental health awareness programs, and women's health education sessions addressing common health issues.

Fostering Inclusive Growth through Women Empowerment

The CSR department organized community awareness programs for women's groups in Subash Nagar, Lowjee, Vasrang, and Khopoli. These sessions focused on creating awareness about CSR initiatives, future planning, Self-Help Group activities, associated benefits, and the roles and schemes offered by various government departments. SSMI delivered motivational sessions and multiple non-technical training programs aimed at empowering women with practical skills.

SDG Linkage



SSMI's sustainability initiatives and responsible business practices are aligned with the United Nations Sustainable Development Goals (SDGs). Through its focus on employee welfare, occupational health and safety, ethical business conduct, responsible sourcing and customer satisfaction, the Company contributes to multiple global development priorities.

SSMI supports SDG 3 (Good Health and Well-being) by implementing a structured occupational health and safety management system, providing access to medical support and promoting preventive health measures for employees and workers. Initiatives related to fair employment practices, employee benefits, training and engagement activities contribute to SDG 8 (Decent Work and Economic Growth) by fostering a safe, inclusive and productive workplace.

The Company's commitment to ethical conduct, grievance redressal mechanisms, customer privacy and responsible data management aligns with SDG 16 (Peace, Justice and Strong Institutions). SSMI's emphasis on local sourcing and engagement with suppliers supports SDG 12 (Responsible Consumption and Production) and SDG 17 (Partnerships for the Goals) by strengthening sustainable supply chains and promoting responsible procurement practices.

Its Zero Effluent Discharge system, closed-loop water recycling, and strict monitoring of water quality support SDG 6 (Clean Water and Sanitation) by preventing pollution, reducing freshwater withdrawal, and ensuring responsible water stewardship across the value chain. The company's GHG reduction programs, renewable energy adoption, natural gas transition, energy-efficient operations, and verified emissions reporting strengthen its contribution to SDG 13 (Climate Action) by actively lowering its carbon footprint and aligning with national and global decarbonization frameworks. Furthermore, by eliminating wastewater discharge, controlling emissions, responsibly managing waste, and preventing contaminants from entering soil and water bodies, SSMI helps protect SDG 14 (Life Below Water) and SDG 15 (Life on Land), ensuring that its operations do not harm aquatic ecosystems or terrestrial biodiversity.

Through continuous improvement, compliance with applicable standards and stakeholder engagement, SSMI remains committed to integrating sustainability into its operations and contributing positively to the achievement of the SDGs.

Glossary

Sr. No	Abbreviation	Full From
1	APHA	American Public Health Association
2	BEE	Bureau of Energy Efficiency
3	BLQ	Below Limit of Quantification
4	BOD	Biochemical Oxygen Demand
5	CDP	Carbon Disclosure Project
6	CII	Confederation of Indian Industry
7	COD	Chemical Oxygen Demand
8	COO	Chief Operating Officer
9	CSR	Corporate Social Responsibility
10	DC	Direct Current
11	DG	Diesel Generator
12	EAF	Electric Arc Furnace
13	EBT	Eccentric Bottom Tapping Slag
14	EEIO	Environmentally Extended Input-Output
15	EHS	Environment, Health and Safety
16	ESG	Environmental, Social and Governance
17	FO	Furnace Oil
18	FY	Financial Year

19	GEMBA	Japanese term meaning "Actual Place" (Worksite)
20	GHG	Greenhouse Gas
21	GJ	Gigajoule
22	GRI	Global Reporting Initiative
23	HRIS	Human Resource Information System
24	HSD	High-Speed Diesel
25	IPCC	Intergovernmental Panel on Climate Change
26	ISO	International Organization for Standardization
27	ITI	Industrial Training Institute
28	kWh	Kilowatt-hour
29	KMC	Khopoli Municipal Corporation
30	KPIs	Key Performance Indicators
31	LF	Ladle Furnace
32	LED	Light Emitting Diode
33	LOQ	Limit of Quantification
34	LPG	Liquefied Petroleum Gas
35	LLP	Limited Liability Partnership
36	LSHS	Low Sulphur Heavy Stock
37	MIDC	Maharashtra Industrial Development Corporation

