

# Business Responsibility and Sustainability Report (BRSR)

The SEBI circular SEBI/HO/CFD/CMD-2/P/CIR/2021/562 has stated that with effect from the financial year 2022-2023, filing of BRSR shall be mandatory for the top 1,000 listed companies (by market capitalization) and shall replace the existing BRR. Filing of BRSR is voluntary for the financial year 2021-22. As a proactive measure to adapt to changing regulatory requirements, we have attempted to map our existing ESG information with the requirements of BRSR. In addition to BRSR, we are also reporting Business Responsibility Report (BRR) as per mandates.

## WELSPUN'S APPROACH TO BUSINESS RESPONSIBILITY AND SUSTAINABILITY

As the method's to assessing business performance evolves rapidly, their commitment and action with respect to environmental, social, and governance (ESG) principles have come into prominence. Welspun Corp Limited (WCL) believes in conducting its operations sustainably and aligning business with ESG objectives to enable value creation for all our stakeholders and to preserve the natural ecosystem for future generations.

At WCL, we build stakeholder value by taking responsibility for our operations and ensuring positive impacts in the ecosystem in which we operate, while ensuring the highest standards in product quality and fulfilling customer needs. The key pillars of business responsibility at WCL are: Governance, Protecting the Planet, Customer Centricity, Creating Healthy Communities, Empowering Our People and Collaborating with Stakeholders.

We believe that a sustainability centric approach is foundational to business responsibility and is instrumental in the coming together of economic, environmental and social dimensions that are essential to building a future ready organization and making a lasting positive impact on our stakeholders, operations and the natural ecosystem. Thus, we have integrated ESG goals into our overall business strategy to reinforce our market position, deliver financial performance, secure long-term value for our stakeholders and promote environmental preservation.

WCL is strongly committed to maintaining the highest standards of corporate governance, transparency and fairness in all matters related to the business and stakeholder engagement. A performance-driven successful business is governed by a defined structure of authorities guided by fundamental policies to operate ethically and create value. These policies are brought together as an assurance for WCL to enhance its integrity through a professional and mature work environment. We intend to build on these policies along our journey, and as we mature.

In light of our commitment to being a responsible business and growing sustainably, we have established an ESG committee at the Board level and have formulated plans for initiatives to be implemented across Environment, Social and Governance dimensions. Further, we have redefined the governance of Environment and Social aspects across organizational levels and this is helping to propel us towards meeting our commitments on carbon, water, waste, supply chain and CSR.

Operational excellence, high standards of compliance and a performance driven culture are prioritized at WCL. Our manufacturing facilities are certified for quality management system, environmental management system, occupational health, and safety management system. The certifications include: APIQR, SPECQ1, ISO-9001, ISO/TS-29001, AD 2000-Markblatt, HPOIEN / ISO 3834-3, ISO-14001 and ISO-45001. Our processes aim for maximum asset utilization and most of our products are made from externally procured plates and coils and make limited use of natural resources as raw materials. We continue to work towards greater resource efficiency by leveraging innovation, technology, R&D expertise and recovery and recycling methods.

Aligning with our commitment to minimizing the environmental impact of our operations, we have adopted a detailed risk assessment process that forms a part of our Enterprise Risk Management (ERM) framework. The process includes a detailed evaluation of all our processes, raw materials, products and services and helps to identify and measure the significance of Environmental Aspects and Associated Impacts. Our environmental performance is continuously monitored to ensure that it complies with regulatory requirements and we regularly submit compliance reports to relevant authorities to communicate our performance.

We are working to minimize the use of energy in our production and processing operations. We have put into action measures for energy efficiency and aim for carbon neutral status by employing renewable energy

and negating emissions with carbon offset programs. To this end, we have also taken steps in logistics that allow for greater efficiency in transporting materials and thereby reduce GHG emissions.

Our processes are not water intensive and we do not have a significant impact on water bodies through water withdrawal. The major industrial usage of water is for coating applications on line pipes while our offices use municipal supply water for domestic purposes such as drinking, cleaning, flushing, etc. We measure and monitor the quantity of water consumed across all our business locations and operations. WCL aims to ensure water stewardship by identifying operations where water conservation techniques can be implemented and by using recycled water to limit water consumption.

In order to reduce the impact of waste generated by our operations on the environment, we have adopted the 3R approach (i.e., Reduce, Reuse, Recycle) to monitor the waste generated and identify areas for waste reduction, recycling and reuse. All waste is segregated, treated, and disposed appropriately, in line with guidelines from Pollution Control Boards

For us to be truly sustainable, it is imperative that our value chain is equally a part of this journey. We recognize the need to take on board our supply chain and support necessary capacity building to enhance their ESG performance. Therefore, training in Environment and Social aspects and supplier assessments are among some of the steps we have articulated to develop a sustainable supply chain. We regularly evaluate our vendors on required quality standards to ensure the highest standards in material procurement. As our products depend on customer-specific requirements, we engage with a limited supplier base to procure high-quality materials. However, we encourage and promote local procurement for other components used in our processes. This not only lends to reducing the environmental impact of our procurement practices, but also supports employment and continued livelihoods in the communities surrounding our operations.

WCL's employees are our greatest asset, and we believe our diverse workforce contributes significantly to the innovation and creativity that fuels our growth strategy. We make equal opportunities available for all our employees, regardless of race, religion, gender, age, nationality, or disability. Our approach to learning and development aims to inculcate new competencies and enhance existing skills that address our people's development needs as well as our business goals.

Ensuring a healthy and safe work environment is accorded high priority and a culture of safety is driven by the top management and executed at every level through the EHS Management System. WCL is accredited for ISO 45001 that enables risk assessment of all activities for achieving organizational HSE goals. We have a well-established Occupational Health, Safety and Environment (OHSE) policy, and Safety Committees at the facilities ensure compliance with regulations and deliver safety trainings to our employees and contract staff.

Corporate Social Responsibility (CSR) is ingrained into our business strategy. Our CSR contributions are aimed towards creating a positive impact on the lives of the less privileged through well-planned initiatives and key focus areas. Our social mission is enshrined within the 3Es, namely, Education, Empowerment and Environment & Health. WCL's CSR activities are carried out through the Welspun Foundation for Health and Knowledge (WFHK) in areas such as strengthening educational foundation, improving access to healthcare services, empowering people, and preserving the environment.

