

# SUSTAINABILITY REPORT

## 2022-23



*The Sandur Manganese & Iron Ores Limited*



**Transcending towards a sustainable future**

# Content

<b>Vision statement and ethos on sustainability</b>	<b>1</b>
<b>Message from Managing Director</b>	<b>2</b>
<b>Message from Director (Mines)</b>	<b>3</b>
<b>Business Responsibility &amp; Sustainability Reporting</b>	<b>4</b>
<b>Reporting Boundary</b>	<b>6</b>
<b>Material Sustainable issues</b>	<b>7</b>
<b>Our ESG initiatives</b>	<b>10</b>
<b>Awards &amp; Accolades</b>	<b>35</b>



# ***Vision statement and ethos on sustainability***



Dump stabilisation and greening at KVH Mine

## ***The Company's vision statement on sustainability***

"Build a happy and contented society using effective and appropriate technology to improve the living standards and infrastructure facilities in the local region, with emphasis on education, health, training rural youth for better employability, solar electricity in every home and street, clean drinking water and sanitation for all."



## ***M. Y. Ghorpade, Founder Patron***

"All that we get (earn) from the soil of Sandur in one form or the other should be primarily used to benefit Sandur.... The Mining Lease is something that has to be held in Trust for the benefit of those who are working so hard for so many years, with so much faith and determination. This is not anybody's private property, but a sacred social responsibility, in which each one of us has to function as Trustee for the toiling workforce."



# REJIGGING OUR ESG GOALS THROUGH BRSR



I am pleased to present first “Business Responsibility and Sustainability Report”. The seed of sustainable development was planted from the day our founder contemplated to set this business and incorporated this Company on 18 January 1954. Sustainable development has been the cornerstone of this organisation from its inception.

The new reporting format named, Business Responsibility and Sustainability Report (BRSR), aims to establish links between the financial results of a business with its Environmental, Social and Governance (ESG) performance. This can make it easier for regulators and investors, and allied stakeholders to obtain a holistic view on the responsibility of the organisation towards society, stakeholders and environment while keep a stronghold on governance. The philosophy of our Founder Patron, M Y Ghorpade “All that we get (earn) from the soil of Sandur in one form or the other should be primarily used to benefit Sandur.... The Mining Lease is something that has to be held in Trust for the benefit of those who are working so hard for so many years, with so much faith and determination. This is not anybody’s private property, but a sacred social responsibility, in which each one of us has to function as Trustee for the toiling workforce” has always been the ethos and culture of this organisation. Sustainability is deeply embedded in our purpose and form the core of our organisation.

Our responsibility towards BRSR is to provide authentic information for the benefit of stakeholders at large. During the process we could be able to identify various material sustainable issues, risks and opportunities and mitigation measures. In addition, we could also able be to derive our voluntary commitments, targets and goals to meet our already existing ESG goals. BRSR reflects our commitment to govern business with ethics, being responsive to all stakeholders and protecting the flora and fauna.

I am thankful to all the employees for their unswerving support in excelling in sustainability. We see the coming years as a significant opportunity to integrate ESG and imbibe BRSR principles in our business strategy. Moving towards net zero, adopting best waste management practices, imbibing best corporate governance practices, ensuring holistic development of all stakeholders and preserving and protecting ecology and biodiversity for future generations are some of the long-term goals that we should always strive for. We are focussed toward our sustainability goal and committed to meet the same. Emphasising the statement of M Y Ghorpade, we should work as a trustees, protect the world and future generation to come.

**Bahirji Ajai Ghorpade**  
**Managing Director**



## INTEGRATION WITH BUSINESS OPERATIONS WILL BE KEY

BRSR introduced by the regulators is an improvement over the BRR. It is a welcome move and ensures more meticulous data capturing.

A committee that included SEBI was set up by the Ministry of Corporate Affairs (MCA) to revisit disclosures being made by corporates in terms of their sustainability performance. The BRSR framework emerged from the recommendations of this committee and extensive consultations with stakeholders and global organizations such as SASB (Sustainability Accounting Standards Board) and GRI (Global Reporting Initiative).

While the environmental aspect is an important part of the framework, the BRSR is developed based on 'National Voluntary Guidelines' and places significant stress on the social dimension to encourage corporates to continue to address the realities of social disparities and income inequalities in the country. Thus, it requires reporting on social metrics such as workforce diversity, employees' health and safety, employee engagement, social impact assessment of CSR projects among others.

The Company has pioneered working on sustainability issues from its inception. Development of local areas, community development, employee wellbeing, quality education, health care facilities, taking care of biodiversity, flora & fauna etc have been predominant aspects taken care by the Company and are part of the Company's philosophy and vision statement. During the course of the Company's development, these issues have become integral part of business and its culture. BRSR reporting will undoubtedly provide further thrust to understand and undertake already existing sustainability issues in a more systematic and scientific manner. Host of issues ranging from environment protection, waste management, water management, renewable energy consumption, stakeholders' engagement, ethics, transparency, accountabilities etc. are being identified as key sustainability issues to be addressed now and in future too.

The BRSR 2022-23 is the first-year report prepared by the Company. With the evolution of system, processes and procedures the Company will ensure not only bringing improvement in reporting methodology but also to extend it to other business partners thereby making sustainability more comprehensive.

**Mohammed Abdul Saleem**  
**Director (Mines)**  
**Director responsible for BRSR**



# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORTING

The new reporting format named, Business Responsibility and Sustainability Report (BRSR), aims to establish links between the financial results of a business with its ESG performance. This can make it easier for regulators and investors, and allied stakeholders to obtain a fair estimate of overall business stability, growth and sustainability.

SEBI has mandated that the BRSR will be applicable to the top 1,000 listed entities (by market capitalisation) for reporting on a voluntary basis for FY2021–22 and on a mandatory basis from FY2022–23. BRSR is principle-based reporting and based on nine principles delineated in National Guidelines for Responsible Business Conduct.

## BRSR PRINCIPLES

Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent and accountable.

1

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

2

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

3

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

4

Business should respect and promote human rights.

5

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

6

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

7

Business should promote inclusive growth and equitable development.

8

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

9



# EMBEDDING BRSR PRINCIPLES TO THE COMPANY'S ESG GOALS

For more than six decades of existence, social development, environmental protection, business sustainability has always been the core of the organisation. Vision of founder patron M Y Ghorpade and the organisation's core values, principles and vision statement have always given paramount importance to sustainable and holistic development of the local people and surrounding community. As mentioned under NGRBC all the nine principles mentioned under NGRBC are interdependent, interconnected and non divisible.

All the nine principles are in one form or the other connected to the environmental, social and governance aspect of the business and deal with its impacts. Diagrammatic representation below depicts the linkages of different principles to the ESG goals of the business. Principle driving the main aspect of ESG remain at centre whereas other principles revolve around it. For example principle 6: Business should respect and make efforts to protect and restore the environment considered as central principle to drive the environmental aspects of ESG where as other principles revolve around it. The policies, procedures and its implantations support governance aspects of the ESG.



# REPORTING BOUNDARY

The disclosure under this BRSR is on standalone basis unless otherwise stated

## Mines located at

Deogiri  
Subbarayana Halli  
Kammathuru and  
Ramghad of  
Sandur Taluk, Ballari District  
Karnataka State



## Plant located at

Vyasanakere  
Hosapete  
Vijaynagar District  
Karnataka State



## Registered office located at

'SATYALAYA', Door No.266, (Old No.80)  
Behind Taluka office, Ward No.1, Palace Road,  
Sandur - 583 119

## Corporate office located at

'SANDUR HOUSE', No.9, Ballari Road,  
Sadashiva Nagar, Bengaluru - 560 080  
Karnataka State



# MATERIAL SUSTAINABILITY ISSUES

1. Business ethics
2. Corporate governance, accountability & disclosures
3. Conflict of interest involving members, employees and business partners
4. Responsible consumption and production
5. Occupational Health & Safety
6. Employee development & retention
7. Relationship management with different stakeholders
8. Human Rights issues
9. Critical incident management
10. Green House Gas emissions
11. Circular economy
12. Afforestation
13. Energy management
14. Water management
15. Community development

Material topics represent an organization's most significant impacts on the economy, environment and people, including their human rights. Identification of material topics has been a significant part of BRSR process. Consultation and discussion have played the main role in identifying the material topics most relevant to the organization we operate. Even though the Company has identified several material topics relevant to the Company, most relevant issues requiring frequent monitoring have been part of this report. Management is responsible for delivery of the materiality assessment, which establishes the link between the operations of a company, their impact on ESG issues and relevance to key stakeholders.

