



Business Responsibility & Sustainability Report

FY 2024-25

Business Responsibility and Sustainability Report

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

Sl. No.	Particulars	Information
1.	Corporate Identity Number (CIN) of the Listed Entity	L14292TG1973GOI001660
2.	Name of the Listed Entity	Mishra Dhatu Nigam Limited
3.	Year of incorporation	1973
4.	Registered office address	P.O. Kanchanbagh Hyderabad - 500058
5.	Corporate address	P.O. Kanchanbagh Hyderabad - 500058
6.	E-mail	company.secretary@midhani-india.in
7.	Telephone	040 – 2418 4515
8.	Website	https://midhani-india.in/
9.	Financial year for which reporting is being done	FY 2024-25
10.	Name of the Stock Exchange(s) where shares are listed	1. BSE Limited; and 2. National Stock Exchange of India Limited
11.	Paid-up Capital (in ₹)	187,34,00,000/-
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Dr. S. V. S. Narayana Murty Chairman & Managing Director 040 2418 4501 cmd@midhani-india.in P.O. Kanchanbagh Hyderabad – 500058
13.	Reporting boundary- Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Standalone basis
14.	Name of assurance provider	Not Applicable
15.	Type of assurance obtained	Not Applicable

Note: The data for previous year has been rationalised wherever necessary.

II. Products/services

16. 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
1.	Manufacturing	Manufacturing of Special Metals and Alloys/ Metal and Metal Products	100

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

S. No.	Product/Service	NIC Code (5 Digit)	% of total Turnover contributed
1.	Manufacturing of Special Metals and Alloys	24103	40
		24105	30
		24108	15
		24204	10
		24319	5

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

Location	Number of plants	Number of offices	Total
National	2 (Hyderabad and Rohtak)	3 (Hyderabad, Delhi and Rohtak)	5
International	None	None	0

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

Locations	Number
National (No. of States)	14
International (No. of Countries)	10

b. What is the contribution of exports as a percentage of the total turnover of the entity? - 8.76 %**c. A brief on types of customers :**

Our company operates in strategic sectors such as Defence, Space, Aerospace & Energy and is engaged in manufacturing of Special Steels, Superalloys and Titanium alloys. Most of our customers belong to strategic sectors.

IV. Employees**20. 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)
EMPLOYEES						
1.	Permanent (D)	276	238	86.23	38	13.77
2.	Other than Permanent (E)	3	3	100	0	0
3.	Total employees (D + E)	279	241	86.38	38	13.62
WORKERS						
4.	Permanent (F)	510	468	91.76	42	8.24
5.	Other than Permanent (G)	82	77	93.90	5	6.10
6.	Total workers (F + G)	592	545	92.06	47	7.94

Notes:

- 'Permanent Employees' means Executive and Non-Unionized Supervisors (NUS).
- 'Workers' means Non-Executives.
- Other than permanent means Fixed Term Contract Employees/Workers.
- Details of Employees and Workers are excluding Directors.

b. Differently abled Employees and workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	6	6	100	0	0
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total differently abled employees (D + E)	6	6	100	0	0
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	9	9	100	0	0
5.	Other than permanent (G)	0	0	0	0	0
6.	Total differently abled workers (F + G)	9	9	100	0	0

21. Participation/Inclusion/Representation of women:

Particulars	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	4	1	25
Key Management Personnel (KMP)	1	0	0

Whole time Directors & CFO (who is also a Director) are included in Board of Directors.

KMP includes – Company Secretary & Compliance Officer.

22. Turnover rate for permanent employees and workers:

Particulars	FY 2024-25			FY 2023-24			FY 2022-23		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	8.10	7.59	8.03	9.68	0	8.44	10.77	3.17	9.92
Permanent Workers	2.89	0	2.64	3.02	2.33	2.95	4.80	6.81	4.98

23. Names of holding / subsidiary / associate companies / joint ventures-

S. No.	Name of the holding / subsidiary / associate companies / joint ventures as on 31 st March, 2025 (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Utkarsha Aluminium Dhatu Nigam Limited	Joint Venture	50	No
2.	Advanced Materials (Defence) Testing Foundation	Joint Venture	20	No

VI. CSR Details

24.

- Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes
- Turnover (in ₹) : ₹ 1074,10,14,801.44
- Net worth (in ₹) : ₹ 1414,47,89,336.48

VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/ No) # (If Yes, then provide web-link for grievance redress policy)	FY 2024-25 Current Financial Year			FY 23- 24 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities-	Yes https://pgportal.gov.in/ Public can submit their grievance at CPGRAMS.	5	0	None	7 Centralized Public Grievance Redress and Monitoring System (CPGRMS)	0	None
Investors (other than shareholders)	Yes https://pgportal.gov.in/ Public can submit their grievance at CPGRAMS and also by contacting authorities https://midhani-india.in/grievance-contacts/	0	0	None	0	0	None
Shareholders	Yes https://scores.sebi.gov.in/	4	0	None	1	0	None
Employees and workers	Yes, MIDHANI has internal mechanism for receiving employees & workers grievance and its redressal, which is available offline mode on Intranet Portal.	9	0	None	0	0	None
Customers	Yes https://midhani-india.in/department_marketing/business-enquiries/ all business related enquires/grievance can be addressed mentioned.	0	0	None	15	5	The complaints pending as on March 31, 2024 were resolved during FY 2024-25.
Value Chain Partners	Yes, https://pgportal.gov.in/	4	0	None	0	0	None

v) 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 ¹	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.	GHG Emissions	R	Greenhouse gas (GHG) emissions, primarily carbon dioxide and methane, are a major concern in alloy manufacturing due to fossil fuel combustion and industrial processes. Despite technological advancements that have lowered emissions per tonne of steel, the sector remains highly carbon-intensive. These emissions pose regulatory risks and increase operational costs, making environmental compliance a critical challenge for manufacturers.	To address climate impact and regulatory risks, the company has adopted clean energy solutions including clean hydrogen, clean LPG, and solar power installations (4MW ground-mounted and 60KWp rooftop), generating over 3.12 million kWh annually and cutting carbon emissions by 2,500 tons. These initiatives not only reduce greenhouse gas (GHG) emissions but also enhance operational efficiency and help mitigate financial exposure to rising fuel costs and emission-related regulations.	No negative impact reported in the FY 2024-25
2.	Energy Management	R	The business operations of the Company is an energy-intensive process that relies heavily on fossil fuel combustion and electricity sourced from the grid, both of which contribute to significant direct and indirect emissions. The energy-intensive nature of the sector has notable implications for climate change, as the combustion of fossil fuels generates substantial Scope 1 emissions, while electricity consumption results in indirect Scope 2 emissions. Further energy costs form a significant part of operational expenses.	MIDHANI adopts a proactive approach to mitigate energy-related risks and enhance sustainability by investing in renewable energy sources. The company has established ground-mounted and rooftop solar power plants, generating over 31 lakh kWh of energy and reducing its carbon footprint by 2,500 tons. Further to reduce its power factor, provided Automatic Power Factor Controller (APFC) & Dynamic Power Factor Controller (DPFC)	No negative impact reported in the FY 2024-25

