



ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) REPORT 2022-2023





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About the Report

This report provides a comprehensive view of the Company's ESG activities for the fiscal year 2022- 23, offering comparative insights vis-à-vis FY22 throughout its content. The reporting scope encompasses our 11 manufacturing units located in Bengaluru, Dujana, Hyderabad, Hosur, Malur, Murbad, Raipur, and Sikandrabad, as well as our corporate offices in Delhi, Noida, and Ghaziabad. The report is prepared in accordance with the Global Reporting Initiative (GRI) Universal Standards 2021. Additionally, the United Nations Sustainable Development Goals (UNSDGs), comprising 17 pivotal areas identified by the UN in 2015, are thoughtfully mapped to relevant sections of this document.

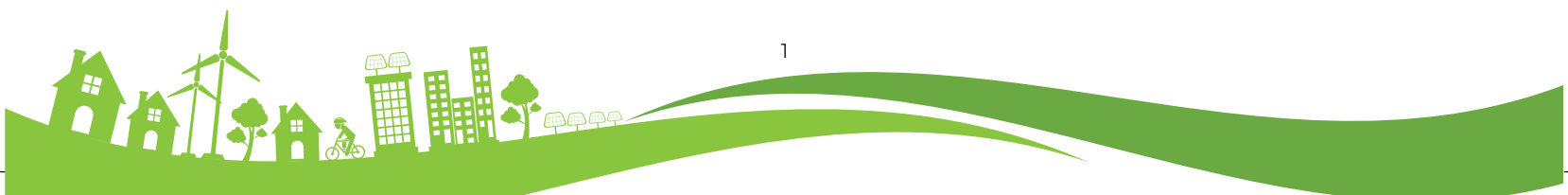
Every facet of our business operations has been scrutinized through the lens of ESG considerations. The ESG elements are meticulously addressed on a company-wide basis, permeating each business endeavor. This report comprehensively captures these integrated ESG elements and their alignment with our corporate strategies. Notably, our aspirations for the future are outlined alongside these achievements, articulating clear and tangible targets that underscore our commitment to continuous improvement and sustainable practices. This year's report marks a significant stride in our commitment to combatting climate change through actionable steps, compared to FY22 ESG report. We have prepared our TCFD report, with a concise overview featured within this document.



Reporting Principles and Framework

In addition to adhering to the guiding principles and content elements outlined in the Sustainability Report Framework, this report has been meticulously prepared following the GRI standards. Information has been restated from in the following chapters namely, Integrating Environmental Responsibility, Being Socially Responsible and Governance. The report also takes into consideration the relevant requirements and principles of the following framework Is and guidelines:

- ◆ United Nations Sustainable Development Goals (UN SDGs)
- ◆ United Nations Global Compact (UNGC)
- ◆ Green House Gas Protocol (as applicable)
- ◆ National Guidelines on Responsible Business Conduct (NGRBC)
- ◆ Companies Act, 2013 (along with the rules established therein) and Indian Accounting Standards
- ◆ Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, including compliance with the Business Responsibility and Sustainability Report (BRSR) framework.



Reporting Scope and Boundary

The sustainability report for FY23 covers the financial and non-financial performance of APL Apollo from April 1st, 2022, to March 31st, 2023, and enlists key highlights, goals, strategies, and our journey towards accelerating sustainable growth. More specifically, for some of the reported Key Performance Indicators, figures of the last three years have been incorporated to provide a holistic overview and showcase our progress over the years.



Management's Responsibility

The contents of this Report have undergone comprehensive evaluation by our Company's senior leadership team, including the Chairman and Managing Director, Executive Director, Chief Financial Officer, Vice Presidents overseeing Safety, Health, and Sustainability, as well as other departmental heads, along with the Company Secretary and Chief Legal Officer (Corporate and Compliance). This concerted effort aims to enhance governance oversight, risk management, and overall controls.

Contained within this report are certain forward-looking statements that fall within its purview. These statements are susceptible to numerous risks, uncertainties, and other factors that could lead to substantial disparities between the actual outcomes and anticipated projections. APL Apollo Tubes Ltd. does not commit to updating these forward-looking statements to reflect events or circumstances occurring after the date of this report.

