



## ANNEXURE- II

# Business Responsibility and Sustainability Report for Financial Year 2024-25

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

Sr No.	Particulars	Details
1.	Corporate Identity Number (CIN) of the Listed Entity	L27201DL1974PLC007114
2.	Name of the Listed Entity	RAMA STEEL TUBES LIMITED
3.	Year of incorporation	26-02-1974
4.	Registered office address	B-5, 3rd Floor, Main Road, Ghazipur, Delhi, 110096
5.	Corporate address	B-5, 3rd Floor, Main Road, Ghazipur, Delhi, 110096
6.	E-mail	investors@ramasteel.com
7.	Telephone	011-43446600
8.	Website	www.ramasteel.com
9.	Financial year for which reporting is being done	FY 2024-25
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited ("BSE") and National Stock Exchange of India Limited ("NSE")
11.	Paid-up Capital (In Rs)	1,55,82,63,201
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Name: Mr. Manish Kumar Designation: Company Secretary Contact No: +91-11- 43446600 E-mail id: investors@ramasteel.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 under this report are made on standalone basis.
14.	Name of assurance provider	Not Applicable
15.	Type of assurance obtained	Not Applicable

### II. Products/ser vices

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

Sr No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Manufacturing & Trading	Metal and metal products	100%

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

Sr No.	Product/Service	NIC Code	% of total Turnover contributed
1.	Manufacturing and Trading of Metal and Metal Products	24311	100%

### 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	3	1	4
International	0	0	0

**19. Markets served by the entity:**
**a. Number of locations**

Location	Number
National (No. of States)	17
International (No. of Countries)	16*

\*The international operation are carried out by the Company through its subsidiary, which are outside the reporting boundaries of this report

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

0.53%

**c. A brief on types of customers**

The steel produced by the company finds diverse applications across key sectors such as Automobile, General Engineering, Machinery, Infrastructure, and Industrial projects, where customers incorporate our steel into a variety of specialized uses. Our clientele spans these industries, reaching end-users primarily through a robust network of dealers and distributors. Committed to sustainability, we also power our operations with energy sourced from non-conventional and renewable resources, ensuring a greener footprint while delivering high-quality steel to every segment we serve.

More details on our products and their applications are available at our website: [www.ramasteel.com](http://www.ramasteel.com).

**IV. Employees**
**20. Details as at the end of Financial Year:**
**a. Employees and workers (including differently abled):**

Sr.No.	Particulars	Towtal(A)	Male		Female	
			No.(B)	%(B/A)	No.(C)	%(C/A)
<b>Employees</b>						
1.	Permanent (D)	48	43	89.58%	5	10.42%
2.	Other than Permanent (E)	0	0	0.00%	0	0.00%
3.	<b>Total employees (D + E)</b>	<b>48</b>	<b>43</b>	<b>89.58%</b>	<b>5</b>	<b>10.42%</b>
<b>Workers</b>						
4.	Permanent (F)	70	70	100.00%	0	0.00%
5.	Other than Permanent (G)	0	0	0.00%	0	0.00%
6.	<b>Total workers (F + G)</b>	<b>70</b>	<b>70</b>	<b>100.00%</b>	<b>0</b>	<b>0.00%</b>

**b. Differently abled Employees and workers:**

Sr.No.	Particulars	Towtal(A)	Male		Female	
			No.(B)	%(B/A)	No.(C)	%(C/A)
<b>Differently Abled Employees</b>						
1.	Permanent (D)	0	0	0.00%	0	0.00%
2.	Other than Permanent (E)	0	0	0.00%	0	0.00%
3.	<b>Total differently abled Employees (D + E)</b>	<b>0</b>	<b>0</b>	<b>0.00%</b>	<b>0</b>	<b>0.00%</b>
<b>Differently Abled Workers</b>						
4.	Permanent (F)	0	0	0.00%	0	0.00%
5.	Other than Permanent (G)	0	0	0.00%	0	0.00%
6.	<b>Total differently abled</b>	<b>0</b>	<b>0</b>	<b>0.00%</b>	<b>0</b>	<b>0.00%</b>

**21. Participation/Inclusion/Representation of women**

	Total (A)	No. and percentage of Females	
		No.(B)	%(B/A)
Board of Directors	6*	1	16.67%
Key Management Personnel	4*	0	0.00%

\*Mr. Naresh Kumar Bansal and Mr. Richi Bansal holds the position both as Director and KMP in the Company.