In the coming years, our strategic focus would be to undertake action and allocate adequate resources to achieve our ESG goals in alignment with associated business goals:

- Energy-efficiency measures, prioritizing renewable energy strategies
- Effects on the wellbeing and prosperity of employees and stakeholders
- Monitoring targets and communicate to stakeholders on a timely basis while prioritizing our Environment and Social goals
- Sustainable supply chain program
- Strengthening organization's reputation through strategic stakeholder engagement and facilitating collaborations

Each phase of our ESG action is a holistic long-term vision aligned with our business, social and environmental objectives aimed at establishing a healthy ecosystem of economic growth and societal value creation. As we move into the future, ESG will be the cornerstone of our financial success, competitive advantage, and future accomplishments.

**SECTION A - GENERAL DISCLOSURES****I. Details of the listed entity**

<b>Corporate Identity number:</b>	L27100GJ1995PLC025609
<b>Name of the Listed Entity:</b>	Welspun Corp Limited
<b>Year of incorporation:</b>	1995
<b>Registered office address:</b>	Welspun City, Village Versamedi, Taluka Anjar, Dist. Kutch, Gujarat-370110
<b>Corporate address:</b>	Welspun House, 5th Floor, Kamala Mills Compound, Senapati Bapat Marg, Lower Parel, Mumbai - 400 013
<b>E-mail:</b>	CompanySecretary_WCL@welspun.com
<b>Telephone:</b>	+91 22 6613 6000
<b>Website:</b>	www.welspuncorp.com
<b>Financial year for which reporting is being done:</b>	April 1, 2021 to March 31, 2022
<b>Name of the Stock Exchange(s) where shares are listed:</b>	National Stock Exchange of India & BSE Limited
<b>Paid-up Capital:</b>	₹ 4,819,862,685 divided in to 260,949,395 Equity Shares of ₹ 5 each fully paid-up and 351,511,571 Preference Shares of ₹ 10 each fully paid-up
<b>Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:</b>	Mr. Alok Mishra - Group Head - Sustainability + 91 22 6613 5936 alok_mishra@welspun.com
<b>Reporting boundary:</b>	The Environmental data is reported for the line pipe & coating operations of at locations (Anjar, Bhopal, Mandya and Dahej) of Welspun Corp Limited for period from 01, April 2021 to 31, March 2022. The head count metrics includes all employees of WCL in India (excluding WSSL).

**II. Products/services**

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
i.	Welspun Corp Ltd, is in the business of manufacturing of tubes, pipes and hollow profiles and of tube or pipe fittings of cast-iron/cast-steel	The products are industrial B2B products that are engineered to order and hence very specific to the project for which they are to be used.	100%

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

S. No.	Product/Service	NIC Code	% of total Turnover contributed
i.	Welded Pipes	24,311	
ii.	Induction Bends		
iii.	Pipe Coating Systems		

**III. Operations**

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

Location	Number of plants	Number of offices	Total
<b>National</b>	4 - (Anjar, Dahej, Mandya & Bhopal)	1 - Mumbai	5
<b>International</b>	Pipe Coating Systems	2- Houston, Mauritius	3

## 17. Markets served by the entity:

## a. Number of locations

Locations	Number
National (No. of states)	Available across India (28 states)
International (No. of countries)	Australia, UAE, Iraq, Nepal, and Canada

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

Contribution of exports is 41% of the total turnover.

## c. A brief on types of customers

WCL trades its products in the B2B segment, and its customers comprises leaders of the oil and gas sector like Shell, Saudi Aramco, TOTAL, Chevron to name a few.

**IV. Employees**

## 18. Details as at the end of Financial Year:

## a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>Employees</b>						
1.	Permanent (D)	1,190	1,122	94.3%	68	5.7%
2.	Other than Permanent (E) (interns, trainees, part time employees, etc.)	262	231	88.2%	31	11.8%
<b>3.</b>	<b>Total employees (D + E)</b>	<b>1,452</b>	<b>1,353</b>	<b>93.2%</b>	<b>99</b>	<b>6.8%</b>

**Workers**

4.	Permanent (F)	1,278	1,268	99.2%	10	0.8%
5.	Other than Permanent (G) (contract)	801	784	97.9%	17	2.1%
<b>6.</b>	<b>Total workers (F + G)</b>	<b>2,079</b>	<b>2,052</b>	<b>98.7%</b>	<b>27</b>	<b>1.3%</b>

## b. Differently abled Employees and workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1.	Permanent (D)	5	5	100.0%	0	0.0%
2.	Other than Permanent (E)	1	1	100.0%	0	0.0%
<b>3.</b>	<b>Total differently abled employees (D + E)</b>	<b>6</b>	<b>6</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>

**DIFFERENTLY ABLED WORKERS**

4.	Permanent (F)	4	4	100.0%	0	0.0%
5.	Other than Permanent (G)	0	0	-	0	-
<b>6.</b>	<b>Total differently abled workers (F + G)</b>	<b>4</b>	<b>4</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>

## 19. Participation/Inclusion/Representation of women

Particulars	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	8	3	38%
Key Management Personnel	3	0	0%

## 20. Turnover rate for permanent employees and workers

Particulars	FY 2021-22		
	Male	Female	Total
Permanent Employees	252	16	268
Permanent Workers	210	0	210

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

## 21. (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)
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Welspun Corp Limited has 11 subsidiaries as of 31st March 2022.

S. 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	Welspun Tradings Limited (India)	Wholly Owned Subsidiary	100%	No, the subsidiaries manage and carry out their own BR initiatives in line with the legal requirements applicable to them.
2	Welspun Pipes Inc (USA)	Wholly Owned Subsidiary	100%	
3	Welspun Tubular LLC (USA)	Wholly Owned Subsidiary	100%	
4	Welspun Global Trade LLC (USA)	Wholly Owned Subsidiary	100%	
5	Welspun Metallics Limited (India)	Wholly Owned Subsidiary	100%	
6	Welspun DI Pipes Limited (India)	Wholly Owned Subsidiary	100%	
7	Welspun Specialty Solutions Limited (Listed subsidiary in India)	Subsidiary	50.03%	
8	Anjar TMT Steel Private Limited (India)	Wholly Owned Subsidiary	100%	
9	Welspun Wasco Coatings Private Limited (India)	Joint-Venture	51%	
10	Welspun Mauritius Holdings Limited (Mauritius)	Subsidiary	89.98%	
11	Mahatava Plastic Products & Building Materials Private Limited (India)	Wholly Owned Subsidiary	100%	

**VI. CSR Details**

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes  
 (ii) Turnover (in ₹): ₹ 65,050 million  
 (iii) Net worth (in ₹): ₹ 45,280 million

