

# Business Responsibility Report

[As per Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

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

- M. Y. Ghorpade, Founder Patron

## SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

1	Corporate Identity Number (CIN)	L85110KA1954PLC000759
2	Name of the Company	The Sandur Manganese & Iron Ores Limited
3	Registered address	‘SATYALAYA’, Door No. 266 (Old No. 80), Ward No. 1, Behind Taluka Office, Sandur - 583119, Ballari District, Karnataka Tel: 08395 260301, Fax: 08395 260473
4	Website	<a href="http://www.sandurgroup.com">www.sandurgroup.com</a>
5	E-mail id	<a href="mailto:secretarial@sandurgroup.com">secretarial@sandurgroup.com</a>
6	Financial Year reported	2021-22
7	Sector(s) that the Company is engaged in (industrial activity code-wise)	(a) Mining of Manganese Ores (NIC Code 07293) (b) Mining of Iron Ores (NIC Code 07100) (c) Manufacture of Ferroalloys (NIC Code 24104) (d) Generation of Power (Captive consumption) (NIC Code 35102) (e) Manufacture of Coke (NIC Code 19101)
8	List three key products/services that the Company manufactures/ provides (as in balance sheet):	(a) Mining of Manganese Ores and Iron Ores (b) Manufacture of Ferroalloys (c) Manufacture of Coke and Generation of Power
	(a) Number of International Locations (Provide details of major 5)	Nil
	(b) Number of National Locations	Karnataka
9	Markets served by the Company – Local/State/National/ International	Local, State and National

## SECTION B: FINANCIAL DETAILS OF THE COMPANY

1	Paid up Capital (INR)	₹ 900.19 lakh
2	Total Turnover (INR)	₹ 2,28,397 lakh
3	Total profit after taxes (INR)	₹ 67,512 lakh
4	Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%)	₹ 446.29 lakh which exceeds 2% of the average net profit of the Company for the last 3 financial years.
5	List of activities in which expenditure in 4 above has been incurred	Refer Annexure F to the Board’s Report

## SECTION C: OTHER DETAILS

1	Does the Company have any Subsidiary Company/ Companies?	No
2	Does the subsidiary company/ companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s):	Not Applicable
3	Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]:	Business Responsibility Reporting has become applicable from the year ended 31 March 2020. The Company encourages other entities that the Company does business with, to independently undertake BR initiatives similar to the ones undertaken by the Company.

## SECTION D: BUSINESS RESPONSIBILITY (BR) INFORMATION

### 1. DETAILS OF DIRECTOR/DIRECTORS RESPONSIBLE FOR BR\*

#### (a) Details of the Director/Director responsible for implementation of the BR policy/policies

1. DIN Number	00061497
2. Name	Mohammed Abdul Saleem
3. Designation	Director (Mines)

#### (b) Details of the BR head

1. DIN Number	00061497
2. Name	Mohammed Abdul Saleem
3. Designation	Director (Mines)
4. Telephone number	+91 8395 271127
5. E-mail id	<a href="mailto:saleem@sandurgroup.com">saleem@sandurgroup.com</a>

\* Business Responsibility Reporting has become applicable from the financial year 2019-20. The Board of Directors at its meeting held on 31 August 2020 appointed Mohammed Abdul Saleem, Director (Mines) as the BR head and the person responsible for implementation of the BR policy/policies of the Company.

#### Principle-wise (as per NVGs) BR Policy/policies:

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

<b>Principle 1:</b>	Businesses should conduct and govern themselves with Ethics, Transparency and Accountability
<b>Principle 2:</b>	Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle
<b>Principle 3:</b>	Businesses should promote the wellbeing of all employees
<b>Principle 4:</b>	Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized
<b>Principle 5:</b>	Businesses should respect and promote human rights
<b>Principle 6:</b>	Businesses should respect, protect, and make efforts to restore the environment
<b>Principle 7:</b>	Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner
<b>Principle 8:</b>	Businesses should support inclusive growth and equitable development
<b>Principle 9:</b>	Businesses should engage with and provide value to their customers and consumers in a responsible manner

**(a) Details regarding the above 9 principles (P1 to P9) is given below [Reply in Yes/No (Y/N)]:**

S. No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have policy/ policies for(Refer Note 1)	Y	Y	Y	Y	Y	Y	Y	Y	Y
2	Has the policy been formulated in consultation with relevant stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
3	Does the policy conform to any national /international standards? If yes, specify.	Y	Y	Y	Y	Y	Y	Y	Y	Y
4	Has the policy been approved by the Board? If yes, has it been signed by the MD/ owner/ CEO/ appropriate Board Director? (Refer Note 2 below)	Y	Y	Y	Y	Y	Y	Y	Y	Y
5	Does the Company have a specified committee of the Board/ Director/ Official to oversee the implementation of the policy?	Y	Y	Y	Y	Y	Y	Y	Y	Y
6	Indicate the link to view the policy online? (Refer Note 3)	<a href="https://www.sandurgroup.com/Policies.html">https://www.sandurgroup.com/Policies.html</a>								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
8	Does the Company have in- house structure to implement the policy/ policies	Y	Y	Y	Y	Y	Y	Y	Y	Y
9	Does the Company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to policy/ policies?	Y	Y	Y	Y	Y	Y	Y	Y	Y
10	Has the Company carried out independent audit/evaluation of the working of this policy by an internal or external agency? (Refer Note 4)	Y	Y	Y	Y	Y	Y	Y	Y	Y