¹Material issues identified are referred from the Sustainability Accounting Standards Board (SASB) 2023-24 version. SASB Standards are maintained and enhanced by the International Sustainability Standards Board (ISSB). This follows the SASB's merger with the International Integrated Reporting Council (IIRC) into the Value Reporting Foundation (VRF) and subsequent consolidation into the IFRS® Foundation in 2022. The latest standards have been accessed at <https://sasb.ifrs.org/> on 14th April, 2025 at 11:10 IST

S. No.	Material issue identified ¹	Indicate whether Risk or Opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3.	Waste and Hazardous Materials Management	R	The handling and disposal of operational waste, particularly hazardous waste, pose significant environmental and health risks if not managed responsibly. Improper storage or disposal practices can result in land and water contamination, threatening ecosystems and communities.	The Company has implemented robust waste management systems in line with regulatory frameworks and environmental best practices, earning ISO 14001:2015 certification across its operations, including offices and manufacturing units. To mitigate risks associated with long-term waste disposal impacts, the Company proactively reduces waste, particularly hazardous streams, and focuses on recycling or selling non-hazardous by-products.	No negative impact reported in the FY 2024-25
4.	Employee well-being	O	A high-quality, motivated workforce is essential for MIDHANI to realize mission of achieving self-reliance in the research, development and supply of critical alloys and products of National security and strategic importance. MIDHANI's workforce is instrumental for achieving value creation and excel Corporate Citizenship. MIDHANI is equally committed to providing a safe working environment that empowers employees to excel to the best of their abilities. The company fosters a culture of care and collaboration, grounded in trust and mutual respect, ensuring a respectful workplace for everyone. MIDHANI offers comprehensive social security benefits to employees and their families.	Not Applicable	Positive.

S. No.	Material issue identified ¹	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)
5	Supply Chain Management	R	Ensuring the timely procurement of raw materials like iron ore on favourable commercial terms from third-party suppliers is critical. Any delays or failure in this process could hinder the Company's ability to meet the demand and impact overall operational efficiency. Further mineral extraction has significant environmental and social impacts.	To mitigate supply chain risks, the Company should diversify suppliers, maintain buffer stock, use real-time tracking, and establish strong partnerships. Regular supplier assessments, strategic sourcing agreements, and contingency planning further enhance supply chain resilience ensuring they avoid illegal or environmentally damaging activities and uphold social responsibility standards.	No negative impact reported in the FY 2024-25
6	Community Support and Corporate Social Responsibility	O	Building strong community relations is crucial for sustaining trust and fostering long-term social impact. The Company recognizes that community well-being is key to its growth and is committed to actively supporting social development initiatives that contribute to the broader community. MIDHANI's CSR initiatives are focused on Promotion of Health Care and Sanitation, Promotion of Education, Skill Development and are designed in such manner to make a positive impact on quality of life. These initiatives reinforce the Company's commitment to giving back and building positive relationships with stakeholders beyond its business operations.	NA	Positive

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements. The National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business (NVGs) released by the Ministry of Corporate Affairs has adopted nine areas of Business Responsibility. These briefly are as follows:

P1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

P2: Businesses should provide goods and services in a manner that is sustainable and safe.

P3: Businesses should respect and promote the well-being of all employees, including those in their value chains.

P4: Businesses should respect the interests of and be responsive to all its stakeholders.

P5: Businesses should respect and promote human rights.

P6: Businesses should respect and make efforts to protect and restore the environment.

P7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.

P8: Businesses should promote inclusive growth and equitable development.

P9: Businesses should engage with and provide value to their consumers in a responsible manner.

[illegible]

Disclosure Questions	P 1 Ethics & Transparency	P 2 Service responsibility	P 3 Human Resources	P 4 Responsive to Stakeholders	P 5 Human Rights	P 6 Restore environment	P 7 Public Policy Advocacy	P 8 Inclusive growth	P 9 Customer Engagement
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.	ISO 45001:2018	ISO 45001:2018	ISO 45001:2018 and DPE Guidelines on Human Resource Management	Indian Labour Codes and ISO 9001:2015	DPE Guidelines on Human Resource Management	ISO 14001:2015	-	Public Procurement Policy - MSME	Quality Policy, has ISO/IEC 17025:2017 & ISO 9001: 2015
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	None	None	None	None	None	None	None	None	None
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

*The Company has robust policies procedures/practices as well as standard operating procedures in place which are available on the website of the Company and Company's Intranet Portal.

Governance, leadership and oversight:

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

The global shift towards sustainability has accelerated in the post-pandemic era, with businesses increasingly turning intent into action. MIDHANI, with over five decades of expertise in manufacturing alloys and special metals, has remained committed to responsible growth by ensuring efficient resource management and maintaining a minimal environmental footprint. Its focus on meeting strategic national requirements, rather than mass commercial production, underscores this approach.

Social responsibility has been integral to MIDHANI's ethos, well before it became a statutory requirement under the Companies Act, 2013. The company's CSR initiatives are centered on education, health, and wellness, with the aim of empowering and upskilling communities. Employees are actively encouraged to volunteer in CSR projects, strengthening engagement with local communities and fostering a deeper sense of purpose.

As a Government-owned enterprise, MIDHANI operates under strict oversight from institutions such as the Comptroller and Auditor General of India, the Ministry of Defence, and the Central Vigilance Commission. This ensures the highest standards of transparency, accountability, and governance.

Looking ahead, MIDHANI aspires to act as a catalyst for positive change by building on its achievements and deepening its commitment to sustainability and social impact.

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

Dr. S.V.S. Narayana Murty
Chairman & Managing Director

9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details:

Yes, the Company's Corporate Social Responsibility and Sustainable Development Committee is responsible for sustainability related issues.

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow up action	All the policies of the Company are approved by the Board and being a Govt. Company, mandates of Department of Public Enterprises/ Administrative Ministry are also applicable and followed by Company. Policies w.r.t. National Guidelines for Responsible Business Conduct (NGRBC) are reviewed periodically or on a need basis by an Executive Committee.																	
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The Company complies with the extant regulations and principles as are applicable.																	

	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.	Audits on different subjects such as ISO 14001, ISO 45001, Cyber Security etc. were done. However, no Independent Assessment carried out for evaluation of the working of its Policies.								

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

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as “Essential” and “Leadership”. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

PRINCIPLE 1

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

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	0	No trainings were Imparted to Directors on Principles during the year	-
Key Managerial Personnel	0	No trainings were Imparted to KMP on Principles during the year	-
Employees other than BoD and KMPs	65	Corporate Governance, Ethics, Leadership, Vigilance awareness, Safety awareness, measures for well-being	100%
Workers	29	Safety awareness, measures for well-being	100%

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

The Company had no monetary and non-monetary 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, during FY 24-25.