**VI. Transparency and Disclosures Compliances**

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)  (If Yes, then provide web-link for grievance redress policy)	FY 2021-22	
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year
Communities		-	-
Investors (other than shareholders)	-	-	-
Shareholders	Yes ( <a href="https://www.welspuncorp.com/system/downloads/attachments/000/000/805/original/Policy_on_Investors%E2%80%99_Grievance_Redressal_Mechanism10.03.2021.pdf?1615436668_">https://www.welspuncorp.com/system/downloads/attachments/000/000/805/original/Policy_on_Investors%E2%80%99_Grievance_Redressal_Mechanism10.03.2021.pdf?1615436668_</a> )	6	0
Employees and workers	Yes	0	0
Customers	Yes	6	4
Value Chain Partners	-	-	-
Other (please specify)	-	-	-

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

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

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

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

S. 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	Climate Change	R	WCL's business objectives and principles have been mapped with various industry trends and global frameworks including Sustainability Accounting Standards Board (SASB), Global Reporting Initiative (GRI), ESG metrics, National Voluntary Guidelines (NVGs). This analysis has enabled in identifying the risks and opportunities for WCL.	WCL has identified and assessed its physical and transition risks in line with recommendations provided by Task Force in Climate-Related Financial Disclosures (TCFD)	Negative Implication
2	Energy and Carbon	R		WCL has set a target to increase its renewable energy consumption to 20% by 2030 and be carbon neutral by 2040. The company has implemented various energy saving initiatives.	Negative Implication
3	Occupational Health & Safety	R		WCL has Safety Committees in its facilities that ensure adherence to WCL's Occupational Health, Safety and Environment (OHSE) policy, compliance with regulations and provide safety trainings to its employees and contract staff. Additionally, they access near-miss and other incidents at sites to identify the gaps in preventive risk mitigation, improving processes and procedures.	Negative Implication
4	Community development and engagement	O			
5	Water management	R		WCL measures and monitors the quantity of water consumed across all its business locations and operations. WCL aims to ensure water stewardship by identifying operations where water conservation techniques can be implemented and using recycled water to limit water consumption. It also ensures proper treatment of wastewater from its facilities in line with applicable standards and regulations.	Negative Implication
6	Air emission	R		Proper maintenance of power equipment. Maintain air to fuel ratio to avoid NOx generation.	
7	Governance, ethics & transparency	O			
8	Human Rights	R		Our Code of Conduct and Ethics Policy, Prevention of Sexual Harassment (PoSH) Policy, and HR practices covers aspects of human rights for WCL's operations and are extended to subsidiaries, suppliers and business partners.	Negative Implication
9	Product quality	O			



S. 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)
10	Waste management	R		WCL has undertaken initiatives towards reducing waste generation and effectively segregate, treat and dispose it based on the type of waste generated in line with guidelines from Pollution Control Boards. It has adopted the 3R approach (i.e., Reduce, Reuse, Recycle) to monitor the waste generated from its operations and identify areas for waste reduction, recycling and reuse. All the metal scrap and e-waste from its sites are sent to authorized vendors promoting recycling of waste.	Negative Implication
11	Risk identification & management	R		The Company has established a risk management policy that defines the overall risk management framework covering guidelines for risk identification, assessment, prioritization, mitigation and monitoring. The risk management committee of the Board oversees and reviews the risk management framework as well as the assessment of risks, its management and mitigation procedures. The committee reports its findings and recommendations to the Board.	Negative Implications
12	Economic performance and Business growth	O			
13	Customer centricity	O			
14	Compliance	R		Risk registers are developed for each location and drilled down to each function which includes the compliance aspects of business. Plant head and functional heads are responsible to manage the risks and ensure compliance to the regulatory requirements.	Negative Implications
15	Employee wellbeing	O			
16	Innovation	O			
17	Circular economy	O			
18	Sustainable product (Green Steel)	O			
19	Supply chain Sustainability/value chain	R		WCL has implemented its Supplier Code of Conduct based on ESG parameters for its suppliers to adhere and follow. It regularly evaluates its vendors on required quality standards to ensure the highest standards in material procurement. The assessment procedures include screening on ISO, EMS certifications, supply chain management, labour practices, safety, in addition to quality, delivery and service ratings.	Positive Implication
20	Biodiversity and ecology	R		Plantation initiatives through Weispun Foundation near all operation sites.	



**SECTION B: MANAGEMENT AND PROCESS DISCLOSURES**

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
<b>Policy and management processes</b>									
1. a. Whether your entity's policy/ policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
c. Web Link of the Policies, if available	<a href="https://www.welspuncorp.com/resources">https://www.welspuncorp.com/resources</a>								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	No	Yes	Yes	No	Yes	Yes
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 your entity and mapped to each principle.	The policies are based on prescribed principles, conformance to the spirit of international standards like ISO 9001, ISO 14001, ISO 45001, UNGC guidelines and ILO guidance.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.				Assess 100% of all suppliers as per ESG compliant Code of Conduct	Carbon Neutrality - 20% RE by 2030 or Achieve carbon neutrality by 2040 To achieve water neutrality by 2040 To achieve Zero Waste to Landfill by 2040			Impact 20,00,000 lives through CSV by 2040	
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.				93% of critical suppliers assessed based on ESG compliant Code of Conduct	A 300KW solar park is planned for CAPEX 2022 to be setup at Anjar facility Achieved water intensity of 0.64 KL/MT in FY22 Achieved Zero Waste to Landfill in FY22			Impacted lives of 1,95,375 people through CSV	

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
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### Governance, leadership and oversight

7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements: Integrated Report >> Leadership messages

WCL is dedicated to cultivating a culture in which sustainability is woven into the very fabric of all that we do. We believe that a sustainability-centric approach is fundamental to business responsibility, and that it is pivotal in bringing together the economic, environmental, and social dimensions that are necessary for building a future-ready organisation and having a long-term positive impact on our stakeholders, operations, and natural ecosystem. We have integrated ESG objectives into our growth strategy and are convinced that working towards these goals will enable us to strengthen our market position, achieve financial performance, secure long-term value for our stakeholders, and support environmental preservation.

WCL evaluated its natural strengths, found areas for improvement, devised more effective techniques, and formed solid relationships. We constantly convert challenges into opportunities and leverage it's a strong balance sheet, outstanding governance framework, and maximum asset usage to maximize growth opportunities. The Company's solid financial position and execution expertise not only give WCL adequate room to deal with unexpected scenarios, but also enable us to explore and fund new business opportunities such as ductile iron pipes, that result in increased financial earnings and stability. Our emphasis on automation, digitization, and the development of our people, enables our business to grow from strength to strength and we are confident in our ability to maintain long-term focus while addressing immediate issues.