**22. Turnover rate for permanent employees and workers**

	Turnover rate in current FY (2024-25)				Turnover rate in previous FY (2023-24)				Turnover rate in the year prior to the previous FY (2022-23)			
	Male	Female	Other	Total	Male	Female	Other	Total	Male	Female	Other	Total
Permanent Employees	10.99%	0.00%	0.00%	<b>10.00%</b>	4.08%	22.22%	0.00%	<b>5.61%</b>	3.85%	0.00%	0.00%	<b>3.54%</b>
Permanent Workers	30.30%	0.00%	0.00%	<b>30.30%</b>	2.82%	0.00%	0.00%	<b>2.82%</b>	20.00%	0.00%	0.00%	<b>20.00%</b>

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

S. No.	Name of the holding/ subsidiary/ associate companies/ joint ventures (A)	Indicate whether holding/Subsidiary/ Associate/Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Lepakshi Tubes Private Limited	Subsidiary	100.00%	No
2.	RST International Trading, FZE (Dubai based Company)	Subsidiary	100.00%	No
3.	Rama Defence Private Limited	Subsidiary	100%	No
4.	Ashoka Infra Steel, Partnership Firm	Subsidiary	51.00%	No
5.	RST Industries Limited (Nigeria based Company)	Step-down Subsidiary	51.00%	No
6.	Pir Panchal Constructions Private Limited ("AOP")*	Joint Venture	25.00%	No
7.	Oram Green Energy Limited	Associate	40%	No
8.	Bigwin Buildsys Coated Private Limited**	Associate	24.81%	No

\* The Company held a 25% stake in the Joint Venture, Pir Panchal Constructions Private Limited (AOP). In its Board Meeting held on April 9, 2025, the Board approved the sale of the Company's entire 25% stake in the Joint Venture. Accordingly, the Company has ceased to be a Joint Venture partner in Pir Panchal Constructions Private Limited (AOP).

\*\*On April 26, 2025, the Company has acquired 2,480 equity shares equivalent to 24.81% stake of M/s Bigwin Buildsys Coated Private Limited.

**VI. CSR Details**

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: **Yes**  
 (ii) Turnover (in ₹): **840,02,61,379/-**  
 (iii) Net worth (in ₹): **310,96,56,018/-**

**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:**

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 2024-25 Current Financial Year			FY 2023-24 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 Weblink: <a href="https://ramasteel.com/assets/pdf/Stakeholders%20Code%20of%20Conduct.pdf">https://ramasteel.com/assets/pdf/Stakeholders%20Code%20of%20Conduct.pdf</a>	-	-	NA	-	-	NA
Investors (Other than shareholders)		-	-	NA	-	-	NA
Shareholders		NA	-	-	NA	-	-
Employees and workers		-	-	NA	-	-	NA
Customers		-	-	NA	-	-	NA
Value Chain Partners		-	-	NA	-	-	NA

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, as per the following format

Sr.No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk /opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Energy and emission management	R	Environment and climate change are critical issues for the entire world, which has necessitated the need for regulatory and compliance stringency.	The company has adopted measures such as use of solar power, switching from Furnace Oil to PNG.	Negative
2.	Water resources management	R	Water and natural resources are scarce and require responsible use, efficient disposal and recycling.	The Company has installed the water treatment plant.	Negative



Sr.No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk /opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3.	Compliance	O	Compliance of regulations and laws is of utmost importance for long-term substance of an organisation.		Positive
4.	Occupational Health and safety	R	Providing healthy and safe workplace is critical for us a responsible employer and to ensure business continuity.	We make suitable investment in safety related technologies, protective equipment and training to mitigate the risk.	Negative
5.	Employee relations, training and development	O	Good employee relations are important for long-term association with the company. Also, learning, upskilling and overall growth of our human resource are vital for the long-term success of the company.		Positive
6.	Diversity and equality	O	As a global organisation, we strive to have diversified and inclusive work culture, which is free from any kind of discrimination.		Positive
7.	Corporate Governance and Business Ethics	O	High standards of corporate governance and business ethics are critical to have a robust organisation and create goodwill among customers, suppliers, investors and wider society.		Positive
8.	CSR and Impact assessment	O	Efforts for the uplifting of community is part of our CSR strategy and measuring the impact of our social initiatives is critical to understand effectiveness and reach of program.		Positive

**SECTION B: MANAGEMENT AND PROCESS DISCLOSURES**

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

	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>										
1.	<b>a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	<b>b. Has the policy been approved by the Board? (Yes/No)</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	<b>c. Web Link of the Policies, if available</b>	<a href="http://www.ramasteel.com/policy-and-code-of-conduct.php">www.ramasteel.com/policy-and-code-of-conduct.php</a>								
2.	<b>Whether the entity has translated the policy into procedures. (Yes / No)</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.	<b>Do the enlisted policies extend to your value chain partners? (Yes/No)</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4.	<b>Name of the national and international codes/certifications / labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.</b>	The company has following: 1. BIS-1239:(Part-1:2004) 2. ISO-9001:2015								
5.	<b>Specific commitments, goals and targets set by the entity with defined timelines, if any.</b>	The Company has constituted the ESG committee which are under process to set the targets and goals in accordance to the standards and identified key focus area which can contribute to the societies in phased manner. Also diversify its business in Solar energy sector.								
6.	<b>Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.</b>									

**Governance, leadership and oversight**

**7. Statement by director responsible for the business responsibility and sustainability report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)**

Mr. Naresh Kumar Bansal, Chairman and Managing Director of the Company, firmly believes that enduring growth and long-term stakeholder value can only be achieved by embedding sustainability into the very core of our business. This means upholding the highest standards of governance while proactively embracing our environmental and social responsibilities. Our commitment is to conduct every facet of our operations ethically and responsibly — conserving natural resources, empowering communities, and nurturing our people — all with the aim of becoming a truly resilient and future-ready organization. Significant progress has already been made on this path, and we will continue to drive these initiatives forward with greater intensity, enhancing our operational efficiencies and cementing our position as a socially, economically, and environmentally conscious leader.