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	None	None	Nil	None	None
Settlement	None	None	Nil	None	None
Compounding Fee	None	None	Nil	None	None

Non- Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	None	None	Nil	None	None
Punishment	None	None	Nil	None	None

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.

Not Applicable.

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

Yes, The Company has 'zero tolerance' of any practice that may be classified as corruption, bribery or giving or receipt of bribes and the same has been mentioned in its Code of Conduct. The Anti Bribery policy is available on the website of the Company viz. <https://midhani-india.in/policies/>.

MIDHANI is a Govt. Company and its Conduct, Discipline and Appeal (CDA) Rules for executives of the Company clearly brought out disciplinary proceedings in case of bribery or corruptions. MIDHANI also has a Chief Vigilance Officer, who is appointed by Central Vigilance Commission (CVC). MIDHANI also enters into Integrity Pact with suppliers in respect to all procurements exceeding ₹ 40 Lakh, and such procurements are monitored by Independent External Monitor (IEM) who are appointed by CVC. The financials of MIDHANI are also subject to supplementary/ test audit by Comptroller and Auditor General of India.

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

Particulars	FY 24- 25	FY 23- 24
Directors	None	None
KMPs	None	None
Employees	1	None
Workers	None	1

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

None

Particulars	FY 24- 25		FY 23- 24	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	None	-	None	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	None	-	None	-

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.

Action taken by law enforcement agencies on cases of corruption:

FY 24-25 & FY 23-24

Action by concerned authorities on cases of corruption as per extant applicable laws, rules, procedures was initiated and same is under progress.

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

Particulars	FY 24- 25	FY 23- 24
Number of days of accounts payables	84.77	82.17

9. Open-ness of business

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

Parameter	Metrics	FY 24- 25	FY 23- 24
Concentration of Purchases [#]	a. Purchases from trading houses as % of total purchases	Nil	Nil
	b. Number of trading houses where purchases are made from	Nil	Nil
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	Nil	Nil
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	2.4	6.5
	b. Number of dealers / distributors to whom sales are made	4	10
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	2.4	6.5
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	Nil	Nil
	b. Sales (Sales to related parties / Total Sales) [®]	Nil	Nil
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	Nil	Nil
	d. Investments (Investments in related parties / Total Investments made)	Nil	Nil

[#] Trading house has been defined as a business that specialises in facilitating transactions between a home country and foreign countries, but does not include related parties. There are no purchases from Trading houses in FY 2024-25. However, MIDHANI purchase products from Authorised dealer/distributor as a Trading Partner.

[®] Sales (Sales to related parties/Total Sales)", Revenue from operations has been considered as disclosed in Note 40 of Audited Standalone Financial Statements for the year ended March 31, 2025.

Leadership Indicators

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

Total number of awareness programmes held	Topics / principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programmes
Two (2)	1. Vendor meet on Indigenization 2. Vendor meet- 2024	45% (Domestic vendors covered under awareness programme)

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, MIDHANI has Code of Business Conduct and Ethics for Board Members and Senior Management, which requires all Directors of the Company and Senior Management to always act in the interest of the Company and ensure that any other business or personal association which they may have does not involve any conflict of interest with the operations of the Company. In case of any actual or potential conflicts of interest, the concerned Director/Senior personnel is required to immediately report such conflicts and seek approvals as required under applicable law and under Company's policies.

The Company receives an annual declaration from its Board of Directors and Senior Management confirming adherence to the Code of Conduct, which inter-alia includes the provisions on dealing with conflict of 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.

Particulars	FY 24- 25	FY 23- 24	Details of improvements in environmental and social impacts
R&D	Nil	Nil	-
Capex	Approx. ₹ 63 Lakh (1.26% of total Capex)	Approx. ₹ 145 Lakh (1.84% of total Capex)	<ol style="list-style-type: none"> 1. Provided Variable Frequency Drive (VFD) panel at Melt-IV to reduce the power consumption, thus helping in conservation of natural resources and environment. 2. Scrapped all old company operated vehicles and replaced with BS-VI emission norms vehicles and Electric vehicles. 3. Usage of pure Hydrogen for annealing and Clean LPG in furnaces results in zero carbon emissions, thus helping in conservation of Environment. 4. Old fans, lights replaced with Energy efficient Fans, LED lights in the plant. 5. Tree Plantation was done to increase the greenbelt and planted around 13450 saplings in inside the plant, corporate office, Township, etc. 6. Developed & Maintaining water bodies of about 350000 Sq. meters where in the rain water and treated water gets collected. The water body itself developing its own flora and fauna with migratory birds flocking now.

- Does the entity have procedures in place for sustainable sourcing? (Yes/No)
No, MIDHANI being a Govt. Company procures goods and services mostly through tendering process, hence sustainable sourcing stipulators cannot be incorporated in procurement procedures as it may lead to limiting the participation of vendors in tender enquiries. Though such stipulators are not present in procurement procedures as of now, many of our suppliers are already adopting such standards.
 - If yes, what percentage of inputs were sourced sustainably?
Not Applicable.
- 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.

The Company does not have any specific product to reclaim at the end of life. However, at the project and operation sites, there are systems in place to recycle, reuse and dispose in line with regulatory requirement for the above waste being generated during course of manufacturing and operation.
- 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.

EPR is not applicable to MIDHANI.

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?

MIDHANI did not conduct life cycle perspective of its products as MIDHANI majorly only supplies raw materials in forms of super alloys/ Titanium alloys & special steels. MIDHANI does not manufacture any end products.

- 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.

Not applicable.

- 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 24- 25	FY 23- 24
Scrap Utilization	24.87%	20.76%

- 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:

No products are re-claimed at end of life, hence not applicable.

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

Not Applicable.

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 ^s		Paternity Benefits ^s		Day Care facilities ^s	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	238	238	100	238	100	Not applicable	-	238	100	0	0
Female	38	38	100	38	100	38	100	Not applicable	-	38	100
Total	276	276	100	276	100	38	100	238	100	38	13.76
Other than Permanent employees											
Male	3	3	100	3	100	Not applicable	-	0	0	0	-
Female	0	0	0	0	0	-	-	-	-	0	-
Total	3	3	100	3	100	-	-	3	0	0	-

^sMaternity, Paternity Benefits and Day Care Facilities are available to all permanent employees, however, other than permanent employees are eligible for Maternity and Day Care facilities.

All employees are covered under Medical Scheme of MIDHANI where, the empaneled hospitals are providing medical attention as per CGHS rates which are borne by the company upto 95% of the total expenses incurred by the employee for in-patient treatment.