In keeping with our commitment to reducing the environmental impact of our business, we have implemented a rigorous risk assessment as part of our Enterprise Risk Management (ERM) framework. The procedure entails a thorough examination of all of our processes, raw materials, products, and services, as well as identifying and quantifying the importance of Environmental Aspects and Associated Impacts. Our environmental performance is constantly reviewed to ensure that it meets regulatory standards, and we submit compliance reports to the appropriate authorities on a regular basis to share our progress.

The Company recognises that climate change is not just an environmental issue but also a business risk. WCL thus focuses on identifying and mitigating environmental and social risks in its value chain. We have adopted renewable energy in our operations and will continue to track greenhouse gas emissions and remain committed to lowering our overall carbon footprint.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).  
 Mr. Vipul Mathur-Managing Director & CEO  
 + 91 22 6613 6000  
 vipul\_mathur@welspun.com

9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes	Yes	Yes	No	Yes	Yes	No	Yes	Yes
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Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
10. Details of Review of NGRBCs by the Company:									
	Indicate whether review was undertaken by Director/ Committee of the Board/ Any other Committee								
	Frequency (Annually/ Half-yearly/ Quarterly/ Any other - please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action				Board Committee					Quarterly
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances				Board Committee					Quarterly
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
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

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

Principle 1: Businesses should conduct and govern themselves with integrity 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 Topics/ principles covered under the training and its impact
%age of persons in respective category covered by the awareness programmes	
Board of Directors Key Managerial Personnel	The Board members were taken through familiarisation programs which included updates on: <ol style="list-style-type: none"> <li>Raw material (Principle 2)</li> <li>Brands and Marketing (Principle 9)</li> <li>Consumer Insights (Principle 9)</li> <li>Business specific updates operational updates (Principle 6)</li> <li>Different channels of customers (Principle 9)</li> <li>CSR activities (Principle 8)</li> <li>Code of conduct (Principle 1)</li> </ol>
Employees other than BoD and KMPs	The employees and workers were given training on health and safety (Principle 3), skill upgradation (Principle 3) and human rights (Principle 5)

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): No

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.  
NA

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, WCL does have an anti-corruption and anti-bribery policy. The policy is available publicly on the following weblink: [https://www.welspuncorp.com/system/downloads/attachments/000/000/981/original/3.\\_WCL\\_\\_ABAC\\_shorter\\_version\\_\(1\).pdf?1651060581](https://www.welspuncorp.com/system/downloads/attachments/000/000/981/original/3._WCL__ABAC_shorter_version_(1).pdf?1651060581)

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 2021-22
Directors	Nil
KMPs	Nil
Employees	Nil
Workers	Nil

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

	FY 2021-22
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0

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.

NA

### 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	Total number of training and awareness programmes held	% age of value chain partners covered (by value of business done with each partner) under the awareness programmes
6	First Aid, QMS & SME courses with High Impact, Webinar on Environmental, Social and Governance	Anjar - Approx. 4% Bhopal - 27%

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. Annual Disclosures of interested parties and process to disclose conflict, if any, during the meeting held for consideration of proposal with interested party. Interested directors do not attend the agenda in which they have interest.

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

**Essential Indicators**

- 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 2021-22	Details of improvements in environmental and social impacts
R&D		25.2 million (Total R&D expense of the year).
Capex		Nil

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

Product	Process to safely reclaim the product
a. Plastics (including packaging)	NA (Steel Being used for our product, which is 100% recycled)
b. E-Waste	Disposed to authorised recyclers.
c. Hazardous Waste	During Pipe coating Epoxy & paint cake Hazardous waste is generated which is transported to PCB (Pollution control board) approved vendors for Co processing.
d. Other Waste	Non-Hazardous Polyethylene (PE) waste generated during pipe coating and it is transported to local vendors for recycling & reprocessing. All other wastes are also transported to authorized recyclers

- Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

No

If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards?

NA

**Leadership Indicators**

- Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

No

- 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.

NA

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 2021-22

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 2021-22		
	Re-used	Recycled	Safely disposed
Plastics (including packaging)			
E-waste		NA	
Hazardous Waste			
Other Waste			

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
NA	

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)
<b>Permanent Employees</b>											
Male	1217	1122	92%	1122	92%	0	0%	1217	100%	0	0%
Female	77	68	88%	68	88%	68	88%	0	0%	0	0%
Total	1294	1190	92%	1190	92%	68	5%	1217	94%	0	0%
<b>Other than Permanent Employees</b>											
Male	231	0	0%	0	0%	0	0%	0	0%	0	0%
Female	31	0	0%	0	0%	0	0%	0	0%	0	0%
Total	262	0	0%	0	0%	0	0%	0	0%	0	0%

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

Category	% of workers 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)
<b>Permanent workers</b>											
Male	1,268	937	74%	216	17%	0	0%	0	0%	0	0%
Female	10	7	70%	1	10%	7	70%	0	0%	0	0%
Total	1,278	944	74%	217	17%	7	1%	0	0%	0	0%
<b>Other than Permanent workers</b>											
Male	82	12	15%	0	0%	0	0%	0	0%	0	0%
Female	17	0	0%	0	0%	0	0%	0	0%	0	0%
Total	99	12	12%	0	0%	0	0%	0	0%	0	0%

## 2. Details of retirement benefits, for Current FY\*.

Benefits	FY 2021-22		
	No. of employees covered as a % of total employees	No. of permanent workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/NA)
PF	100%	100%	YES
Gratuity	100%	100%	YES
ESI	4%	70%	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.

[https://welspungroup.sharepoint.com/PortalHRPolicy/Equal%20Opportunity%20Policy%20\\_V1.0.pdf#search=equal](https://welspungroup.sharepoint.com/PortalHRPolicy/Equal%20Opportunity%20Policy%20_V1.0.pdf#search=equal)

## 5. Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent Employees					
	Total number of people returned after parental leave in FY	Total Number of people who took parental leave in FY	Return to work rate	Total Number of people retained for 12 months after returning from parental leave	Total number of people returned from parental leave in prior FY	Retention Rate
Male	20	20	100%	20	20	100%
Female	1	1	100%	1	0	0%
Total	21	21	100%	21	20	95%



## 5. Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Total number of people returned after parental leave in FY	Total Number of people who took parental leave in FY	Permanent Workers			Retention Rate
			Return to work rate	Total Number of people retained for 12 months after returning from parental leave	Total number of people returned from parental leave in prior FY	
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
Total	0	0	0	0	0	0

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes. SA 8000 certified unit so system as per certification's requirement is implemented.
Other than Permanent Workers	
Permanent Employees	Anjar - SPT (Social Performance Team) is there which captures/ discusses such grievances.
Other than Permanent Employees	At Bhopal, we maintain Grievance Register.