**1. SMIORE has the following policies covering the nine principles:**

<b>Principle 1:</b>	Ethics Policy; Code of Conduct for Directors and Senior Management and Employees; Vigil Mechanism / Whistle-Blower Policy; Code of Conduct to Regulate, Monitor and Reporting of Trading by Designated Persons and their immediate relatives; Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, Code of conduct for the employees
<b>Principle 2:</b>	Tryst with SMIORE – An informal Will of M. Y. Ghorpade; Quality, Environmental, Occupational Health and Safety (QEOHS) Policy
<b>Principle 3:</b>	Human Resource (HR) Policies; Quality, Environmental, Occupational Health and Safety (QEOHS) Policy; Policy on Prevention of Sexual Harassment
<b>Principle 4:</b>	Corporate Social Responsibility Policy; Tryst with SMIORE – An informal Will of M. Y. Ghorpade; Policy on Prevention of Sexual Harassment
<b>Principle 5:</b>	HR Policies; Quality Environmental Occupational Health and Safety (QEOHS) Policy; Policy on Prevention of Sexual Harassment
<b>Principle 6:</b>	Quality Environmental Occupational Health and Safety (QEOHS) Policy; Environmental Clearances for Mines and Plant; Supplementary Environment Mining Plans for mines
<b>Principle 7:</b>	Quality Environmental Occupational Health and Safety (QEOHS) Policy
<b>Principle 8:</b>	Corporate Social Responsibility Policy; Tryst with SMIORE – An informal Will of M. Y. Ghorpade
<b>Principle 9:</b>	Quality Environmental Occupational Health and Safety (QEOHS) Policy

2. All the Policies have been approved by the Board of Directors, except HR Policies and Policy on Prevention of Sexual Harassment, which have been approved by the Managing Director.

3. All the Policies are available on the website except HR Policies and Tryst with SMIORE – An informal Will of M. Y. Ghorpade, Environmental Clearances for Mines and Plant, SEMP for Mines

4. Evaluation of the Policies is undertaken periodically by the internal auditors, secretarial auditors and/or statutory auditors.

(b) If answer to S. No.1 against any Principle, is 'No', please explain why: (Tick up to 2 options)

S. No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	The Company has not understood the Principles									
2	The Company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles									
3	The Company does not have financial or manpower resources available for the task									NOT APPLICABLE
4	It is planned to be done within next 6 months									
5	Any other reason (please specify)									

## 2. Governance related to Business Responsibility

The Company believes that Corporate Governance is not only a principle that the organization follows but it's a way of life that is embedded in organizational culture and behavior of each employee of the organization. Governance of business responsibility begins with policy formulations and its implementation. The mindset of contributing to the different stakeholders and the environment at large, besides earning profits, which emanated from the very objective of incorporation of the organization coexists at present also.

Assessment of Business responsibility performance is a continuous process and is imbedded in the business activities. The BR performance is continuously monitored by Managing Director and Director (Mines) at regular intervals in the meetings conducted at Mines and the Plant. However, to make the monitoring of performance holistic and robust, Board of Directors in its meeting dated 10 February 2021 constituted Corporate Sustainability Committee (CSC). The Company conducted meeting of CSC on 9 November 2021 to discuss several matters relating to business responsibility and sustainability. Also, at the meeting of Corporate

Social Responsibility Committee (CSRC) the members discuss principles 4 and 8 of BR principles.

Business Responsibility Report can be viewed as part of Annual Report and is available online at <https://www.sandurgroup.com/Annual-Report.html>

## SECTION E: PRINCIPLE-WISE DETAILS:

### PRINCIPLE 1: BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH ETHICS, TRANSPARENCY AND ACCOUNTABILITY

The robust system of Corporate Governance practices of the Company reflects the value system encompassing its ethos, culture, principles, policies, openness and relationship with internal and external stakeholders. The Company believes in conducting its affairs in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity, and ethics in dealing with all the stakeholders that include employees, customers, suppliers, Government and the community. Towards this, the Company has adopted various codes and policies so as to conduct the affairs of the Company in a fair and transparent manner.

Sl. No.	Codes formulated by the Company	SEBI Regulation under which codes are formulated
1	Code of Conduct for Board Members and Senior Management	Regulation 17(5) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
2.	Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives	Regulation 9(1) read with Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015
3	Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information	Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

With growth of the organization and inclusion of new people from different background, culture and attributes with the existing work force, the Company contemplated to have a comprehensive code of conduct and ethics policy for employees. Besides bringing harmony and maintaining unity amongst diversity the benefit of Code of conduct and ethics policy can be multifold including to inculcate good principles, values and discipline. The management felt that a well implemented Code of Conduct and Ethics Policy enables organization to establish an organizational culture of maintaining highest standards of ethics and integrity at all levels and to prevent and detect unlawful and unethical conduct and activities. The Board in its meeting dated 28 June 2021 approved the Code of Conduct and Ethics Policy for the employees.

The Company's Code of Conduct stands on six pillars namely straightforwardness, morality, integrity, obligations, responsibility and equality (SMIORE) which are six core values imbibed in the organization's culture, building a strong foundation on which the organization stands. Each letter of SMIORE signifies one pillar

correlating to a core value, conveying a healthy relationship with the Company's belief system of GATE (Governance, Accountability, Transparency and Equality). In order to make the employees of the organization to understand the basic tenet of code of conduct and ethics and implement it in day to day operations several training programmes were undertaken by the Secretarial team lead by Company Secretary at Deogiri mines location, plant location at Vyasankere, corporate office and registered office.

In addition to the Code of Conduct policy, the Company also has developed whistle blower policy and POSH policy to strengthen Company's ethics practices.

The clause in the Code of Conduct policy relating to ethics, bribery and corruption covers the Company and extends to a large number of contractors/service providers. The Company during onboarding of vendors and customers ensure mandatory assurance by the new entrants to abide the Code of Conduct policy of the Company. The Corporate governance clause has been an integral part of

each agreements and contracts entered with external parties there by ensuring adherence of transparency in all the business transactions.

During the financial year 2021-22, no complaints were received from any of the Company's stakeholders.

## **PRINCIPLE 2: BUSINESSES SHOULD PROVIDE GOODS AND SERVICES THAT ARE SAFE AND CONTRIBUTE TO SUSTAINABILITY THROUGHOUT THEIR LIFE CYCLE**

The foundation of the Company is laid on the principles of safe and scientific mining, and we are proud to progress into the future keeping these principles intact. A commitment to conserve the local ecology and the welfare of surrounding communities lie at the heart of all our mining efforts. Our proactive adherence to applicable norms and voluntary environmental protection projects exemplifies our attachment to the rich heritage of land. The Company's award-winning Sustainable Development Framework (SDF) is a benchmark in sustainable mining operations in the country.

