

Business Responsibility & Sustainability Report

SECTION A: GENERAL DISCLOSURES

I Details of the listed entity

1. Corporate Identity Number (CIN) of the listed entity	L85110KA1954PLC000759
2. Name of the listed entity	The Sandur Manganese & Iron Ores Limited
3. Year of incorporation	1954
4. Registered Office address	'SATYALAYA', Door No.266 (Old No.80), Ward No.1, Behind Taluka Office, Sandur - 583 119, Ballari District, Karnataka
5. Corporate Office address	Sandur House, No.9, Bellary Road, Sadashivanagar, Bengaluru - 560 080, Karnataka
6. E-mail	secretarial@sandurgroup.com
7. Telephone	08395 260300
8. Website	www.sandurgroup.com
9. Financial Year for which reporting is being done	1 April 2025 to 31 March 2026
10. Name of the Stock Exchange(s) where shares are listed	BSE Limited National Stock Exchange of India Limited
11. Paid-up Capital	₹4,86,10,48,140/-
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR	Neha Thomas Company Secretary & Compliance Officer 080 41520176 secretarial@sandurgroup.com
13. Reporting Boundary - Are the disclosures under this report made on a standalone basis (i.e., only for the entity) or on a consolidated basis (i.e., for the entity and all the entities which form a part of its consolidated financial statements, taken together)?	The disclosures made under this Report are on standalone basis.
• Registered Office located at 'SATYALAYA', Door No.266 (Old No.80), Ward No.1, Behind Taluka Office, Sandur, Ballari District, Karnataka • Mines located at Deogiri, Subbarayanahalli, Kammathuru and Ramghad, Sandur Taluk, Ballari District, Karnataka • Plant located at Vyasanakere, Mariyammanahalli, Hosapete, Vijayanagara District, Karnataka • Corporate Office at Sandur House, No.9, Bellary Road, Sadashivanagar, Bengaluru, Karnataka	
14. Name of the Assessment or Assurance Provider	Not Applicable
As per SEBI Circular dated 28 March 2025, assessment or assurance of the Business Responsibility and Sustainability Report (BRSR) Core is not applicable to the Company for the Financial Year 2025-26.	
15. Type of assessment or assurance obtained	Not Applicable

II Products/Services

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

Sl. No.	Description of Main Activity	Description of Business Activity	% of turnover of the entity
1	Mining	Manganese and iron ores	76.22
2	Ferrodalloys	Silicomanganese	18.76

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

Sl. No.	Product/Service	NIC Code	% of total turnover contributed
1	Iron ore	07100	65.12
2	Manganese ore	07293	11.09
3	Ferrodalloys	24104	18.76

III Operations

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

Location	Number of plants	Number of offices	Total
National	1	3	4
International	Nil	Nil	Nil

19. Markets served by the entity:

a. Number of locations:

Location	Number
National (No. of States)	15
International (No. of Countries)	Nil

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

Nil

c. A brief on types of customers:

The Company's market segment has been identified based on broad segments that align with the long-term strategic objectives. The Company operates within a Business to Business (B2B) framework, serving industrial customers who utilize its manganese and iron ores. These customers are primarily involved in manufacturing steel products and other allied products for end consumers. The main types of customers include:

Steel Manufacturers: These are industrial companies, such as steel mills, that use the Company's iron and manganese ores as raw materials to produce steel products. They range from integrated steel plants to other producers creating steel for various applications.

Ferroalloy Producers: These customers rely on the Company's manganese ore to manufacture ferroalloys, which are critical additives used in steel production to enhance properties like strength and durability.

While steel manufacturers and ferroalloy producers form the core customer base, the Company may also supply other industrial manufacturers who use manganese or iron ores in their processes, though the primary focus remains on the steel production sector.

IV Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

Sl. No.	Particulars	Total (A)	Male		Female		Others	
			No.(B)	% (B/A)	No. (C)	% (C/A)	No. (H)	% (H/A)
Employees								
1	Permanent (D)	416	377	90.63	39	9.38	0	0.00
2	Other than Permanent (E)	4	4	100.00	0	0.00	0	0.00
3	Total Employees (D+E)	420	381	90.71	39	9.29	0	0.00
Workers								
4	Permanent (F)	2,291	2,161	94.33	130	5.67	0	0.00
5	Other than Permanent (G)	5	3	60.00	2	40.00	0	0.00
6	Total Workers (F+G)	2,296	2,164	94.25	132	5.75	0	0.00

b. Differently abled employees and workers:

Sl. No.	Particulars	Total (A)	Male		Female		Others	
			No.(B)	% (B/A)	No. (C)	% (C/A)	No. (H)	% (H/A)
Differently abled employees								
1	Permanent (D)	1	0	0.00	1	100.00	0	0.00
2	Other than Permanent (E)	0	0	0.00	0	0.00	0	0.00
3	Total Differently Abled Employees (D+E)	1	0	0.00	1	100.00	0	0.00

b. Differently abled employees and workers: (Contd.)

Sl. No.	Particulars	Total (A)	Male		Female		Others	
			No.(B)	% (B/A)	No. (C)	% (C/A)	No. (H)	% (H/A)
Differently abled workers								
4	Permanent (F)	9	7	77.78	2	22.22	0	0.00
5	Other than Permanent (G)	0	0	0.00	0	0.00	0	0.00
6	Total Differently Abled Workers (F+G)	9	7	77.78	2	22.22	0	0.00

21. Participation/Inclusion/Representation of women:

	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	7	1	14.29
Key Management Personnel*	3	1	33.33

* Key Managerial Personnel includes Managing Director who is also forming part of the Board of Directors, Chief Financial Officer and Company Secretary & Compliance Officer.

22. Turnover rate for permanent employees and workers:

(Disclose trends for the past 3 years)

Category	FY 2025-26 (Turnover rate in current FY)				FY 2024-25 (Turnover rate in previous FY)				FY 2023-24 (Turnover rate in the year prior to previous FY)			
	Male	Female	Other	Total	Male	Female	Other	Total	Male	Female	Other	Total
Permanent Employees	12.95	14.81	0.00	13.13	10.33	17.78	0.00	11.07	13.22	13.48	0.00	13.25
Permanent Workers	4.90	5.93	0.00	4.96	4.70	4.30	0.00	4.67	3.11	5.67	0.00	3.30

V Holding, Subsidiary and Associate Companies (including Joint Ventures)**23. (a) Names of holding/subsidiary/associate companies/joint ventures:**

Sl. No.	Name of the holding/subsidiary/associate companies/joint ventures	Indicate whether holding/subsidiary/associate/joint venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Skand Private Limited	Holding (52.37% shares held in the Company)	0.00	No
2	Sandur Pellets Private Limited	Wholly Owned Subsidiary (Liquidated on 29 April 2026)	100.00	No
3	Arjas Steel Private Limited	Material Subsidiary	98.94	No
4	Arjas Modern Steel Private Limited	Material Subsidiary	98.94 (Indirect acquisition)	No
5	ReNew Sandur Green Energy Private Limited	Associate	49.00	No

VI CSR Details

24.	(i) Whether CSR is applicable as per Section 135 of the Companies Act, 2013?	Yes
	(ii) Turnover (₹)	20,10,61,72,884
	(iii) Net worth (₹)	31,08,51,22,882

VII Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2025-26 (Turnover rate in current FY)			FY 2024-25 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	0	0	NA	0	0	NA
Investors (other than shareholders)	Yes	0	0	NA	0	0	NA
Shareholders	Yes	2	0	NA	1	0	NA
Employees and Workers	Yes	0	0	NA	0	0	NA
Customers	Yes	0	0	NA	0	0	NA
Value Chain Partners	Yes	0	0	NA	0	0	NA
Other (please specify)	NA	0	0	NA	0	0	NA

The Grievance Redressal Policy of the Company can be accessed at: <https://www.sandurgroup.com/downloads/Corporate-Governance/Policies/Public-Grievance-Policy.pdf>

26. Overview of the entity's Material Responsible Business Conduct Issues:

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

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk or opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative)
1	Governance, Compliance and Ethics	R	Non-adherence to governance practices, non-compliance with applicable regulations or unethical business conduct may result in reputational damage, penalties and loss of stakeholder trust, affecting the organization's long-term performance.	The Company conducts its affairs in a fair and transparent manner. The Employees' Code of Conduct and Ethics Policy of the Company inculcate good principles, values and discipline in the employees of the Company while performing their duties. The Company regularly conducts training and awareness sessions for its workforce on ethical conduct and compliance. Further, the Company has in place compliance monitoring system and conducts periodic internal and external audits for monitoring the adherence to applicable regulations of the Company.	Negative