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

Category	FY 2021-22		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)
Total Permanent Employees	1,191	0	0
- Male	1,123	0	0
- Female	68	0	0
Total Permanent Workers	1,278	414	33%
- Male	1,268	414	33%
- Female	10	0	0

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

Category	FY 2021-22				
	Total (A)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)
<b>Employees</b>					
Male	1,123	729	65%	951	85%
Female	68	41	60%	60	88%
Others	262	2	1%	1	50%
Total	1,453	772	53%	1,070	74%
<b>Permanent Workers</b>					
Male	1,217	1,086	89%	998	82%
Female	10	10	100%	8	80%
Others	291	291	100%	0	0%
Total	1,518	1,387	91%	1,006	66%

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

Category	FY 2021-22		
	Total (A)	No. (B)	% (B/A)
		No. (B)	% (B/A)
<b>Employees</b>			
Male	1,350	1,122	83%
Female	99	99	100%
Others	2	2	100%
Total	1,451	1,223	84%
<b>Permanent Workers</b>			
Male	2,052	1,268	62%
Female	27	0	0%
Others	291	0	0%
Total	2,370	1,268	54%

## 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. HSE Management System is prepared with the integrated approach where all the 3 HSE factors are effectively managed to reduce risks in the workplace of company. The objective of a HSE Management System is to provide a structured management approach to control safety & environmental risks. Overall HSE management System have four level of documents as follow,

Level 1: Document: Health, Safety & Environmental Management System Manual

Level2: HSE Procedure Manual

Level 3: Operational Control Procedures

Level 4: HSE Document List

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

Step 1: Collect Existing Information about Workplace Hazards.

Step 2: Inspect the Workplace for Safety Hazards.

Step 3: Identify Health & Work-Related Hazards.

Step 4: Conduct Incident Investigations.

Step 5: Identify Hazards Associated with Emergency Situations.

- 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/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)

Yes

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

Safety Incident/Number	Category	FY 2021-22 Current Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees and Permanent workers	0.53
	Contract Workers	0
Total recordable work-related injuries	Employees and Permanent workers	3
	Contract Workers	0

Safety Incident/Number	Category	FY 2021-22 Current Financial Year
No. of fatalities	Employees and Permanent workers	1
	Contract Workers	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0
	Permanent Workers	0

The fatal incident at the plant was thoroughly investigated by the local HSE team member along with a cross functional plant operations team and the root cause of incident was identified. The team has revamped the concerned operational procedure and built in engineering controls to prevent future recurrence of such incidents at the plant. Minimizing manual interventions during such operations has also been adopted. Further focus on employee skill enhancement has also been adopted through repeated training and awareness sessions.

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

WCL provides trainings to its employees.

Reward employees for safe behaviour.

Partner with occupational clinicians.

Use labels and signs.

Keep things clean.

Make sure employees have the right tools and have regular equipment inspections.

Encourage stretch breaks.

Implement safety protocols from the start.

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

	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	Nil	Nil
Health & Safety	Nil	Nil	Nil

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% workplace assessments for the year F21-22 through, <ol style="list-style-type: none"> <li><b>INTERNAL AUDITS:</b> Once in a six-month, Internal Audit carried out by certified Internal Auditors.</li> <li><b>EXTERNAL AUDIT:</b> Focus Audit and Certificate Renewal Audit successfully completed by accredited 3rd party audit firm M/s LRQA.</li> <li><b>MONTHLY MANAGEMENT AUDIT:</b> Once in a month a complete safety audit conducted by respective Plant Head, HSE Head, other functional Head, Safety Champions and Plant team.</li> <li><b>APEX COMMITTEE MEMBER'S PLANT VISIT:</b> With the objective of identifying the gaps in workplace management.</li> </ol>
Working Conditions	The assessment of working conditions covers the entire premises including all operation & production activities, Health & hygienic, Admin and other office buildings, Canteen and Gurukul building, and Store.

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.

Hazard / Risk identification is a regular activity at the plant. Workplace hazards are identified and rectified by the plant EHS teams.

**Leadership Indicators**

1. Does the entity extend any life insurance or any compensatory package in the event of death of

- (A) Employees (Y/N) - Yes
- (B) Permanent Workers (Y/N). - Yes

Yes. All the employees are covered under the Social security Insurance Schemes and Medi-claim Insurance. In case of death or disablement, the nominee of the deceased employee (or the employee in case of disablement) is entitled for the compensation in accordance with the provisions of the Employees' Compensation Act. Further, the employee or his/her nominee is also entitled for the compensation under the "Employees' Deposit Linked Insurance Scheme" and under the "Associate Welfare Scheme".

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

Suppliers are assessed on ESG parameters and it is ensured that statutory requirements are met by the partners.

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:

Category	FY 2021-22	
	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
Employees	0	0
Permanent Workers	2	2

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, for identified roles in reference to business requirement.

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	50% of critical suppliers assessed
Working Conditions	50% of critical suppliers assessed

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

Based on the severity of the findings of suppliers' assessment, suppliers are given a tentative time frame to close the findings with root-cause analysis and further correctional and corrective actions. We expect our suppliers to engage and improve their sustainability performance to achieve the larger goal of creating a sustainable value-chain. In case of a severe or major violation of our code of conduct, a follow-up assessment takes place based on or within the mutually agreed target date of completion of identified findings.

**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.

Welspun continuously engages with its internal and external stakeholders regularly through structured mechanisms such as meetings, workshops, and one-on-one discussions and identifies the key stakeholder groups through timely feedback.