## 5 steps approach for materiality assessment

Identification  
of  
stakeholders

Identification  
of material  
issues

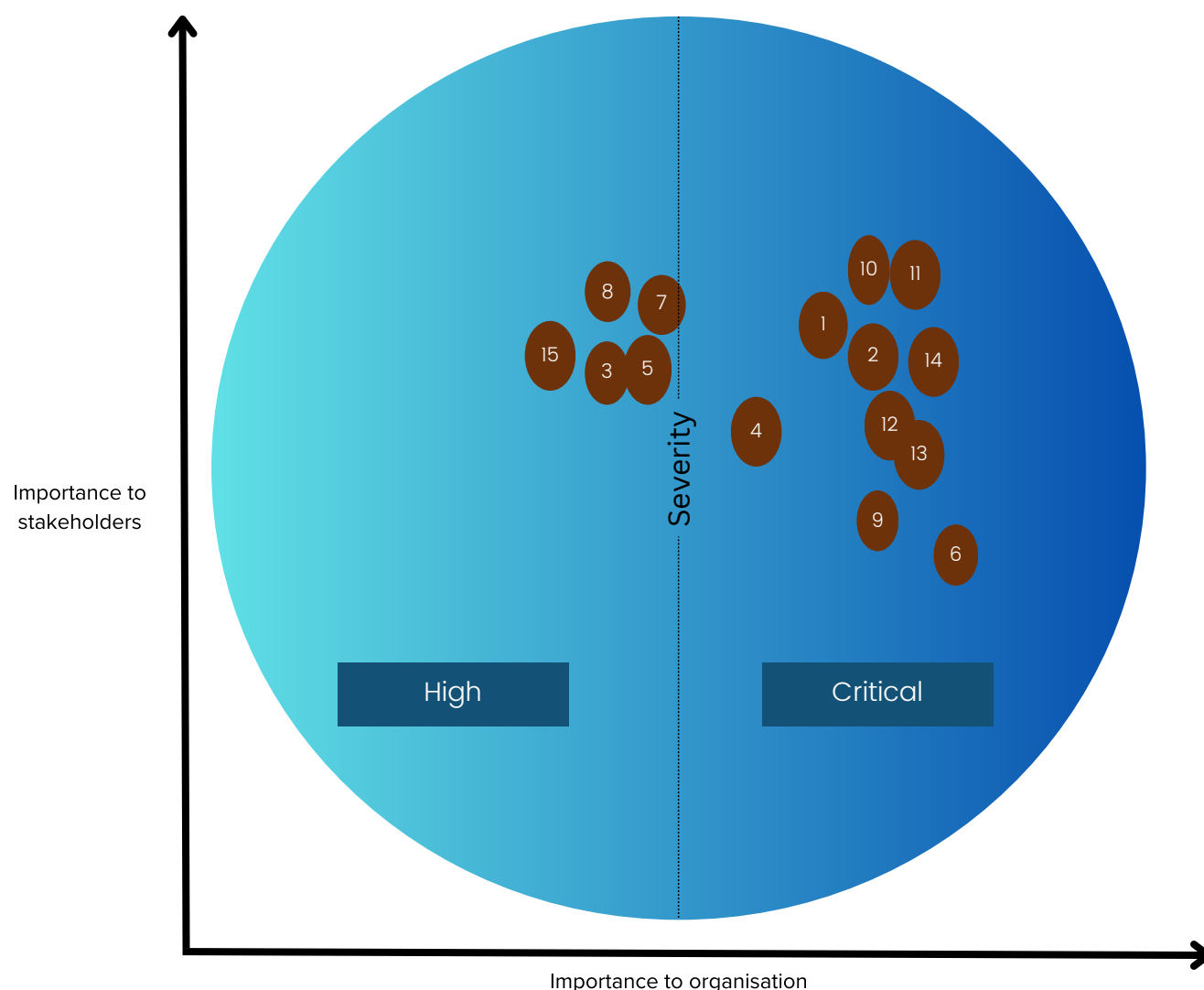
Engagement  
of  
stakeholders  
and analysis of  
issues

Prioritization of  
material  
issues

Mitigation  
measures for  
key material  
issues



## MATERIAL SUSTAINABILITY ISSUES MATRIX



At SMIORE, we believe in placing utmost importance on engaging with our stakeholders, appreciating their views and, where applicable, incorporating them within our business operations. We are committed to designing an effective ESG strategy that reflects and is responsive to their expectations.

In FY23, the Company conducted a materiality assessment to identify key ESG topics for SMIORE. The process involved identifying the stakeholders, identifying the material issues, engaging the stakeholders to make analysis to identify the importance of issues & impacting the stakeholders and prioritizing the issue for reasonable actions. Based on the Company's study, the team could identify and prepare an exhaustive list of 50 topics. Through understanding the macro business environment, sector specific trends and challenges, as well as benchmarking against peers, this list was condensed to 15 of the most relevant issues with respect to the Company's operations. Importance of each topic on a five-point scale ranging from low to very high. Based on the responses received, the weighted average of each topic was calculated, arriving at a score to prioritize the 10 themes, which are presented in the graph above.

Specific commitments, goals and targets set by the entity with defined timelines, if any.

Sl. No.	Specific commitment and goals	Mandatory/ voluntary	Status of implementation
1	Plantation shall be raised including green belt of adequate width by planting the native species around the Mining Lease (ML) area, plant sites, roads, Overburden dump sites etc. in consultation with the local DFO/ Agriculture Dept. The density of the trees shall be around 2000 plants per hectare.	Mandatory	Ongoing
2	100% solid waste is reused and utilized	Mandatory	Ongoing
3	Recycle and reuse iron ore fines, coal and coke fines, lime fines and such other fines collected in the pollution control devices and vacuum cleaning the devices after in process briquetting/ agglomeration.	Mandatory	Ongoing
4	Top soil shall be stacked properly with proper slope with adequate safeguards and shall be backfilled for reclamation and rehabilitation of mined out area.	Mandatory	Ongoing
5	Regular monitoring of ground water level and quality shall be carried out by establishing a network of existing wells and constructing new piezometers during the mining operation. The monitoring shall be carried out four times in a year.	Mandatory	Ongoing
6	Conservation measures for protection of flora and fauna in the core & buffer zone shall be drawn up in consultation with the local forest and wildlife department	Mandatory	Ongoing
7	Fugitive dust emissions from all the sources be controlled regularly. Water spraying arrangement on haul roads, loading, and unloading and at transfer points be provided and properly maintained.	Mandatory	Ongoing
8	Occupational health surveillance program of the workers be undertaken periodically to observe any contractions due to exposure to dust and take corrective measures, if needed.	Voluntary	Ongoing
9	Industrial waste water (workshop and the waste water from the mines and plants) should be properly collected, treated so as to conform to the prescribed standards	Voluntary	Ongoing
10	A Final Mine Closure Plan, along with details of Corpus Fund, shall be submitted to the Ministry of Environment & Forests 5 years in advance of final mine closure for approval.	Mandatory	Complied

# Our ESG Initiatives



## Environment

Bio-Diversity Management

Afforestation

From a liner to a circular economy

Waste Management

Waste Heat Recovery Boiler

Reclamation & rehabilitation measures at Mines

Energy Management



## Social

Employee Wellbeing

Occupational Health & Safety

Safety Measures

Community wellbeing

CSR programme, Promoting education

Grievance Redressals

Stakeholders Engagement

Policy advocacy



## Governance

Board independence

Board diversity

Board Committees

Transparency & accountability

Code of conduct, ethics & integrity

Policies

Governance structure for business sustainability

Conserving resources of all kinds by taking highest responsibility to achieve the sustainability goals have been the moto of this Company from its inception. The Company is committed to building a sustainable and resilient future through its resources and responsibilities. SMIORE believes in a proactive and future oriented approach by understanding the importance of communicating ESG criteria in their business strategy and action plans. The Company believes that operating ethically and sustainably is not just a responsibility but a fundamental enabler for organisation growth.