**8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies)**

Mr. Naresh Kumar Bansal, Chairman and 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 company have constituted a committee known as the "ESG committee" which is responsible for the overall sustainability performance of the company. The committee oversee the implementation of activities under the purview of polices of the 9 principles of NGRBCs & other relevant applicable principles.



The committee is chaired by Managing Director, CEO and Factory Occupier of the Company as members of the committee. The committee meets half yearly for the activities and progress.

The terms of reference for the committee are:

1. Responsible for adoption of National Guidelines on Responsible Business Conduct on ESG Responsibilities in business practice.
2. Responsible for the policies created for or linked to 9 key principles of the NGRBCs & other international standards and frameworks.
3. Review the process of initiatives under the purview of Sustainability policies.
4. Review BRSR disclosures on pre-decided frequency.
5. Review progress of Business Responsibility initiatives.
6. Review annual Business Responsibility and Sustainability Report and present it to the Board for Approval.

**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	ESG Committee									Half Yearly								
Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances	ESG Committee									Half Yearly								

**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.**

No

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

Not Applicable

**SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE**

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

**Essential Indicators**

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	2	The Company conducted programme regarding the amendments in the Companies Act, 2013, Rules prescribed thereunder, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and all other applicable laws of the Company including BRSR, best Practices in industry, external ratings and disclosures, Stakeholder engagement and Materiality, Risks and Opportunities etc.	100.00%
Key Managerial Personnel	2	The Company conducted programme regarding the amendments in the Companies Act, 2013, Rules prescribed thereunder, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and all other applicable laws of the Company including BRSR, best Practices in industry, external ratings and disclosures, Stakeholder engagement and Materiality, Risks and Opportunities etc.	100.00%
Employees other than BoD and KMPs	3	Code of Conduct, Integrity and Ethics, Skill Development, Safety Management	100.00%
Workers	4	Safety Management, Code of Conduct and Skill Development	100.00%

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

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine		BSE/ NSE	448400	Delay in completion of Bonus Issue as per Regulation 295 (1) of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018,	No, The Company has paid the requisite fine, such delay was arise due to frequent non-working/trading days in the stock exchange and non-availability of listing approval in due course of time



Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Settlement		BSE / NSE	Nil	Non-Compliance with provisions of Regulation 167(6) of SEBI ICDR Regulations, 2018 with respect to preferential allotment of convertible warrants allotted on 10.06.2022	No, Observation given by the stock exchanges after that the company file an application with the SEBI for listing the shares and as per the Company prayer mentioned in the application letter, SEBI directed the stock exchange to list the shares.
Compounding	Not Applicable				

Non-Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions		Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	Not Applicable				
Punishment	Not Applicable				

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, Rama Steel Tubes Limited is committed to conduct business in an honest and ethical manner. We also aspire to follow highest standards of transparency, honesty and accountability in the business affairs through behaving responsibly, equitably and with integrity in all the business dealings and relationships.

Accordingly, Anti-Corruption and Ant-Bribery Policy has been adopted by the company, which applies to all individuals working at all levels and grades for Rama Steel Tubes Limited.

**Weblink of the Policy:**

<https://ramasteel.com/assets/pdf/Anti-Corruption%20and%20Anti-Bribery%20Policy.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 2024-25	FY 2023-24
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

	FY 2024-25		FY 2023-24	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA

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

Not Applicable

**8. Number of days of accounts payables ((Accounts payable \*365) / Cost of goods/services procured) in the following format:**

	FY 2024-25	FY 2023-24
Number of days of accounts payables	56	42

**9. Open-ness of business**

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

Parameter	Number	FY 2024-25	FY 2023-24
<b>Concentration of Purchases</b>	a) Purchases from trading houses as % of total purchases	-	-
	b) Number of trading houses where purchases are made from	-	-
	c) Purchases from top 10 trading houses as % of total purchases from trading houses	-	-
<b>Concentration of Sales</b>	a) Sales to dealers / distributors as % of total sales	99.45%	98.60%
	b) Number of dealers / distributors to whom sales are made	196	259
	c) Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	83.63%	56.44%
<b>Share of RPTs in</b>	a) Purchases (Purchases with related parties / Total Purchases)	0.00	1.72
	b) Sales (Sales to related parties / Total Sales)	0.01	1.33
	c) Loans & advances (Loans & advances given to related parties / Total loans & advances)	77.21	72.76
	d) Investments (Investments in related parties / Total Investments made)	61.06	98.53

**Note 1:** Trading house has been defined as a business that specialises in facilitating transactions between a home country and foreign countries, but does not include related parties. There are no purchases from trading houses in FY 2024-25.