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 and scope of engagement including key topics and concerns raised during such engagement
Investors	No	Quarterly results calls, Participation in investor conferences, Media releases and investor presentations	Quarterly	Financial performance, Capital allocation, Risk management
Government and regulators	No	Engagement on a need basis, Participation in industry level consultation groups, Participation in forums	Continuous	Compliance, Sustainable practices, Inclusive growth
Employees	No	Employee surveys, Team building workshop, Capacity building and training, Annual appraisals, Employee newsletters, Rewards and recognitions, Volunteering opportunities	Continuous	Professional growth, Diversity at the workplace, Leadership Connect sessions, Workplace safety, Equal opportunities, Work-life balance, Wages and benefits
Business partners / suppliers and contractors	No	Contract agreements, Direct interactions, Supplier meets, Membership in industry associations	Continuous	Payment processing cycles, Business ethics, Transparency, Compliance
Communities & NGOs	Yes	Direct engagement, Dedicated CSR team, CSR projects and initiatives, Visits and camps, Community need assessments	Continuous	Infrastructure development, Education & healthcare, Environmental protection, Employment opportunities, Human rights
Customers	No	Active Participation in Pre-qualification Processes, Business Development Visits and Presentations, Participation in Product Development Programs for Specific Projects and Applications, Multi-level Relationship Management, Promoting Ethical Business Practices	Continuous	Increasing customer base, winning over competition, Providing Customized Solutions, Enhancing Collaboration, Ethical Transparency

#### Leadership Indicators

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

There is no mechanism for a direct consultation between board and stakeholders. The board is informed through the stakeholder relationship committee which receives the necessary feedback from stakeholders through the different business functions.

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. The initiatives of Wel-Shiksha which address the social concerns, Wel-Netrutva which addresses the health concerns and healthy life through organic green vegetable which addresses the environmental concerns were incorporated through stakeholder consultations.

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

WCL has implemented initiatives like Wel-Shiksha and Wel-Netrutva to address the concerns of vulnerable groups like children and women in the community.

#### Principle 5: Businesses should respect and promote human rights

##### Essential Indicators

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

Category	FY 2021-22		
	Total (A)	No. of employees / workers covered (B)	% (B / A)
<b>Employees</b>			
Permanent	846	21	2%
Other than permanent	253	0	0%
Total Employees	1,099	0	0%
<b>Workers</b>			
Permanent	997	0	0%
Other than permanent	510	0	0%
Total Workers	1,507	0	0%

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

Category	FY 2021-22				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)
<b>Employees</b>					
Permanent					
Male	1122		0%	1122	100%
Female	68		0%	68	100%
Other than Permanent					
Male	228		0%	228	100%
Female	31		0%	31	100%
<b>Workers</b>					
Permanent					
Male	1268	61	5%	898	71%
Female	10	0	0%	10	100%
Other than Permanent					
Male	784		0%	784	100%
Female	0	0	0	0	0

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

	Number	Male Median remuneration/ salary/ wages of respective category (in INR)	Number	Female Median remuneration/ salary/ wages of respective category (in INR)
Board of Directors (BoD)	5		3	
Key Managerial Personnel	3	18,457,500	0	
Employees other than BoD and KMP	1,149	606,620	70	471,570
Permanent Workers	1,230	268,518	10	216,000

## 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)

The HR team responds to any issues raised on human rights.

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

The issues related to human rights can be raised through the site representatives who then pass on the grievance to local HR / sustainability team who work towards the resolution of grievance.

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

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

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

Internal Complaint Committee for POSH

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

Supplier Code of Conduct is in place which looks after the aspects of human rights issues and the same is duly signed and acknowledged by the suppliers as a commitment to the code of conduct.

## 9. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	As per SA 8000: 2 Plants were assessed: Anjar + Dahej
Forced/involuntary labour	As per SA 8000: 2 Plants were assessed: Anjar + Dahej
Sexual harassment	As per SA 8000: 2 Plants were assessed: Anjar + Dahej
Discrimination at workplace	As per SA 8000: 2 Plants were assessed: Anjar + Dahej
Wages	As per SA 8000: 2 Plants were assessed: Anjar + Dahej
Others - please specify	

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

There were no corrective actions taken since there were 0 concerns arising from the assessments.



### Leadership Indicators

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

There have been no instances of business process being modified / introduced as a result of addressing human rights grievances/complaints.

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

SA 8000 certified Anjar, Dahej units

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, we have provided facilities for differently abled Visitors at Admin Block, Anjar.

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>
Sexual Harassment	50% of critical suppliers
Discrimination at workplace	50% of critical suppliers
Child Labour	50% of critical suppliers
Forced Labour/Involuntary Labour	50% of critical suppliers
Wages	50% of critical suppliers
Others - please specify	50% of critical suppliers
	Aspects covered:
	<ul style="list-style-type: none"> <li>▪ Freedom of association and Collective Bargaining</li> <li>▪ Environment Management and Compliance</li> <li>▪ Health and Safety</li> <li>▪ Business Ethics</li> </ul>

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

NA

### Principle 6: Businesses should respect and make efforts to protect and restore the environment

### Leadership Indicators

1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:

Parameter	FY 2021-22
Total electricity consumption (in GJ)	257,493
Total fuel consumption (in GJ)	51,927
Energy consumption	
Total energy	309,421
Energy intensity per rupee of turnover (Total energy)	4.75 GJ per ₹ million

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.

Yes, the following plants is registered as designated consumers under PAT scheme of Government of India: WCL Anjar (PAT Cycle II)

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

Parameter	FY 2021-22
Water withdrawal by source (in kilolitres)	
(i) Surface water	
(ii) Groundwater	
(iii) Third party water (Municipal Water Supply)	311,118
(iv) Seawater / desalinated water	
(v) Others	
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	311,118
Total volume of water consumption (in kilolitres)	311,118
Water intensity per rupee of turnover (Water consumed KL / turnover)	4.78 KL per ₹ million

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

No

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

Parameter	Please specify unit	FY 2021-22
NOx	MT	10
SOx	MT	6
Particulate matter (PM)	MT	77
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.

Yes. The external agency hired for assessment is M/s Royal Environment Auditing & Consultancy Service.