### **2.1 List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.**

The Company produces Manganese Ores and Iron Ores at mines and manufactures ferroalloys and coke at plant locations.

The Company adopted sustainable mining practices and production processes for all its products. It ensures to implement appropriate environmental measures in all its mining operations to protect and safeguard the environmental parameters such as air, water, land, noise and biodiversity. Similarly, special measures are being taken at plant to conserve the resources.

The Company has secured a total of 21 prizes as part of Annual Mines Safety Week Celebrations organized by Mines Safety Association of Karnataka under the aegis of Directorate General of Mines Safety, Government of India. Further, the Company has secured 14 prizes, including Overall First Prize at the Mines Environment & Mineral Conservation celebrations organized under the aegis of Indian Bureau of Mines, Government of India.

### **Scientific and systematic mining**

The vision of our founders made the Company the vanguard for scientific mining in India. Since its inception, the Company has set exemplary milestones in scientific mining, safety, afforestation and environment protection. Multiple safety and operational excellence awards won by the Company are the testimony to its highly evolved and meticulous functioning steeped in scientific rigour. Congregation of the Company's values, culture and philosophy with utmost regard and respect to the various mining statutes and rules have held us in good stead in our approach to scientific and systematic mining.

More than 87% of our mining lease is forestland, which we nurture and develop through seamless afforestation initiatives. The Company's SEMP programs consist of:

1. Waste Dump Management - consolidation and geo-textile greening, construction of toe walls, retaining walls and gully plugs;

2. Water Flow Management - constructing drains, dams, silt settling and water harvesting pits; and

3. Green Cover Management - plantations and avenue trees.

Upholding sustainable practices is core to Company's operations. The Sustainable Development Unit (SDU) at the Unit level - comprises of Technical, Financial, CSR, HRD, Environment heads to ensure implementation of Sustainable Development principles. These principles include elements such as intra and inter-generational equity, the precautionary principle, scientific operations, environmental management and socio-economic impacts, creation of social and physical infrastructure through stakeholder engagement.

Ministry of Mines, Government of India has awarded 5 Star Rating to Company's Mines based on the assessment of various parameters of Sustainable Development Framework (SDF) prescribed by the India Bureau of Mines (IBM). On the first occasion during 2014-15, the Company was the only Mining Lessee to have been awarded 5 Star Rating in the State of Karnataka and was among the only three Iron Ores Mining Lessees in the country to receive Five Star Rating. Thereafter, the Company has been awarded 5 Star Rating during 2015-16 and 2016-17 also. At the 5th National Conclave on Mines & Minerals held on 23 November 2021 in Delhi, the Ministry of Mines, Government of India has awarded 5 Star Rating to both the mines of the Company. The current 5 Star Rating awarded to the mines of the Company are for the years 2017-18, 2018-19 and 2019-20. Subsequently, at the 6<sup>th</sup> National Conclave on Mines & Minerals held on 12 July 2022 in Delhi, the Ministry of Mines, Government of India has awarded Five Star Rating to both the mines of the Company for the year 2020-21.

The Company has always laid special emphasis on scientific operations, safety, afforestation and environment protection. The Company has won several awards for safety and environmental protection at the State and National levels. Ministry of Labour & Employment, Government of India has awarded Vishwakarma Rashtriya Puraskar, National Safety Award (Mines) to the Company's Deogiri Manganese & Iron Ores Mine for the year 2017. The award was presented by Hon'ble Minister Bhupender Yadav, Ministry of Labour & Employment, Government of India on 8 March 2022 at Vigyan Bhawan in New Delhi. The Company's culture and philosophy of utmost regard and respect to the various statutes and rules, has held the Company in good stead.

### **State of art and highly integrated ferroalloys plant**

The Company's state of art ferroalloys plant at Vyasankere, Hosapete operates under sustainable framework enabling operation to manufacture and produce quality products while conserving energy and resources. The Company strives for fully-integrated operations with a vision to achieve self-sufficiency and optimum operational efficiency through forward and backward integrations. The Company completed its coke oven expansion in FY21 with the commissioning of the coke oven plant. The Coke Oven plant is the most recent addition to SMIOR's operations. It consists of 4 batteries and has a cumulative capacity of 0.5 MTPA. This expansion commenced in March 2018 and was fully-commissioned on 18 January 2021. The setting up of this plant fuels the long-term goal of our Company to set up a steel plant. With these plant expansions, our Company has enabled a feasible power generation set up to support the Ferroalloys operations.

It has also enabled integration of Coke for future downstream activities of steel expansion. By setting the coke oven plant with integrated Waste Heat Recovery Boilers (WHRB), our Company has taken major steps towards producing metallurgical coke and generating cleaner energy for the power requirement of ferroalloy manufacturing operations.

Several initiatives undertaken at the plants to improve the sustainability aspect and produce quality products during the year 2021-22:

- Significant renewable energy potential identified across all locations;
- Recovery and reuse of metal from ferroalloys slag. Sustained solid waste utilization;
- Process optimization initiatives such as waste heat recovery systems and by-product gas utilization;
- Investment in air pollution control equipment;
- Systems to increase water consumption and its efficiency and reusing water by recycling the it in a close loop.

Both Socio-Economic Assessment and Environmental Impact Assessment have formed an integral part of the process of granting/renewal of mineral concession and the Environment Clearance for setting up/upgradation of Ferroalloys, Coke oven and power Plant. The Company implements the approved development plans in the local area of its operations. The Company's Mines are in conformity with ISO 9001:2015 for Quality Management Systems, ISO 14001:2015 for Environmental Management Systems and ISO 45001:2018 for Occupational Health & Safety Management Systems duly certified by Indian Register Quality Systems and Ferroalloy plant is ISO 9001:2015 for the management system of operations certified by Bureau of Veritas. ISO audit examines various social and environmental parameters and assess the measures taken by the Company thereby improving the quality standards of products and mitigating risk associated with the mining and manufacturing processes involved with the above products.