For any queries/feedback related to the report, please direct the same to the Corporate Communications Department by contacting any of the following:

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About APL Apollo

APL Apollo Tubes Ltd., established on February 24th, 1986, is a prominent public limited company listed on the BSE Limited and National Stock Exchange of India Limited. Our registered office is at 37, Hargobind Enclave, Vikas Marg, Delhi-110092, India. We specialize in producing Electrical Resistance Welded (ERW) steel tubes and are recognized as one of India's leading steel tube manufacturers. With a well-established distribution network and a strong commitment to quality, we proudly hold the title of India's largest structural steel tubing company. Our success is attributed to our efficient three-tier distribution system, serving dealers, wholesalers, and end consumers. Our manufacturing facilities have a current production capacity of 3.6 million tons of steel tubes. We have also built an extensive distribution network comprising of warehouses, over 800 dealers and distributors, and more than 50,000 retailers and fabricators. At APL Apollo, we are guided by passionate leadership that

prioritizes continuous company growth. Our objectives, vision, and core values shape our business practices and goals. The commercial operations of the Raipur facility introduced approximately 167,000 tonnes of highly value-added products in FY23, setting new standards in the Indian market. Throughout our journey, we have expanded our production capacity, leading the way in revolutionizing structural steel tube production for over three decades. We embrace sustainable solutions and serve both domestic and international markets. Our product offering includes over 1,100 different pre-galvanized tube varieties, catering to approximately 20 nations worldwide.

With a dedicated workforce of 4,317 employees operating across 11 locations, our remarkable net sales (private sector) reached 16,1660 million INR. Our strong financial position is evident with a debt-to-equity ratio (D/E) of 0.1x. We offer an extensive product and service portfolio, comprising over 2,500 distinct SKUs, and are affiliated with industry associations and national or international advocacy groups such as the Confederation of Indian Industries (CII) and the Federation of Indian Export Organizations (FIEO).



Our Vision

To be a global leader and high performing organization recognized for excellence, governance, customer delight and building long term relationships with all our partners.

Our Mission

To drive the journey of transformation of commodities to value added products through innovation and technology.

Our Core Values



Leadership by Example



Commitment



Trust



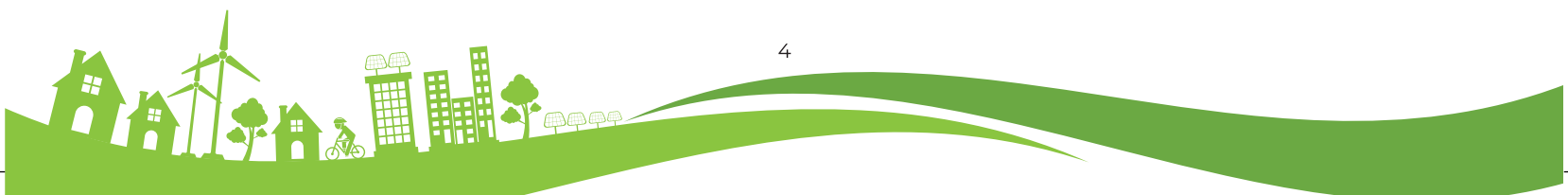
Innovation



Integrity

Precautionary Principle

Our company operates within an environmentally friendly industry with minimal harm to the environment. Nonetheless, we have proactively embraced the most energy-efficient and environmentally sustainable technologies from around the world as part of our precautionary approach in all our operations. We consistently implement this precautionary strategy to reduce any potential adverse environmental impacts, actively striving to decrease our company's overall environmental footprint.