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

Parameter	Unit	FY 2021-22
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	3,365
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	92,435
Total Scope 1 and Scope 2 emissions per rupee of turnover	Tonne CO <sub>2</sub> per INR	1.47 tCO <sub>2</sub> e per ₹ million

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. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details.  
A solar park of 300KW is being planned to be setup at Anjar facility. WCL has also taken several energy conservation measures like installing variable frequency Drives, digital temperature controllers, retrofitting LED lights, replacing the use of furnace oil and LPG with natural gas, switching to efficient pumps and improvements in the HVAC system.
8. Provide details related to waste management by the entity, in the following format:

Parameter	FY 2021-22
<b>Total Waste generated (in metric tonnes)</b>	
Plastic waste <b>(A)</b>	691 MT
E-waste <b>(B)</b>	-
Bio-medical waste <b>(C)</b>	-
Construction and demolition waste <b>(D)</b>	-
Battery waste <b>(E)</b>	1.3 MT
Radioactive waste <b>(F)</b>	-
Other Hazardous waste. Please specify, if any. <b>(G)</b>	
1. Grease	1. ETP Sludge: 14 MT
2. Used Oil	2. Expander Sludge: 48 MT
3. ETP Sludge	3. Paint waste cutback tape: 45 MT
4. Dry ink waste	4. Paint Cake: 205 MT
5. Waste containing oil	5. Used waste oil: 5 MT
	6. Empty barrels/containers contaminated with hazardous chemicals /waste: 81 MT
	7. Cotton Waste: 0.2 MT
	8. Process Waste: 20 MT
Other Non-hazardous waste generated <b>(H)</b> . <i>Please specify, if any.</i> (Break-up by composition i.e., by materials relevant to the sector)	
	1. MS Scrap: 12955 MT
	2. Other than MS scrap: 1382 MT
	3. Wooden pallets: 153 MT
<b>Total (A+B + C + D + E + F + G + H)</b>	15,600 MT

Parameter	FY 2021-22
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>	
(i) Recycled	MS Scrap: 12955
(ii) Re-used	Wooden pallets: 153
(iii) Other recovery operations	
<b>Total</b>	<b>13,108</b>

**For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)**

Category of waste	
(i) Incineration	332
(ii) Landfilling	
(iii) Other disposal operations	2,160 (Sold to authorised recycler)
<b>Total</b>	<b>2,492</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

9. a. Briefly describe the waste management practices adopted in your establishments.
1. All generated different types of waste have been managed and handled as per their characteristic i.e., Non-hazardous & Hazardous.
  2. Collection of different types of wastes into the waste bins, temporary Storage yard at each plant level and designated Waste Storage Yard are identified.
  3. Standard Operating Procedure (SOP) has been developed for smooth operation, handling, and transportation.
  4. Wastes are transported to the Vendor or Recycler authorized by Pollution Control Boards.
  5. Opted co-processing disposal practice for major hazardous waste class over to incineration for superior environmental performance.
- b. 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.
- Reduction of Paint waste:  
 Reduction in Hose length of Mixed Paint from 1500 mm to 1250 mm.  
 Optimizing Flushing time by Timer based automation.
10. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:

S. 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.
Not applicable as there are no operations near above-mentioned zones.			

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
No EIA undertaken in FY 2021-22					

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

Yes

S. 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
NA				

#### Leadership Indicators

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

Parameter	FY 2021-22	
<b>From renewable sources</b>		
Total electricity consumption (in GJ) (A)	-	
Total fuel consumption (B)	-	
Energy consumption through other sources (C)	-	
<b>Total energy consumed from renewable sources (A+B+C) (in GJ)</b>	<b>-</b>	
<b>From non-renewable sources</b>		
<b>Total electricity consumption (in GJ) (D)</b>	<b>2,57,493</b>	<b>257,493</b>
Total fuel consumption (E) (in GJ)		51,927
Energy consumption through other sources (F)		
<b>Total energy consumed from non-renewable sources (D+E+F) (in GJ)</b>		<b>309,421</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

2. Provide the following details related to water discharged:

Parameter	FY 2021-22	
<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	Treatment - STP & ETP Quantity – 5,622 KL	
(ii) To Groundwater		
- No treatment		
- With treatment – please specify level of treatment		

Parameter	FY 2021-22
(iii) To Seawater	
- No treatment	
- With treatment - please specify level of treatment	Treatment - STP & ETP Quantity - 94,290 KL
(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>99,912</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

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

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

(i) Name of the area: Anjar

(ii) Nature of operations: Steel Pipe Manufacturing

(iii) Water withdrawal, consumption and discharge in the following format:

WCL's Anjar facility falls under a water stress area. We have setup a 30 MLD Sewage Treatment plant at our Anjar factory, which recycles sewage wastewater from the neighbouring areas, leading to zero intake of freshwater for manufacturing processes.

Parameter	FY 2021-22
<b>Water withdrawal by source (in kilolitres)</b>	
(i) Surface water	0
(ii) Groundwater	0
<b>Total volume of water withdrawal (in kilolitres)</b>	
<b>Total volume of water consumption (in kilolitres)</b>	228,324
<b>Water intensity per rupee of turnover</b> (KL Water consumed / INR million turnover)	3.51 KL per ₹ million
<b>Water discharge by destination and level of treatment (in kilolitres)</b>	
<b>Total water discharged (in kilolitres)</b>	<b>94,290</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

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

Parameter	Unit	FY 2021-22
<b>Total Scope 3 emissions</b>	Metric tonnes of CO2 equivalent	5,02,453  (The emission inventory includes 7 out of 12 applicable categories of Scope 3. Remaining 5 categories are being computed and to be reported next fiscal year. The reported categories are:  1. Downstream Transportation & Distribution 2. Upstream Transportation & Distribution 3. Purchase goods & Services 4. Capital Goods 5. Investments 6. Waste generated from operations 7. End of Life
<b>Total Scope 3 emissions per rupee of turnover</b>	Tonne CO2 per INR million	7.72 tCO2e per ₹ million

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

No

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

NA

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

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Installed STP of 30 MLD to recycle wastewater and reuse within the manufacturing process at WCL Anjar.	This process ensures recycling and treatment of sewage water generations. 100% of water requirement is met through the recycled water thus ensuring zero freshwater usage.	100% recycled water usage in our entire production activities
2	Solar dried bio-sludge (used a fuel in boiler)	The sludge generated from the operating facility has an equivalent calorific value as coal. Therefore, it is dried and used as an alternative fuel in boilers.	It reduces the coal consumption in the boiler
3	Briquettes	Biomass briquettes are a biofuel substitute to coal and charcoal and is used in boiler operations.	It reduces the coal consumption in the boiler

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

We have implemented Disaster management plant for occurrence of a sudden calamity of chain of events, which affect normal working within the factory area and/or may Cause Serious injuries, loss of life, extensive damage to the Properties etc. It may also result from Natural phenomena like flood, earthquakes, cyclones, forest fires in Which the day-to-day Patterns of life are, in many instances, suddenly disturbed and people are plugged in to helplessness and Suffering and as a Result needs Protection, clothing, shelter, Medical and necessity of life.



Aim of this Disaster Plan is to familiarize employees in the Factory to:

- (a) Control Disaster
  - (b) Combat Fire
  - (c) Rescue People
  - (d) Save life not only inside the Factory but also in neighbouring area in Case of an Accident.
8. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard?

There is no significant adverse impact to the environment, arising from the value chain of WCL.