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits ^s		Paternity Benefits ^s		Day Care facilities ^s	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent workers											
Male	468	468	100	468	100	Not applicable	-	468	100	0	-
Female	42	42	100	42	100	42	42	-	-	42	42
Total	510	510	100	510	100	42	42	468	100	42	42
Other than Permanent workers											
Male	77	77	100	77	100	Not applicable	-	77	0	0	-
Female	5	5	100	5	100	5	100	Not applicable	-	5	100
Total	82	82	100	82	100	5	100	77	0	5	6.09

^sMaternity, Paternity Benefits and Day Care Facilities are available to all permanent workers, however, other than permanent workers are eligible for Maternity and Day Care facilities.

All workers are covered under Medical Scheme of MIDHANI where, the empaneled hospitals are providing medical attention as per CGHS rates which are borne by the company upto 95% of the total expenses incurred by worker for in-patient treatment.

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

Particulars	FY 24- 25	FY 23- 24
Cost incurred on well-being measures as a % of total revenue of the company	0.55	0.55

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

Benefits	FY 24- 25			FY 23- 24		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100	100	Yes	100	100	Yes
Gratuity	100	100	Yes	100	100	Yes
ESI	0	0	Not applicable	0	0	Not applicable
Post Retirement Medical Benefit Scheme	100	100	Yes	100	100	Yes

Note: The retirement benefits are provided to all eligible permanent employees and workers.

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, MIDHANI provides conducive environment for differentially abled persons with infrastructure. Company allows the personal vehicles of differentially abled persons (Orthopaedically disabled) within factory premises to help them reach their work spot.

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.

MIDHANI being a Central Public Sector Undertaking (Govt. Company), follows DPE Guidelines on Reservation for SC/ST/OBC and Differently abled. The DPE Guidelines/ HR Policies with respect to Reservation to recruitment of Differently abled are available on MIDHANI's Intranet Portal. The details of recruitment of Differently abled employees is also depicted in the Annual Reports available on MIDHANI Website.

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

Gender	Permanent employees		Permanent workers	
	Return to work rate (%)	Retention rate(%)	Return to work rate (%)	Retention rate (%)
Male	100	100	100	100
Female	100	100	100	100
Total (%)	100	100	100	100

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 [#]
Other than Permanent Workers	Yes [#]
Permanent Employees	Yes [#]
Other than Permanent Employees	Yes [#]

[#]Yes. Grievance Redressal process is available to all our employees to raise their concerns or grievances to the management. It ensures that all such issues are addressed promptly, impartially, and justly. Depending on the employees' interest & option, he/she can raise the grievance, either in writing or orally to the concerned people i.e. immediate superior or the Human Resource Head. An employee can also raise their concern in writing through an e-mail mentioning clearly about the details to the immediate superior and/or to the Human Resource Department.

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

Category	FY 24- 25			FY 23- 24		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees						
Male	238	193	81.09	256	205	80.07
Female	38	30	78.95	41	29	70.73
Total Permanent Workers						
Male	468	381	81.41	431	358	83.06
Female	42	36	85.71	42	36	85.71

8. Details of training given to employees and workers:

Category	FY 24- 25					FY 23- 24				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	238	238	100	238	100	256	256	100	256	100
Female	38	38	100	38	100	41	41	100	41	100
Total	276	276	100	276	100	297	297	100	297	100
Workers										
Male	468	468	100	468	100	431	431	100	431	100
Female	42	42	100	42	100	42	42	100	42	100
Total	510	510	100	510	100	473	473	100	473	100

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

Category	FY 24- 25			FY 23- 24		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	238	238	100	244	244	100
Female	38	38	100	34	34	100
Total	276	276	100	278	278	100
Workers[#]						
Male	468	468	100	432	432	100
Female	42	42	100	42	42	100
Total	510	510	100	474	474	100

[#]Worker's Annual Performance and career development reviews are undertaken in calendar year instead of financial year.

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, occupational health and safety management system has been implemented. It covers the entire operations covering all manufacturing units, industrial production facilities and offices. MIDHANI's safety policy is in accordance with the International Standards ISO 45001:2018 (Occupational Health and Safety Management System Standard). EHS Management System defines the mandatory requirements for the systematic management and execution within the organisation.

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

The Company has in place systematic risk management process to identify and control all the hazards at manufacturing units and offices. The Company's risk management process is applied through five steps (Identification, Assessment, Mitigation, Monitoring and Reporting).

- 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, The Company provides access to non-occupational medical and healthcare services, such as OP examination at CGHS rates at empanelled hospitals and in-patient treatment at empanelled hospitals wherein Company borne upto 95% of treatment cost as per CGHS rates, at its respective locations.

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

Safety Incident/Number	Category*	FY 24- 25	FY 23- 24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	1.59	1.62
	Workers	7.74	12.5
Total recordable work-related injuries	Employees	3	3
	Workers	26	42
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	2	1

*Workers here means contract workforce and Employees means employees on the rolls of MIDHANI.

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

MIDHANI is ISO 14001:2015 (Environment Management System) and ISO 45001:2018 (Occupational Health and Safety Management System) certified Company. There is a systematic risk management process in place to identify and control all the hazards in projects/units which requires verification of conformity. The EHS management system has various procedures and EHS norms. Therefore, a process has been established for carrying out Internal EHS audits. National Safety Week was observed in the month of March 2025 and various awareness programs were held to sensitize employees on safety. MIDHANI has formulated on site emergency plans, in line with MSIHC Rules 1989.

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

	FY 24- 25			FY 23- 24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	None	None	None	None	None	None
Health & Safety	None	None	None	None	None	None

14. Assessments for the year:

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

MIDHANI has robust Internal audit process in line with ISO 45001:2018 requirement and it covers all construction projects, offices and manufacturing units. At least one internal audit is conducted in a financial year across manufacturing units/offices.

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.

Standard Safety, Health Inspection Committee (SHSIC) was constituted with GM (P-II & IV) as Chairman and executives from Safety Department. The Committee has inspected entire plant and submitted the report. Total 276 observations were submitted to departments/shop and 95% of those observations were complied/resolved by the concerned in-charges.

Shop/Area wise Designated Safety Officers (DSOs) & Safety Captains (DSCs) were identified and then groups were formed to conduct quarterly shop floor safety inspections. Total of 893 observations were submitted during FY 2024-25 and 95% of those observation were complied.

Leadership Indicators

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

Yes, MIDHANI has Death Relief Fund and Group Insurance under EDLI Scheme for Employees and Workers. As per the Scheme, in case of death of an employee/worker while in service, an ex-gratia amount is given to their nominee.

As per MIDHANI's Employee' Family Benefit Scheme 2021, monetary benefit is provided to an employee's & worker's family on depositing the terminal benefits with the Company, in case of death of an employee while in service.

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

MIDHANI ensures that contribution towards ESI/Provident Fund is provided by the manpower contractor.

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:

Particulars	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 24- 25	FY 23- 24	FY 24- 25	FY 23- 24
Employees	Nil	Nil	Nil	Nil
Workers	2	1	2	1

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) :

Regular training is provided to employees while in employment to upskill their abilities / traits.