**Note 2:** For calculation closing balances have been considered as disclosed in the Audited Standalone Financial Statements for the year ended March 31, 2025.

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

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

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

Yes.

The company has process in place to avoid and manage any conflict of interest involving members of the board. Our "Code of Conduct for Board of Directors and Senior Management" has well defined clauses to avoid any such conflict. Also, we follow a policy that requires that any conflict or potential conflict of must be disclosed to the management for guidance and appropriate action.

**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 2024-25	FY 2023-24	Details of improvements in environmental and social impacts
R&D	-	-	NA
Capex	1%	3%	2023-24:- In the process of upgrading of solar panels and other accessories in the existing solar plant at Khopoli Plant, to work more efficiently. 2024-25:- In the process of upgrading of solar panels and other accessories in the existing solar plant at Khopoli Plant, to work more efficiently.

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

While our current practices are focused on ensuring quality and reliability, we are actively exploring opportunities to enhance our sourcing procedures to incorporate sustainability principles. We recognize the importance of sustainable sourcing and are committed to developing robust measures in the near future.

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

Not Applicable

**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)	Not Applicable
(b) E-waste	Not Applicable
(c) Hazardous waste	The company is producing nominal quantity of waste. Further, the company hires external waste management agencies for disposing off the same in responsible way.
(d) other waste	The company is producing nominal quantity of waste. Further, the company hires external waste management agencies for disposing off the same in responsible way.

**4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No).**

No

**Leadership Indicators****1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)?**

No

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

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

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2024-25	FY 2023-24
Not Applicable		

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

	FY 2024-25			FY 2023-24		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	-	-	-	-	-	-
E waste	-	-	-	-	-	-
Hazardous waste	-	-	1.40	-	-	4.04
Other Waste	-	-	0.05	-	-	0.11

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 Percentage of total products sold in respective category
Not Applicable	

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

**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	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
<b>Permanent employees</b>											
Male	43	7	16.28%	7	16.28%	-	-	-	-	-	-
Female	5	1	20.00%	1	20.00%	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>48</b>	<b>8</b>	<b>16.67%</b>	<b>8</b>	<b>16.67%</b>	-	-	-	-	-	-
<b>Other than permanent employees</b>											
Male	-	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	-	-	-	-	-	-	-	-	-	-	-



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

Category	% of worker covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
<b>Permanent worker</b>											
Male	70	23	32.86%	23	32.86%	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>70</b>	<b>23</b>	<b>32.86%</b>	<b>23</b>	<b>32.86%</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Other than permanent worker</b>											
Male	-	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

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

	FY 2024-25	FY 2023-24
Cost incurred on well-being measures as a % of total revenue of the company*	0.85	0.97

\*The percentage has been calculated considering only permanent employees.

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

Benefits	FY 2024-25			FY 2023-24		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	41.67%	85.71%	Yes	36.54%	66.67%	Yes
Gratuity	100.00%	100.00%	Yes	100.00%	100.00%	Yes
ESI	27.08%	85.71%	Yes	21.15%	72.38%	Yes

**3. Accessibility of workplaces**

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

Yes

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

Yes

[www.ramasteel.com/assets/pdf/Stakeholders%20Code%20of%20Conduct.pdf](http://www.ramasteel.com/assets/pdf/Stakeholders%20Code%20of%20Conduct.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	-	-	-	-
Female	-	-	-	-
Other	-	-	-	-
Total	-	-	-	-

**6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker?**

Category	Yes/No	(If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes	All employees including associates, contractors, can share any grievances/ issues/suggestions across (pertaining to employees and stakeholders across the value chain) including but not limited to non-compliance, ethics, unfair treatment, harassment, discrimination or inequality, safety and hazards, corruption, human right violations or anything they feel appropriate through following avenues <ul style="list-style-type: none"> <li>• Immediate line manager or the Human Resources department of our company</li> <li>• Reporting channel set out in our company's 'Whistleblower' policy and "Stakeholders Code of Conduct"</li> </ul>
Other than Permanent Workers		
Permanent Employees		
Other than Permanent Employees		

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

Category	FY 2024-25			FY 2023-24		
	Total employees/ workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	48	-	-	52	-	-
Male	43	-	-	48	-	-
Female	5	-	-	4	-	-
Other	-	-	-	-	-	-
Total Permanent Workers	70	-	-	-	-	-
Male	70	-	-	105	-	-
Female	-	-	-	-	-	-
Other	-	-	-	-	-	-