# ENVIRONMENT



# BIODIVERSITY MANAGEMENT

The United Nations (UN) Decade on Ecosystem Restoration (2021-2030) is a rallying call for the protection and revival of ecosystems all around the world, for the benefit of people and nature. It aims to halt the degradation of ecosystems and restore them to achieve global goals. SMIORE is one of the very few Indian mining companies to join hands with this initiative. As a part of the forest ecosystem restoration initiative, over 1,00,000 saplings across 50 native plant species that includes Rare, Endemic & Threatened (RET) and IUCN Red Listed species were raised & planted this year in their natural habitat as a key strategy for conserving biodiversity, mitigating climate change, and combating desertification. Till now, we have planted about 38 lakh saplings and ensured 90% survival. This exercise will be continued in the coming years with a goal to achieve high taxonomic, functional, and phylogenetic diversity, which cannot be achieved by plantations and monocultures.



Fully reclaimed and rehabilitated waste dump at Company's mines location at **Deogiri**

## Conservation of *Crotolaria sandoorensis*:

*Crotolaria sandoorensis* is an undershrub having restricted distribution in hilly forested areas of Sandur region in Ballari district, Karnataka. It is a narrow endemic species found nowhere else in the world. Today, with less than 100 individuals, the species is facing the risk of extinction because of various anthropogenic drivers like habitat destruction, invasive species, rampant mining activities in the past, etc. SMIORE was able to locate a few individuals in the wild and successfully propagated in its nursery with the support of local forest officials, which is a first of its kind for this species. Later, saplings were re-introduced in their natural distribution areas, to augment the natural population in the wild and conserve this threatened species.



Native Species Nursery at Mines

# AFFORESTATION



SMIORE is known for its environment friendly initiatives since its inception and has worked responsively to protect nature and natural resources. We at SMIORE strive to reduce our impact on biodiversity and ecosystem through our compensatory afforestation and other programs. We have legacy of successfully raising and planting over 38,00,000 saplings through the green belt & afforestation activities. The conservation measures within its premises and the surrounding forested areas are aimed at achieving “No Net Loss” of biodiversity. SMIORE has gone beyond the compliances by achieving 40% green cover and volunteering towards greening and restoring damaged ecosystems in the vicinity. Further, SMIORE has identified key floral and faunal components through the Wildlife Conservation Management Plan in consultation with the State Forest Department and ensured funding for implementing the recommendations, which would go a long way in restoring local landscapes and conservation of biodiversity.

## Environmental Education:

SMIORE strongly believes that “Nature Stewardship” at an early age could bring in a positive change and helps child build knowledge and skills necessary to address complex environmental issues and be environmentally aware citizens. Accordingly, we have launched ambitious environment education program Clean School, Green Ballari for schools of Ballari district of Karnataka wherein we have roped in Centre for Environment Education (CEE), Ahmedabad. CEE was established as a Centre of Excellence under the Ministry of Environment, Forest and Climate Change, Govt. of India, and working in the field of “Environmental Education” and “Education for Sustainable Development” over several decades. .



Mass plantation by school children and villagers of Deogiri on world environment day



# FROM A LINEAR TO A CIRCULAR ECONOMY

The linear economy is a traditional economic model that follows the simple pattern of taking resources, making products, and then disposing of them – better known as the ‘Take, Make, Waste’ economy.

This approach relies on a constant supply of natural resources for use in items designed for relatively short product life and to be discarded and replaced by a newer model. Little or no consequence is attached to disposal, the disposal method, and the resources lost in that process.

In the last few decades, consumer behaviour has evolved to incorporate recycling and reuse practices. By recycling and reusing products, we are helping to conserve our natural resources, protect our ecosystems, and reduce greenhouse gas emissions.

However, recycling adopts a downstream approach where efforts to reduce waste begin at the end of a product’s life cycle.

In a circular system, the concept of resource consumption and waste prevention is considered throughout the entire lifecycle of a product. The focus on reducing environmental impact is key in all stages, from product design and manufacture to extracting valuable resources for reuse in new products.

Solid Waste Generation and its management at SMIORE		
Overburden	Mines	Land filling
Coke Fines	Coke Oven Plant	Used in Sinter plant and sold to Pellet Plants
SiMn/ FeMn Slag	Ferroalloy Plant	SiMn Slag Sold to cement industries and FeMn slag will be reused in SiMn Production as Raw Material
Baghouse Dust/ Dedusting Unit Fines	Ferroalloy Plant	Reused in SiMn Production after briquetting.
Sludge from Combined ETP	ETP at plant	Disposed to secured landfill facilities

The Company's ferroalloys plant is a 'Zero' discharge plant. The blow down water from the power plant is re-used in the quenching of coke. Treated water is re-used /recycled in Coke oven quenching system. Coke fines generated in quenching becomes wet and are collected in settling pond and recycled. All process waste water generated inside the plant at different points (Ferroalloys and Coke Oven) are recycled in settling ponds. Waste water generated from various processes is recycled back or used for dust suppression & green belt development. No water is discharged outside the plant.

The Company's water management plan includes rainwater harvesting, a water target to improve the efficiency and recycling of used water from the kitchens, bathrooms and laundry, water risk review to assess risks and opportunities associated with biodiversity. Recycled water (including water from Sewage Treatment Plant) is used for dust suppression caused by vehicular traffic.

These initiatives have enabled the Company to recycle/re-use 100% of our waste generated from operational activities.



Implemented R&R Structures- Silt settling tank

## WASTE MANAGMENT



Implemented R&R Structures- Silt settling tank with Rain water harvesting pit

SMIORE has obtained authorization from Karnataka State Pollution Control Board (KSPCB) under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 for generation, storage and safe disposal of the following type of hazardous wastes.

Category 5.1 Used Waste Oil and  
Category 5.2 Oil Soaked Cotton Waste

Used waste oil and oil-soaked cotton waste generated during maintenance of machinery and vehicles is flammable. Hence, these wastes are hazardous in nature.

The Company has well defined SOPs for generation, storage and safe disposal of Hazardous waste.

All waste oil generated in the manufacturing process is collected through drain ports and stored in leak proof drum before being disposed off to agencies duly authorized for recycling.



## WASTE HEAT RECOVERY BOILER WITH WET QUENCHING SYSTEM

Modified wet quenching system is an advanced wet quenching system with low environmental impact. It was developed as an environmental friendly alternative to dry quenching process. The emissions of dust are as low as for a wet quenching system and the gaseous emissions are even less. Besides, investment and operation and maintenance costs are substantially lower. The process itself is a combination of bottom and top quenching methods, providing extremely short cooling time. The coke is fairly stabilized by the described handling and needs no further treatment except screening as usual.

Production enhancement without any environmental impact by enhancing coke oven production level from 0.4 MTPA to 0.5 MTPA contributes to additional power generation from harnessing the sensible heat of the additional flue gases. By enhancing the production level from 0.4 MTPA to 0.5 MTPA during the financial year 2022-23, the additional power generation was about 4 MW. For generation of 1 MW power using thermal coal, it requires about 0.8 MT of thermal coal, depending on its CV. With an average value of 0.8 MT of thermal coal per MW, it works out to a saving of  $0.8 \times 4 = 3.2$  MT /Hour which is  $24 \times 3.2 = 76.8$  MT of thermal coal per day.

Without any impact on the environment, the production capacity of coke oven was enhanced after taking EC approval, there is a saving from burning of 75 MT of thermal coal per day, which has been very significant



## RECLAMATION AND REHABILITATION MEASURES AT MINES

The waste generated from the mining of Manganese and Iron Ores are being dumped in designated waste dumps as per Production and Development Plan approved by IBM.

Engineering structures proposed for Dump Management as per R&R Plan approved by Central Empowered Committee (CEC) constituted by the Hon'ble Supreme Court and implementation being monitored by Hon'ble Supreme Court appointed Monitoring Committee has been implemented to best possible extent.

The list of engineering structures built for Surface Dump Management within the mine lease includes Retaining Walls, Garland Drains, Silt Settling Tanks, Culverts, Gully Plugs, Loose Boulder Check Dams and Stone Masonry Check Dams.

Width of the dumps and height of dumps are being maintained as per dump management plan prepared by Indian Council of Forestry Research and Education (ICFRE) and approved by Hon'ble Supreme Court constituted CEC.