26. Overview of the entity's Material Responsible Business Conduct Issues: (Contd.)

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk or opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative)
2	Occupational Health & Safety	R	Ensuring health and safety of the workforce is vital for the Company, given the high-risk nature of Company's operations. Failure to manage safety effectively may result in workplace injuries, regulatory non-compliance, legal penalties and operational disruptions. Exposure to dust, heat, noise etc., creates occupational health risks leading to significant consequences. Safety incidents can also affect workforce morale and undermine the Company's reputation.	The Company has Standard Operating Procedures for Occupational Health & Safety Management which are in conformity with the ISO 45001:2018 Standards. The Company conducts training programmes and mock drills for its workforce on a regular basis for awareness, aimed at protecting them and minimizing potential hazards. The Company also conducts regular safety audits and inspections to ensure compliance with the standards.	Negative
3	Human Rights	R	The Company's operations involve extensive engagement with employees, contract workers, local communities and other stakeholders. Failure to respect and uphold human rights may lead to regulatory actions, legal disputes, social unrest, operational delays and reputational damage.	The Company upholds the dignity of every individual associated with it. Policy on Prevention of Sexual Harassment (POSH) of the Company, promotes a free, fair and discrimination free working environment for employees and provides a mechanism for raising concerns and resolution of disputes. The Company caters to the right of the employees and workers to work in just and favorable conditions. Further, the Company advocates gender equality at workplace.	Negative
4	Green House Gas (GHG) Management	O	GHG management aids the Company to comply with the evolving global and national regulations, avoiding risks and reiterating sustainable mining. Effective management of GHG emissions can result in lower operating costs through improved fuel and energy consumption and increased adoption of renewable energy. It further presents opportunities for operational excellence and long-term value creation.	GHG emissions are measured on an annual basis by the Company to identify opportunities for reduction. Further, the Company has undertaken upgradation of its entire pollution control equipment to ensure that all emissions are well within prescribed norms. There is an increase in the contribution of renewables at the Company's own premises, substituting them with cleaner fuels to reduce the Scope I and Scope II emissions.	Positive

26. Overview of the entity's Material Responsible Business Conduct Issues: (Contd.)

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk or opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative)
5	Carbon Emissions and Energy	O	Investing in renewable energy and enhancing energy efficiency helps the Company in lowering operational costs and reducing its carbon footprint, thereby strengthening its sustainable credentials and ensuring compliance with environmental regulations.	The Company has entered into Share Subscription and Shareholders Agreement with ReNew Green Energy Solutions Private Limited and ReNew Sandur Green Energy Private Limited (RSGEPL) and Power Purchase Agreement with RSGEPL to procure renewable power from solar and wind to meet the energy requirements at plant. With a focus to eliminate utilization of thermal coal for power generation for ferroalloys production, the Company has set up Waste Heat Recovery Boiler (WHRB) which produces power using waste heat from coke oven plant. The WHRB, which is a co-generation plant as classified by the Government of Karnataka, has potential to generate about 212 mu per annum. The non-production energy requirements are met through solar energy by installation of solar-powered solutions, including water heaters, street lighting systems, home lighting systems and industrial power systems. Further, ensuring energy efficient Heavy Earth Moving Machinery (HEMM), Diesel Generator Sets, Tippers helps the Company in reduction of carbon footprint. Electrification of 500 Tonnes Per Hour (TPH) Crushing and Screening Plant and Downhill Conveyor Pipe System at mines will result in significant reduction in fossil fuel consumption. To ascertain the contributions for reduction in carbon footprint, Energy Audits through accredited auditors are undertaken.	Positive
6	Environmental Impact	R	Environmental impacts caused by mining activities lead to substantial environmental effects such as habitat loss and degradation. As regulatory oversight intensifies and public concern for sustainable practices rises, the Company shall adhere to the compliances and adopt measures to protect the environment. In case the Company fails to ensure compliance with regulatory requirements, it may lead to legal penalties, operational shutdowns and damage to the Company's reputation.	The Company maintains a nursery with an annual capacity of ~1.5 lakh saplings, comprising fruit-bearing, fodder and indigenous plant species. To promote biodiversity conservation and ecological restoration, priority is accorded to the cultivation of native species that are non-exotic and non-invasive. The Forest Department procures these saplings to meet their requirement. As part of its mine reclamation and environmental management initiatives, the Company has undertaken extensive plantation and afforestation activities across the lease area. During the year, plantation measures facilitated the stabilisation of 167.40 hectares (Ha) of mine dumps. Further, a green belt	Negative

26. Overview of the entity's Material Responsible Business Conduct Issues: (Contd.)

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk or opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative)
				covering 66.68 Ha has been developed along the mine lease boundary as a safety zone, afforestation has been carried out over 87.00 Ha of barren land and avenue plantations have been established across 43.75 Ha along haul roads. The generated topsoil is used for plantation/afforestation work up to end of lease period.	
7	Waste Management and Circular Economy	O	Circular economy enables the optimisation of natural resources through reduction, reuse, recycling and recovery of materials used across the operations of the Company, to the extent possible. It helps in waste management and cost optimisation thereby creating long-term environmental and economic value, conserving natural resources and supporting regulatory compliance.	The Company has reclaimed 167.22 Ha of waste dumps and 45.93 Ha of exhausted mine pit areas. Further, 27.45 Ha of mined-out pits and 87.00 Ha of waste land have been reclaimed and rehabilitated. Recycling wastewater generated out of domestic consumption is carried out through Sewage Treatment Plan (STP) with 150 KLD capacity. The recycled water is used for dust suppression and afforestation purposes. The Company has built engineering structures for facilitating groundwater recharge. Hydrogeological studies along with groundwater monitoring mechanism is in place to measure the impact of recharge to groundwater table. The Ferro Manganese (FeMn) slag which is generated during FeMn production is recycled by converting into bricks and introducing in the raw material charge mix for Silico Manganese (SiMn) production. Likewise, the Company has enabled a vendor to set up a M-sand unit within the plant premises using SiMn slag.	Positive
8	Water Management	O	The Company's operations are situated in safe areas, as designated by the Central Ground Water Authority (CGWA) and are not located in critical or water-stressed areas. By implementing suitable water management strategies, the Company can optimize water usage, reduce overall consumption and minimize its environmental footprint. This strengthens the Company's reputation and results in financial advantages through cost savings.	The Company conducts regular water audits through CGWB accredited auditor, to ensure efficient water use and compliance with environmental standards. The Company's plant has a fully compliant Zero Liquid Discharge (ZLD) facility which prevents any liquid waste from being released into the environment, thereby minimizing water pollution. The Company has constructed rainwater harvesting pits, check dams and silt settling tanks to augment groundwater recharge within its mining lease area. The Company has STP and the treated water is used for green belt development and for dust suppression of haul roads. The blow down water from the cooling towers is used in ferroalloy plant for slag granulation and in coke oven for quenching process, which reduces the requirement for fresh water.	Positive

26. Overview of the entity's Material Responsible Business Conduct Issues: (Contd.)

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk or opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative)
9	Community Relations	R	The Company's operations, projects, and business decisions can directly or indirectly affect local communities and other stakeholders. Poor management of community relationships may lead to reputational damage, regulatory challenges/penalties, operational disruptions etc.	Continuous consultations are carried out with local communities in the buffer zone of the mining leases and the surroundings of the plant during various stages of operations that could impact/affect community lives. The Company engages in robust focus group discussions with community leaders and local community stakeholders to address different areas of concern and share information. 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, skill-development of locals, promoting, assisting local small businesses and self-help activities. Based on such stakeholders' consultation, the Company has, in the interest of public, undertaken construction of 35 kms of external roads surrounding the mining area at a cost of ₹8,500 lakh to mitigate the impact of dust due to transportation of ores through trucks, along with other mining lessees and customers in the region. Further, the Company, through its Corporate Social Responsibility/Corporate Environmental Responsibility initiatives promotes economic growth of the community. The Company is promoting Lambani Art through Sandur Kushala Kala Kendra, which helps in uplifting the tribal community. The Kendra is recognized by Khadi and Village Industries Commission (KVIC) and has a Geographical Identification (GI) Tag No.134 for Sandur Lambani Embroidery. Further, the Company supports 14 educational institutions with ~6,000 students and ~450 staff members to promote education and skill development.	Negative
10	Technological and Process Innovation	O	Advancements in mining technologies like automated mining machinery and processing methods like enhanced ore beneficiation techniques increase operational efficiency, improve safety, optimise resource utilisation, reduce costs and support sustainable mining practices. Investment in latest technologies, helps the Company to stay competitive and efficient.	The Company is in the process of setting up a Beneficiation Plant and Washing Plant aimed at upgrading iron ore grade, suitable for pellet manufacturing. The Company also promotes adoption of energy-efficient technologies, water conservation measures and sustainable mining practices to support its environmental objectives.	Positive

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

The National Guidelines on the Economic, Social and Environmental Responsibilities of Business released by the Ministry of Corporate Affairs have adopted the following nine areas of Business Responsibility:

Principle 1:	Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable
Principle 2:	Businesses should provide goods and services in a manner that is sustainable and safe
Principle 3:	Businesses should respect and promote the well-being of all employees, including those in their value chain
Principle 4:	Businesses should respect the interests of and be responsive to all its stakeholders
Principle 5:	Businesses should respect and promote human rights
Principle 6:	Businesses should respect and make efforts to protect and restore the environment
Principle 7:	Businesses, when engaged in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
Principle 8:	Businesses should promote inclusive growth and equitable development
Principle 9:	Businesses should engage with and provide value to their consumers in a responsible manner

Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes										
1.	a. Whether the entity's policy/policies cover each principle and its core elements of the NGRBCs? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/No)	Certain policies are approved by the Board of Directors and certain policies are internal and issued by the Managing Director. Implementation of policy decisions is carried out by the management.								
	c. Web Link of the Policies, if available	https://sandurgroup.com/policies Certain policies are internal to the Company and not placed on the website.								
2.	Whether the entity has translated the policy into procedures? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.	Do the enlisted policies extend to your value chain partners? (Yes/No)	No	No	No	No	No	No	No	No	No
4.	Name of the national and international codes/certifications/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by the entity and mapped to each principle.		ISO 9001 :2015	ISO 45001 :2018			ISO 14001 :2015			
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	*At the end of this Section.								
6.	Performance of the entity against specific commitments, goals and targets along-with reasons in case the same are not met.	Not Applicable								
Governance, leadership and oversight										
7.	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements.	**At the end of this Section.								
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility Policy(ies).	Bahirji Ajai Ghorpade Managing Director								
9.	Does the entity have a specified Committee of the Board/Director responsible for decision making on sustainability related issues? (Yes/No). If yes, provide details.	Yes. The Corporate Sustainability Committee (CSC) has been constituted by the Board for decision making on sustainability related issues. The details on CSC have been provided in the Corporate Governance Report forming part of the Annual Report.								

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES (Contd.)**10. Details of Review of NGRBCs by the Company:**

Subject for Review	Indicate whether review was undertaken by Director/ Committee of the Board/any other Committee										Frequency (Annually/Half-yearly/Quarterly/ any other - please specify)									
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9		
Performance against above policies and follow up action										Yes, Annually.										
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances										Yes, Ongoing.										

11. Has the entity carried out independent assessment/evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9
	The Company periodically conducts a comprehensive internal audit of its policies.								

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

Sl. No.	Specific commitment and goals	Timeline Mandatory/ Voluntary	Performance/Status of implementation
1.	The Company shall carryout plantation/ afforestation in backfilled and reclaimed area of mining lease, around water body, along the roadsides, in community areas etc., by planting the native species in consultation with the State Forest Department/Agriculture Department/ Rural Development Department/Tribal Welfare Department/Gram Panchayat such that only those species be selected which are of use to the local people. The Central Pollution Control Board (CPCB) guidelines in this respect shall also be adhered to. The density of the trees should be around 2,500 saplings per hectare.	Mandatory	Ongoing. During the Financial Year, 14.63 Ha of exhausted portion of mine pit has been backfilled from Mining Leases (ML) Nos.2678 and 2679. 7.30 Ha of inactive slopes of dumps has been covered with geo coir mats and grassification. 94,500 saplings (88,500 from ML No.2678 and 6,000 from ML No.2679) were planted. Stabilised dumps increased from 152.12 Ha to 167.22 Ha with an increase of 9.92% compared to previous financial year. Further, 11.27 Ha of dumps afforested. Since its inception, the Company has planted 41,77,687 trees across areas within and outside its mining leases, with an average survival rate of 82.5%, reflecting its sustained commitment to ecological restoration and biodiversity conservation.
2.	Catch drains, settling tanks and siltation ponds of appropriate size shall be constructed around the mine working, mineral yards and Topsoil/Overburden/ Waste Dumps to prevent run off of water and flow of sediments directly into the water bodies (Nallah/River/Pond etc.). The collected water should be utilized for watering the mine area, roads, green belt development, plantation etc. The drains/ sedimentation sumps etc., shall be de-silted regularly, particularly after monsoon season, and maintained properly.	Mandatory	Ongoing. During the Financial Year, as part of engineering measures for waste dump management, 1,684 meters of retaining wall and 958 meters of garland drains were constructed. Regular maintenance of engineering structures built for runoff. Surface water management is carried out through desilting.

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

Sl. No.	Specific commitment and goals	Timeline Mandatory/ Voluntary	Performance/Status of implementation
3.	The land-use of the mine lease area at various stages of the mining scheme as well as at the end of life shall be governed as per the approved Mining Plan. The excavation vis-a-vis backfilling in the mine lease area and corresponding afforestation to be raised in the reclaimed area shall be governed as per the approved mining plan. It shall ensure the monitoring and management of rehabilitated areas until the vegetation becomes self-sustaining.	Mandatory	Ongoing. As per the approved Mining Plan, 11.70 Ha in ML No.2678 and 2.93 Ha in ML No.2679 were backfilled during the Financial Year.
4.	Industrial wastewater (workshop and wastewater from mine) should be properly collected and treated so as to conform to the notified standards prescribed from time to time. The standards shall be prescribed through Consent To Operate (CTO) issued by concerned State Pollution Control Board (SPCB). The workshop effluent shall be treated after its initial passage through oil and grease trap.	Mandatory	Ongoing. Based on the water consumption of workshop, Oil and Grease Traps are provided for treatment of wastewater generated at workshop. All the waste oil collected are collected and sold to authorised recyclers.
5.	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. The coal fines generated are reused in coke production. The coke fine generated are sold as breeze coke in the market for use in sinter and pellet plants. The dust collected in ferroalloy plant baghouse is recycled in the ferroalloy production by briquetting.
6.	Develop and implement rainwater harvesting measures on long term basis to augment groundwater resources in the area in consultation with the Central Ground Water Board/State Ground Water Department.	Mandatory	Ongoing. The Company has constructed and maintained engineering structures like 53 rainwater harvesting pits, contributing to a groundwater recharge of 2,934 m ³ /day at mines. Additionally, rooftop rainwater harvesting systems have been implemented, augmenting 2 KL/day. As per the Hydrogeological Studies carried out for both the Mining Leases recharge to groundwater as per Groundwater Estimate Commission (GEC) Norms is 16,553 m ³ /day.
7.	Explore the possibility of increasing the transportation through conveyor belt to reduce the impact due to transportation by road.	Mandatory	Ongoing. The Company has commissioned the Downhill Conveyor Pipe System for ore evacuation which will significantly reduce the fleet of trucks used for ore evacuation.
8.	Installation of the Continuous Ambient Air Quality Monitoring Stations (CAAQMS) in consultation with CPCB/SPCB for real time environment monitoring.	Mandatory	Completed. The Company has installed and three CAAQMS equipment.
9.	Topsoil shall be stacked properly with proper slope with adequate safeguards and shall be backfilled for reclamation and rehabilitation of mined out area.	Mandatory	Ongoing. Out of the total 12,344 Tonnes of topsoil generated during the Financial Year, 90% has been utilized for afforestation activities.

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

Sl. No.	Specific commitment and goals	Timeline Mandatory/ Voluntary	Performance/Status of implementation
10.	Install permanent water sprinklers along the haul road and the approach road, fog cannon/mist sprayer at various locations in the mine area. The air pollution control equipment like bag filters, vacuum suction hoods, dry fogging system etc., shall be installed at Crushers, and other areas prone to air pollution. The Company shall take necessary measures to avoid the generation of fugitive dust emissions. The dense plantation shall be carried out in the vicinity of the crusher. The Stack emission monitoring of the Crusher shall be carried out at periodic intervals.	Mandatory	Ongoing. During the Financial Year, the Company has commissioned and installed sprinklers covering more than 3 Ha of the area. Air pollution control equipments for crushing and screening plants like the hood cover for the conveyors, canopy for crushers, water spray systems at transfer points of crushing and screening, truck mounted fog system, wheel wash systems have been introduced. Stack monitoring for fugitive emissions is also being carried out and monitored values are well within permissible limits.
11.	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. During the Financial Year, 94,500 native species, primarily fruit and fodder bearing were planted. Additionally, 8 water troughs were constructed to quench thirst of wildlife in the forest area. As part of the approved Wildlife Conservation Plan, an amount of ₹25.2 lakh was deposited was remitted to Forest Department.
12.	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. Regular dust suppression measures like the deployment of water tankers for dust suppression of haul roads, internal and external, deployment of truck mounted fog system, mist cannons, air pollution control measures for fixed crushing and screening plants, enhanced green belt have ensured fugitive emissions are within permissible limits.
13.	Regularly monitor and maintain records with respect to groundwater level and quality in and around the mine lease by establishing a network of existing wells as well as new piezo-meter installations during the mining operation in consultation with Central Ground Water Authority/State Ground Water Department.	Mandatory	Ongoing. Quarterly monitoring of Piezometers within the mine lease area and a 10 km radius is being carried out, including monitoring of groundwater quality during pre and post monsoon periods. During the Financial Year, two digital water level recorders equipped with telemetry systems were installed. Periodic monitoring of the groundwater in surrounding areas of the plant carried out as per the norms.
14.	Third Party Audits - Impacts of Implementation of R&R Plan, Water Audits, Energy Audit, Audit for assessing Environmental Clearance Compliance through Accredited Auditors.	Voluntary	Ongoing. During the Financial Year, a third-party audit to assess compliance with Environmental Clearance conditions was carried out by M/s. B. S. Envitech Private Limited, a laboratory accredited by the National Accreditation Board for Education and Training (NABET) and National Accreditation Board for Testing and Calibration Laboratories (NABL) and recognized by the Ministry of Environment, Forest and Climate Change (MoEF&CC). Water Audit was carried out by Central Ground Water Board (CGWB) accredited auditor. Hydrogeological Studies were carried out by Former Regional Director of CGWB and Former Superintending Hydrogeologist, CGWB. Energy Audit was carried out through Bureau of Energy Efficiency accredited auditor.