## 8. Details of training given to employees and workers:

Category	FY 2024-25					FY 2023-24				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
<b>Employees</b>										
Male	43	43	100.00%	43	100.00%	48	48	100.00%	48	100.00%
Female	5	5	100.00%	5	100.00%	4	4	100.00%	4	100.00%
Other	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>48</b>	<b>48</b>	<b>100.00%</b>	<b>48</b>	<b>100.00%</b>	<b>52</b>	<b>52</b>	<b>100.00%</b>	<b>52</b>	<b>100.00%</b>
<b>Workers</b>										
Male	70	70	100.00%	70	100.00%	105	105	100.00%	105	100.00%
Female	-	-	-	-	-	-	-	-	-	100.00%
Other	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>70</b>	<b>70</b>	<b>100.00%</b>	<b>70</b>	<b>100.00%</b>	<b>105</b>	<b>105</b>	<b>100.00%</b>	<b>105</b>	<b>100.00%</b>

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. (B)	% (B / A)	Total (D)	No. (E)	% (E / D)
<b>Employees</b>						
Male	43	43	100.00%	48	48	100.00%
Female	5	5	100.00%	4	4	100.00%
Other	-	-	-	-	-	-
<b>Total</b>	<b>48</b>	<b>48</b>	<b>100.00%</b>	<b>52</b>	<b>52</b>	<b>100.00%</b>
<b>Workers</b>						
Male	70	70	100.00%	105	105	100.00%
Female	-	-	100.00%	-	-	-
Other	-	-	-	-	-	-
<b>Total</b>	<b>70</b>	<b>70</b>	<b>100.00%</b>	<b>105</b>	<b>105</b>	<b>100.00%</b>

## 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?

Rama Steel Tubes Limited has implemented occupational health and safety management system at all the manufacturing locations for ensuring the safety and well-being of employees in the workplace. the company is committed to create a safe and healthy working environment for its employees to achieve "ZERO HARM" in the workplace, and to have a positive impact on productivity and employee morale.

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

All the manufacturing locations have adequate arrangements to identify work related hazards and assess risks. Various measures for the same include following:

- Hazardous Identification and Risk Assessment (HIRA)
- Job Safety Analysis
- Quantitative Risk Assessment
- Walkthrough observations
- Plant Safety inspection
- Internal Safety Audits

- c. **Whether you have processes for workers to report the work related hazards and to remove themselves from such risks?**  
Yes
- d. **Do the employees/ worker of the entity have access to non-occupational medical and healthcare services?**  
Yes

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

Safety Incident/Number	Category	FY 2024-25	FY 2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	-	-
	Workers	-	-
Total recordable work-related injuries	Employees	-	-
	Workers	-	-
No. of fatalities	Employees	-	-
	Workers	-	-
High consequence work related injury or ill-health (excluding fatalities)	Employees	-	-
	Workers	-	-

**12. Describe the measures taken by the entity to ensure a safe and healthy work place.**

Managers conduct timely assessment of all the manufacturing plants with regards to health and safety conditions and regulatory compliance. This is further reviewed by the top management periodically. Also, employees and workers receive relevant health and safety trainings regularly.

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	-	-	NA	-	-	NA
Health & Safety	-	-	NA	-	-	NA

**14. Assessments for the year:**

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100.00%
Working Conditions	100.00%

**Note:** Internal assessment by the company

- 15. **Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.**  
Not Applicable

**Leadership Indicators**

- 1. **Does the entity extend any life insurance or any compensatory package in the event of death of**  
(A) Employees (Y/N): No  
(B) Workers (Y/N): No
- 2. **Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.**  
NA



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

Gender	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25	FY 2023-24	FY 2022-23	FY 2021-22
Employees		-	-	-
Workers	-	-	-	-

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)

No

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	-
Working Conditions	-

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

Not Applicable

#### PRINCIPLE 4: 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..

We follow a proactive and dynamic stakeholder engagement process, where we thoughtfully identify key stakeholders from a broad and diverse landscape. This selection is guided by the material impact each group can have on our company's capacity to create value — and equally, by the influence our decisions may have on them. This collaborative, two-way approach enables us to foster meaningful, long-term relationships that support sustainable growth and shared success..

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

S.No.	Stakeholder Group	Whether identified as Vulnerable & Marginalized Group	Channels of communication	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
1	Investors and Shareholders	No	Website, Annual General Meeting, Annual Report, Investor Meetings and Calls, Press Release and Investor Publications	Continuous	Financial performance and Business sustainability
2	Employees including workers	No	Emails, Meetings, Trainings, Notice Board	Continuous	Policies, feedback, training & development
3	Customers	No	Meetings, Phone calls, E-mails, website	Continuous	Product and service quality, feedback and grievance redressal,
4	Regulators (Government)	No	Compliance reports, meetings	Need Based	Permits and mandatory submissions
5	Community	No	CSR initiatives, meetings	Need Based	Community initiatives & service related