Leadership Note

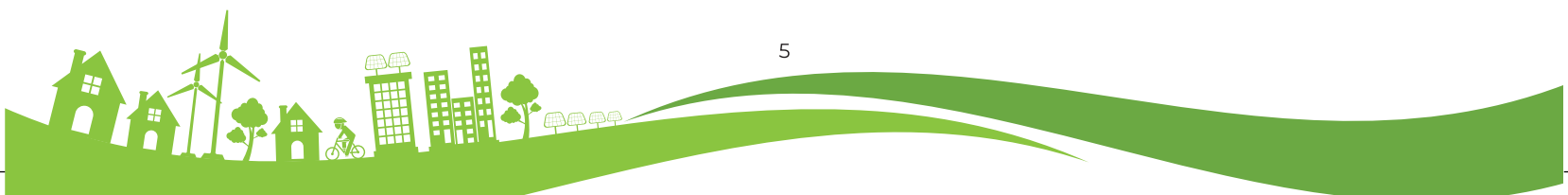
We are delighted to introduce APL Apollo's 3rd ESG Report, for the financial year 2023. In line with our ongoing commitments, this year's report reflects our deepened environmental commitment, as we have taken a step further by conducting climate-related risk analysis in accordance with Task Force on Climate-Related Financial Disclosures (TCFD) guidelines. Additionally, we take great pleasure to present our inaugural TCFD report. Guided by our core values of leadership, commitment, trust, innovation, and integrity, we have ensured to present a comprehensive overview of our business operations, supported by facts and figures that underscore our dedication to reducing our environmental footprint.

As we continue to expand our market presence, we are fully committed to prioritizing the Environmental, Social, and Governance (ESG) framework. In this regard, we have set ambitious targets, with a primary focus on attaining net-zero emissions by 2050, which has received validation from SBTi. Additionally, we have established a goal to reduce 25% of scope 1 & 2 emissions per metric ton of steel

produced by 2030 and to make renewable energy available to all our manufacturing plants by 2025. Through dedicated initiatives, we have already achieved a 37% share of renewable energy in our total energy consumption. We collaborate closely with our customers and business partners to ensure the integration of our sustainability commitments across all aspects of our operations. It's worth noting that we have achieved Zero Liquid Discharge at two of our plants and are striving to make all our plants ZLD-compliant by 2025.

Our dedication to research and innovation has been greatly enhanced, with a strong focus on green technologies and expanding our range of value-added products. Collaborative research carried out in conjunction with IIT Roorkee and APL Apollo has unveiled the potential for tubes to function as highly efficient structural steel components, enhancing the quality and sustainability of various infrastructure projects. These projects encompass high-rise buildings, factories, warehouses, data centers, medical facilities, and more. This approach offers an effective way to construct sturdy, durable, and environmentally sustainable structures. A standout example of our commitment is APL Apollo's Tubular Steel – an innovative product set to revolutionize the construction industry. Importantly, it distinguishes itself as one of the most environmentally friendly construction materials available, aligning with the standards established by the Indian Green Building Council (IGBC) for green products.

Our dedication to social responsibility goes well beyond mere adherence to legal requirements; it is driven by our aim to



enhance the welfare of society. As responsible corporate citizens, we take it upon ourselves to generate a positive impact on the communities where we operate. Our sustainability efforts are continuously evaluated, and priorities are periodically reviewed and adjusted. This inclusive approach involves our investors, business partners, educators, and our dedicated employees.

In our commitment to our employees' well-being, we provide safety training to both our plant workers and corporate staff, with the goal of achieving a zero incident and injury rate by 2025. We engage in ongoing dialogues with employees to understand their concerns, including issues related to sexual harassment, fair compensation, work-life balance, and career prospects. This not only helps identify areas for improvement but also recognizes their valuable contributions. Annually, we celebrate International Women's Day to advocate for gender equality, challenge biases, and encourage individuals to combat gender stereotypes and discrimination.

Aligned with our commitment, we aim to increase the representation of female

employees in the permanent workforce category by 5% by 2025. At APL Apollo, we firmly believe in establishing reliable mechanisms for addressing grievances to proactively address issues and maintain the trust of local communities. Our interactions with these communities are built on mutual respect and open communication, enabling us to actively seek and incorporate their perspectives into our business operations.

We have also enacted a series of robust corporate policies, encompassing BRSR reporting, anti-corruption and anti-bribery measures, human rights standards, and others, along with corresponding guidelines that reinforce the principles of sound governance. These policies will remain steadfast cornerstones of our operations, directing us in the pursuit of responsible and sustainable decision-making. With a dedicated team of experts, we wish to express our gratitude for the trust and support you consistently bestow upon us as we continue our endeavors to achieve business outcomes rooted in creating a positive impact for our employees, the environment, and our shareholders.