**2.2 For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product:**

**a. Reduction during sourcing/production/distribution achieved since the previous year throughout the value chain?**

Consumption of raw material, utilities, stores and spares such as electricity, water, fuel oil, lubricant oil are regularly monitored by the Company at its mines and plant. Energy audits are routinely carried out, both at the mines and plant, and the recommendations implemented. External audit, internal audit and the energy audit are regularly carried out and their recommendations are used for identifying and prioritizing energy efficient technological measures and savings opportunities.

**b. Reduction during usage by consumers (energy, water) has been achieved since the previous year?**

Not applicable, since our products are intermediary products for manufacture of steel and allied products.

**2.3 Does the Company have procedures in place for sustainable sourcing (including transportation)? If yes, what percentage of your inputs was sourced sustainably?**

No raw material sourcing is required for the mining operations. In the case of ferro-alloys production major portion (about 85%) of strategic raw material like Manganese Ores from captive mines is transported through road transportation. In case of Coke production, 100% of strategic raw material which is Coking Coal is sourced through importing from different countries. The sustainable sourcing procedure adopted for Coking Coal procurement is placing orders well in advance to schedule discharge of shipments and transportation through trucks/trains to meet consumption requirement.

**2.4 Has the Company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work? If yes, what steps have been taken to improve their capacity and capability of local and small vendors?**

Generating employment for local residents and improving their standard of living has been Company's primary objective from inception.

Apart from direct employment of skilled and unskilled persons from the local villages in both mining and ferroalloy operations, the Company also creates employment opportunities directly and indirectly throughout its value chain. The Company encourages deployment of transport trucks and machineries owned by local villagers. In addition, contracts for civil works, supply of water, services like material handling (loading/unloading), waste haulage, maintenance contracts etc., are largely offered to the local people depending upon their knowledge and ability.

**2.5 Does the Company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%).**

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

The Ferromanganese (FeMn) slag which was produced previously during FeMn production is recycled by converting into bricks and introducing in the raw material charge mix for Silicomanganese (SiMn) production. This helps in recovering the Manganese content available in the FeMn Slag. About 18,000 to 20,000 Tonnes per annum of FeMn slag bricks are recycled and used for production. Likewise, the Company has enabled a vendor to set up a M-sand unit within the plant premises using SiMn slag.

The Company's ferroalloys plant is a 'Zero' discharge plant. The blow down water from the power plant is re-used in the quenching of coke. Treated water is re-used/recycled in Coke oven quenching system. Coke fines generated in quenching becomes wet and are collected in settling pond and recycled. All process waste water generated inside the plant at different points (Ferroalloys and Coke

Oven) are recycled in settling ponds. Waste water generated from various processes is recycled back or used for dust suppression & green belt development. No water is discharged outside the plant.

These initiatives have enabled us to recycle/re-use 100% of our waste generated from operational activities. All waste oil generated in the manufacturing process is collected through drain ports and stored in leak proof drum before being disposed off to agencies duly authorized for recycling.

### PRINCIPLE 3: BUSINESSES SHOULD PROMOTE THE WELLBEING OF ALL EMPLOYEES

The culture and history of SMIORE goes with doing well for others. From 1950s, under the vision and leadership of Shri. M.Y. Ghorpade, many pioneering initiatives to setup various organisations and institutions were taken up. This was done with an objective to ensure wholesome development and progress of people of the Sandur region. After incorporation of the Company several welfare initiatives for employees were undertaken by the Company.

During the COVID 19 pandemic time, the Company has put in place 'COVID 19 Epidemic Management' (CEM) system as a prevention and control mechanism for arresting the spread of virus. The Company has taken extensive steps and formed task forces at various levels to safeguard and protect nearly 5000 employees, direct and indirect, and their families. About 150 employees - Directors, Senior Executives and Officers are engaged in monitoring and implementing various preventive and control measures for safety of the employees. Continuous engagement and monitoring by task force enabled the Company containing the spread of virus and safeguarding the lives of its almost entire work force.

In continuation to above measures, the Company also facilitated vaccination at Company's hospitals in Deogiri, Subbarayanahalli, Occupational Health Centre at the Plant and the Government Hospital at Sandur to the employees and their family members free of cost.

#### Employee engagement during the year

The Company came out with a unique effort in the name of SANDUR SAMBHRAMA in the year 2021-22. This celebration of oneness is to improve the bonding and enable employees of the organisation to work together. This event began on 7<sup>th</sup> of December (which was the birth anniversary of Company's Founder and Patron M. Y. Ghorpade) and culminated on the 18<sup>th</sup> of January which is SMIORE day, (the day on which the Company was incorporated) included various activities such as sports, cultural and social activities across all our units.

#### Inauguration of employee quarters

On 7 December 2021 at Subbarayanahalli and Deogiri, 192 quarters were inaugurated. These are full-fledged 1 BHK houses with 24-hour supply of electricity and water, along with Solar water heating systems. This is one of SMIORE's most important welfare initiatives for the employees. Satyanarayan Pooja was held at both locations, followed by the house warming ceremonies and handing of the keys to the employees. A grand lunch was organised for

around 7,500 people consisting of employees, family members and villagers from surrounding villages.

#### Existing welfare programmes

Also, several welfare programmes have been carefully planned and effectively implemented over the years under the guidance of Company's Founder Patron M. Y. Ghorpade, for more than 3000 direct and indirect employees. The welfare programmes are tailored with priority for right to food, clothing, housing, medical care and education.

#### The welfare programmes include:

- Subsidized LPG (cooking gas) - 8 cylinders a year with 90% subsidy over Government subsidized rates;
- Free solar heated water;
- Free electricity to employees in Company's colonies;
- Free consultation and medication at dispensaries and hospitals at Sandur, mining camps at Deogiri & Subbarayanahalli, Swamihalli & Yeshwanthnagar, and occupational health centre at the Plant;
- Medical expenses entitlement - 20% of annual salary every year over and above the requirement of chronic ailment medication at subsidized cost for employees and their dependents;
- Generous and almost full reimbursement of cost of treatment/ surgeries in case of major ailments for employees and their dependents;
- Festival gifts for Ugadi, Deepavali, Ramzan and Christmas;
- Cash gift for clothing - ₹ 2,000 to ₹ 12,500 to every employee every year;
- Cash gift for marriage of employees and their children - ₹ 10,000 to ₹ 1 lakh (subject to fulfilment of specified criteria);
- Scholarships to meet total fee (based on Government fee) for PUC, Degree courses, Engineering, Medicine; and other professional courses;
- Scholarships for study in Sandur Residential School, Sandur Polytechnic and SMIORE PU College; and
- Funeral expenses and financial help in the event of death in family.