S.No.	Stakeholder Group	Whether identified as Vulnerable & Marginalized Group	Channels of communication	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
6	Value-chain partners, including suppliers and Vendors	No	Meetings, Phone calls, emails, website	Continuous	Product and service quality, feedback and grievance redressal

### Leadership Indicators

- Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.**

The company maintains continuous and meaningful dialogue with its stakeholders across both formal and informal platforms to gain deep insights into the economic, environmental, and social aspects that matter most to them. Key observations and relevant feedback are regularly conveyed to the Board through senior management, ensuring these considerations shape our strategic decisions. To further strengthen these relationships, the company has adopted a "Stakeholders' Code of Conduct," which outlines a clear and ethical framework for engaging with all stakeholder groups — aligning our governance principles and values with their interests for enduring, trust-based partnerships.

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

Yes

The company has identified the universe of relevant ESG topics through stakeholder discussions. Inputs from such discussions have been also been used for the company's ESG policy.

- Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.**

Not Applicable

### PRINCIPLE 5 Businesses should respect and promote human rights

#### Essential Indicators

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. of employees/ workers covered (B)	% (B / A)	Total (C)	No. of employees/ workers covered (D)	% (D / C)
<b>Employees</b>						
Permanent	48	48	100.00%	52	52	100.00%
Other than permanent	-	-	-	-	-	-
<b>Total Employees</b>	<b>48</b>	<b>48</b>	<b>100.00%</b>	<b>52</b>	<b>52</b>	<b>100.00%</b>
<b>Workers</b>						
Permanent	70	70	100.00%	105	105	100.00%
Other than permanent	-	-	-	-	-	-
<b>Total Workers</b>	<b>70</b>	<b>70</b>	<b>100.00%</b>	<b>105</b>	<b>105</b>	<b>100.00%</b>



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

Category	FY 2024-25					PY 2023-24				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
<b>Employees</b>										
Permanent	48	-	-	48	100.00%	52	-	-	52	100.00%
Male	43	-	-	43	100.00%	48	-	-	48	100.00%
Female	5	-	-	5	100.00%	4	-	-	4	100.00%
Other	-	-	-	-	-	-	-	-	-	-
<b>Other than Permanent</b>	-	-	-	-	-	-	-	-	-	-
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-
<b>Workers</b>										
Permanent	70	-	-	70	100.00%	105	-	-	105	100.00%
Male	70	-	-	70	100.00%	105	-	-	105	100.00%
Female	-	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-
<b>Other than Permanent</b>	-	-	-	-	-	-	-	-	-	-
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-

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

a. Median remuneration / wages:

	Male		Female		Other	
	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	3,99,000	1	70,000	0	0
Key Managerial Personnel	4	40,58,004	0	0	0	0
Employees other than BoD and KMP	38	3,60,600	5	4,81,356	0	0
Workers	70	1,78,560	0	0	0	0

\*Mr. Naresh Kumar Bansal and Mr. Richi Bansal holds both position of Director and KMP in the Company.

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

	FY 2024-25	FY 2023-24
Gross wages paid to females as % of total wages	2.88	1.54

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

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

The Company upholds an open-door policy that actively promotes transparent, two-way communication, ensuring every grievance is heard and resolved promptly. We give particular attention to matters concerning Human Rights — employees can freely escalate such issues to their supervisor, who, in turn, engages the Human Resources Head at the facility to present the case to the Management for resolution.

Additionally, the Company is fully committed to fostering a safe and respectful work environment, supported by a robust policy on the prevention of sexual harassment as outlined in the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013," complete with a well-defined grievance redressal mechanism. Furthermore, our "Stakeholders' Code of Conduct" reinforces these commitments, setting clear guidelines to uphold fairness, integrity, and respect across all interactions.

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	-	-	-	-	-	-
Discrimination at workplace	-	-	-	-	-	-
Child Labour	-	-	-	-	-	-
Forced Labour/ Involuntary Labour	-	-	-	-	-	-
Wages	-	-	-	-	-	-
Other human rights related issues	-	-	-	-	-	-

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

	FY 2024-25	FY 2023-24
Total Complaints reported under Sexual Harassment on 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 treats all cases of discrimination and harassment with utmost seriousness, ensuring that every complainant is treated with dignity, respect, and complete confidentiality. Our commitment is reinforced by a comprehensive policy on sexual harassment in line with the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013," and is further supported by the relevant provisions in our "Stakeholders' Code of Conduct."

We maintain a zero-tolerance stance on retaliation of any kind against individuals who come forward in good faith. Anyone found engaging in such behavior will face strict disciplinary and/or legal action, reflecting our unwavering resolve to protect those who speak up and to foster a safe, respectful, and inclusive working environment.

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

No

**10. Assessments for the year:**

	<b>% of your plants and offices that were assessed (by entity or statutory authorities or third parties)</b>
Child labour	100.00%
Forced/involuntary labour	100.00%
Sexual harassment	100.00%
Discrimination at workplace	100.00%
Wages	100.00%
Others	-

Note: Internal assessment by the company

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

Not required as no significant risks or concerns were observed in the assessment.