Mr. Sanjay Gupta
Executive Chairman





Highlights from this Report

Net Zero Commitment

We have committed to become net zero by 2050.

SBTi Target Setting

We have committed to set a science-based target through the Science Based Targets initiative.

Greenhouse Gas Emissions

APL Apollo Tubes Ltd. has committed to reducing Scope 1&2 emissions per metric ton of steel produced by 25% by 2030, against a 2022 base-year.

TCFD Report

In line with our environmental commitments, this year's report reflects our dedication towards sustainability, as we have taken a step further by conducting climate-related risk analysis in accordance with Task Force on Climate-Related Financial Disclosures (TCFD) guidelines.

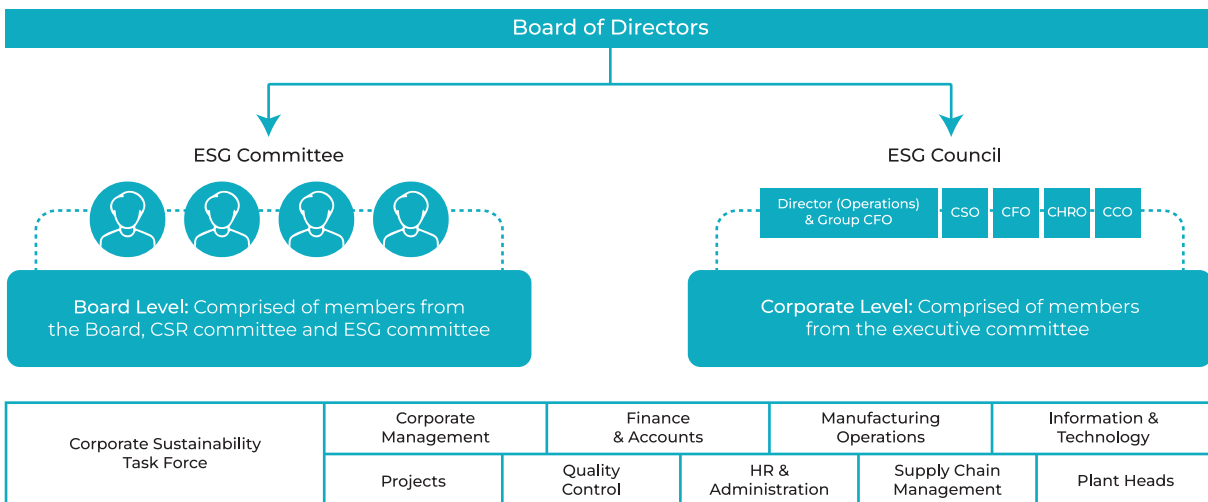
Transition Towards a Sustainable Tomorrow

In FY23, our energy consumption from renewable sources is 37%. Further, we have taken a target of achieving a 47% renewable energy consumption rate by the year 2024-2025.

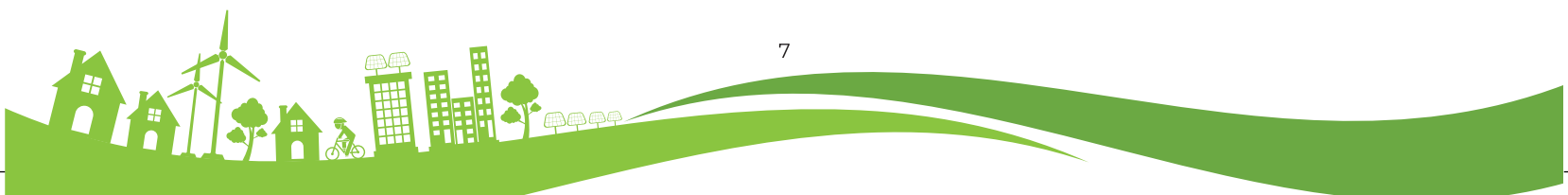
Life Cycle Assessment

APL Apollo has undertaken a life cycle assessment for five of our products: MS tubes, GI Tubes, GP Tubes, Alu Zinc Sheets, and Alu Zinc Coated Sheets.