The slope angle of individual terrace is between 32-33° and overall slope angle is maintained 26-27°. The inactive dump terraces are covered with geo-coir mats, shrubs and native species for dump stabilisation.



Coir Mat laid for stabilisation of Waste Dump

Development  
in Iron Ore during FY  
2022-23 1.29 million  
tons

Development in  
Manganese Ore during  
FY 2022-23 6.52 million  
tons

Backfilling  
during the  
year  
9.08 ha

Back fill Qty  
0.79 million  
tons



Implemented R&R Structures- Masonry toe wall for the waste dump



# ENERGY MANAGEMENT



The Company is targeting to generate its entire requirement of non-production energy from solar energy by installing solar products like water heaters, street lighting systems, home lighting systems, industrial power systems in the Mines.

During the financial year 2022-23, the Company has installed solar based devices with an aggregated installed capacity of 331394 kW to replace a part of its total requirement of electricity.

With a focus to completely eliminate utilisation of thermal coal for power generation for ferro alloys production, the Company has set-up Waste Heat Recovery Boilers and is producing power using waste heat from Coke Oven plant. The Waste Heat Recovery Boiler, which is a co-generation plant as classified by the Government of Karnataka, has potential to generate about 212 mu per annum. Further in association with Renew, the Company has installed 33 MW of Solar and 9.9 MW of Wind Farms to meet the energy requirements of the Ferroalloy plant.

Generation of Solar Energy during the year 2022-23				
Sl.No	Description	Quantity in Numbers	KWH/System/Year	UNITS Generated in KWH
1	20 Watts Solar street light	242	72	17424
2	50 Watts x 4 No's LED Flood light	8	720	5760
3	20Watts Home light system	399	72	28728
4	10 KW Solar off grid system	2	18000	36000
5	500Watts off grid system	1	1800	1800
6	5.5 KW Submersible pump	3	7920	23760
7	1 HP Solar Pump on grid system	2	1074	2148
8	300 KW Solar on grid system	1	112714	112714
9	1 KW Solar off grid system	2	1440	2880
10	5 KW Solar on grid system	1	7506	7506
11	5 KW Solar off grid system	1	7506	7506
12	160W Solar lighting off grid	1	576	576
13	320W Solar lighting off grid	1	1152	1152
14	160 KW Solar on grid	1	83440	83440
Total				331394









Allotment of house to employees at mines location

## EMPLOYEE WELLBEING

Several welfare programmes have been carefully planned and effectively implemented over the decades under the guidance of Company's Founder Patron M. Y. Ghorpade, for more than 4000 direct and indirect employees. The welfare programmes are tailored with priority for right to food, clothing, housing, medical care and education.

The welfare programmes include:

- Supply of food grains to employees at prices prevailed during 1972;
- Subsidized LPG (cooking gas) - 8 cylinders a year with 90% subsidy over Govt. subsidized rates;
- Free solar heated water;
- Free electricity to employees in Company's colonies;
- Free consultation and medication at Dispensaries and Hospitals at Sandur, Deogiri, Subbarayana Halli, Swamihalli, Yeshwanthnagar, and Occupational Health Centre at the Plant;
- Medical expenses entitlement - 20% of annual salary every year Chronic ailment medication at subsidized cost for employees and their dependents;
- Generous and almost full reimbursement of cost of treatment/surgeries in case of major ailments for employees and their dependants;
- Festival gifts for Ugadi, Deepavali, Ramzan and Christmas;
- Cash gift for clothing - ₹2000 to ₹12,500 to every employee every year;
- Cash gift for marriage of employees and their children - ₹10,000 to ₹1 lakh;
- Fee concessions to employees' children for schooling and scholarships for higher education;
- Scholarships for PUC, Degree courses, Engineering, Medicine; and other professional courses;
- Funeral expenses and financial help in the event of death in family and
- Incentives for Family Planning.



Glimpses from Sandur Sambhrama 2022-23, an annual Employee engagement activities

# OCCUPATIONAL HEALTH & SAFETY

Our employees' health and safety is of utmost importance to us. We encourage our employees to observe all safety rules & practices and notify potential health & safety hazards in the work environment. We are dedicated to maintain a productive work place by minimizing the risk of accidents, injury and exposure to health risks. All employees and contractors demonstrate commitment to safety in their every day behaviors and decisions. We ensure that all operational facilities adhere to health and safety rules and regulations. As a first step towards our commitment, we have framed a well-defined safety policy.



## HEALTH CARE

- Dispensaries and hospitals in employee colonies and a full-fledged hospital in Sandur- Arogya Community Health Centre, with special emphasis on eye care, women and childcare.
- Conducting regular specialty treatment camps by expert doctors.
- Free consultation and medication to employees and their families at Dispensaries & Hospitals
- Annual health camps for cancer detection, woman and childcare, cardiac care, paediatrics, orthopaedic treatment and ENT.
- Free eye camps every month.
- Ambulance facilities at Deogiri, Subbarayana Halli, Sandur and Vysanakere
- Providing financial help and arrangement for medical care for patients from low-income families, in case of any major ailment.





# SAFETY MEASURES

- Induction training, on job training and conducting classroom safety & fire training sessions for employees and contract workers working at mines and plant.
- Providing regular safety trainings and education to employees to ensure they have the knowledge and skills to work safely.
- Issuing Personal Protective Equipment (PPE) & Special PPE's to employees & contractor's workers working at mines and plant.
- Issuing of all types Work Permits & giving clearances for any Major & Shutdown activities.
- Conducting safety inspections of the workplace at mines and plant including machineries, equipment and vehicles to identify potential risk areas and hazards and ensure compliance with safety regulations.
- Investigating all near miss, Fire incidents and accidents that occur on the plant site to determine their cause and recommend preventive measures.
- Preparing & reviewing Safety SOP's, safety Manuals, Onsite Emergency Plans, Safety Procedures and Protocols, and making recommendations for improvements.
- Monitoring and tracking safety performance metrics, such as Severity/Frequency/Incident rates and safety compliance data.
- Celebrating safety milestones and achievements with workers & employees, such as reaching a certain number of incident-free days or completing a safety training program.



- Safety audits of the mines and plants to evaluate the unsafe acts & unsafe conditions.
- Conducting Onsite & Offsite Emergency Mock drills and Fire drills to handle the emergency situations as per schedule.
- Conducting Safety promotional activities like – Safety Skit, safety Poster, Safety Song, Safety Essay, Safety Slogans & Safety quiz competitions.
- Celebrating National Safety Day, Fire prevention Day & Chemical disaster prevention days at the location to improve safety culture.
- Conducting Divisional & Central Safety Committee meetings with Management, employees & workers to discuss safety concerns and ways to improve safety performance.
- Recognizing and rewarding employees & workers who demonstrate a commitment to safety. This can include awards & prizes.



## COMMUNITY WELLBEING

Dedicated community liaison teams maintain regular and open dialogue with stakeholders, particularly local communities and undertake various community-related initiatives including preferential employment of local people, training and skill-development of locals, promoting and assisting local small businesses and self-help activities.

Setting up and support to Sandur Kushala Kala Kendra (SKKK) for nurturing traditional art craft and embroidery skills and creating opportunities for supplementary income, for the dependant and local artisans especially tribal and backward women of the Iambani community and ensure improving their living standards.

The Company engages in robust consultation with local government bodies, people's representatives, district and local Government authorities and surveys to identify the disadvantaged, vulnerable & marginalized stakeholders as beneficiaries for Company's scholarship programmes, health and sanitation programmes like toilet construction, health camps for cancer detection, woman and child care including prevention of child labour, cardiac care, pediatrics, orthopedics and ENT including specialized eye care.

The Company strives to give proportionate and fair representation to various communities and castes. It endeavors to achieve gender equality and provide more opportunities to girls/women.



Prime Minister, Narendra Modi at the SKKK stall interacting with Ms. Basanthi.B (Embroidery Department) and Ms. Shashikala (Quality Control and Sales Department) on 16 February 2023

Over the years, the Company has made a concerted effort to align the interests of local communities in the areas that the Company operates, on the basis of mature and respectful partnership. The Company recognizes that it must engage in consultation with local community stakeholders at all the stages of its operations, including mine closure and post-closure activities. Continuous consultations are carried out with local communities in the buffer zone of the mining lease and the surroundings of the Plant during various stages of operations that could impact/affect their lives. The Company engages in robust focus group discussions with community leaders and local community stakeholders to address different areas of concern and sharing of information.