5. Details on assessment of value chain partners: No such assessment undertaken.

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

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

Not applicable, as no assessment of value chain partners was undertaken on Health and Safety practices and working conditions.

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.

MIDHANI being a strategic Defence Public Sector Undertaking, engaged in manufacturing of special steel, super alloys etc., hence, in line with the business model, MIDHANI has identified the following key stakeholders group: -

Stakeholder group	Basis of Identification
Suppliers/ Contractors	MIDHANI has significant dependency on supply chain partners for raw materials. MIDHANI also need substantial skilled casual workers manpower. To maintain sustainable growth, these partners are key elements in meeting the delivery and cost objectives for various contracts.
Government	Orders from Government (Defence, Energy and Space) and PSU's make up 90% of orders booked during FY 24-25, hence are the largest clients for the business.
Employees and Workforce	MIDHANI manufactures high end alloys and critical alloys, and such super alloys must meet stringent quality which can be only achieved through highly skilled manpower.
Regulatory bodies	MIDHANI is regulated by various regulatory bodies and to achieve sustainable growth it is important to understand priorities of these agencies and address their concerns, if any, to maintain compliance levels and establish benchmark performance levels.
Shareholders and Investors	Shareholders and investors make an important contribution to the growth of the company. Shareholders play an important role through exercise of their voting rights.
Communities through its CSR	MIDHANI always catalyse socio-economic development of communities around its premises. MIDHANI primarily focus on under-privileged and marginalized sections to enable them to bring them on-par with others.

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
Government	No	Monthly D.O. Letter Quarterly Results, Annual Reports, Stock Exchange filings, issue specific meetings, representations.	As and when required	Reporting requirement, statutory compliance, support from authority and resolution of issues.
Customers (majorly Govt. & Public Sector)	No	Formal business interaction.	As and when required	Challenges that are faced during order execution. Project delivery, timeline
Suppliers/ contractors	No	Regular supplier and dealer meets i.e. Vendor Meet.	As and when required	Need and expectation, schedule, supply chain issue, etc

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
Employees and Workforce	No	MIDHANI has intranet portal for dissemination of information related to Circulars, OM' s etc. - Company encourages its employees to showcase their talent in Games/ Cultural programs on various occasions like 'MIDHANI's Foundation Day', Independence Day, Republic Day, Hindi Diwas, Women's Day, etc. - Company reaches out to its employees & their families through in house magazines which are published to cover important events of the Company on quarterly basis. - Apart from regular training programs on technical/ non- technical topics program related to work life balance, meditation are also conducted.	As and when required	Employees' growth and benefits, their expectation, volunteering, career growth, professional development and continuing education and skill training etc
Community	Yes (Some of the Company's CSR Project Beneficiaries)	Direct engagement and through the Company's CSR project implementation partners (Implementing agencies i.e. NGOs)	As and when required	Regular review is done for effective service. Beneficiaries are encouraged to provide feedback/ lodge grievance w.r.t CSR activities

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.

The Company interacts with various stakeholders through sub-committees of the Board viz. CSR Committee, Human Resource Committee, Risk Management Committee, and Corporate Management Committees. These Committee undertakes review and discuss agenda pertaining to economic, social topics and the recommendation by the Committee is placed before Board of Directors for appropriate decision.

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.

The Company on regular basis engages with its stakeholders to boost relationships enabling the Company to make informed decisions. CSR projects undertaken in area of Education, Health Care, Nutrition, etc. are based on the Government Guidelines and inputs received from relevant stakeholders. Recommendations received from Board level committees are being implemented by way of policies and activities of the Company.

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

The Company has established MIDHANI's Primary Health Care Center to provide basic health care facilities to economically vulnerable stakeholders.

PRINCIPLE 5

Businesses should respect and promote human rights

Essential Indicators

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

Category	FY 24- 25			FY 23- 24		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	276	60	21.73	297	48	16.16
Other than permanent	3	0	0	2	0	0
Total Employees	279	60	21.50	299	48	16.05
Workers						
Permanent	510	90	17.64	473	20	4.23
Other than permanent	82	0	0	106	0	0
Total Workers	592	90	15.20	579	20	3.45

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

Category	FY 24- 25					FY 23- 24				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	238	-	-	238	100	256	-	-	256	100
Female	38	-	-	38	100	41	-	-	41	100
Other than Permanent										
Male	3	-	-	3	100	2	-	-	2	100
Female	0	-	-	-	-	0	-	-	0	100
Workers										
Male	468	-	-	468	100	431	-	-	431	100
Female	42	-	-	42	100	42	-	-	42	100
Other than Permanent										
Male	77	-	-	77	100	104	-	-	104	100
Female	5	-	-	5	100	2	-	-	2	100

3. Details of remuneration/salary/wages:

a Median remuneration / wages:

Particulars	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (in Rupees)	Number	Median remuneration/ salary/ wages of respective category
Board of Directors	2	38,20,343.23	0	0
Key Managerial Personnel	1	12,22,262.52	0	0
Employees other than BoD and KMPs	235	12,22,262.52	38	11,92,305.66
Workers	463	4,81,291.20	43	5,02,422.86

- a) CFO is a Director, hence, included in Board of Directors.
- b) Remuneration means Basic Pay and Dearness Allowance (DA).
- c) Salary Amount given above is the Median salary in the respective category.
- d) Calculated for those who were employed during whole FY 24-25.

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

Particulars	FY 24- 25	FY 23- 24
Gross wages paid to females as % of total wages	10.98%	9.97%

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

Yes, Company has procedures and means wherein employees can reach out to HR Dept./ respective dept. heads to address such issues.

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

All grievances are addressed as and when received by the respective Dept. heads, in coordination with HR. All the grievances received are duly investigated and appropriate actions are taken to resolve the issue/complaint. Whenever required, disciplinary actions are initiated as deemed fit and assistance from regulatory authority is sought.

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

Particulars	FY 24- 25			FY 23- 24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	1	1	The resolution is in progress.	0	0	None
Discrimination at workplace	0	0	None	0	0	None
Child Labour	MIDHANI doesn't employee child labour.					
Forced Labour/Involuntary Labour	0	0	None	0	0	None
Wages	0	0	None	0	0	None
Other human rights related issues	0	0	None	0	0	None

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

Particulars	FY 24- 25	FY 23- 24
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	01	Nil
Complaints on POSH as a % of female employees / workers	1.18	Not Applicable
Complaints on POSH upheld	Nil	Not Applicable

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

The Company has a Whistle Blower Policy wherein the employees/ vendors or any stakeholders of Company can report, without fear of retaliation - any wrong practices, unethical behaviour or non-compliance which may have a detrimental effect on the organisation, including financial damage and impact on brand image. Also, MIDHANI's CDA Rules and Standing Orders requires employees to behave responsibly in their action and conduct. Apart from that, the Company has Committees for the protection of women at workplace to ensure their rights, receive grievances, conduct investigation and to take actions.