ESG Governance Structure



Risk Management Committee of the Board functions as the ESG Committee



Driving Change: Sustainability Strategy and Performance

Our ESG Framework

Businesses increasingly embrace ESG principles, which prioritize human rights, corporate conduct, and environmental stewardship. Our comprehensive Business Responsibility Policy enables us to cut down on our emissions, energy, water consumption etc. Additionally, it also helps attract more investors.

Adapting to ethical business trends is vital for organizational vitality. APL Apollo has a comprehensive ESG framework aligned with evolving trends, reflecting a commitment to enrich lives. ESG is intrinsic to our operations, guided by cross-functional governance and dedicated leadership.

In 2021, we launched a three-phase ESG roadmap. The first phase established a strong foundation, focusing on governance and policy development. Currently, we're in the "Meeting Milestones" phase (2022-2024), integrating ESG risks into decision-making alongside business risks.



“ApI Apollo Tubes Stands on 4 Pillars- Innovation, Market Creation, Distribution Enhancement & ESG”

Anubhav Gupta
Group CSO



01

ESG Vision and Mission

Defining an ESG-specific vision, mission, and governance structure that binds functional roles to stakeholder responsibilities.

ESG Governance

Assessing how well our business strategy and goals coincide with widely recognized reporting frameworks and ESG indices.

02**03**

ESG Focus Areas

Enhancing the concept of materiality to pinpoint and concentrate on aspects that hold significance due to their direct financial influence on the organization, as well as their environmental and social consequences.

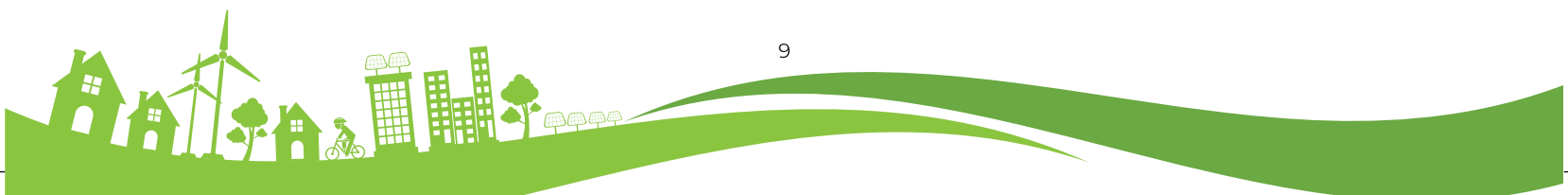
ESG Performance Metrics and Target

Integrating distinct organizational objectives with a robust action plan internally.

04**05**

Responsible Communication

In order to communicate all this information to our stakeholders, we have produced this report that comprises Management Approach Disclosures (DMAs) concerning crucial material subjects, alongside case studies, and both qualitative and quantitative data.





ESG Vision & Mission

Vision

To be a high-performing organization that values social and environmental well-being, fosters relationships, and promotes innovation.

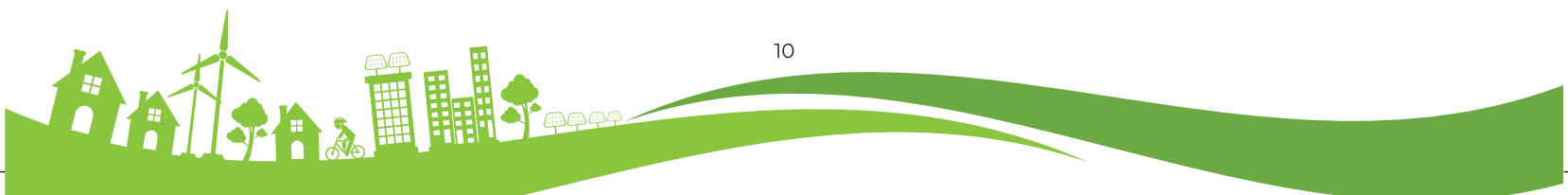
Mission

To be a high-quality building, materials to be global client base while utilizing innovative technologies in an environment of motivated employees, focusing on continuous improvement and complying to the highest business standards while managing our impact on the environmental.