The most popular welfare programme of the Company, implemented effectively and continuously sustained for the last five decades, is supply of subsidised food grains at prices prevalent in 1972. The Company provides to all its employees (2,287 in all) the facility of a Ration Card which entitles every employee to a package of 16 essential food commodities, which is sufficient for a family of about 5 for a month, at a cost of ₹ 145 for the whole package, as against the actual cost of about ₹ 3,250, thus, largely insulating them from inflation and protecting their real wages and quality of life.

Through the Food Security Scheme, the Company provides a subsidy of nearly ₹ 900 lakh per annum.

**Details of Employees of the Company are as under:**

3.1	Total number of employees	2,287		
3.2	Total number of employees hired on temporary/ contractual/ casual basis	-		
3.3	Number of permanent women employees	190		
3.4	Number of permanent employees with disabilities	9		
3.5	Do you have an employee association that is recognised by management?	Yes – SMIORE Workers Union is registered body with Registration No.32/BD dated 26 July 1969 and is affiliated to Indian National Trade Union Congress (INTUC) with affiliation No.4442 dated 30 December 1972		
3.6	What percentage of your permanent employees is members of this recognized employee association?	83%		
3.7	Number of complaints relating to child labour, forced labour involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year	<b>Category</b>	<b>Complaints filed during FY 2021-22</b>	<b>Complaints pending during FY 2021-22</b>
		Child labour / forced labour / Involuntary labour	Nil	Nil
		Sexual harassment	Nil	Nil
		Discriminatory employment	Nil	Nil
3.8	What percentage of under- mentioned employees were given safety & skill up-gradation training in the last year?	<b>Category</b>	<b>Percentage</b>	
			<b>Safety Training</b>	<b>Skill Upgradation</b>
		Training		
		Permanent Employees	100%	20%
		Permanent Women Employees	100%	20%
		Casual / Temporary / Contractual Employees	NA	NA
		Employees with disabilities	100%	NIL

**PRINCIPLE 4: BUSINESSES SHOULD RESPECT THE INTERESTS OF, AND BE RESPONSIVE TOWARDS ALL STAKEHOLDERS, ESPECIALLY THOSE WHO ARE DISADVANTAGED, VULNERABLE AND MARGINALIZED**

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

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

Based on such stakeholders' consultation, the Company has, in the interest of public, undertaken construction of 35 kilometers of

external roads surrounding the mining area at a cost of ₹ 8,500 lakh to mitigate the impact of dust due to transportation of ores through trucks. The cost of construction of these external roads is being shared by other mining lessees and customers in the region.

Company's sustained efforts in the direction of socio-economic reconstruction and service, over the years, has set the tone and road map for the Company's progressive growth.

**4.1 Has the company mapped its internal and external stakeholders? Yes/No**

Yes, the Company has mapped its internal and external stakeholders for the purpose of stakeholder engagements.

The Company values its stakeholders and the Company's CSR initiatives are aimed at building trust and mutually rewarding partnerships with internal and external stakeholders who also exhibit some of the Company's core values and form an important part of its journey as a sustainable organization. The key stakeholders include the following:

**Internal:**

- Board members
- Promoters
- Employees



**External:**

- (a) Government and other regulatory authorities;
- (b) Customers;
- (c) Shareholders;
- (d) Local community;
- (e) NGO's and other stakeholders;
- (f) Vendors.

**4.2 Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders.**

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

SMIORE has always been benevolent in providing employment to locals in and around our Registered Office located at Sandur, Mines located at Deogiri, Subbarayanahalli, Kamathuru and Ramgad and Plant located at Vyasankere. The Company strives to give proportionate and fair representation to various communities and castes. It endeavors to achieve gender equality and provide more opportunities to girls/women. The Company has also provided employment to many young widows, for them to have a decent life, by introducing lady security guards for taking care of children in the schools supported by the Company. Preference is given to differently-abled and transgender candidates.

**4.3 Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders?**

SMIORE has consistently done its bit in the welfare of the area and the surrounding villages. Education and Health are the thrust areas in which SMIORE has paid special attention. Some of the noteworthy social service activities of the Company are as follows:

- Support to educational institutions, Primary Schools, High Schools, Pre-University Colleges and a Polytechnic, which together represent about 5,500 students and about 250 teachers.
- Scholarships for studies to needy and meritorious students.
- Free Vocational Training for better Employability to local boys and girls in trades such as Electrical Wiring, TV Repair, Welding, Fitting, Plumbing, Carpentry, Masonry, Horticulture and Computer Operation.
- Aid to Special Training Centre for rural children's education and prevention of child labour. Cash incentives to such parents to leave their children for study in such schools.
- SMIORE Academy of Teachers Training for teachers.
- Dispensaries and hospitals in employee colonies and also almost a full-fledged hospital in Sandur, with special emphasis on eye care, woman and child care, and regular specialty treatment camps by expert doctors.
- Free eye camps 3 to 4 times every year. Financial help and arrangement for medical care to patients from poor families suffering from major ailments.
- Outreach programmes for primary eye and health check-up in the neighbouring villages.
- Construction of houses for flood affected victims.
- Contributions for development works in Ballari District.
- De-silting of lakes around the mines and other locations.
- Repair and Construction of roads in local areas.
- Support to the Sandur Kushala Kala Kendra (SKKK) for nurturing traditional art and craft and for creation of opportunities for supplemental income to dependents of employees and local artisans, especially tribal and backward women of the area.
- A multipurpose hall, Adarsha Community Centre, provided almost free of charge to employees and local population of Sandur, for marriages and other events.
- Immediate relief to fire accident victims of surrounding villages by way of free cloth, food grains, etc.
- Medical help to victims of man-animal conflict in Ballari district.

**PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS****5.1 Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?**

SMIORE understands that human rights represent respect for individuals and communities and is committed to safeguarding these rights. The Company upholds fundamental human rights in its human resource practices/ policies while dealing with its direct and indirect employees. Human Rights are a fundamental precept of all Company policies. The Company also mandates its suppliers/ contractors etc. to ensure compliance with various applicable labour statutes in respect of their employees/workers.

The Company caters to the right of the employees to work in just and favorable conditions (safe and healthy) and upholds the dignity of every individual associated with it. Policy on Prevention of Sexual Harassment (POSH) of Company, promotes a free, fair and discrimination free working environment for employees and provides a mechanism for raising concerns and resolution of disputes.

**5.2 How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?**

No stakeholder complaints were received in the past financial year.

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

As part of the Reclamation & Rehabilitation (R&R) Plan prescribed by the Indian Council of Forestry Research & Education (ICFRE) as per the orders of the Hon'ble Supreme Court, SMIORE is implementing Supplementary Environment Management Plan (SEMP) at an estimated cost of about ₹ 7,100 lakh by undertaking (1) Waste Dump Management - consolidation and geo-textile greening, construction of toe walls, retaining walls and gully plugs; (2) Water Flow Management - constructing drains, dams, silt settling and water harvesting pits; and (3) Green Cover Management - plantations and avenue trees.

Environmental impacts throughout the operations is minimized through the adoption of effective environmental management which includes the following elements:

- Environmental Impact Assessment (EIA) and preparation of Environment Management Plan (EMP) both during mine planning and in the process of implementing projects at the Plant;
- Economically viable mineral development within the carrying capacity of the Environment;
- Scientific mining with efficiency-increasing technologies, mining and management practices;
- Biodiversity management including mitigating the effects on flora and fauna and preventing pollution of rivers, streams and creeks;
- Pollution control in respect of airborne contaminants, noise and vibration;
- Management of hazardous substances including process reagents, oil and fuel;
- Management of water including that generated during mining operations, mineral handling and processes, ferroalloy operations etc.

Environmental Impact Assessment (EIA) has been carried out and an Environment Management Plan (EMP) prepared for the Mines and the Plant. Through this EIA/EMP Report, an attempt has been made to identify and list all possible aspects, which could generate significant impact on different environmental attributes during various phases of operations and the implementation of the Projects. An Environment Management Cell (EMC) has been set up, which is responsible for ensuring compliance with Environment Management Plans for the Mines and Metal & Ferroalloys (MFA) Plant.

EMC undertakes monitoring of the environmental pollution levels by measuring fugitive emissions, ambient air quality, water and effluent quality, noise level etc., either departmentally or by appointing external agencies wherever necessary. In case, the monitored results of environmental pollution are found to exceed the allowable values, the EMC suggests remedial action and ensure that the same are implemented through the concerned officers in-charge of respective operations. EMC coordinates all the related activities such as collection of statistics with respect to the health of workers, population of the region, afforestation and green belt development/ plantation.

EMC carries out periodic audits and routinely report to the person heading the Mines/Plant. Further, non-compliances/ infringements of the forest and environment laws, if any, are required to be brought to the notice of the head of the Mines/Plant. The EMC lays down Standard Operating Procedures for implementing the Environment Management Plan and bring to the notice of the Committee any non-compliances/ infringements and appropriate remedial measures thereof. EMC prepares half-yearly reports on EC Compliance for submission to the Ministry of Environment, Forests and Climate Change (MOEF&CC).

The EMC checks the operation of Pollution Control Equipment, Waste Management, Greenery Management, regular compliance

to conditions of Environment Clearance (EC), Forest Clearance (FC), Consent for Establishment (CFE) and Consent for Operation (CFO), maintenance of statutory documents, regular statutory audit and arranges trainings related to Environmental Protection etc.

The Company is maintaining a green cover over about 250 hectares in the mining lease area and is in the process of developing green cover over 45 hectares within its MFA Plant by developing and maintaining in-house nurseries with about 2.5 lakh saplings consisting of variety of native species. The MFA plant also has an in-built organic converter where kitchen waste is used to convert into compost for use in the Nursery. The Mines too creates its own compost for its nurseries through vermicomposting.

The MFA plant has created a water reservoir with storage capacity of 25 million liters populated with native species of fishes.

As part of upgradation of the ferroalloy plant and set up of the coke oven plant, the Company has also upgraded the entire pollution control equipment to ensure that air and water pollution are well within the prescribed norms. In the Coke Oven project, the Company has decided to store coking coal and coke under covered sheds, thereby, preventing air and water pollution.

With an objective to reduce dust pollution during mining and ore transportation process, the Company has taken up tarring/ concreting of 32 kilometres of roads within mining areas and 35 kms of roads outside mining areas. Further, the Company is setting up a Down Hill Conveyor System with 300 tonnes per hour capacity to convey sized-ore to one of the railway sidings, thereby eliminating significant truck movements which otherwise would generate dust pollution.

In addition, SMIOR celebrated World Environment Day on 5 June 2022 with various initiatives in the thematic areas with campaign slogan "Only One Earth" framed by United Nations Environment Programme (UNEP) with focus on "Living Sustainably in Harmony with Nature". Major among these initiatives include establishing a botanical garden harbouring 40 native species consisting medicinal, rare, endemic and threatened flora of the region, setting up a seed repository of native species, mass plantation drive with more than 500 saplings planted on the occasion, tree adoption program and a drawing competition on the theme "Only One Earth" for the students of SMIOR High School, Deogiri. A. Renukamma, Range Forest Officer (RFO), Gudekote, a recipient of the Chief Minister's award, jurisdictional RFO Somashekhar Reddy and a couple of other field officers of the Company were felicitated on the occasion and prizes were distributed to the winners of the drawing competition.