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

The company's policy and processes are designed to take care of human rights. Further, there has not been any such adverse event requiring modification or introduction a business process

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

Nil

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

Yes

**4. Details on assessment of value chain partners:**

	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
Child labour	-
Forced/involuntary labour	-
Sexual harassment	-
Discrimination at workplace	-
Wages	-
Others	-

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

Not Applicable

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

<b>Parameter</b>	<b>FY 2024-25</b>	<b>FY 2023-24</b>
<b>From renewable sources</b>		
<b>Total electricity consumption GJ (A)</b>	1142	685
Total fuel consumption GJ (B)	-	-
Energy consumption through other sources (C)	-	-
<b>Total energy consumption from renewable sources (A+B+C)</b>	<b>1142</b>	<b>685</b>

Parameter	FY 2024-25	FY 2023-24
<b>From non-renewable sources</b>		
Total electricity consumption (D)	9713	11,736
Total fuel consumption (E)	4479	13,801
Energy consumption through other sources (F)	-	-
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>14192</b>	<b>25,537</b>
<b>Total energy consumed (A+B+C+D+E+F)</b>	<b>15334</b>	<b>26,221</b>
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	0.00000183	0.00000330
*Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	0.00000009	0.00000016
Energy intensity in terms of physical output (Total energy consumed /Total Employee)	130.00	167.02
Energy intensity (optional) – the relevant metric may be selected by the entity	NA	NA

**\*Note 1:** The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2025 by World Bank which is 20.45 for India, at <https://data.worldbank.org/indicator/PA.NUS.PPP>.

**Note2:** 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. the company is not identified as designated consumer

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

Parameter	FY 2024-25	FY 2023-24
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	-	-
(ii) Groundwater	2,051	1,958
(iii) Third party water	528	458
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	<b>2,579</b>	<b>6,009</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>2,482</b>	<b>2,082</b>
Water intensity per rupee of turnover (Water consumed / turnover)	0.000000295	0.000000262
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	0.000000014	0.000000013
Water intensity in terms of physical output (Water Consumed in KL/Total Employee)	21.04	13.26
Water intensity (optional) – the relevant metric may be selected by the entity	NA	NA

**Note:** The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2024 by World Bank which is 20.45 for India, at <https://data.worldbank.org/indicator/PA.NUS.PPP>.

**Note 2:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? If yes, name of the external agency.: No

4. **Provide the following details related to water discharged:**

Parameter	FY 2024-25	FY 2023-24
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water		
No treatment	-	-
With treatment – please specify level of treatment	-	-



Parameter	FY 2024-25	FY 2023-24
(ii) To Groundwater		
No treatment	-	-
With treatment – please specify level of treatment	97	335
(iii) To Seawater		
No treatment	-	-
With treatment – please specify level of treatment	-	-
(iv) Sent to third-parties		
No treatment	-	-
With treatment – please specify level of treatment	-	-
(v) Others		
No treatment	-	-
With treatment – please specify level of treatment	-	-
<b>Total water discharged (in kilolitres)</b>	<b>97</b>	<b>335</b>

**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.**

Yes

We have adopted a range of measures for water conservation and security; that includes increased recycling of treated waste water to reduce fresh water intake, selection of advanced water treatment technologies, Zero Liquid Discharge at our Mumbai plant and use of part of treated water for gardening at Sahibabad plant.

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

Parameter	Please specify unit	FY 2024-25	FY 2023-24
NOx	KG	0.28	1.28
Sox	KG	0.14	0.65
Particulate matter (PM)	KG	0.05	0.24
Persistent organic pollutants (POP)		-	-
Volatile organic compounds (VOC)		-	-
Hazardous air pollutants (HAP)		-	-
Others – please specify		-	-

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

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

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 1 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric Tonnes of CO <sub>2</sub> equivalent	345	1,065
Total Scope 2 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric Tonnes of CO <sub>2</sub> equivalent	2141	2,450
Total Scope 1 and Scope 2 emissions intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)		0.000000296	0.000000443
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)		0.000000014	0.000000022

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 1 and Scope 2 emission intensity in terms of physical output		21.06	22.39
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	NA	NA	NA

\*Note 1: The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2024 by World Bank which is 20.45 for India, at <https://data.worldbank.org/indicator/PA.NUS.PPP>.

Note 2: 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.**

The company has 650 KW of solar power plant at Mumbai Plant. Also, the company has started to upgrade solar power panel in order to increase existing standard level of efficiency. Moreover, the Company is using PNG instead of furnace oil at factory.