## DEVELOPMENT OF SCHOOL INFRASTRUCTURE

Presently, eleven Educational Institutions are managed by Sandur Education Society, with more than 3400 students and 125 staff (both teaching and non-teaching). Out of the 125 staff, 34 are covered under grant in aid from state government and the remaining 91 are unaided staffs.

Four educational institutions namely Sandur Residential School (SRS), Sandur Polytechnic (SanPoly), Sandur Girls Residential School (SGRS) and SMIORE Vyasapuri Composite PU College (SVCPUC) are functioning under Shivapur Shikshana Samiti (SSS) with about 2,600 students and 330 staff (both teaching and non-teaching).

The Company supports the schools by way of:

- Construction and renovation of schools
- Providing school buses for transportation of children
- Aiding the schools requirements by proving laptops, CPUs, printers, projectors etc
- Renovating the science lab and providing lab equipments etc.

# PROMOTING EDUCATION

## SCHOLARSHIP PROGRAMMES

The Company has instituted Sandur Vidya Prothsaha Scholarships (SVPS) to help children of needy persons of Sandur and surrounding areas to get better education by giving scholarships, on a merit – cum – means basis. The Scholarship scheme is being implemented through Karnataka Seva Sangha (KSS), a Charitable Trust formed under Indian Trust Act, 1882.



Inauguration of school at Deogiri

During the year 2022-23, the Company has completed the construction of Deogiri English Medium School at Deogiri, Sandur at a project cost of Rs 4.42 crore.

The Company has also started the infrastructure development of three schools of Sandur Education Society at the beginning of the financial year 2022-23 at an approved budgeted spend of Rs.3.03 crore.



# STAKEHOLDERS RELATIONSHIP

The Company values its stakeholders and the several initiatives undertaken by the Company are aimed at building trust and mutually rewarding partnerships with internal and external stakeholders who exhibits some of the Company's core values and form an important part of its journey as a sustainable organization.



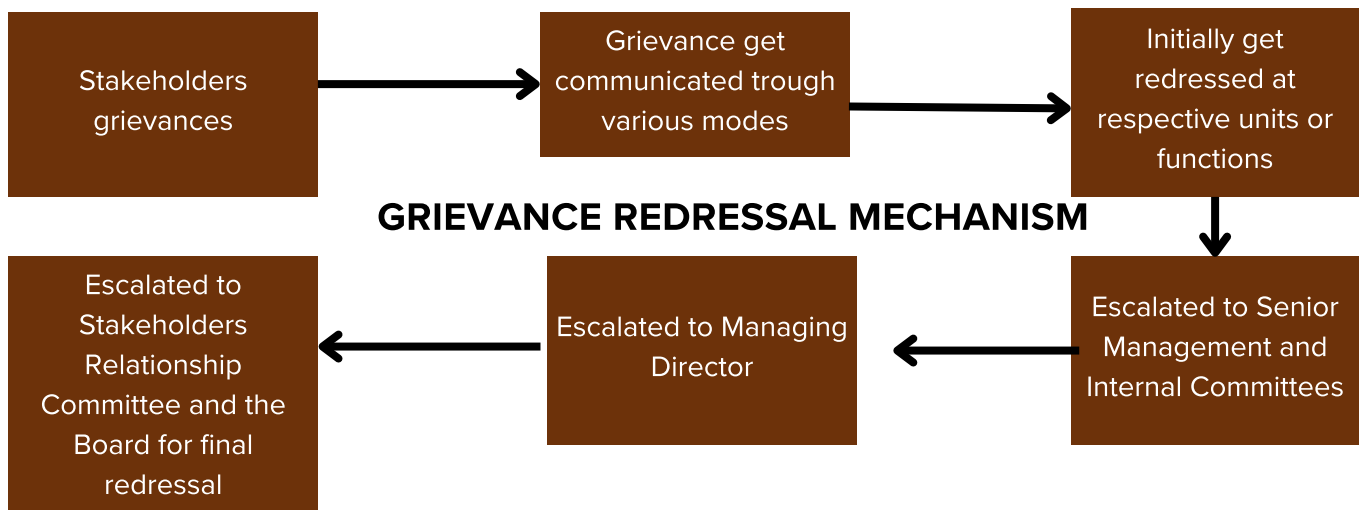
The Company has mapped its internal and external stakeholders for the purpose of stakeholder engagements as follows:

## External Stakeholders

Shareholders  
Bankers  
Government Bodies/Regulators  
Customers  
Vendors  
Value Chain Members  
Service Providers  
civil Society  
Villages/ Local Communities

## Internal stakeholders

Promoters  
Board of Directors  
Employees





# STAKEHOLDERS ENGAGEMENT

Key stakeholders	Methods of engagement	Key topics of discussions	Corresponding material topics
<b>BOARD MEMBERS</b>	<ul style="list-style-type: none"> <li>BOD &amp; related committees' meetings</li> <li>General Meetings</li> <li>other meetings</li> <li>Company events</li> </ul>	<ul style="list-style-type: none"> <li>Economic performance</li> <li>Business ethics</li> <li>ESG performance</li> <li>Successful strategy implementation</li> <li>Capital allocation</li> <li>Digital transformation</li> </ul>	<ul style="list-style-type: none"> <li>Economic performance</li> <li>Business ethics</li> <li>Strong governance</li> <li>ESG performance</li> <li>Environmental impact &amp; GHG emissions</li> <li>Sustainable workplace &amp; practices</li> </ul>
<b>SHAREHOLDERS</b>	<ul style="list-style-type: none"> <li>Annual general meeting</li> <li>Periodic meetings</li> <li>Corporate regulatory disclosures</li> <li>Annual report</li> <li>Website</li> </ul>	<ul style="list-style-type: none"> <li>Economic performance</li> <li>Capital allocation</li> <li>Successful strategy implementation</li> <li>Business ethics</li> <li>ESG issues</li> <li>Environmental impact</li> <li>Regulatory issues</li> </ul>	<ul style="list-style-type: none"> <li>Economic performance</li> <li>Business ethics</li> <li>Governance</li> <li>Environmental impact &amp; GHG emissions</li> <li>Community Welfare</li> <li>Procurement practices</li> </ul>
<b>EMPLOYEES</b>	<ul style="list-style-type: none"> <li>Employee induction</li> <li>Performance reviews</li> <li>Internal communications through Sandur Antaranga</li> <li>Company events</li> <li>Training and developments</li> <li>Policies &amp; procedures</li> <li>Exit interviews</li> </ul>	<ul style="list-style-type: none"> <li>Employee wellbeing</li> <li>Business ethics</li> <li>Diversity &amp; inclusion</li> <li>Health &amp; safety</li> <li>Training &amp; development</li> <li>Sustainable workplace</li> <li>Compensation</li> <li>Succession planning</li> </ul>	<ul style="list-style-type: none"> <li>Occupational health &amp; safety</li> <li>Equal opportunity, diversity, &amp; inclusion</li> <li>Training &amp; development</li> <li>Gainful employment</li> <li>Business ethics</li> </ul>
<b>VILLAGERS/ LOCAL COMMUNITIES</b>	<ul style="list-style-type: none"> <li>Day-to-day interactions &amp; meetings</li> <li>Local initiatives and volunteering activities</li> <li>CSR activities, Donations and sponsorship</li> <li>Website</li> </ul>	<ul style="list-style-type: none"> <li>Environmental impact</li> <li>Community Wellbeing</li> <li>Industry practices</li> </ul>	<ul style="list-style-type: none"> <li>Community welfare</li> <li>Environmental impact &amp; sustainability practices</li> <li>Business ethics</li> <li>Biodiversity</li> <li>Waste Management</li> </ul>
<b>CUSTOMERS</b>	<ul style="list-style-type: none"> <li>Day-to-day interactions &amp; meetings</li> <li>Website</li> <li>Marketing material (e.g., annual reports, sustainability reports, social media, etc.)</li> <li>Exhibitions and conferences</li> <li>Business Development efforts</li> <li>Networking events</li> </ul>	<ul style="list-style-type: none"> <li>Client wellbeing</li> <li>Privacy &amp; security</li> <li>Responsiveness to their requirements</li> <li>Quality, safety and cost</li> <li>Business ethics</li> <li>Company impact on the environment</li> </ul>	<ul style="list-style-type: none"> <li>Quality, health &amp; safety</li> <li>Biodiversity</li> <li>GHG emissions</li> <li>Waste management</li> <li>Business ethics</li> <li>Procurement practices</li> </ul>
<b>GOVERNMENT ENTITIES</b>	<ul style="list-style-type: none"> <li>Direct engagement through on-site, licensing department</li> <li>National development plans and programmes</li> <li>Audits</li> <li>Press releases</li> <li>Local forums</li> </ul>	<ul style="list-style-type: none"> <li>Alignment with national development plans &amp; programmes</li> <li>Regulatory compliance</li> <li>Labour practices</li> <li>Transparency</li> <li>Community wellbeing</li> <li>National employment</li> </ul>	<ul style="list-style-type: none"> <li>Business ethics</li> <li>Economic performance</li> <li>ESG performance</li> <li>Procurement practices</li> <li>Environmental impact &amp; sustainability practices</li> <li>Community welfare</li> <li>Biodiversity</li> </ul>
<b>SUPPLIERS &amp; BUSINESS PARTNER</b>	<ul style="list-style-type: none"> <li>Day to day interactions</li> <li>Supplier assessment and audit</li> <li>Regular meetings with key suppliers and subcontractors</li> <li>Supplier satisfaction survey</li> </ul>	<ul style="list-style-type: none"> <li>Procurement practices</li> <li>Fair practice</li> <li>Business ethics</li> <li>Environmental impact</li> <li>Terms and conditions</li> <li>Cost negotiation</li> </ul>	<ul style="list-style-type: none"> <li>Procurement practices</li> <li>Environmental impact &amp; sustainability practices</li> <li>Business ethics</li> <li>Waste Management</li> </ul>