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

No such clause incorporated by MIDHANI in its agreements and contract, however MIDHANI is committed to safeguard Human Rights and provide safe work-space to its employees and workers. MIDHANI ensures timely wage payment and availability of ESI to its casual workers engaged through third party consultancy.

10. Assessments for the year:

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100
Forced/involuntary labour	100
Sexual harassment	100
Discrimination at workplace	100
Wages	100

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

None.

Leadership Indicators

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

MIDHANI did not receive any human rights grievances/complaints that have necessitated to introduce or modify our business processes.
2. Details of the scope and coverage of any Human rights due-diligence conducted.

Not conducted.
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, MIDHANI provides conducive environment for differentially abled persons with infrastructure. Company allows the personal vehicles of differentially abled persons (Orthopaedically disabled) within factory premises to help them reach their work spot.
4. Details on assessment of value chain partners:

No such assessment of value chain partners undertaken.
5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.

Not Applicable.

PRINCIPLE 6

Businesses should respect and make efforts to protect and restore the environment

Essential Indicators

1. Details of total energy consumption (Mega Joules) and energy intensity, in the following format¹:

Parameter	FY 24- 25	FY 23- 24
From renewable sources		
Total electricity consumption (A)*	66,34,256.04	1,06,83,093.96
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total energy consumed from renewable sources (A+B+C)	66,34,256.04	1,06,83,093.96
From non-renewable sources		
Total electricity consumption (D)	22,19,99,227.20	20,09,58,026.40
Total fuel consumption (E)	26,94,40,060.45	31,79,67,719.49
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewable sources (D+E+F)	49,14,39,287.65	51,89,25,745.89
Total energy consumed (A+B+C+D+E+F)	49,80,73,543.69	52,96,08,839.85
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations) - MJ/Rupees	0.046	0.049
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)² (Total energy consumed / Revenue from operations adjusted for PPP) - MJ/USD	0.96	1.11
Energy intensity in terms of physical output		
Energy intensity per workforce - MJ/Workforce	82,891.24	86,935.13
	6,33,681.35	6,87,803.69

*During FY 2023–24, the plant was newly commissioned and remained under the operational control of the OEM until the year 2023 since its inception. Post-handover from the OEM, frequent breakdowns and disturbances in the grid network have led to interruptions in power generation and decrease in the electricity.

¹The above calculations are in accordance with Part B, Attribute 3 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

²The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

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 external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

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.

Mishra Dhatu Nigam Limited does not have any facilities recognized as Designated Consumers under the Government of India's Perform, Achieve, and Trade (PAT) Scheme. The entity was therefore not subject to any specific obligations or targets under the PAT framework during the reporting year.

3. Provide details of the following disclosures related to water, in the following format³:

Parameter	FY 24- 25	FY 23- 24
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Groundwater	2,44,550.00	2,42,850.00
(iii) Third party water	1,13,132.00	1,41,825.00
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	3,57,682.00	3,84,675.00
Total volume of water consumption (in kilolitres)	2,04,382.00	2,20,425.00
Water intensity per rupee of turnover (Total water consumption / Revenue from operations) - KL/Rupees	0.000019	0.000021
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)⁴ (Total water consumption / Revenue from operations adjusted for PPP) - KL/USD	0.00039	0.00046
Water intensity in terms of physical output	34.01	36.18
Water intensity per workforce - KL/workforce	260.03	286.27

³The above calculations are in accordance with Part B, Attribute 2 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

⁴The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

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 external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

4. Provide the following details related to water discharged:

Parameter	FY 24- 25	FY 23- 24
Water discharge by destination and level of treatment (in kilolitres)		
(i) Surface water		
- No treatment	--	--
- With treatment – please specify level of treatment	--	--
(ii) Groundwater		
- No treatment	--	--
- With treatment – please specify level of treatment	--	--
(iii) Seawater / desalinated water		
- No treatment	--	--
- With treatment – please specify level of treatment	--	--
(iv) Sent to third-parties		
- No treatment	1,02,200	1,09,500
- With treatment - please specify level of treatment - Primary, Secondary and Tertiary treatment (STP)	51,100	54,750
(v) Others		
- No treatment	--	--
- With treatment – please specify level of treatment	--	--
Total water discharged (in kilolitres)	1,53,300	1,64,250

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 external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

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

Mishra Dhatu Nigam Limited (MIDHANI) currently does not operate under a Zero Liquid Discharge (ZLD) mechanism. However, the Company has established a Sewage Treatment Plant (STP) to effectively manage and treat domestic wastewater generated from its premises. The maximum quantity of domestic wastewater generated is estimated at 90 m³/day.

The treated water from the STP is proposed to be reused for gardening and landscaping purposes, thereby promoting sustainable water management practices within the facility.

The wastewater treatment process is carried out in three stages -Primary, Secondary, and Tertiary treatment:

- **Primary Treatment:** Involves screening and equalization to remove large particles and balance the wastewater characteristics.
- **Secondary Treatment:** Comprises an aeration process followed by secondary clarification to biologically degrade organic matter.
- **Tertiary Treatment:** Involves chemical oxidation to ensure further purification and compliance with prescribed discharge standards.

Through this structured treatment process, MIDHANI ensures that domestic wastewater is effectively managed and environmentally responsible practices are adopted, even in the absence of a ZLD system.

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

Parameter	Unit	FY 24- 25	FY 23- 24
NOx	µg/m ³	138.70	117.20
SOx	µg/m ³	66.90	67.50
Particulate matter (PM)	µg/m ³	34.40	37.12
Persistent organic pollutants (POP)	µg/m ³	138.70	117.20
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, Sampling and evaluation of air emissions is carried out on a bi-monthly basis by an authorized third-party agency, M/s TEAMS LABS & CONSULTANTS, which is accredited by the State Pollution Control Board.

7. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details⁵.

Parameter	Unit	FY 24- 25	FY 23- 24
Total Scope 1 emissions	Metric tonnes of CO ₂ equivalent	15,295.01	18,570.39
Total Scope 2 emissions⁶	Metric tonnes of CO ₂ equivalent	44,831.51	39,968.32
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO ₂ equivalent/ Rupees	0.0000056	0.0000055
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)⁷ (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	Metric tonnes of CO ₂ equivalent/ USD	0.00012	0.00012

Parameter	Unit	FY 24- 25	FY 23- 24
Total Scope 1 and Scope 2 emission intensity in terms of physical output⁸	Metric tonnes of CO2 equivalent/ MT	10.01	9.61
Total Scope 1 and Scope 2 emission intensity per workforce	Metric tonnes of CO2 equivalent/ workforce	76.50	76.02

⁸ The above calculations are in accordance with Part B, Attribute 1 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

⁶ The above calculations as per the updated emission factors provided in the CO₂ Baseline Database for the Indian Power Sector – User Guide, Version 20.0, December 2024, published by the Central Electricity Authority, Ministry of Power, Government of India.