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

Sl. No.	Specific commitment and goals	Timeline Mandatory/ Voluntary	Performance/Status of implementation
15.	Occupational health surveillance program for the workers be undertaken periodically to observe any contractions due to exposure to dust and take corrective measures, if needed.	Voluntary	Ongoing. As per the prevailing statutes, occupational health and safety of workers are carried out. Annual medical check-up of all the employees and workers are carried out as per the guidelines.
16.	Efforts to minimise water consumption in the steel plant complex by segregation of used water, practicing cascade use and by recycling treated water.	Mandatory	Ongoing. The blow down water from the cooling towers is used in ferroalloy plant for slag granulation and in coke oven for quenching process. This reduces the freshwater requirement. Also, the treated water from STP plant is used for green belt development.
17.	Provide solar power generation on roof tops of buildings, for solar light system for all common areas, streetlights, parking around project area and maintain the same regularly; Provide LED lights in their offices and residential areas.	Voluntary	Ongoing. Currently, 99.15% of power put to use for plant operations are from renewable sources and 7.3% of the total power consumption at mines is met through solar power.

**** Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements.**

Since its inception, the Company has remained steadfast in its commitment to sustainability and inclusive growth. The Company recognizes that long-term business success is closely linked to the wellbeing of the communities and ecosystems in which it operates. The Company continues to prioritize in initiatives that foster socio-economic development and environmental stewardship. The key areas of focus include community development, employee health and welfare, educational advancement, access to healthcare, and the preservation of biodiversity and natural habitats. These commitments are aligned with the Company's core values and guide its long-term objectives and decision-making processes. The receipt of Seven Star Rated Mine award for the Company's outstanding efforts and best practises in green mining, is a testimony to the Company's commitment towards sustainable growth.

BRSR provides a comprehensive framework to systematically assess, manage, and enhance Environmental, Social and Governance (ESG) performance. The Company remains dedicated to maintaining the highest standards of corporate governance, integrity, transparency, accountability, and ethical conduct. Looking ahead, the Company will continue to prioritize material sustainability issues, including environmental conservation, efficient resource management, waste reduction, water stewardship, renewable energy adoption, stakeholder engagement, responsible business practices, and robust governance mechanisms. These focus areas will remain central to the Company's efforts to create sustainable value for all stakeholders while contributing positively to society and the environment.

Bahirji Ajai Ghorpade
Managing Director
Director responsible for BRSR

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

[illegible]

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

PRINCIPLE 1: BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH INTEGRITY, AND IN A MANNER THAT IS ETHICAL, TRANSPARENT AND ACCOUNTABLE

Essential Indicators

1. Percentage coverage by training and awareness programs on any of the principles during the Financial Year:

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors (BoD)	1 In addition to this, principles are discussed in the Board and Committee meetings at different times as an ongoing activity.	Principles 1, 3 and 4	100
Key Managerial Personnel (KMPs)	2	Principles 1, 3, 4, 5 and 6	100
Employees other than BoD and KMPs	14	Principles 3, 5 and 6	100
Workers	33	Principles 3, 5 and 6	100

2. Details of fines/penalties/punishment/award/compounding fees/settlement amount paid in proceedings (by the entity or by directors/KMPs) with regulators/law enforcement agencies/judicial institutions, in the Financial Year:

(Note: The disclosures are based on the materiality as specified in Regulation 30 of the Listing Regulations and as disclosed on the entity's website)

Segment	Monetary				
	NGRBC Principle	Name of the regulatory/enforcement agencies/judicial institutions	Amount (₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/Fine			Nil		
Settlement					
Compounding Fee					

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

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

Case details	Name of the regulatory/enforcement agencies/judicial Institutions
Not Applicable	

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

Yes, the Anti-Corruption and Anti-Bribery Policy reaffirm the commitment of the Company and its subsidiaries to uphold the highest standards of integrity, transparency, accountability and ethical conduct in all business dealings. The policy is aimed at ensuring compliance with applicable anti-corruption and anti-bribery laws and to reinforce the Sandur Group's zero-tolerance approach to any form of bribery or corruption, whether direct or indirect.

The policy can be accessed at:

<https://www.sandurgroup.com/downloads/Corporate-Governance/Policies/Anti-corruption-and-anti-bribery-policy.pdf>

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

	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Directors	Nil	Nil
KMPs		
Employees		
Workers		

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

	FY 2025-26 (Current Financial Year)		FY 2024-25 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of conflict of interest of the Directors	Nil	NA	Nil	NA
Number of complaints received in relation to issues of conflict of interest of the KMPs				

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

Not applicable as there were no cases of corruption or conflicts of interest during the year under review.

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

	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Number of days of accounts payables	41	41

9. Open-ness of business

Details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties:

Parameter	Metrics	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	21.61	42.24
	b. Number of trading houses where purchases are made from	327	6
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	70.55	100.00

Details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties: (Contd.)

Parameter	Metrics	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Concentration of Sales	a. Sales to dealers/distributors as % of total sales	19.37	5.51
	b. Number of dealers/distributors to whom sales are made	45	19
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	80.28	92.07
Share of RPTs in	a. Purchases (Purchases with related parties/Total Purchases) (in %)	33.74	24.25
	b. Sales (Sales to related parties/ Total Sales) (in %)	3.16	0.82
	c. Loans & advances (Loans & advances given to related parties/Total loans & advances) (in %)	-	-
	d. Investments (Investments in related parties/Total Investments made) (in %)	-	77.16

The Company defines trading houses as vendors who only buy and sell products without any value addition to that product.

Leadership Indicators**1. Awareness programmes conducted for value chain partners on any of the principles during the Financial Year:**

Total number of awareness programme held	Topic/principles covered under the training	% age value chain partners covered (by value of business done with such partners) under the awareness programmes
889	The Company has adopted a structured approach to engage its value chain partners, emphasizing three key segments: Safety, Ethics and Supply Chain Responsibility. Below are the specific initiatives under each segment: Safety - All individuals accessing the Company's sites, including vendors and contractors, are required to undergo mandatory safety training at the Safety Leadership Development Centre (SLDC). This initiative underscores the Company's dedication to fostering a safe working environment across its operations and value chain. Mock drills are being conducted. Ethics - Vendor and contractor partners participate in awareness sessions covering the Company's Policy on Anti-Bribery and Anti-Corruption as well as Prevention of Sexual Harassment. These sessions are vital for promoting ethical business conduct and cultivating a respectful workplace culture. Supply Chain Responsibility - The Company conducts regular awareness sessions on responsible supply chain practices. This effort reflects a strong commitment to sustainability and accountability throughout the supply chain. The Company's initiatives demonstrate a proactive stance in aligning with the NGRBC principles, ensuring that safety, ethical practices, and supply chain responsibility are prioritized across its value chain.	~60%

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

Yes, the Company receives requisite declaration from the Board Members and KMPs relating to the entities they are interested and ensures requisite approvals as required under the statute as well as the Company's policies are in place before transacting with such entities/individuals.

PRINCIPLE 2: BUSINESSES SHOULD PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE

Essential Indicators

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

	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)	Details of improvements in environmental and social impacts
R&D	Nil	Nil	Not assessed
Capex	Nil	Nil	Not assessed

2. a. Does the entity have procedures in place for sustainable sourcing?

Yes. The Company is committed to responsible and sustainable procurement practices that align with the Company's sustainability framework. The Company prioritize sourcing from vendors with recognized sustainability programs and establish a Chain of Custody to ensure traceability and responsible sourcing of input materials.

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

Mining operations do not require sourcing of any raw material. The Company practices sustainable procurement in line with all suppliers, vendors and input materials. In the case of ferroalloys production, the major portion of strategic raw material like manganese ore is from captive mines and is transported through road. Sourcing of materials other than raw materials are from various sources.

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

E-waste:

During the Financial Year 2025-26, ~0.94 Tonnes of e-waste generated by the Company were collected and disposed of in an environmentally responsible manner through an authorized and registered recycler.

Hazardous Waste:

The Company has obtained authorization from Karnataka State Pollution Control Board (KSPCB) under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 for the generation, storage and 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, equipments and vehicles are flammable and potential threats to environment considering pollution aspects. 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. The particulars of records for generation and disposal of hazardous waste to registered recyclers are furnished to KSPCB.