## POLICY ADVOCACY



SteelMint (BigMint Technologies Pvt. Ltd.), under its networking & events platform organised Roadshow- cum- Conference on Karnataka's Mining Sector: A Closer Look at Ground Zero Post- SC Order, co hosted by SMIORE at Hotel Hyatt Place, Ballari, on 19-21 January 2023. Networking dinner was organised at Shivavilas Palace Hotel, Sandur. Various cultural programmes were also held to make the evening a remarkable one.

Association associated with

Federation of Indian Mineral Industries ('FIMI'), New Delhi

Indian Ferro Alloy Producers Association ('IFAPA') Mumbai

The Associated Chambers of Commerce and Industry of India ('ASSOCHAM'), New Delhi

Mines Safety Association of India

Broad areas of discussions

- Sustainable Mining Practices;
- Sustainable environmental practices;
- Energy Conservation;
- Inclusive Development;
- Community development.



# GOVERNANCE



The Company has established high standards of governance to build an environment of trust, transparency, and accountability. The Company’s corporate governance reflects its value system encompassing its culture, policies, and relationships with its stakeholders. The Company is of the opinion that ‘Governance’ is the driving force behind the other two elements of ESG. The Company’s commitment to strong corporate governance is integral to the business and it helps the Company to create long-term value for all its stakeholders.

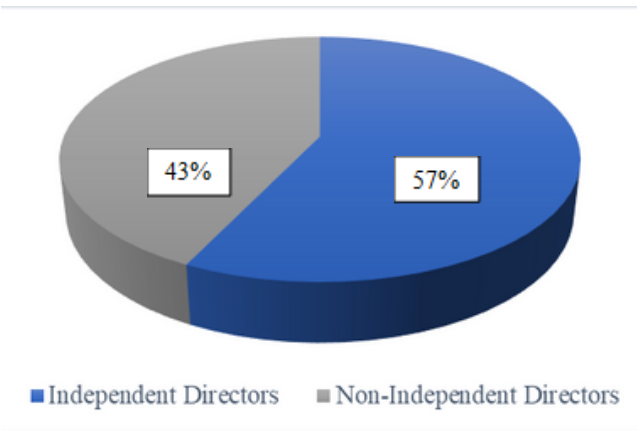
## BOARD INDEPENDENCE

The Board of the Company is duly constituted with optimum combination of Executive and Non-Executive, Independent and Non-Independent Directors. As on 31 March 2023, the Board comprised of seven members consisting of a Non-Executive Director, four Independent Directors and two Executive Directors. The Chairman of the Board is a Non-Executive Director. All the Board members are encouraged to meet and interact with the management at regular intervals.



<i>Chairman</i> <i>Non-Executive Director</i>	<i>4 Independent Directors</i> <i>(Including a woman director)</i>	<i>2 Executive Directors</i>
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Optimum combination of Executive, Non Executive and Independent Directors in the Board



The Company has an independent majority on the Board which ensures that the stakeholders concerns are duly addressed by the Company. It helps in fostering independent decision making and for mitigating any conflict of interest that may arise.



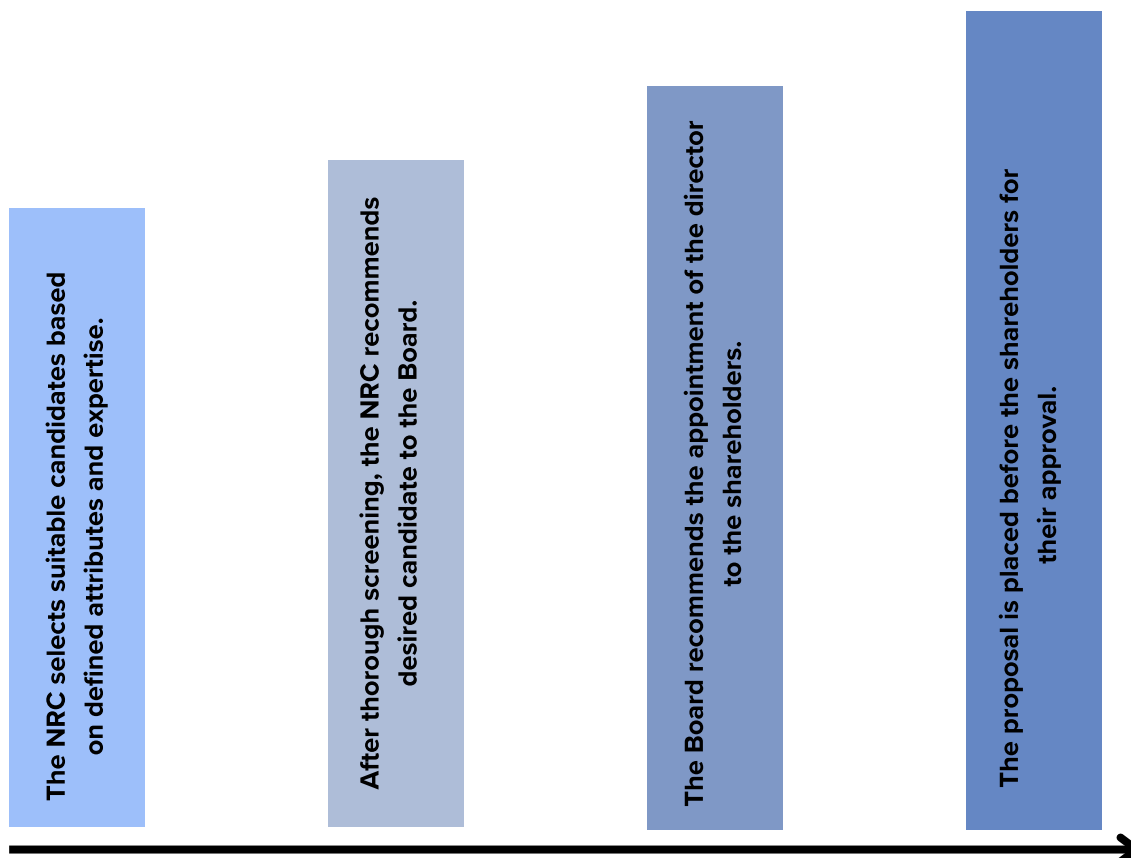
## BOARD DIVERSITY

The Board of Directors of the Company comprise people from diverse backgrounds, with specialized skills and talents to oversee, control and carefully monitor the internal operations of the Company. They provide leadership and guidance to the management, thereby enhancing shareholders value.