39	MSEDCL	Maharashtra State Electricity Distribution Company Limited
40	MT	Metric Ton
41	NG	Natural Gas
42	NGOs	Non-Governmental Organizations
43	PAT	Perform, Achieve and Trade
44	pH	Potential of Hydrogen
45	RO	Reverse Osmosis
46	SDA	Sectoral Decarbonization Approach
47	SBTi	Science Based Targets initiative
48	SDG	Sustainable Development Goals
49	SEBI	Securities and Exchange Board of India
50	SHE	Safety, Health and Environment
51	SOx-NOx	Oxides of Sulphur and Nitrogen
52	SPM	Suspended Particulate Matter
53	SSMI	Sanyo Special Steel Manufacturing India Pvt. Ltd.
54	TSS	Total Suspended Solids
55	TUV	Technischer Überwachungsverein (Technical Inspection Association)
56	ZLD	Zero Liquid Discharge

Annexure

Assurance Statement



TUVINDIA

INDEPENDENT ASSURANCE STATEMENT

The Directors and Management,
Sanyo Special Steel Manufacturing India Private Limited,
Jagdish Nagar, Taluka Khalapur
District Raigad, Khopoli - 410216
Maharashtra, India

Sanyo Special Steel Manufacturing India Private Limited (hereinafter referred to as "Sanyo Special Steel") engaged TUV India Private Limited ("TUVI") to conduct an independent external assurance of the non-financial Environmental, Social, and Governance (ESG) indicators disclosed in Sanyo Special Steel's Sustainability Report (hereinafter referred to as "the Report") for the reporting period April 1, 2024 to March 31, 2025. The Report has been prepared with reference to the Global Reporting Initiative (GRI) Standards 2021. This assurance engagement does not constitute verification of 'in accordance' (Core or Comprehensive) compliance with GRI Standards and is limited to selected disclosures within the defined scope. The scope of the assurance engagement covered independent limited assurance engagement on these ESG disclosures and related performance data for the stated reporting period. TUVI conducted assurance in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised), *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*, applicable to non-financial and sustainability information.

Management's Responsibility

Sanyo Special Steel has developed the Report content and is responsible for monitoring its ESG data and identifying material sustainability issues relevant to its operations. This includes the identification, establishment, and reporting of performance management systems, data governance, and quality control measures. The management of Sanyo Special Steel is accountable for the accuracy and completeness of the ESG data, as well as the processes involved in collecting, analysing, and reporting the information disclosed through both web-based and printed formats. This responsibility extends to the maintenance and integrity of the company's website where such information may be presented. Sanyo Special Steel's management is also responsible for preparing the ESG Report with reference to the applied criteria of the Global Reporting Initiative (GRI) Standards. It is incumbent upon Sanyo Special Steel to ensure that the Report is free from any material misstatements, whether intentional or unintentional, thereby maintaining the trust and confidence of stakeholders in the disclosed information. Furthermore, Sanyo Special Steel is responsible for ensuring the archiving and reproducibility of the disclosed ESG data, making it available to stakeholders upon request.

Scope and Boundary

The scope of work includes limited assurance of the following non-financial performance / KPI disclosures as disclosed in the Report. In particular, the assurance engagement included the following:

- Verification of the application of the principles as mentioned in the Global Reporting Initiative (GRI) Standards, and the quality of information presented in the report over the reporting period;
- Review of the policies, initiatives, practices and performance described in the Report;
- Review of the non-financial disclosures made in the Report against the requirements of the GRI Standards;
- Verification of the reliability of the GRI Standards Disclosure on environmental & social topics by verifying sample data;
- Specified information was selected based on the materiality determination by the organization; however, no independent validation of the materiality determination process as per GRI 3-1 requirements was performed.