In presence of the chief guest and other dignitaries, employees of SMIOR, elected panchayat members and residents of Deogiri village took oath to make Deogiri Panchayat "single use plastic free" in a phased manner.

#### **6.1 Does the policy related to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others**

The policies cover the Company and all its contractors operating within its premises.

**6.2 Does the Company have strategies / initiatives to address global environmental issues such as climate change, global warming, etc.? Yes / No. If yes, please give hyperlink for webpage etc.**

Yes. The Company recognizes the need to address the global environmental issues such as climate change, global warming, etc., and endeavors to contribute its utmost to reduce climate change and global warming. The Company has planted more than 35 lakh saplings with about 85% survival within its mining leases and is in the process of planting many saplings in and around its ferroalloy and coke plant. These initiatives can be viewed at <https://www.sandurgroup.com/SDF.html>.

**6.3 Does the Company identify and assess potential environmental risks? Yes / No**

Yes, the Company has defined methods of identifying and assessing potential environmental risks. It carries out Environmental Impact Assessment (EIA) of operations/ activities to identify impacts on the surrounding environment and initiate mitigation measures accordingly.

EIA for all its mines and industrial activities has been conducted and mitigation measures are being implemented as per the EMPs duly approved by the appropriate authorities. Regular monitoring of environmental parameters is carried out to ensure the effectiveness

of the measures implemented and to comply with the CPCB / MOEF&CC guidelines. Moreover, Disaster Management Plan (DMP) and Emergency Action Plan (EAP) have also been prepared and implemented for the Plant. The Environment Management Systems at the Mines are in conformity with the ISO 14001:2015 Standard. Environmental monitoring and audits are being carried out both at the Mines and the Plant to check that the environmental management measures are being satisfactorily implemented and are delivering the appropriate level of environmental performance. The system is being monitored periodically by the regulatory authorities. Further, as per the directions of the Hon'ble Supreme Court, Indian Council of Forestry Research & Education (ICFRE), Dehradun has reviewed the environmental protection measures being adopted by the Company and suggested for improvements in the form of Supplementary Environment Management Plan.

**6.4 Does the Company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if yes, whether any environmental compliance report is filed?**

Yes, the Company has taken up upgradation of its entire pollution control equipment to ensure that all emissions from plant operations are well within prescribed norms. Necessary environmental compliance report is filed on quarterly basis with Pollution Control Board.

**6.5 Has the Company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc? Yes / No. If yes, please give hyperlink for web page etc.**

**Generation of Solar Energy during the year 2021-22**

Sl. No.	Description	Quantity in Numbers	KWH/System/Year	UNITS Generated in KWH
1	20 Watts Solar street light	232	72	16704
2	50 Watts x 4 No's LED Flood light	8	720	5760
3	20 Watts Home light system	399	72	28728
4	10 KW Solar off grid system	2	36000	72000
5	500 Watts off grid system	1	1800	1800
6	5.5 KW Submersible pump	3	7920	23760
7	1 HP Solar Pump on grid system	2	1074	2148
8	300 KW Solar on grid system	1	300	70330
9	1 KW Solar off grid system	1	1440	1440
10	5 KW Solar on grid system	1	7500	7500
11	5 KW Solar off grid system	1	7500	7500
12	160 W Solar lighting off grid	1	576	576
13	320 W Solar lighting off grid	1	1152	1152
<b>Total</b>				<b>239398</b>

With a focus to completely eliminate utilisation of thermal coal for power generation for ferro alloys production, the Company has set-up Waste Heat Recovery Boilers and is producing power using waste heat from Coke Oven plant. The Waste Heat Recovery Boiler, which is a co-generation plant as classified by the Government of Karnataka, has potential to generate about 212 mu per annum. Further details can be viewed at <https://www.sandurgroup.com/SDF.html>.

**6.6 Are the Emissions / Waste generated by the Company within the permissible limits given by CPCB / SPCB for the financial year being reported?**

Yes. All emissions and wastes generated by the Company are monitored on a regular basis and are within permissible limits as specified by CPCB/SPCB. Also, the returns are filed regularly with the statutory authorities as per requirement.

**6.7 Number of show cause / legal notices received from CPCB/ SPCB which are pending (i.e. not resolved to satisfaction) as on end of financial year.**

Nil

**PRINCIPLE 7: BUSINESSES, WHEN ENGAGED IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A RESPONSIBLE MANNER**

**7.1 Is your Company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with.**

The Company is member of Federation of Indian Mineral Industries (FIMI), New Delhi and Indian Ferro Alloy Producers Association (IFAPA) Mumbai and The Associated Chambers of Commerce and Industry of India (ASSOCHAM), New Delhi.

**7.2 Have you advocated / lobbied through above associations for the advancement or improvement of public good? Yes / No; if yes specify the broad areas (drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)**

Yes, following are the broad areas:

- Sustainable Mining Practices;
- Energy Conservation; and
- Inclusive Development.

**PRINCIPLE 8: BUSINESSES SHOULD SUPPORT INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT**

For us at SMIORE, reaching out to underprivileged communities is part of our Philosophy and Culture. This entails transcending business interests and grappling with the "quality of life" challenges that underserved communities face, and working towards making a meaningful difference to them.

SMIORE, for close to seven decades, has been consciously contributing towards Social improvement and shall continue to have among its objectives the promotion and growth of the society.

The Company's CSR Policy identifies broad areas in which the Company will undertake projects and serves as a guiding document to help execute and monitor CSR projects. Also, during the time of COVID 19 pandemic, the Company has put in place 'COVID 19 Epidemic Management' (CEM) system for prevention and control measures and safeguard the lives of employees and their families which is defined under Principle 3 of this Report.