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
	Nil

PRINCIPLE 3: BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS

Essential Indicators

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent employees											
Male	377	*Please refer to the note below				NA	NA	4	1.06	0	0.00
Female	39					3	7.69	NA	NA	0	0.00
Other	0					0	0.00	0	0.00	0	0.00
Total	416					3	0.72	4	0.96	0	0.00
Other than permanent employees											
Male	4	*Please refer to the note below				NA	NA	0	0.00	0	0.00
Female	0					0	0.00	NA	NA	0	0.00
Other	0					0	0.00	0	0.00	0	0.00
Total	4					0	0.00	0	0.00	0	0.00

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent workers											
Male	2,161	*Please refer to the note below				NA	NA	12	0.56	0	0.00
Female	130					1	0.77	NA	NA	0	0.00
Other	0					0	0.00	0	0.00	0	0.00
Total	2,291					1	0.04	12	0.52	0	0.00
Other than permanent workers											
Male	3	*Please refer to the note below				NA	NA	0	0.00	0	0.00
Female	2					0	0.00	NA	NA	0	0.00
Other	0					0	0.00	0	0.00	0	0.00
Total	5					0	0.00	0	0.00	0	0.00

* The Company maintains its own hospital and dispensaries at its Registered Office, mines and plant locations for treatment of employees' and their dependents. Employees are also eligible to avail 20% of their salaries as medical entitlements during illness. In addition, financial assistance is provided to the employees for major illness.

The Company maintains day care facilities at mines locations. However, during the year under review and previous years, such facilities were not availed by any employees.

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent):

	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Cost incurred on well-being measures as a % of total revenue of the Company	1.28	1.42

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

Benefits	FY 2025-26 (Current Financial Year)			FY 2024-25 (Previous Financial Year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/NA)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/NA)
PF	99.05	99.78	Y	99.31	99.83	Y
Gratuity	99.05	99.78	Y	99.31	99.83	Y
ESI*	1.90	3.35	Y	5.77	4.48	Y
Others:						
Employees Voluntary Pension Scheme/Post Retirement Ex-gratia^	49.52	99.78	NA	46.65	99.83	NA

* Employees and Workers working at Mines Unit are not covered under the Employees State Insurance Act, 1948, as it is not applicable for Mines and the Company's dedicated hospitals are catering the requirement.

^ Employees Voluntary Pension Scheme was discontinued w.e.f. 30 June 2025 and Post Retirement Ex-gratia was implemented w.e.f. 1 July 2025.

3. Accessibility of workplaces

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

Yes.

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

The Employees' Code of Conduct and Ethics Policy has stipulated the following points to deal with equal rights of employees:

Human Resource Relations, Health, Safety and Human Rights:

- Employees have a right to work in a professional, respectful and safe workplace environment. The Company expects its employees to treat each other, customers and third parties with respect and dignity. The Company has zero tolerance for harassment, including violence (verbal or physical), discrimination, sexual harassment, retaliation and any other form of abusive or inappropriate behaviour in the workplace.
- The Company is committed to ensuring its employees are treated fairly, compensated appropriately, and hired and promoted without discrimination by reason of race, nationality, ethnic origin, colour, religion, age, gender, marital status, family status, sexual orientation, political belief or disability. Any employee whose actions are inconsistent with these principles will be disciplined, up to and including dismissal.
- The Company shall establish and maintain safe working conditions and conduct its operations in an environmentally responsible manner in accordance with applicable environmental laws, regulations and standards.

The Employees' Code of Conduct and Ethics Policy can be accessed at <https://www.sandurgroup.com/downloads/Corporate-Governance/Policies/7-replaced-employees-code-of-conduct-and-ethics-policy.pdf>

5. Return to work and retention rates of permanent employees and workers that took parental leave*:

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100.00	100.00	100.00	100.00
Female	100.00	100.00	100.00	100.00
Other	0.00	0.00	0.00	0.00
Total	100.00	100.00	100.00	100.00

* Paternal leave includes maternity, paternity and adoption leave.

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

	Yes/No (if Yes, then give details of the mechanism in brief)
Permanent workers	Yes. The Company has open door policy to address any kind of concern/grievances. The Company also conducts open sessions and town hall meetings to address any queries/concerns of employees. The Company has a Works Committee to address and redress the grievances of employees.
Other than permanent workers	
Permanent employees	
Other than permanent employees	

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

Category	FY 2025-26 (Current Financial Year)			FY 2024-25 (Previous Financial Year)		
	Total employees/workers in respective category (A)	No. of employees/workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees/workers in respective category (C)	No. of employees/workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Permanent Employees						
Male	377	86	22.81	388	84	21.65
Female	39	7	17.95	42	8	19.05
Other	0	0	0.00	0	0	0.00
Total	416	93	22.36	430	92	21.40
Permanent Workers						
Male	2,161	1,859	86.02	2,157	1,934	89.66
Female	130	111	85.38	137	117	85.40
Other	0	0	0.00	0	0	0.00
Total	2,291	1,970	85.99	2,294	2,051	89.41

8. Details of training given to employees and workers:

Category	FY 2025-26 (Current Financial Year)					FY 2024-25 (Previous Financial Year)				
	Total (A)	On Health and Safety measures		On Skill upgradation		Total (D)	On Health and Safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	381	269	70.60	228	59.84	391	238	60.87	356	91.05
Female	39	6	15.38	3	7.69	42	4	9.52	15	35.71
Other	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Total	420	275	65.48	231	55.00	433	242	55.89	371	85.68

8. Details of training given to employees and workers: (Contd.)

Category	FY 2025-26 (Current Financial Year)					FY 2024-25 (Previous Financial Year)				
	Total (A)	On Health and Safety measures		On Skill upgradation		Total (D)	On Health and Safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
		Workers								
Male	2,164	848	39.19	1,097	50.69	2,160	434	20.09	268	12.41
Female	132	45	34.09	28	21.21	138	0	0.00	7	5.07
Other	0	0	0	0	0.00	0	0	0.00	0	0.00
Total	2,296	893	38.89	1,125	49.00	2,298	434	18.89	275	11.97

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

Category	FY 2025-26 (Current Financial Year)			FY 2024-25 (Previous Financial Year)		
	Total (A)	No. (B)	% (B/A)	Total (D)	No. (E)	% (E/D)
Employees						
Male	381	349	91.60	391	373	95.40
Female	39	35	89.74	42	36	85.71
Other	0	0	0.00	0	0	0.00
Total	420	384	91.43	433	409	94.46
Workers						
Male	2,164	1,744	80.59	2,160	1,524	70.56
Female	132	129	97.73	138	127	92.03
Other	0	0	0.00	0	0	0.00
Total	2,296	1,873	81.58	2,298	1,651	71.85

10. Health and safety management system:

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

Yes, it covers all the employees and staff working at mining and plant locations.

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

A well-defined safety observation system, hazard identification and risk assessment procedures are in place. Some of them are enlisted below:

- 1) Hazard Identification & Risk Assessment
- 2) Barrier Health Management
- 3) Quantitative Risk Assessment
- 4) Job Safety Analysis
- 5) Hazop
- 6) Inspections
- 7) Audits
- 8) Safety Observation System

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

Yes.

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

Yes.

11. Details of safety related incidents:

Safety Incident/Number	Category*	FY 2025-26	FY 2024-25
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	Nil	1.47
	Workers	Nil	Nil
Total recordable work-related injuries	Employees	Nil	1
	Workers	Nil	Nil
No. of fatalities	Employees	Nil	Nil
	Workers	Nil	Nil
High consequence work related injury or ill-health (excluding fatalities)	Employees	Nil	Nil
	Workers	Nil	Nil

* Inclusive of contract workforce.

Total recordable injuries are minor injuries, and the employee resumed work after minor treatment at the plant. There were no injuries at mines during the Financial Years 2025-26 and 2024-25.

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

The Company's Occupational Health and Safety Management System coverage is as per ISO 45001:2018. The Company recognizes health and safety as an integral part of its operations by promoting "Zero Harm" in its operations and endeavors to prevent all injuries and work-related illnesses. The Company aspires to set the highest standards required to comply with and exceed applicable statutory health and safety requirements. It provides appropriate training to employees, associates, contractors and suppliers to help them work safely. The system helps in assessing risks and provides controls on health and safety hazards in operations and activities. Regular assurance programs are conducted, and timely actions are taken. The systems ensure that incidents are reported timely, investigated for root causes and deployment of lessons learnt across organization. The Company conducts regular safety mock drills. The Company has a QR code which is placed at various location to report real time unsafe acts.

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

Benefits	FY 2025-26 (Current Financial Year)			FY 2024-25 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	Nil	NA	Nil	Nil	NA
Health & Safety	Nil	Nil	NA	Nil	Nil	NA

14. Assessment for the year:

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

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

The Company ensures safety at the workplace through planning, gathering information, onsite inspection, documentation review, evaluation & reporting, follow-up, corrective actions and continuous improvements.