TUVI has verified the below-mentioned disclosures given in the Report. The assurance engagement is limited to selected ESG disclosures and does not cover the complete set of GRI disclosures

Topic	Indicator	GRI Disclosure
Water	Water consumption	303-3, 303-4, 303-5
	Waste generated	306-2, 306-3, 306-4
Emissions	Direct (Scope 1) GHG emissions, Energy indirect (Scope 2) GHG emissions	305-1, 305-2
	Emission Intensity	305-4
Energy	Energy consumption within the organization	302-1
	Energy Intensity	302-3
Governance	Governance structure and composition	2-9 ⁱ
Procurement Practices	Proportion on spending on local supplier	204-1
Ethics and Integrity	Anti-Corruption, Anti-Competitive behaviour	206-1, 206-2, 206-1
Employment	New Employees higher, Benefits for full time, Part-time employees, Parental Leave	401-1, 401-2, 401-3
Human Rights and Labor	Child Labour, Forced or Compulsory Labour	408-1, 409-1

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Occupational Health and Safety	Occupational Health and Safety Management System	403-1, 403-2, 403-4, 403-5, 403-7, 403-8, 403-9, 403-10
Training and Education	Training for Employees, Upgradation of skills	404-1, 404-2, 404-3

Onsite Verification

Sanyo Special Steel Manufacturing India Pvt Ltd – Jagdish Nagar, Taluka Khalapur, District Raigad, Khopoli – 410216. An on-site verification was conducted in January 2026. Applicable boundaries for disclosures are explained in the Report. The assurance boundary is restricted to the above-mentioned location and does not extend to other operations, subsidiaries, or value chain impacts as defined under GRI boundary principles

Limitations

TUVI did not perform any assurance procedures on the prospective information disclosed in the report, including targets, expectations, and ambitions. Consequently, TUVI draws no conclusion from the prospective information. During the assurance process, TUVI did not come across any limitations to the agreed scope of the assurance engagement. TUVI is contracted by the Sanyo Special Steel and answerable to the Sanyo Special Steel's management only. TUVI verified the data on a sample basis; the responsibility for the authenticity of the data entirely lies with Sanyo Special Steel. TUVI expressly disclaims any liability or co-responsibility in the case of erroneous data reported or for any decision a person or entity would make based on this assurance statement. The scope of assurance does not include complete Scope 3 emissions categories, and exclusions are based on data availability and organizational boundary

Our Responsibility

TUVI's responsibility in relation to this engagement was to perform a limited level of assurance and to express a conclusion based on the work performed. This engagement did not include an assessment of the adequacy or the effectiveness of Sanyo Special Steel's strategy or management of sustainability-related issues or the sufficiency of the report against GRI Standards, ISAE 3000 (revised) standard and other requirements mentioned under the scope of the assurance. TUVI's responsibility regarding this verification is in accordance with the agreed scope of work which includes non-financial quantitative and qualitative information disclosed by Sanyo Special Steel. The intended users of this assurance statement are the management of 'Sanyo Special Steel'. This assurance engagement is based on the assumption that the data and information provided to us by Sanyo Special Steel are complete and true.

Verification Methodology

During the assurance engagement, TUVI adopted a risk-based approach, focusing on verification efforts with respect to disclosures. TUVI has verified the disclosures and assessed the robustness of the underlying data management system, information flows, and controls. In doing so:

- TUVI conducted interviews with key representatives, including data owners and decision-makers from different functions of Sanyo Special Steel.
- TUVI reviewed the level of adherence to principles of GRI standards;
- TUVI examined and reviewed the documents, data (on sample basis) and other information made available by Sanyo Special Steel for the reported disclosures including the Management Approach and performance disclosure.
- Sampling was conducted based on a risk-based approach considering materiality and likelihood of error; therefore, only representative samples were tested and not the entire data population.

Action Plan

The following improvement opportunities, aligned with impacts, risks, and opportunities, were identified:

- Sanyo Special Steel can set the targets for Energy, Water and Waste reduction
- Sanyo Special Steel can evaluate & rate its waste minimization Programme by adopting "Zero Waste to Landfill" Principles
- Sanyo Special Steel can set the target of ban on single use plastic target
- These recommendations are aligned with identified impacts, risks, and opportunities and support strengthening of the organization's management approach in line with GRI 3-3

Our Conclusion

In our opinion, based on the scope of this assurance engagement, the disclosures on sustainability performance reported in the Report along with the referenced information provides a fair representation of the material topics, related strategies, and performance disclosures and meets the requirements within the defined scope of selected disclosures:

Disclosures: TUVI is of the opinion that the reported disclosures generally meet the GRI Standards reporting requirements. Sanyo Special Steel refers to general disclosure to report contextual information about Sanyo Special Steel, while the Management Approach is discussed to report the management approach for each material topic.