⁷ The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

⁸ The above calculations are in accordance with Part A, Section 1(II) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

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 external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

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

MIDHANI has utilized 19,37,073 kWh of solar electricity as part of its decarbonization strategy aimed at enhancing the adoption of renewable energy. Under its ongoing energy efficiency program, the Company continues to focus on reducing fuel and energy consumption. Key initiatives undertaken include:

- Replacement of 300 BLDC ceiling fans, resulting in a savings of 48.6 Mega Joules of non-renewable energy.
- Upgradation of inefficient motors with high power factor motors, leading to improved operational efficiency and reduced energy losses.

9. Provide details related to waste management by the entity, in the following format⁹:

Parameter	FY 24- 25	FY 23- 24
Total Waste generated (in metric tonnes)		
Plastic waste (A)	-	-
E-waste (B)	3.17	-
Bio-medical waste (C)	0.06	0.06
Construction and demolition waste (D)	100.00	3,452.00
Battery waste (E)	0.50	1.00
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any. (G)	-	-
Pickling Sludge	0.04	0.06
Used Coolant Oil	-	0.20
Oil Soaked Cotton Wastes	-	0.06

⁹The above calculations are in accordance with Part B, Attribute 4 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122

Parameter	FY 24- 25	FY 23- 24
Other Non-hazardous waste generated (H). Please specify, if any.(Break-up by composition i.e. by materials relevant to the sector)		
Used Machine Oil	8.64	2.90
Total (A+B + C + D + E + F + G + H)	112.41	3,456.28
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations) – MT/Rupee	0.000000010	0.000000032
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)¹⁰ (Total waste generated / Revenue from operations adjusted for PPP) - MT/USD	0.000000022	0.000000072
Waste intensity in terms of physical output¹¹ - MT/MT	0.02	0.57
Waste intensity per workforce - MT/workforce	0.14	4.49
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)[#]		
Category of waste – E-waste		
(i) Recycled – E-waste	3.17	-
(ii) Re-used	-	-
(iii) Other recovery operations	-	-
Total	3.17	-
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste - Hazardous, Non-Hazardous waste, Construction and Demolition waste, Biomedical waste and Battery waste		
(i) Incineration – Biomedical waste	0.06	0.06
(ii) Landfilling – Construction and Demolition waste	100.04	3,452.32
(iii) Other disposal operations - Battery waste and Used Machine oil	9.14	3.90
Total	109.24	3,456.28

¹⁰The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

¹¹The above calculations are in accordance with Part A, Section 1(II) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

[#]All the Hazardous wastes like Pickling Sludge, Oil-Soaked Cotton waste & Used Coolant Oil being sent to authorised (Hazardous waste Management facility) for safe disposal as per the Telangana State Pollution Control Board (TSPCB) norms. E-Waste, Plastic Waste, Used Batteries, Used Oil selling to authorized recyclers/agencies through auctioning. Bio Medical Waste is also disposing every month through the authorized disposable agency.

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 external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

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

In line with statutory requirements, MIDHANI ensures that all categories of hazardous waste, such as pickling sludge, coolant oil, oil-soaked cotton waste, and similar by-products, are safely stored in designated areas within the central store until further treatment or disposal.

For safe disposal, hazardous wastes are handed over to M/s Ramky Enviro Engineers Ltd., a certified third-party agency, with all movements duly documented through Manifest Form-10 in compliance with regulations. Bio-medical waste is responsibly

disposed of through M/s Sattva Enviro Global Services, while E-waste and used batteries are auctioned only to authorized agents. Additionally, turnover data of hazardous waste is regularly submitted to the concerned regulatory authority in the prescribed Form-04 format under HWMR.

Our waste management practices are guided by the 3R strategy --Reduce, Reuse, and Recycle:

- Reduce: Adoption of advanced waste-reduction technologies and improved inventory management techniques to minimize waste at source.
- Reuse: Recirculation of coolant and quench oils within operations to extend their lifecycle.
- Recycle: Remelting of metallic scrap in arc melting furnaces to produce primary ingots, thereby reducing dependency on virgin raw material.

In alignment with our Consent to Operate (CTO) targets, MIDHANI has also adopted structured methodologies to further reduce hazardous waste generation. For instance, metallic scrap is now increasingly utilized in arc melting operations, thereby lowering overall waste volumes. Furthermore, a new pickling waste treatment technology has been introduced, wherein the liquid discharge from pickling operations is treated with specific chemicals, enabling segregation into reusable water and solid pickling sludge.

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

Not applicable, MIDHANI does not have any operations/offices in/around ecologically sensitive areas.

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

No Environmental Impact Assessment (EIA) was conducted by the Company during the current financial year.

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

There were no material non-compliances reported in the financial year 2024-2025.

Leadership Indicators

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

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

- Name of the area:
- Nature of operations:
- Water withdrawal, consumption and discharge in the following format:

Not applicable, as MIDHANI does not undertake commercial operations in areas of water stress.

Parameter	FY 24- 25	FY 23- 24
Water withdrawal by source (in kilolitres)		
(i) Surface water	--	--
(ii) Groundwater	--	--
(iii) Third party water	--	--
(iv) Seawater / desalinated water	--	--
(v) Others	--	--
Total volume of water withdrawal (in kilolitres)	--	--
Total volume of water consumption (in kilolitres)	--	--
Water intensity per rupee of turnover (Water consumed / turnover)	--	--
Water intensity (optional) – the relevant metric may be selected by the entity	--	--
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water		
- No treatment	--	--
- With treatment – please specify level of treatment	--	--
(ii) Into Groundwater	--	--
- No treatment	--	--
- With treatment – please specify level of treatment	--	--
(iii) Into Seawater / desalinated water	--	--
- No treatment	--	--
- With treatment – please specify level of treatment	--	--
(iv) Sent to third-parties	--	--
- No treatment	--	--
- With treatment – please specify level of treatment	--	--
(v) Others	--	--
- No treatment	--	--
- With treatment – please specify level of treatment	--	--
Total water discharged (in kilolitres)	--	--

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

No external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

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

Parameter	Unit	FY 24- 25	FY 23- 24
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Scope 3 emissions could not be calculated for the reporting year as the methodology for waste disposal and reclamation was not available for certain categories of waste. Since waste-related disclosures form the basis for Scope 3 emission calculations, the absence of this methodology meant that the assessment could not be undertaken. Going forward, the Company is committed to strengthening its processes for data collation and methodology alignment to enable comprehensive calculation and reporting of Scope 3 emissions in future years.		
Total Scope 3 emissions per rupee of turnover			
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity			

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

No external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

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

Not Applicable.