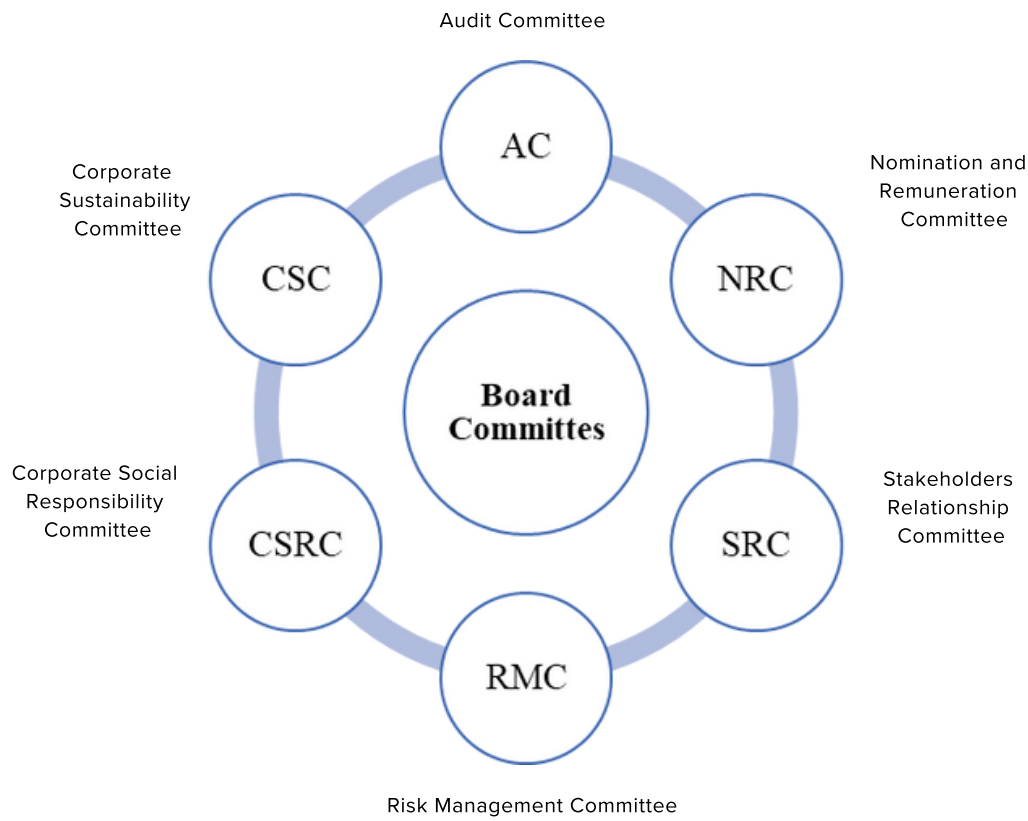
As a leading mining company moving towards an integrated Steel Manufacturer, we take pride in our commitment to embed diversity and inclusion across all levels of the organization. The Company have formulated a 'Policy on Board Diversity' that creates a clear path to more inclusive and collective corporate governance.

## SELECTION PROCESS OF BOARD MEMBERS

The Nomination and Remuneration Committee (NRC) shall identify and ascertain the integrity, qualification, expertise and experience of the person for appointment as director and recommend to the Board, for his/her appointment, subject to shareholder's approval.



# BOARD COMMITTEES



The Board has constituted various committees, which helps them to discharge its duty effectively. To drive a top-down approach for ESG integration, the 'Environment Committee' at the Board level was reconstituted to 'Corporate Sustainability Committee' with the objective of providing oversight, direction and monitoring the Company's ESG strategy and initiatives, as well as to direct initiatives to embed integrated thinking within SMIORE's culture. The Board has delegated various powers to each Committee to manage the Board's work.

## TRANSPARENCY & ACCOUNTABILITY

Transparency and accountability are the values that reinforce the Company's pursuit of good governance and fostering deep, long-standing trust with our stakeholders. To ensure transparency, accountability and ethical operations, the Company has formulated varied policies to govern diverse activities within the organization.





# CODE OF CONDUCT, ETHICS & INTEGRITY



SMIORE has adopted Code of Conduct for Board Members and Senior Management and Code of Conduct and Ethics Policy for its employees. These mechanisms strengthen the Company's commitment to conducting business in an ethical manner, thereby creating a sustainable business.

The Code of Conduct mandates the Company to be fair and not to discriminate on the basis of race, gender, religion and upholds values of equality, tolerance and respect for others. It sets the principles that enhance the ethical and transparent process in managing the Company's affairs.

At SMIORE, commitment to a values-based ethos is enshrined in the Company's Code of Conduct and Ethics Policy. The new joinees are given induction on Code of Conduct. Senior Management is expected to provide an annual statement of Code of Conduct adherence.

The Company demonstrates highest level of ethics, compliance and governance. The Company's continued success is driven by the trust, commitment and faith, our stakeholders have in our business and management.

## POLICIES

The Company has framed policies for managing and monitoring our ethical conduct across every business segment. The Board not only institutionalizes, and reviews policies, but also focuses on overall organizational practices, awareness creation and monitoring associated with each policy and its impact on organizational culture.



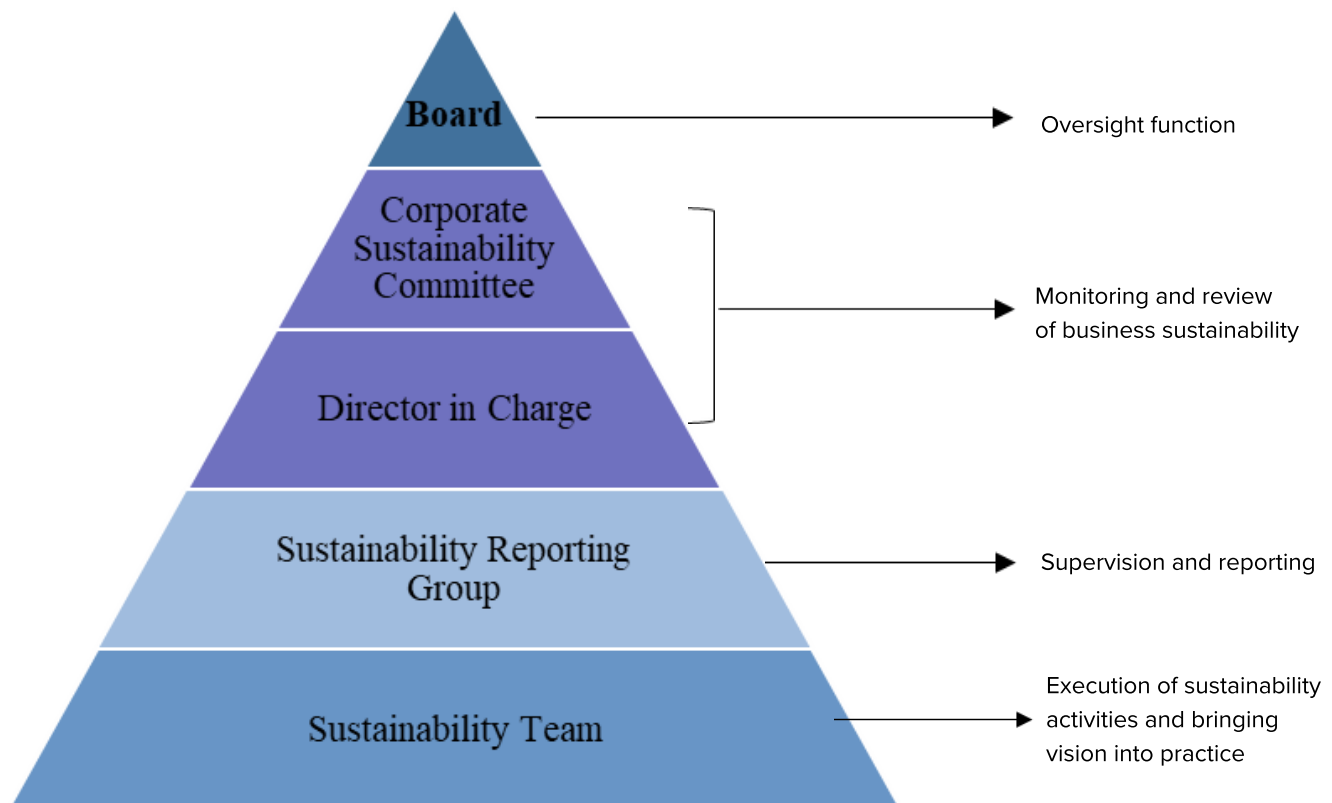


## INTERNAL CONTROLS

The Company has established a robust framework of internal control systems. The Company has in place adequate controls, procedures and policies, ensuring orderly and efficient conduct of its business, including adherence to the Company's policies, safeguarding of its assets, prevention and detection of frauds and errors etc. The adequacy of internal control systems is periodically reported to the Audit Committee.