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

Parameter	FY 2024-25	FY 2023-24
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	0	0
E-waste (B)	0	0
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	0	0
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	1.40	4.04
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	0.05	0.11
Total (A+B + C + D + E + F + G + H)	1.45	4.15
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.00000000171	0.00000000522
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.00000000008	0.00000000026
Waste intensity in terms of physical output	0.01	0.03
Waste intensity (optional) – the relevant metric may be selected by the entity	0	0
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
Category of waste		
(i) Recycled	0	0
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

\*Note 1: The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2024 by World Bank which is 20.45 for India, at <https://data.worldbank.org/indicator/PA.NUS.PPP>.

Note 2: 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.

The Company has hired the external agency for waste management and the Company is not using any type of hazardous and toxic chemicals in the products and process.

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

Sr. No.	Location of operations / offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with?	If no, the reasons thereof and corrective action taken, if any.
Not Applicable				

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

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

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

Yes

Sr. 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
Not Applicable				

#### Leadership Indicators

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

Not Applicable

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

We are yet to start assessing Scope 3 emissions & its intensity.

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

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, as per the following format:

Sr. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
Not Applicable			

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

We have developed a robust Business Continuity Plan to ensure the seamless functioning of our operations — or the swift restoration of critical business processes — in the face of any major disruption. This plan is designed to protect our people and assets while enabling rapid recovery during unforeseen events.

As a vital part of our risk management strategy, we have carefully identified a broad range of risks that could impact our business, including natural disasters such as fire, floods, or extreme weather, as well as other unforeseen events. Our plan outlines the potential impact of these risks on operations, the safeguards and mitigation measures to minimize them, as well as regular testing and review protocols to ensure ongoing effectiveness and relevance. This proactive and dynamic approach enables us to stay resilient and future-ready under all circumstances.

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.

Nil

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

Nil

**PRINCIPLE 7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent**

**Essential Indicators**

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

1 (One)

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

Sr. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National/International)
1	Engineering Export Promotion Council of India	International

2. Provide 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.

Sr. No.	Name of authority	Brief of the case	Corrective action taken
Not Applicable			

**Leadership Indicators**

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

Sr no.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board	Web Link, if available
Nil					

**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.

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

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

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

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

Please refer to the stakeholder code of conduct published on our website at:

<https://ramasteel.com/assets/pdf/Stakeholders%20Code%20of%20Conduct.pdf>

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

	FY 2024-25	FY 2023-24
Directly sourced from MSMEs/ small producers	7.65%	1.38%
Sourced directly from within the district and neighbouring districts	97.88%	73.73%

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 2024-25	FY 2023-24
Rural	--	0
Semi-urban	--	0
Urban	30.72%	27.49%
Metropolitan	69.28%	72.51%

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

**Leadership Indicators**

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

Sr. No.	Details of negative social impact identified	Corrective action taken
Not Applicable		

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

Sr. No.	State	Aspirational District	Amount spent (In INR)
1	-	-	-

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

No

- (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:**

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

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

Name of Authority	Brief of the case	Corrective action taken
Not Applicable		

**6. Details of beneficiaries of CSR Projects:**

Sr. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1.	Skilling/training women in IT/ITES related services	300	100%
2.	Blankets and Food Distribution drive	100	100%
3.	Sport Activities	NA	100%

**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.**

Our sales and marketing team is continuously in touch with the customers for feedback. Also, we organise distributor, dealer and customer meets, where we seek customer feedback and suggestions. The sales and marketing team could be approached for any customer complaint and the Rama Steel is committed for resolution of any issues.

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

Particulars	As a percentage to total turnover
Environmental and social parameters relevant to the product	Not Applicable
Safe and responsible usage	Not Applicable
Recycling and/or safe disposal	Not Applicable

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

	FY 2024-25			FY 2023-24		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	-	-	NA	-	-	NA
Advertising	-	-	NA	-	-	NA
Cyber-security	-	-	NA	-	-	NA
Delivery of essential services	-	-	NA	-	-	NA
Restrictive Trade Practices	-	-	NA	-	-	NA
Unfair Trade Practices	-	-	NA	-	-	NA
Other	-	-	NA	-	-	NA

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

	Number	Reasons for recall
Voluntary recalls	-	NA
Forced recalls	-	NA

**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

Weblink: [www.ramasteel.com/assets/pdf/Information%20and%20Cyber%20Security%20Policy.pdf](http://www.ramasteel.com/assets/pdf/Information%20and%20Cyber%20Security%20Policy.pdf)

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

The company has not faced issues related to advertising, 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. Hence, corrective actions were not required.

**7. Provide the following information relating to data breaches:**

- Number of instances of data breaches: **Nil**
- Percentage of data breaches involving personally identifiable information of customers: **Nil**
- Impact, if any, of the data breaches: **Nil**

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

Information of our products is available on our website. Weblink: [www.ramasteel.com/index.php](http://www.ramasteel.com/index.php)

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

Not Applicable

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

Not Applicable

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

Yes,

Every Product delivered by the Rama Steel meets to the technical requirements defined by National & International standards and also legal requirements mandated by the Local laws.

No, our entity has not carried out any survey with regard to the customer satisfaction.