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

Yes.

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

The contract between the Company and its value chain partners incorporates provisions governing the payment and deduction of mandatory dues as mandated under various statutes. The value chain partners are obligated to comply with all applicable regulations necessary for their operations. This includes ensuring the timely payment of statutory dues to their employees, such as Provident Fund (PF) and Employee State Insurance (ESI), within the stipulated timeframe.

The Company maintains a rigorous verification process, confirming that these payments have been made before releasing funds to value chain partners. This step ensures adherence to statutory requirements and promotes accountability. In cases of non-compliance, consequences may include legal actions, imposition of penalties, or cancellation of orders.

This structured approach reflects SMIORE's commitment to responsible business conduct, emphasizing compliance and ethical practices throughout its supply chain.

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

Particulars	Total no. of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Employees	Nil	Nil	Nil	Nil
Workers	Nil	Nil	Nil	Nil

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

Yes.

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100%
Working Conditions	All value chain partners are assessed periodically on their health, safety practices and working conditions. The evaluation includes aspects like fair business practices, health & safety, human rights and environmental protection. Vendors in high-risk activities are supported in improving their capabilities.

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

There were no significant risks/concerns arising from our value chain partners. However, if required the Company shall take necessary actions to address significant risks/concerns arising from assessments of health and safety practices and working conditions of value chain partners. Key safety initiatives include mandatory safety requirements in request for quotes (RFQs).

PRINCIPLE 4: BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL ITS STAKEHOLDERS

Essential Indicators

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

Since its inception, the Company has relied on and engaged with various internal and external parties to ensure smooth operations. At its offices, the Company employs a dynamic and strategic approach to stakeholder engagement. This involves identifying key stakeholders from a broad spectrum of potential stakeholders, taking into account the significant impact each group has on the Company's ability to generate value, and vice versa. Currently, the Company has identified six primary stakeholder groups: investors and shareholders, employees, local communities, customers, government entities, and suppliers/business partners.

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

Stakeholder Group	Whether identified as vulnerable & marginalized group (Yes/No)	Channels of Communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community, Meetings, Notice Board, Website, Other)	Frequency of engagement (Annually/ Half Yearly/ Quarterly/ Others – Please specify)	Purpose & scope of engagement including key topics and concerns raised during such engagement
Investors & Shareholders	No	- Annual general meeting - Email communications - Corporate regulatory disclosures - Annual report - Website	Quarterly, Half Yearly, Annually, as and when required.	- Helping shareholders voice their concerns regarding the Company policies, reporting, strategy etc. - Understanding shareholder expectation. - Keeping communication channels open.
Employees	No	- Email communications - Meetings - Company events - Notice Board - Policies & procedures	Regular	- Employee wellbeing - Employee induction - Performance reviews - Policy updates - Business ethics - Diversity & inclusion - Health & Safety - Training & development - Building a sustainable culture - Exit interviews - Succession planning.
Villagers/ Community	No	- Day-to-day interactions and meetings - Local initiatives and volunteering activities - CSR activities, donations and sponsorship - Website	As and when required.	- Environmental impact - Community wellbeing - Industry practices

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

Stakeholder Group	Whether identified as vulnerable & marginalized group (Yes/No)	Channels of Communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community, Meetings, Notice Board, Website, Other)	Frequency of engagement (Annually/ Half Yearly/ Quarterly/Others – Please specify)	Purpose & scope of engagement including key topics and concerns raised during such engagement
Customers	No	- Day-to-day interactions and meetings - Website - Marketing material (e.g., annual reports, annual diary, social media, etc.) - Exhibitions and conferences - Business development efforts - Networking events	Regular	- Client wellbeing - Privacy & security - Responsiveness to their requirements - Quality, safety and cost - Business ethics - Impact on the environment
Government Bodies	No	- Direct engagement through on-site, licensing department - National development plans and programmes - Audits - Press releases - Local forums	As and when required.	- Alignment with national development plans and programmes - Regulatory compliance - Labour practices - Transparency - Community wellbeing - National employment
Supplier & Business Partners	No	- Day to day interactions - Supplier assessment and audit - Regular meetings with key suppliers and subcontractors - Supplier satisfaction survey	Regular	- Procurement practices - Environmental impact - Sustainability practices - Business ethics - Waste management

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

The Company's stakeholder engagement strategy seeks feedback on a regular basis, which is then integrated into the organization's medium and long-term strategy and planning exercises. This also enables the Company to promote the idea of shared growth and a common prosperous future for the society at large. The Company has formal mechanisms in place to engage key stakeholder groups in a constructive manner and collect valuable feedback, including on areas that are under the purview of the NGRBC Principles. This proves to be a valuable input for the risk assessment and strategy formulation process of the Company.

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

Yes. Suggestions received from stakeholders and regulators on environmental and social matters are reviewed in Environment Cell/Sustainable Development Unit meetings. These suggestions are subsequently discussed and implemented at the unit level, as appropriate. Additionally, a grievance redressal mechanism is in place to address related concerns.

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

Nil. There are no such vulnerable/marginalized stakeholders which Company has come across in operations.

PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

Essential Indicators

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

Category	FY 2025-26 (Current Financial Year)			FY 2024-25 (Previous Financial Year)		
	Total (A)	No. of employees/workers covered (B)	% (B/A)	Total (C)	No. of employees/workers covered (D)	% (D/C)
Employees						
Permanent	416	195	46.88	430	148	34.42
Other than permanent	4	2	50.00	3	0	0.00
Total Employees	420	197	46.90	433	148	34.18
Workers						
Permanent	2,291	1,401	61.15	2,294	5	0.22
Other than permanent	5	1	20.00	4	0	0.00
Total Workers	2,296	1,402	61.06	2,298	5	0.22

2. Details of minimum wages paid to employees and workers:

Category	FY 2025-26 (Current Financial Year)					FY 2024-25 (Previous Financial Year)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent										
Male	377	8	2.12	369	97.88	388	26	6.70	362	93.30
Female	39	5	12.82	34	87.18	42	5	11.90	37	88.10
Other	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Total	416	13	3.13	403	96.88	430	31	7.21	399	92.79
Other than Permanent										
Male	4	0	0.00	4	100.00	3	0	0.00	3	100.00
Female	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Other	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Total	4	0	0.00	4	100.00	3	0	0.00	3	100.00
Workers										
Permanent										
Male	2,161	763	35.31	1,398	64.69	2,157	816	37.83	1,341	62.17
Female	130	15	11.54	115	88.46	137	25	18.25	112	81.75
Other	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Total	2,291	778	33.96	1,513	66.04	2,294	841	36.66	1,453	63.34
Other than Permanent										
Male	3	0	0.00	3	100.00	3	0	0.00	3	100.00
Female	2	0	0.00	2	100.00	1	0	0.00	1	100.00
Other	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Total	5	0	0.00	5	100.00	4	0	0.00	4	100.00

3. Details of remuneration/salary/wages

a. Median remuneration/wages:

Category	Male		Female		Others	
	Number	Median remuneration/salary/wages of respective category	Number	Median remuneration/salary/wages of respective category	Number	Median remuneration/salary/wages of respective category
Board of Directors (BoD)*	5	30,90,000	1	30,80,000	0	0
Key Managerial Personnel (KMP) #	2	12,65,78,987	1	26,80,049	0	0
Employees other than BoD and KMP	379	5,74,309	38	4,53,282	0	0
Workers	2,164	3,34,505	132	2,51,812	0	0

* The Board of Directors includes only Non-Executive Directors.

KMP includes the Managing Director, Chief Financial Officer and Company Secretary & Compliance Officer.

b. Gross wages paid to females as % of total wages paid by the entity:

	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Gross wages paid to females as % of total wages	4.97	5.17

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

Yes, the Company has the Corporate Sustainability Committee for addressing human rights issues.

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

The Company has put in place a robust Grievance Redressal Process for investigation of employee concerns and has instituted the Employees' Code of Conduct and Ethics Policy that clearly delineates employee responsibilities and acceptable employee conduct. Employees can put in a written grievance letter through People & Culture Department. The issue once registered is duly addressed through a High-Level Committee constituted for this purpose. The Company has also constituted a Works Committee and a Welfare Committee for this purpose.

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

	FY 2025-26 (Current Financial Year)			FY 2024-25 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	Nil	Nil	NA	Nil	Nil	NA
Discrimination at workplace	Nil	Nil	NA	Nil	Nil	NA
Child Labour	Nil	Nil	NA	Nil	Nil	NA
Forced Labour/Involuntary Labour	Nil	Nil	NA	Nil	Nil	NA
Wages	Nil	Nil	NA	Nil	Nil	NA
Other human Rights related issues	Nil	Nil	NA	Nil	Nil	NA

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

	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Total Complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Nil	Nil
Complaints on POSH as a % of female employees/workers	Nil	Nil
Complaints on POSH upheld	Nil	Nil

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

The Company has adopted different policies in order to prevent adverse consequences to the complaint in discrimination and harassment case as follows:

- Employees' Code of Conduct and Ethics Policy
- Whistle Blower Policy

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

Yes.