Universal Standard: Sanyo Special Steel has applied GRI 1, GRI 2, and GRI 3 Standards for reporting organizational context, general disclosures, and material topics. Clause-by-clause verification of these standards was not performed.

Topic Specific Standard: 300 series (Environmental topics), and 400 series (Social topics). These Topic-specific Standards were used to report information on the organization's impacts related to environmental and social topics. TUVI is of the opinion that the reported material topics and Topic-specific Standards that Sanyo Special Steel used to prepare its Report are

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appropriately identified and addressed.

Limited Assurance Conclusion: Based on the procedures we have performed; nothing has come to our attention that causes us to believe that the selected disclosures, within the defined scope, have not been prepared in all material respects. TUVI found the sustainability information to be reliable in all material respects, with regards to the reporting criteria of the GRI Standards. This assurance statement has been prepared in accordance with the terms of our engagement. In accordance to the ISAE 3000 (revised) requirements

Independence: TUVI follows IESBA (International Ethics Standards Board for Accountants) Code which, adopts a threats and safeguards approach to independence. It is confirmed that the Assurance Team is selected to avoid situations of self-interest, self-review, advocacy and familiarity. The Assessment Team was safeguarded from any type of intimidation.

Quality control: The Assurance Team complies with the Code of Ethics for Professional Accountants issued by the IESBA, which includes independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. In accordance with International Standard on Quality Control, TUVI maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

In the context of Assurance, the following contemporary principles have been observed:

Evaluation of the adherence to other contemporary Principles

Inclusivity: The following GRI reporting principles were considered during the assurance engagement: Accuracy, Balance, Clarity, Comparability, Reliability, and Timeliness. Stakeholder identification and engagement is carried out by Sanyo Special Steel on a periodic basis to bring out key stakeholder concerns as material topics of significant stakeholders. In our view, the Report meets the requirements.

Materiality: The materiality assessment process has been carried out based on the requirements of the GRI Standards, considering topics that are internal and external to the Sanyo Special Steel range of businesses. The Report fairly brings out the aspects and topics and their respective boundaries of the diverse operations of Sanyo Special Steel. In our view, the Report meets the requirements.

Responsiveness: TUVI believes that the responses to the material aspects are fairly articulated in the report, i.e., disclosures on Sanyo Special Steel policies and management systems, including governance. In our view, the Report meets the requirements. Impact: Sanyo Special Steel communicates its sustainability performance through regular, transparent internal and external reporting throughout the year, aligned with GRI, and its policy framework encompassing the Environmental, Social, Ethical and other policies. Sanyo Special Steel reports on sustainability performance to the Top Management, who oversees and monitors the implementation and performance of objectives, as well as progress against goals and targets for addressing sustainability-related issues. Evaluation of these principles was limited to selected disclosures within the defined scope.

TUVI expressly disclaims any liability or co-responsibility for any decision a person or entity would make based on this Assurance Statement. The intended users of this assurance statement are the Management of Sanyo Special Steel. The Management of the Sanyo Special Steel is responsible for the information provided in the Report as well as the process of collecting, analyzing, and reporting the information presented in web-based and printed Reports, including website maintenance and its integrity. TUVI's responsibility regarding this verification is in accordance with the agreed scope of work which includes non-financial quantitative and qualitative information (Sustainability Performance) disclosed by Sanyo Special Steel in the Report. This assurance engagement is based on the assumption that the data and the information provided to TUVI by Sanyo Special Steel are complete and true.

Our Assurance Team and Independence

TUVI is an independent, neutral third-party providing sustainability services with qualified environmental and social specialists. TUVI states its independence and impartiality and confirms that there is "No Conflict of Interest" with regard to this assurance engagement. In the reporting year, TUVI did not work with Sanyo Special Steel on any engagement that could compromise the independence or impartiality of our findings, conclusions, and recommendations. TUVI was not involved in the preparation of any content or data included in the Report, with the exception of this assurance statement. TUVI maintains complete impartiality towards any individuals interviewed during the assurance engagement.