ESG Governance

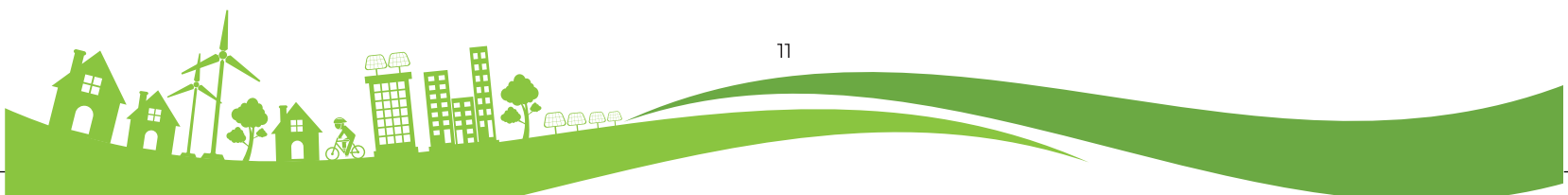
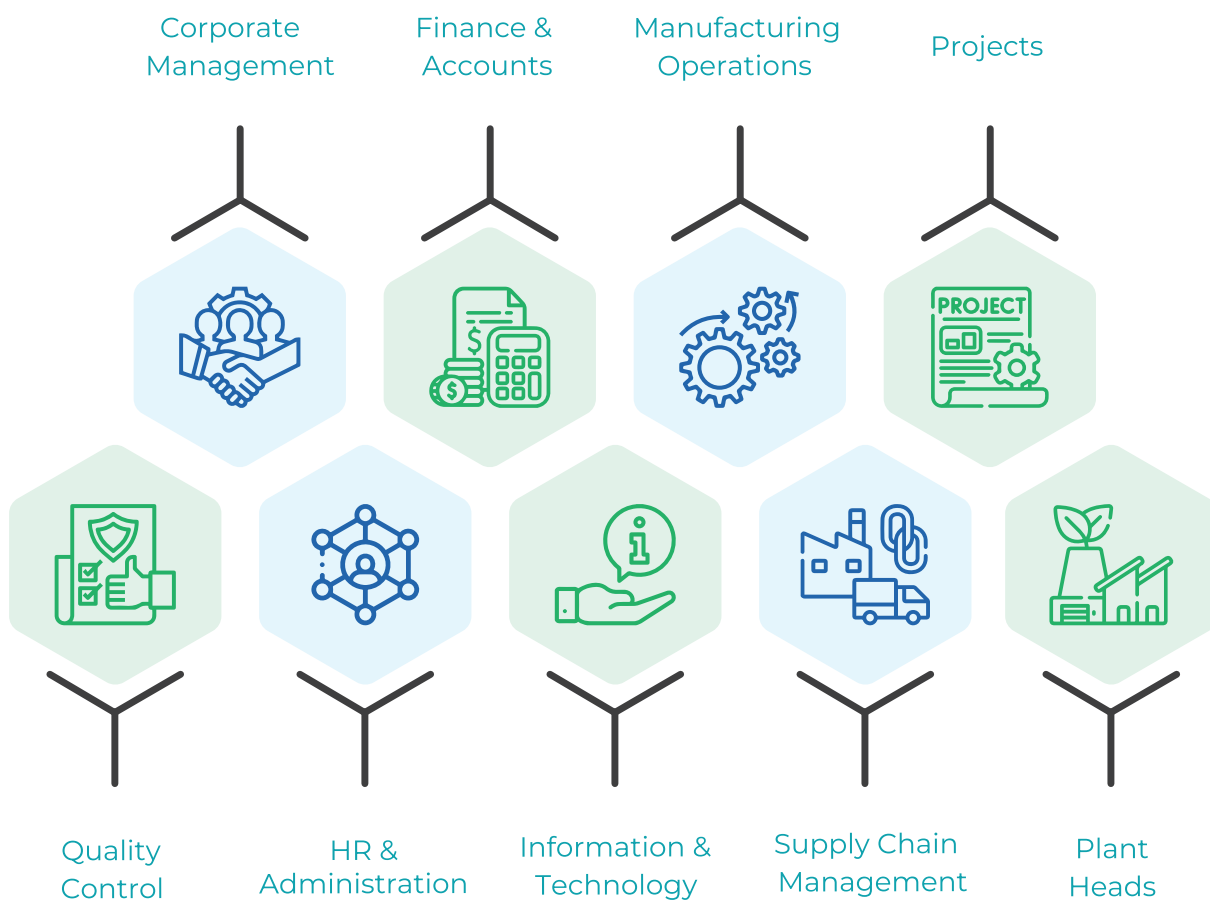
Effective corporate governance fosters a foundation of ethical business conduct, a cornerstone for ensuring the financial robustness of an enterprise. It forges a comprehensive framework of regulations and principles that steer the operations of a business while harmonizing the interests of its diverse stakeholders. We've instituted an internal sustainability team, responsible for overseeing all aspects of Corporate Social Responsibility (CSR) and Environmental, Health, and Safety (EHS) endeavors. The supervision of our company's sustainability initiatives falls under the purview of the Chief Strategy Officer, ultimately answerable to the oversight of the Board of Directors.