10. Assessment for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	Nil
Forced/voluntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – Specify	

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

There were no significant risks or concerns (considering Q10).

Leadership Indicators

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

As there were no human rights issues in the Financial Year 2025-26, no business process was modified/introduced due to this.

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

Nil.

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

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

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Child labour	Nil
Forced/voluntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – Specify	

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

No formal assessment was carried out.

PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

Essential Indicators

1. Details of total energy consumption in Giga Joules and energy intensity:

Parameter	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
From renewable sources		
Total electricity consumption (A) <i>Green Energy - Wind & Solar</i>	3,43,064.97	3,26,248.85
Total fuel consumption (B)	Nil	Nil
Energy Consumption through other Sources (C) <i>Clean Energy (Waste Heat Recovery Boiler)</i>	3,62,791.80	0.00*
Total energy consumed from renewable sources (A+B+C)	7,05,856.77	3,26,248.85
From non-renewable sources		
Total electricity consumption (D)	23,673.14	32,131.06
Total fuel consumption (E)	3,49,711.32	3,93,805.78
Energy consumption through other sources (F)	Nil	Nil
Total energy consumed from non-renewable sources (D+E+F)	3,73,384.46	4,25,936.84
Total energy consumed (A+B+C+D+E+F)	10,79,241.23	7,52,185.69
Energy intensity per rupee of turnover (Total energy consumed in Giga Joules/Revenue from operations in ₹)	0.0000537	0.0000388
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity^ (PPP) (Total energy consumed in Giga Joules/Revenue from operations adjusted for PPP in ₹)	0.0010918	0.0008016
Energy intensity in terms of physical output (Total energy consumed in Giga Joules/total production in metric tonnes)	0.2069311	0.1696060
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

* During the Financial Year 2024-25, Waste Heat Recovery Boiler (WHRB) based power plant was not in operation as coke oven plant operated at minimal load (only heating) due to coke market constraints. Hence, clean energy has not been generated from WHRB.

^ The latest PPP conversion factor published for the year 2026 by International Monetary Fund is 20.066 for India.

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

No.

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

No.

3. Details of the following disclosures related to water:

Parameter	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	2,34,459.70	2,10,086.00
(ii) Groundwater	1,77,354.00	1,66,870.00
(iii) Third party water	1,03,281.00	55,485.00
(iv) Seawater/desalinated water	NA	NA
(v) Others	NA	NA
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	5,15,094.70	4,32,441.00
Total volume of water consumption (in kilolitres)	5,15,094.70	4,32,441.00
Water intensity per rupee of turnover (Total water consumption in kilolitres/Revenue from operations in ₹)	0.0000256	0.0000223
Water intensity per rupee of turnover adjusted for Purchasing Power Parity^ (PPP) (Total water consumption in kilolitres/Revenue from operations adjusted for PPP in ₹)	0.0005211	0.0004607
Water intensity in kilolitres in terms of physical output in metric tonnes	0.0987630	0.0975086
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

[^] The latest PPP conversion factor published for the year 2026 by International Monetary Fund is 20.066 for India

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

No.

4. Provide the following details related to water discharged:

Parameter	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment	Nil	Nil
- With treatment - please specify level of treatment	Nil	Nil
(ii) To Groundwater		
- No treatment	Nil	Nil
- With treatment - Discharge to ground after treatment at septic tank and soak pits	11,942.60	9,336.00
(iii) To Seawater		
- No treatment	Nil	Nil
- With treatment - please specify level of treatment	Nil	Nil
(iv) Sent to third parties		
- No treatment	Nil	Nil
- With treatment - please specify level of treatment	Nil	Nil
(v) Others		
- No treatment	Nil	Nil
- With treatment - STP recycled water used for dust suppression at mines, gardening at plant	29,446.00	29,494.00
Total water discharged (in kilolitres)	41,388.60	38,830.00

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

No.

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

The Company's ferroalloy plant operates as a fully compliant Zero Liquid Discharge (ZLD) facility. Waste and blowdown water from cooling towers and boilers is treated and re-used within the process, as well as for gardening and dust suppression purposes, with no discharge outside the plant premises. The Company has installed 50 KLD capacity MBBR based STP and treated sewage used for maintenance of green belt and secondary purposes.

6. Details of air emissions (other than GHG emissions) by the entity:

Parameter	Please specify unit	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
NOx	KG	1,18,172.11	54,895.81
SOx	KG	3,04,777.81	50,905.71
Particulate matter (PM)	KG	2,83,891.94	83,976.16
Persistent Organic Pollutants (POP)		NA	NA
Volatile Organic Compounds (VOC)		NA	NA
Hazardous Air Pollutants (HAP)		NA	NA
Others - please specify		NA	NA

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

No.

7. Details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity:

Parameter	Unit	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	15,642.99	11,958.39
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	21,764.91	24,088.02
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions in MtCO ₂ eq/Revenue from operations in ₹)		0.0000019	0.0000019
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity[^] (PPP) (Total Scope 1 and Scope 2 GHG emissions in MtCO ₂ eq/Revenue from operations adjusted for PPP in ₹)		0.0000378	0.0000384
Total Scope 1 and Scope 2 emission intensity in MtCO₂eq in terms of physical output in metric tonnes		0.0071725	0.0081279
Total Scope 1 and Scope 2 emission intensity (optional) - the relevant metric may be selected by the entity.		-	-

[^] The latest PPP conversion factor published for the year 2026 by International Monetary Fund is 20.066 for India.

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

No.

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

Yes, the Company has undertaken a significant initiative aimed at reducing greenhouse gas emissions through a strategic partnership with ReNew Green Energy Solutions Private Limited. Under an equity-based agreement, the Company collaborated with ReNew to develop a state-of-the-art power plant that integrates wind and solar energy technologies. During the Financial Year, 99.15% of total power requirement at the plant was met with green and clean energy wherein 9,48,78,406.9 kWh of green energy from ReNew power and 10,07,75,580.6 kWh of power generated through WHRB, thus significantly contributing under Clean Development Mechanism initiative.

9. Details related to waste management by the entity:

Parameter		FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Total Waste generated (in metric tonnes)			
Plastic waste (A)		NA	NA
E-waste (B)		0.940	NA
Bio-medical waste (C)	Category	Quantity	Quantity
	Yellow	0.107	0.081
	Red	0.110	0.289
	White	0.029	0.029
	Blue	0.138	0.103
	Total	0.384	0.502
Construction and demolition waste (D)		NA	NA
Battery waste (E)		1.340	5.690
Radioactive waste (F)		NA	NA
Other Hazardous waste. Please specify, if any. (G)	Category (5.1) (in kilolitres)	6.320	3.664
	Category (5.2) (in metric tonnes)	0.105	0.004
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by material relevant to the sector)	SiMn Slag (Silico-Manganese Slag)	35,637.64	19,034.94
	Bag house dust (Break-up by composition i.e., by materials relevant to the sector)	2,538.00	1,194.00
Total (A+B+C+D+E+F+G+H)		38,184.73	20,238.80
Waste intensity per rupee of turnover (Total waste generated in metric tonnes/Revenue from operations in ₹)		0.0000019	0.0000010
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity^ (PPP) (Total waste generated in metric tonnes/Revenue from operations adjusted for PPP in ₹)		0.0000039	0.0000216
Waste intensity in terms of physical output (in metric tonnes)		0.0073214	0.0045635
Waste intensity (optional) – the relevant metric may be selected by the entity.		-	-
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)			
Category of waste			
(i) Recycled		Nil	Nil
(ii) Re-used Baghouse dust		2,538.00	1,194.00
(iii) Other recovery operations		Nil	Nil
Total		2,538.00	1,194.00

9. Details related to waste management by the entity: (Contd.)

Parameter	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	Nil	Nil
(ii) Landfilling	Nil	Nil
(iii) Other disposal operations		
a. Category 5.1 Used spent oil (in kilolitres)	6.320	3.664
b. Category 5.2 Waste residues containing oil	0.105	0.004
c. SiMn Slag	35,637.64	19,034.94
Total	35,644.065	19,038.60

[^] The latest PPP conversion factor published for the year 2026 by International Monetary Fund is 20.066 for India.

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

No.

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

Valid authorization is obtained for storage and disposal of hazardous waste and bio-medical waste. It has been ensured that the generated hazardous waste is disposed to authorised registered recyclers. The Company strives to reduce hazardous waste generation by optimizing production processes and conducting employee training to foster waste reduction.

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

Sl. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval/clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
			Nil

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency? (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web link
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The Company has not conducted any Environmental Impact Assessment (EIA) of projects in the current Financial Year. However, detailed EIA/Environmental Management Plan (EMP) has been undertaken and formulated in the Financial Year 2022-23 when expansion of Mining Operations was undertaken.