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

Sl. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	Energy conservation/ efficient measure	Installed Automatic Power Factor Controller (APFC) and Dynamic Power Factor Controller (DPFC) to optimize the power factor, thereby reducing electricity consumption.	Efficient power utilization, reduced energy losses, conservation of natural resources, and cost savings.
2.	Application of clean energy	Introduced the use of pure Hydrogen for annealing and Clean LPG in furnaces, resulting in zero carbon emissions during operations.	Positive environmental impact, reduced carbon footprint, contribution to sustainable energy transition.
3.	Conservation of flora and fauna	Planted ~15,000 saplings across plant premises, corporate office, and township. Developed water bodies (~3,50,000 sq. m) to collect rainwater and treated water, which have evolved into habitats for flora, fauna, and migratory birds.	Enhanced biodiversity, improved ecosystem balance, greenbelt development, and increased employee awareness on sustainability.

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

On-Site Emergency Preparedness at MIDHANI

Mishra Dhatu Nigam Limited (MIDHANI) has developed and implemented a comprehensive On-Site Emergency Plan in accordance with the Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 (Rule 13), under the provisions of Major Accident Hazard (MAH) guidelines.

The plan is designed to ensure effective preparedness, response, and mitigation in the event of emergencies or disasters arising from:

- Leakages of flammable gases or hazardous substances
- Fire or explosion in pressurized vessels, melting/gas-fired furnaces, or any other pressure equipment
- Unanticipated plant/process upsets leading to conditions beyond safe operating limits

Such scenarios may pose risks to human lives, cause damage to property, disrupt business operations, and impact surrounding communities, thereby necessitating large-scale mobilization and coordination with external agencies.

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

During the reporting period, no value chain partners were assessed for environmental impact. Furthermore, no adverse social or environmental impacts were identified or reported across the Company's value chain.

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

During the reporting period, no value chain partners were assessed for environmental impact.

8. How many Green Credits have been generated or procured¹²:

- a. By the listed entity – Nil
- b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners - Nil

¹²The above disclosure is made as per the SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/42 dt. 28th March 2025.

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. **Five**
- 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.

Sl. No	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1.	Confederation of Indian Industry	National
2.	Society for Defence Technologist	National
3.	Federation of Indian Chambers of Commerce and Industry (FICCI)	National
4.	Indian Institute of Metals	National
5.	Federation of Telangana Chamber of Commerce and Industry (FTCCI)	National

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

No corrective action taken or underway on the issues related to anti-competitive conduct by the entity, hence not applicable.

Leadership Indicators

1. Details of public policy positions advocated by the entity: **None**

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.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
NA	NA	NA	NA	NA	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:

Not applicable. No rehabilitation and resettlement were undertaken by the entity during reporting period.

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

Any community member can raise complaint on Company's number and email address provided at Company's website which is monitored, addressed and proper record is maintained. Also, any stakeholder of Company can file complaint under Whistle Blower Policy.

For CSR Projects:

In the Community based CSR projects, MIDHANI's representative from CSR team facilitates the interaction between the beneficiary groups, addresses concerns and resolves issues, if any. MIDHANI interact with implementing agencies on regular basis and provide feedback box at CSR sites which are also monitored and addressed accordingly.

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

	FY 24- 25	FY 23- 24
Directly sourced from MSMEs/ small producers%	32	28.26
Directly from within India%	54.50	47.41

% Percentage of Total Procurement including inputs.

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

Location	FY 24- 25	FY 23- 24
Rural	-	-
Semi-urban	-	-
Urban	-	-
Metropolitan	100	100

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):

Not applicable.

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

Sl. No	State	Aspirational District	Amount spent (In INR)
	Nil	Nil	Nil

- 3.

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

Yes, MIDHANI has a preferential procurement policy.

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

MIDHANI procures from MSEs owned by SC/ ST entrepreneurs and MSEs owned by women entrepreneurs.

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

Procured 1.91% of total domestic procurement from SC/ ST MSEs and procured 3.1% of total domestic procurement through MSEs owned by women entrepreneurs.

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:

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. :

Not applicable

6. Details of beneficiaries of CSR Projects:

Sl. No	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Sponsoring free education in BPDV School, Hyderabad to SC, ST & OBC Children.	46	100
2	Sponsored Nutritional kits to TB patients. Kit consists of Rice, Dal, and Groundnuts & Groundnut Oil.	1500	100
3	Sponsorship for procurement of material and operations of MIDHANI Primary Health Care Centre	31168 Below Poverty Line (BPL) patients were treated	100
4	Sponsored Ambulance for palliative care in three remote places of Palakkad District, Kerala.	200 patients	100

PRINCIPLE 9

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

Essential Indicators

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

The Company does not have any specific consumer products. Customer complaints are received email, transmittal letter communications and verbal communications directly to project teams. The customers can also lodge complaint through contact number and email address and web forms provided on the Company website.

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

Particulars	As a percentage to total turnover
Environmental and social parameters relevant to the product	The main products of the company are Special Metals and Alloys. Hence Not Applicable.
Safe and responsible usage	100
Recycling and/or safe disposal	The main products of the company are Special Metals and Alloys. Once the products are sold, it would not come back to the Company. Hence not applicable

Note: Products are made as customer specification/ International Specifications

- Number of consumer complaints in respect of the following:

Particulars	FY 24- 25		Remarks	FY 23- 24		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	Nil	Nil	Nil	Nil	Nil	Nil
Advertising	Nil	Nil	Nil	Nil	Nil	Nil
Cyber-security	Nil	Nil	Nil	Nil	Nil	Nil
Delivery of essential services	Nil	Nil	Nil	15	5	The complaints pending as on March 31, 2024 were resolved during FY 2024-25.
Restrictive Trade Practices	Nil	Nil	Nil	Nil	Nil	Nil
Unfair Trade Practices	Nil	Nil	Nil	Nil	Nil	Nil
Other	Nil	Nil	Nil	Nil	Nil	Nil

- Details of instances of product recalls on account of safety issues:

	Number	Reasons for recall
Voluntary recalls	Nil	Not applicable
Forced recalls	Nil	Not applicable

- 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.

MIDHANI has Board Approved Cyber Security Policy, which is available on the <https://midhani-india.in/policies/>

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.

There are no incident of Cyber security and Data privacy of Customers, hence not applicable.

7. Provide the following information relating to data breaches:

- a. Number of instances of data breaches: **None**
- b. Percentage of data breaches involving personally identifiable information of customers: **None**
- c. Impact, if any, of the data breaches: **None**

Leadership Indicators

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

Details of MIDHANI products can be accessed from its website <http://midhani-india.in/>

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

MIDHANI manufactures industrial products as per customer specifications and demands.

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

Not Applicable.

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

MIDHANI displays product information on the product as per applicable laws/rules. Annual customer survey conducted with major customer to assess customer satisfaction.

For **Mishra Dhatu Nigam Limited**

Sd/-

Dr. S. V. S. Narayana Murty

Chairman & Managing Director

DIN: 11065319

Date: August 13, 2025