For and on behalf of TUV India Private Limited

Manojkumar Borekar
Product Head – Sustainability Assurance Service
TUV India Private Limited



Date: 03/04/2026
Place: Mumbai, India
Project Reference No: 8124549623

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Annexure

GRI Content Index :

The Content Index of this report has been prepared to facilitate easy reference to disclosures and relevant information presented across various sections. Detailed financial information, including audited financial statements and statutory disclosures, is available in the Company's Annual Report.

Table : The below table marks the mapping of fiscal 2025 with the GRI standards 2021 requirements

Statement of use	Sanyo Special Steel Manufacturing India Pvt. Ltd. has reported the information cited in this GRI content index for the period April 1, 2024 to March 31, 2025 "with reference" to the GRI Standards.
GRI 1 used	GRI 1: Foundation 2021

GRI Standard	Disclosure	Location
GRI 2: General Disclosures 2021		
2-1 Organizational details		03
2-2 Entities included in the organization's sustainability reporting		03
2-3 Reporting period, frequency and contact point		01
2-4 Restatements of information		NA
2-5 External assurance		43, 44
2-6 Activities, value chain and other business relationships		07
2-7 Employees		07
2-8 Workers who are not employees		07
2-9 Governance structure and composition		13
2-10 Nomination and selection of the highest governance body		13
2-11 Chair of the highest governance body		13,14,15
2-12 Role of the highest governance body in overseeing the management of impacts		14
2-13 Delegation of responsibility for managing impacts		NA

GRI Standard	Disclosure	Location
	2-14 Role of the highest governance body in sustainability reporting	16
	2-15 Conflicts of interest	14, 16
	2-16 Communication of critical concerns	37
	2-17 Collective knowledge of the highest governance body	15
	2-18 Evaluation of the performance of the highest governance body	NA
	2-19 Remuneration policies	NA
	2-20 Process to determine remuneration	NA
	2-21 Annual total compensation ratio	NA
	2-22 Statement on sustainable development strategy	02
	2-23 Policy commitments	16
	2-24 Embedding policy commitments	16
	2-25 Processes to remediate negative impacts	NA
	2-26 Mechanisms for seeking advice and raising concerns	37
	2-27 Compliance with laws and regulations	12,16,30
	2-28 Membership associations	07
	2-29 Approach to stakeholder engagement	09
	2-30 Collective bargaining agreements	NA
GRI 3: Material Topics 2021		
	3-1 Process to determine material topics	10
	3-2 List of material topics	11
	3-3 Management of material topics	11
GRI 201: Economic Performance 2016		
	201-1 Direct economic value generated and distributed	17
	201-2 Financial implications and other risks and opportunities due to climate change	NA
	201-3 Defined benefit plan obligations and other retirement plans	NA
	201-4 Financial assistance received from government	NA

GRI Standard	Disclosure	Location
GRI 202: Market Presence 2016		
	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	NA
	202-2 Proportion of senior management hired from the local community	NA
GRI 203: Indirect Economic Impacts 2016		
	203-1 Infrastructure investments and services supported	NA
	203-2 Significant indirect economic impacts	17
GRI 204: Procurement Practices 2016		
	204-1 Proportion of spending on local suppliers	17,32
GRI 205: Anti-corruption 2016		
	205-1 Operations assessed for risks related to corruption	12,16
	205-2 Communication and training about anti-corruption policies and procedures	12,16
	205-3 Confirmed incidents of corruption and actions taken	12,16
GRI 206: Anti-competitive Behavior 2016		
	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	NA
GRI 207: Tax 2019		
	207-1 Approach to tax	NA
	207-2 Tax governance, control, and risk management	NA
	207-3 Stakeholder engagement and management of concerns related to tax	NA
	207-4 Country-by-country reporting	NA
GRI 301: Materials 2016		
	301-1 Materials used by weight or volume	31, 32
	301-2 Recycled input materials used	31, 32
	301-3 Reclaimed products and their packaging materials	NA