**8.1 Does the Company have specified programme/ initiatives/ projects in pursuit of the policy related to Principle 8? If yes, details thereof.**

To support inclusive growth and equitable development, the Company has undertaken the following programmes:

**1. SMIORE CSR Education Programme:**

**a. Scholarships:**

The Company has instituted Sandur Vidya Protsaha Scholarships (SVPS) to help children of needy persons of Sandur and surrounding areas to get better education by giving scholarships, on a merit – cum – means basis. Scholarships for children are given in the below mentioned educational institutions:

- (i) Sandur Residential School, Sandur
- (ii) Sandur Girls Residential School, Vyasankere
- (iii) Sandur Polytechnic, Yeshwantnagar
- (iv) SMIORE Vyasapuri PU College, Vyasankere
- (v) SMIORE Vyasapuri High School (English Medium), Vyasankere
- (vi) SES Vidyamandir PU College, Sandur.

**b. Prevention of Child Labour**

Reimbursement of expenses over and above the Central and State Government Grants, to meet expenses of M. Y. Ghorpade Special Training Centre.

**2. SMIORE Health & Sanitation Programme:**

The Company is pursuing its Health and Sanitation Programme by way of construction of toilets (toilet blocks/individual toilets) in villages falling in the buffer zones of the mining lease area and the Plant.

SMIORE has also facilitated Covid-19 vaccination at its Hospitals in Deogiri, Subbarayanahalli, Occupational Health Center in the Plant and Government Hospital in Sandur to the employees of the Company and their family members free of cost.

**3. Community Development**

The Company often receives requests for contributions towards various social causes such as drilling borewells, etc. from district and local Government Authorities, Peoples Representatives, and local government bodies.

**4. Corporate Environment Responsibility**

Ministry of Environment, Forest and Climate Change (MOEF&CC), Government of India, while according the Environment Clearance (EC) for SMIORE's 1.0 MTPA Steel Plant in June 2018, has stipulated that an amount equal to 3% of the project cost has to be spent concurrently along with the project implementation towards Enterprise Social Commitment (ESC). The Ministry has since modified ESC as Corporate Environment Responsibility (CER). Government of India, MOEF&CC (Impact Assessment Division) based on application made by the Company, amended configuration and change in product mix, under Para 7 (ii) of EIA Notification, 2006, for Company's ferroalloys plant located at Hanumanahalli Village, Taluk Hosapete, District Vijaynagara. The amended EC issued on 30 March 2022 suggested CER, expenditure to be incurred under nine specified heads viz., employment for local people, education facilities and sports facilities, drinking water to local village, health care, development of grave yard, toilets, upgradation of temples, green belt development and environment, basic infrastructure development. The spents by the Company under different categories has already been initiated and spents under toilets constructions and upgradation of temple are well above the targets set by the Ministry.

The objectives and spirit of CER is well dovetailed with the ETHOS and VALUES of SMIORE. SMIORE considers CER as an opportunity to serve the local villages rather than fulfillment of any Government stipulated compliance. Even though the approval of MOEF&CC for the Project was received in June 2018, SMIORE had started implementation of CER Programme from financial year 2017-18 itself, immediately following the Public Hearing for the Project held in July 2017. This clearly demonstrates the commitment of SMIORE towards society.

### 8.2 Are the programmes / projects undertaken through in-house team / own foundation / external NGO / government structures / any other organisation?

SMIORE CSR Education Programme and SMIORE Health and Sanitation Programme are being implemented through Karnataka Seva Sangha (KSS), a Charitable Trust formed under Indian Trust Act, 1882.

Community Development initiative and other activities undertaken based on stakeholder's consultation as part of Corporate Environment Responsibility (CER) is undertaken directly by the Company.

### 8.3 Have you done any impact assessment of your initiative?

Yes, routine impact assessment of the various initiatives is carried out and recommendations/feedbacks are incorporated towards alignment of our program.

### 8.4 What is your Company's direct contribution to community development projects - Amount in and the details of the projects undertaken?

Sl. No.	Activities	Amount spent ₹ in lakh (2021-22)
1	Supporting Education Programme	339.80
2	Promotion of Sports	5.50
3	Promotion of cultural / religious faith	11.09
4	Roads and Infrastructure	235.83
5	As per local body recommendation	0.10
6	Support to forest development, environment and wildlife	110.36
7	Promotion of Traditional Arts and Handicrafts Programme	25.06
8	Prevention of Child Labour	4.00
	<b>Total</b>	<b>731.74</b>

### 8.5 Have you taken steps to ensure that this community development initiative is successfully adopted by the community?

Community development has been one of the important elements of our Company's growth. The Company has specially appointed personnel with Masters in Social Welfare (MSW) to conduct survey of villages in the vicinity of the mining area and the plant operations to understand the requirement of the villagers. Various activities used to be undertaken at mines location to bring awareness amongst surrounding people. The Company has adopted Kammathuru village and undertaken various infrastructural development activities. The dedicated team of Welfare department not only interacts with the villagers to identify their requirement but also arranges various counselling and awareness programmes to inculcate the habits to change their lifestyle but also for their better health, safety and development. Consequent to the Company's initiative of participating in the Swachh Bharat Mission and construction of Public Toilets and the Individual Toilets, many of the villages have been declared to be Open Defecation Free (ODF) and the counselling of the villagers and more particularly the Panchayat Members has resulted in committees being formed in the villages to ensure use of toilets.

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

#### 9.1 What percentage of customer complaints / consumer cases are pending as on the end of financial year?

There are no customer cases / complaints pending as on the end of financial year 2021-22.

#### 9.2 Does the Company display product information on the product label, over and above what is mandated as per local laws? Yes / No / N.A. / Remarks (additional information)

Not applicable as the industry is not governed by any regulations with respect to product labelling.

#### 9.3 Is there any case filed by any stakeholder against the Company regarding unfair trade practices, irresponsible advertising and / or anti-competitive behavior during the last five years and pending as on end of financial year?

No

#### 9.4 Did your Company carry out any consumer survey / consumer satisfaction trends?

SMIORE periodically conducts a Customer Satisfaction Survey and senior level officers interact with the customers to assess their satisfaction levels about the quality of the goods supplied by the Company. Officers from the Quality Assurance Department visit the premises of the customers to address the grievances, if any.

For and on behalf of the Board of Directors

Place: Bengaluru  
Date: 11 August 2022

**T. R. Raghunandan**  
Chairman  
DIN: 03637265