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

50% of critical suppliers assessed based on suppliers' code of conduct consisting of ESG aspects including environmental compliance

**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.  
Welspun Corp Limited is a part of 18 associations.
- b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Bombay Chamber of Commerce and Industry (BCCI)	National
2	The Associated Chambers of Commerce and Industry (ASSOCHAM)	National
3	Indian Merchants Chamber (IMC)	National
4	Indian Pipe Manufacturers Association (IPMA)	National
5	Federation of Kutch Industries Associations, (FOKIA)	National
6	International Tube Association, India Chapter (ITA)	National
7	Pipeline Research Council International (PRCI)	National
8	National Association of Corrosion Engineers (NACE)	National
9	American Society of Mechanical Engineers (ASME)	International
10	Engineering Export Promotion Council (EEPC)	National
11	Federation of Indian Exporters Organization (FIEO)	National
12	Interstate Natural Gas Association of America (INGAA)	International
13	Southern Gas Association (SGA)	International
14	North American Steel Pipe Distributors (NASPD)	International
15	Pipeliners Association of Houston	International
16	San Antonio Pipeliners Association (SAPA)	International
17	American Line Pipe Association (ALPA)	International
18	US-India Business Council (USIBC)	International

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

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

Leadership Indicators				
1. Details of public policy positions advocated by the entity:				
S. Public policy No. advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others - please specify)	Web Link, if available
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 and brief details of project	SIA Notification No.	SIA Notification No.	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link	
NA						
2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:						
S. No. for which R&R is ongoing	Name of Project	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
NA						

Principle 8: Businesses should promote inclusive growth and equitable development

3. Describe the mechanisms to receive and redress grievances of the community.	
Grievances of the community, if any, are first communicated with the CSR team. Based on the nature of grievance, the matter is discussed with the respective department. The suggestions / solutions to mitigate the problem are then communicated to the community. Based on mutual agreement, the action plan is executed.	
4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:	
	FY 2021-22
Directly sourced from MSMEs/ small producers	
Sourced directly from within the district and neighbouring districts	
Leadership Indicators	
1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):	
Details of negative social impact identified	Corrective action taken
No negative social impact identified.	

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

S. No.	State	Aspirational District	Amount spent (In INR)
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CSR activities are executed in villages around the manufacturing sites. No aspirational districts are taken up currently under CSR.

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

#### Essential Indicators

- (b) From which marginalized /vulnerable groups do you procure?  
NA

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

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:

S. 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:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Wel-Shiksha	75,000	100% (children)
2	Wel-Netrutva	70,427	100% (women)
3	We-Volunteer	344	
4	Covid-19	15,000	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.  
In case any product supplied to the client is found to not conform to the specifications, then the Clients can raise a formal customer complaint. Upon receiving the complaint, we review the same, refer the data of the testing done at our mills and if need arises, we mobilise our inspector to the site to verify the complaint. Once the complaint is verified as genuine, a root cause analysis is done to identify the root cause/s and a corrective and preventive actions (CAPA) is prepared and presented to the customer. Any commercial issues, costs for repair/ rectification, rectification plan schedule etc is negotiated with the customer and the rectification/ repairs are completed.

As a preventive action, any lessons learnt from the project are discussed at Quarterly review meetings and any modifications needed to the SOP's/ Quality Assurance Plans are made. These lessons learnt are taken into consideration while negotiating any future project contracts.

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

As a percentage to total turnover	
Environmental and social parameters relevant to the product	0% as this is not relevant to the nature of our business activity at this point of time
Safe and responsible usage	0% as this is not relevant to the nature of our business activity at this point of time
Recycling and/or safe disposal	0% as this is not relevant to the nature of our business activity at this point of time

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

Category	FY 2021-22		Remarks
	Received during the year	Pending resolution at end of year	
Data privacy	0	0	0
Advertising	0	0	0
Cyber-security	0	0	0
Delivery of essential services	0	0	0
Restrictive Trade Practices	0	0	0
Unfair Trade Practices	0	0	0
Other (Product related)	0	0	0

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

CSR Project	Number	Reasons for recall
Voluntary recalls	Nil	NA
Forced recalls	Nil	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

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.

Cyber Security and Data privacy of customers: We have a project specific server/ share point for each project where the data pertaining to that project is stored. The access to this is controlled and provided to only select persons handling the project. Generally, project contracts have a secrecy/ non-disclosure clause wherein a specific period is mentioned up to which we must store the project data with us. If not, then the project data is stored for a period of 5 years.

Re-occurrence of instances of product recalls: In case even after taking the preventive actions and modifications to SOP's Quality plans as mentioned above, there is an instance of a re-occurrence of defects, then a re-assessment of the root cause analysis is done any parameters that were previously overlooked are identified. A new CAPA is made and accordingly actions taken, and any further necessary changes made to the SOP's and Quality plans

Penalty/ action taken by regulatory authorities: Since our products are engineered by the client, the question does not apply to us. Regarding any manufacturing related activity, we have not received any penalty/ action on safety of our products. We are certified as per ISO 45001 and SA 8000 and continue to conform to the same.

### Leadership Indicators

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

We manufacture and supply to the customer's specification. Our product range is available at our website <https://www.welspuncorp.com/>

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

We manufacture and supply to the customer's specification. Hence generally the customer is more knowledgeable than us on the usage of our supplied pipes into their pipelines, the operating pressures of their pipelines, the maintenance pigging intervals for pipelines etc.

A safe handling procedure to efficiently handle the pipes without damage and a pipe preservation procedure to safely store the pipes for a long term are provided to the customer as and when required against the specific project.

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

Any forced major events or other delays in delivery/ project progress, in a project are immediately informed to the client as soon as they come to our knowledge

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. To conform to API 5L requirements the API monogram and minimum required information is always marked on each pipe.

In addition to this depending on project requirements, specific additional information can be marked and is covered under a separate document titled "marking map."

Depending on customer requirements 1D or 2D bar codes can also be applied to the pipes at specified locations.

Upon the completion of the Final delivery of every project, a customer feedback form is sent to the customer. Their responses and ratings are noted and circulated to the plant, quality team and all relevant departments for their continuous improvement. The customer satisfaction scores across various projects are compiled into a final CSAT (Customer Satisfaction) score. This score must satisfy the CSAT target for the year. If not, then a root cause analysis and CAPA (Corrective and Preventive Actions) is performed.

5. Provide the following information relating to data breaches:

- a. Number of instances of data breaches along-with impact

Nil

- b. Percentage of data breaches involving personally identifiable information of customers

Nil