GRI Standard	Disclosure	Location
GRI 302: Energy 2016		
	302-1 Energy consumption within the organization	21, 22
	302-2 Energy consumption outside of the organization	22
	302-3 Energy intensity	22
	302-4 Reduction of energy consumption	22
	302-5 Reductions in energy requirements of products and services	23
GRI 303: Water and Effluents 2018		
	303-1 Interactions with water as a shared resource	23
	303-2 Management of water discharge-related impacts	24, 25
	303-3 Water withdrawal	25
	303-4 Water discharge	25
	303-5 Water consumption	25
GRI 305: Emissions 2016		
	305-1 Direct (Scope 1) GHG emissions	26, 27
	305-2 Energy indirect (Scope 2) GHG emissions	26, 27
	305-3 Other indirect (Scope 3) GHG emissions	27
	305-4 GHG emissions intensity	27, 28
	305-5 Reduction of GHG emissions	28
	305-6 Emissions of ozone-depleting substances (ODS)	NA
	305-7 Nitrogen oxides (Nox), sulfur oxides (SOx), and other significant air emissions	30, 31
GRI 306: Effluents and Waste 2016		
	306-3 Significant spills	28

GRI Standard	Disclosure	Location
GRI 306: Waste 2020		
306-1 Waste generation and significant waste-related impacts		28, 29
306-2 Management of significant waste-related impacts		28, 29
306-3 Waste generated		29
306-4 Waste diverted from disposal		30
306-5 Waste directed to disposal		30
GRI 308: Supplier Environmental Assessment 2016		
308-1 New suppliers that were screened using environmental criteria		31
308-2 Negative environmental impacts in the supply chain and actions taken		31
GRI 401: Employment 2016		
401-1 New employee hires and employee turnover		35
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees		36
401-3 Parental leave		NA
GRI 402: Labor/Management Relations 2016		
402-1 Minimum notice periods regarding operational changes		NA
GRI 403: Occupational Health and Safety 2018		
403-1 Occupational health and safety management system		NA
403-2 Hazard identification, risk assessment, and incident investigation		37
403-3 Occupational health services		37
403-4 Worker participation, consultation, and communication on occupational health and safety		37
403-5 Worker training on occupational health and safety		NA
403-6 Promotion of worker health		37

GRI Standard	Disclosure	Location
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		37
403-8 Workers covered by an occupational health and safety management system		37
403-9 Work-related injuries		37
403-10 Work-related ill health		37
GRI 404: Training and Education 2016		
404-1 Average hours of training per year per employee		36
404-2 Programs for upgrading employee skills and transition assistance programs		36
404-3 Percentage of employees receiving regular performance and career development reviews		NA
GRI 405: Diversity and Equal Opportunity 2016		
405-1 Diversity of governance bodies and employees		15,35
405-2 Ratio of basic salary and remuneration of women to men		NA
GRI 406: Non-discrimination 2016		
406-1 Incidents of discrimination and corrective actions taken		34
GRI 407: Freedom of Association and Collective Bargaining 2016		
407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk		NA
GRI 408: Child Labor 2016		
408-1 Operations and suppliers at significant risk for incidents of child labor		34
GRI 409: Forced or Compulsory Labor 2016		
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor		34
GRI 410: Security Practices 2016		
410-1 Security personnel trained in human rights policies or procedures		34
GRI 411: Rights of Indigenous Peoples 2016		
411-1 Incidents of violations involving rights of indigenous peoples		34

GRI Standard	Disclosure	Location
GRI 413: Local Communities 2016		
	413-1 Operations with local community engagement, impact assessments, and development programs	39
	413-2 Operations with significant actual and potential negative impacts on local communities	39
GRI 414: Supplier Social Assessment 2016		
	414-1 New suppliers that were screened using social criteria	NA
	414-2 Negative social impacts in the supply chain and actions taken	NA
GRI 415: Public Policy 2016		
	415-1 Political contributions	NA
GRI 416: Customer Health and Safety 2016		
	416-1 Assessment of the health and safety impacts of product and service categories	37
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	39



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