13. Is the entity compliant with the applicable environmental law/regulations/guidelines in India, such as the Water (Prevention and Control of Pollution) Act, the Air (Prevention and Control of Pollution) Act, Environment Protection Act and Rules thereunder (Y/N). If not, provide details of all such non-compliances:

Sl. No.	Specify the law/regulation/guidelines which was not complied with	Provide details of the non-compliance	Any fines/penalties/action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
				The Company ensures compliance with all relevant industry-specific environmental laws, regulations and guidelines.

Leadership Indicators

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

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

(i) Name of the area:

Ballari and Vijayanagara districts of Karnataka.

The Company's mines and ferroalloy plant are situated in safe areas, as designated by the Central Ground Water Authority (CGWA) and are not located in critical or water-stressed areas.

(ii) Nature of operations:

Mining, ferroalloys and coke production.

(iii) Water withdrawal, consumption and discharge:

Parameter	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water		
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater/desalinated water		
(v) Others		
Total volume of water withdrawal (in kilolitres)		Not Applicable
Total volume of water consumption (in kilolitres)		
Water intensity per rupee of turnover (Water consumed in kilolitres/turnover in ₹)		
Water intensity (optional) – the relevant metric may be selected by the entity		
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water		
- No treatment		
- With treatment – please specify level of treatment		
(ii) Into Groundwater		
- No treatment		
- With treatment – please specify level of treatment		
(iii) Into Seawater		
- No treatment		
- With treatment – please specify level of treatment		Not Applicable
(iv) Sent to third parties		
- No treatment		
- With treatment – please specify level of treatment		
(v) Others		
- No treatment		
- With treatment – please specify level of treatment		
Total water discharged (in kilolitres)		

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

No.

2. Details of total Scope 3 emissions & its intensity:

Parameter	Unit	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent		
Total Scope 3 emissions per rupee of turnover		Not Assessed	
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity			

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

No.

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

Not applicable.

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

Sl. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Renewable Energy - Hybrid Power Plant (Solar & Wind)	The Company has continued with equity-based agreement with ReNew Green Energy Solutions Private Limited and ReNew Sandur Green Energy Private Limited and developed a state-of-the-art power plant integrating wind and solar energy technologies. This collaboration aims to generate sustainable electricity, marking a significant milestone in advancing renewable energy solutions.	During the Financial Year 2025-26, 9,48,78,406.9 kWh power has been generated from the project.
2	Renewable Energy - Solar Installations	Solar installations both on-grid and off-grid were implemented and maintained at mines to meet electricity requirements, while Flat Plate Collector (FPC) solar water heating systems, solar streetlights, home lighting, and solar pumps were installed at the registered office, mines, and residential colonies.	At mines, 7.33% of total power put to use is from solar energy.
3	Sewage Treatment Plant (STP)	Wastewater generated from domestic use is treated at STP.	During the year 29,446 KL of water was recycled at STP and the treated water was used for dust suppression of haul roads.
4	Groundwater Recharge	The Company has constructed rainwater harvesting pits, check dams and silt settling tanks to augment groundwater recharge within its mining lease area.	Estimated recharge to groundwater is 16,553 m3/day through engineering structures and surface runoff management.
5	Water Conservation	By increase in fleet of Mist Cannon system, dry fog dust suppression system at mines, sprinklers water conservation has been achieved.	Specific water consumption at mines per tonne has come down from 0.039 to 0.035.

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

Yes.

The Company has a Business Continuity Policy (BCP). The main objective of BCP is to maintain business continuity under disruptive incidents with an aim to minimize impact on:

- Human life and other living beings;
- Environment and related eco-systems;
- Economic losses;
- All stakeholders (such as investors, employees).

To make this BCP more robust, the Company plans training and awareness sessions across the mines and plant locations. Apart from training, BCP testing is done periodically to check its efficacy and improve it further based on the gaps observed during testing.

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

Not assessed for the reporting period.

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

Not assessed for the reporting period.

8. How many Green Credits have been generated or procured:

a. By the listed entity? - Not assessed.

b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners - Not assessed.

PRINCIPLE 7: BUSINESSES, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT

Essential Indicators

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

Five

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

Sl. No.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (State/National)
1	Federation of Indian Mineral Industries (FIMI)	National
2	Indian Ferro Alloy Producers Association (IFAPA)	National
3	Mining Engineers Association of India (MEAI)	National
4	Mines Safety Association of Karnataka	State
5	Mines Environment & Mineral Conservation Association	State

3. Details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities:

Name of Authority	Brief of case	Corrective action taken
	Nil	

Leadership Indicators

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

Sl. No.	Public policy advocated	Method resorted for such advocacy	Whether information is available in public domain? (Yes/No)	Frequency of review by Board (Annually/ Half yearly/ Quarterly/ Others - please specify)	Weblink, if available
1	Stakeholder comments on Beneficiation of low-grade ores to Controller of Mines, Indian Bureau of Mines, Ministry of Mines, January 2026	Written representation	No	Event based	NA

PRINCIPLE 8: BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

Essential Indicators

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current Financial Year:

Name & brief details of the project	SIA notification number	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain	Relevant web link
Nil					

2. Information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity:

Sl. No.	Name of project for which R&R is ongoing	State	District	No of Project affected families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the Financial Year (₹)
Not Applicable						

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

All grievances can be submitted at investors@sandurgroup.com. The grievances of the community could also be sent to any of the plant locations HR/Admin teams who will handle the same.

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

Parameter	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Directly sourced from MSMEs/small producers	46.57	21.75
Directly from within the district and neighbouring districts #	53.43	66.78

* This parameter is taken from the latest XBRL uploaded by Stock Exchanges.

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

Location	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Rural	74.27	74.56
Semi-urban	16.74	16.50
Urban	0.10	0.10
Metropolitan	8.88	8.85

(Place to be categorized as per RBI Classification System - rural/semi-urban/urban/metropolitan)

Leadership Indicators

1. Details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
No Social Impact Assessment was done in the current Financial Year.	

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

Sl. No.	State	Aspirational Director	Amount spent (₹)
Not Applicable			

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

No, However, the Company engages with its suppliers/vendors to ensure that the overall ecosystem functions with a sense of responsibility, integrity and compliance.

b. From which marginalized/vulnerable groups do you procure?

Not Applicable.

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

Not Applicable.

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

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

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

Name of Authority	Brief of case	Corrective action taken
Nil		

6. Details of beneficiaries of CSR Projects:

Sl. No.	CSR Project	Name of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized group
Not assessed			

PRINCIPLE 9: BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER

Essential Indicators

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

The Company places significant importance on prompt resolution of consumer complaints, if any, so as to ensure consumer satisfaction. Customer complaints and feedback are received by the Company through the following ways:

- (i) Email communication with the personnel from the marketing department.
- (ii) Email communications to the Company's email - investors@sandurgroup.com.
- (iii) Company's website - <https://www.sandurgroup.com/connect-with-us>.

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

	As a percentage to total turnover
Environment and social parameters relevant to the product	The Company is in the business of mining, manufacturing of ferroalloys, coke & generation of energy. The products dealt with by the Company are the input for steel manufacturing and supplied to the steel manufacturers. Hence, the products do not require any information mentioned under this point.
Safe and responsible usages	
Recycling and/or safe disposal	

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

	FY 2025-26 (Current Financial Year)	Remarks	FY 2024-25 (Previous Financial Year)	Remarks
Data privacy	There have been no consumer complaints received in respect of these points.		There have been no consumer complaints received in respect of these points.	
Advertising				
Cyber-security				
Delivery of essential services				
Restrictive trade practices				
Unfair trade practices				
Others				

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

	Number	Reasons for recall
Voluntary recalls	Nil	NA
Forced recalls		

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

Yes.

The Company has an Enterprise Risk Management Policy covering Cyber Security Risk and the same can be accessed at <https://www.sandurgroup.com/downloads/Corporate-Governance/Policies/risk-management-policy-.pdf>.

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

Currently, there are no corrective actions required as no incidents have been reported. However, the Company is proactively enhancing its cybersecurity and data privacy posture through policy development, risk assessments, access controls, monitoring mechanisms, employee training, and alignment with Digital Personal Data Protection Act, 2023 requirements.

7. Information relating to data breaches:

a.	Number of instances of data breaches	Nil
b.	Percentage of data breaches involving personally identifiable information of customers	NA
c.	Impact if any of the data breaches	NA

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

All information regarding the business of the Company can be accessed through the Company's website at <https://www.sandurgroup.com/> and in its periodic disclosures such as the Annual Report and other reports.

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

Not Applicable.

The Company operates within a Business to Business (B2B) framework and is not directly involved in the distribution services to the consumer.

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

Not Applicable.

The Company deals with products like manganese ore, iron ore, ferrosilicon, ferromanganese, coke & generation of energy and it is not directly involved in the distribution services to the consumer.

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

Not Applicable.

The Company deals with products like manganese ore, iron ore, ferrosilicon, ferromanganese, coke & generation of energy and it is not directly involved in the distribution services to the consumer.