## GOVERNANCE STRUCTURE FOR BUSINESS SUSTAINABILITY

Our well-established governance structures give shape to our future strategy, build business resilience and contribute effectively to sustainable growth. At SMIORE, the Board is the core of the Company's governance structure for business sustainability. The objective is to ensure the Company's success by collectively driving and directing management actions and reviewing overall performance, ensuring that stakeholder expectations are surpassed. The Company believes that once the tone is set at the top, others will follow.



The Board had constituted the Corporate Sustainability Committee, headed by Non-Executive Director, which in turn reviews the social and environmental aspects of business sustainability. Mohammed Abdul Saleem, Director (Mines) is the Director in Charge for sustainability related issues. In order to establish a monitoring process, the Company has constituted a Sustainability Reporting Group consisting of 5 employees who in turn ensure that the Company's actions are coherent with the stakeholder's interest. The Sustainability Reporting Group is the core committee which supervises the sustainability activities. At the unit level, the Company has formed a Sustainability Team consisting of employees from various locations, who are responsible for carrying out the day-to-day sustainability activities of the Company.

## Roles and Responsibilities

Architecture	Roles	Responsibilities
<b>BOARD</b>	<ul style="list-style-type: none"> <li>Oversight of business sustainability activities.</li> </ul>	<ul style="list-style-type: none"> <li>Approve the sustainability policy of the Company.</li> <li>Ensure that the activities are undertaken by the Company as per the sustainability vision.</li> <li>Set the strategic direction for the upcoming year on ESG actions and plans.</li> </ul>
<b>CORPORATE SUSTAINABILITY COMMITTEE</b>	<ul style="list-style-type: none"> <li>Monitoring and review of business sustainability</li> </ul>	<ul style="list-style-type: none"> <li>Formulate an action plan for sustainability activities and monitor its implementation.</li> <li>Review of sustainability issues on a periodic basis.</li> <li>Evaluate the performance of the Company on matters relating to sustainability and the impact such activities are making on the people, society and environment.</li> </ul>
<b>DIRECTOR IN CHARGE</b>		
<b>SUSTAINABILITY REPORTING GROUP</b>	<ul style="list-style-type: none"> <li>Supervision and reporting</li> </ul>	<ul style="list-style-type: none"> <li>Supervise the sustainability activities of the Company as per the action plan.</li> <li>Provide implementation status reports to the Corporate Sustainability Committee from time to time.</li> <li>To ensure adherence of compliance while undertaking the business sustainability activities.</li> </ul>
<b>SUSTAINABILITY TEAM</b>	<ul style="list-style-type: none"> <li>Execution of sustainability activities and bringing vision into practice</li> </ul>	<ul style="list-style-type: none"> <li>Carry out the day-to-day sustainability activities of the Company in line with Company's vision on sustainability.</li> </ul>



# AWARDS & ACCOLADES



SMIORE has been setting new benchmarks in safe, scientific, sustainable and responsible mining and ferroalloy production since its inception. Our efforts have been recognized time and again by government and reputed private bodies.

The Ministry of Mines under the aegis of Government of India and Indian Bureau of Mines has introduced the 'Sustainable Development Framework' (SDF) and have undertaken a system of rating mining leases. The Ministry rolled out Five Star Rating Awards in the year 2014-15. On the first occasion during 2014-15, the Company was the only Mining Lessee to have been awarded 5 Star Rating in the State of Karnataka and was among the only three Iron Ores Mining Lessees in the country to receive Five Star Rating.



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## FIVE STAR RATING AWARDS 2021-22

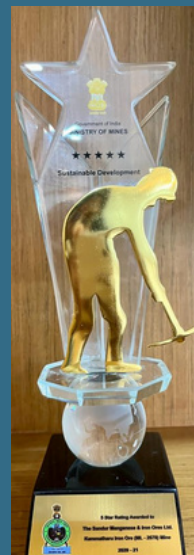
At the 75th Anniversary of Indian Bureau of Mines held on 1 March 2023 in Nagpur, the Ministry of Mines, Government of India has awarded 5 Star Rating to both the Mining Leases of the Company, for the year 2021-22.

## FIVE STAR RATING AWARDS 2020-21

At the 6th National Conclave on Mines & Minerals held on 12 July 2022 in Delhi, the Ministry of Mines, Government of India has awarded 5 Star Rating to both the Mining Leases of the Company, for the year 2020-21.



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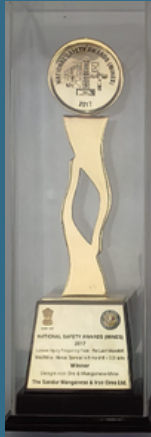
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## FIVE STAR RATING AWARDS 2019-20

At the 5th National Conclave on Mines & Minerals held on 23 November 2021 in Delhi, the Ministry of Mines, Government of India has awarded 5 Star Rating to both the Mining Leases of the Company, for the year 2019-20.

***The Company has been presented with Five Star Rating Award for the 8th time on 1 March 2023. The Company has been receiving Five Star Rating Awards from inception of this award by Ministry of Mines, Government of India in the year 2014 -15 and thereafter for all years.***

# AWARDS & ACCOLADES



## NATIONAL SAFETY AWARD

(MINES) - 2017

The Ministry of Labour & Employment, Government of India has awarded Vishwakarma Rashtriya Puraskar, National Safety Award (Mines) to the Company's Deogiri Manganese & Iron Ore Mine for the year 2017 on 8 March 2022.

## 33 PRIZES FROM MINES SAFETY ASSOCIATION, KARNATAKA INSPECTION : 2022-23

Mines Safety Association of Karnataka, under the aegis of Directorate General Mines Safety, Government of India has organised for inspection of all the mines. Each of the mine was inspected under the supervision of a Deputy Director. SMIORE has bagged a total of 33 prizes, under different categories such as Mine Workings, Safety Management System, Occupational Health, Welfare Amenities and Awareness on Silicosis, Contractual Work Vis Safety, Swachha Bharat Abhiyaan, Drilling & Blasting, Crusher & Electrical Installations, Loading & Transportation, Maintenance of Mining Machinery, Publicity & Innovation etc., for our Deogiri, Kammaturu, Subbarayana Halli and Ramghad Mines.



## 17 PRIZES AT THE MEMC WEEK 2022-23

At the 21st MEMC Week organised by the Mines Environment & Mineral Conservation Association (MEMCA) of Karnataka under the aegis of Indian Bureau of Mines, Government of Mines, SMIORE has bagged a total of 17 prizes, including the overall first prize for both the mines.



## BEST SAFETY PERFORMANCE INDUSTRY 2022-23

SMIORE's plant in Vyasanakere has been awarded "Best Safety Performance Industry" on BKRIS regional level competition. The award was given by the Department of Factories and Boilers, Government of Karnataka as a part of the 52nd National Safety Day programme.



The Company firmly believes that safety is not just a priority but a core value that the employees live by every day. The Company has implemented stringent safety protocols and measures to ensure that the Company's employees are always working in a safe and secure environment.



## *The Sandur Manganese & Iron Ores Limited*

(An ISO 9001:2015; ISO 14001:2015 and 45001:2018 certified company)

CIN: L85110KA1954PLC000759; Website: [www.sandurgroup.com](http://www.sandurgroup.com)

### **REGISTERED OFFICE**

**‘SATYALAYA’, No.266**

**Ward No.1, Palace Road**

**Sandur – 583 119, Ballari District**

**Karnataka, India**

**Tel: +91 8395 260301/ 283173-199**

**Fax: +91 8395 260473**