ESG Committee & its Roles & Responsibilities

In a resolute move to fortify the company's dedication to sustainability and incorporating key ESG concerns, we have instituted an ESG committee. This committee plays an important role in discerning the ESG (Environmental, Social, and Governance) priorities, setting targets, and curating a strategic blueprint aimed at seamlessly integrating sustainability across the Company's policies and operations.

The committee's main role is the execution of the company's diverse ESG initiatives. At the forefront of our corporate sustainability endeavors, we have constituted a team of cross-functional expertise to bring various perspectives and expertise to our decision-making. This will oversee all facets of ESG-related duties and responsibilities, solidifying our commitment to a more sustainable future.





Our ESG Governance Charter

The purpose of the ESG Charter is to function as a guiding policy declaration that directs and informs continuous voluntary initiatives. It showcases the company's dedication to ESG and enables stakeholders, particularly operational managers across all tiers, to convey crucial sustainability concerns, establish objectives, and consistently update on advancements towards short, medium, and long-term achievements.



Objectives of the Charter

The primary aim of the Charter is to encourage excellence in the formulation, execution, and disclosure of ESG matters. It also seeks to facilitate collective knowledge enhancement within the organization. The Charter is strategically devised to accomplish the following:

- ◆ Showcase the company's dedication to sustainability for crucial stakeholders.
- ◆ Highlight the company's sustainability merits.
- ◆ Establish a clear framework for tracking advancements towards immediate, intermediate, and long-term objectives.
- ◆ Foster an organizational emphasis on enhancing performance.
- ◆ Cultivate an array of sustainability initiatives leading to efficiency and reduced costs.
- ◆ Stimulate the integration of optimal practices from peers and shared learning experiences.

Sustainability Principles Important to APL Apollo

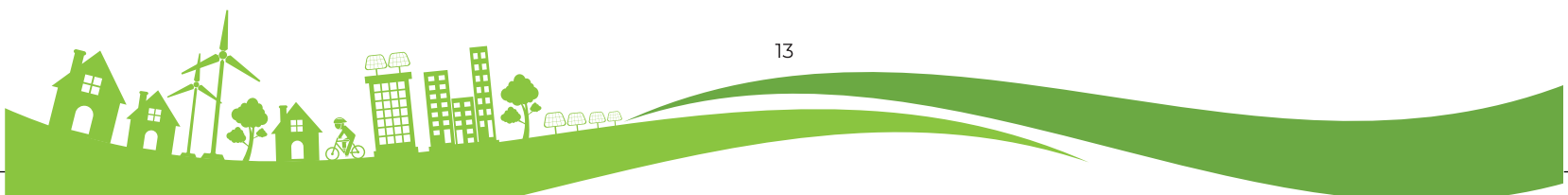
- ◆ Corporate governance, which aims for sustainability, involves balancing the company entity's economic, environmental, and social goals in every decision-making, considering short, medium, and long-term perspectives.
- ◆ Sound risk management should direct decision-making in circumstances where exact scientific guidance and predictions are unavailable to prevent unmanageable and terrible environmental repercussions on society and future generations.
- ◆ Utilizing non-renewable resources should be restricted so that their eventual depletion is not anticipated in the near future. Offsets should be used concurrently if energy reduction is not practicable in the common techniques of manufacturing.

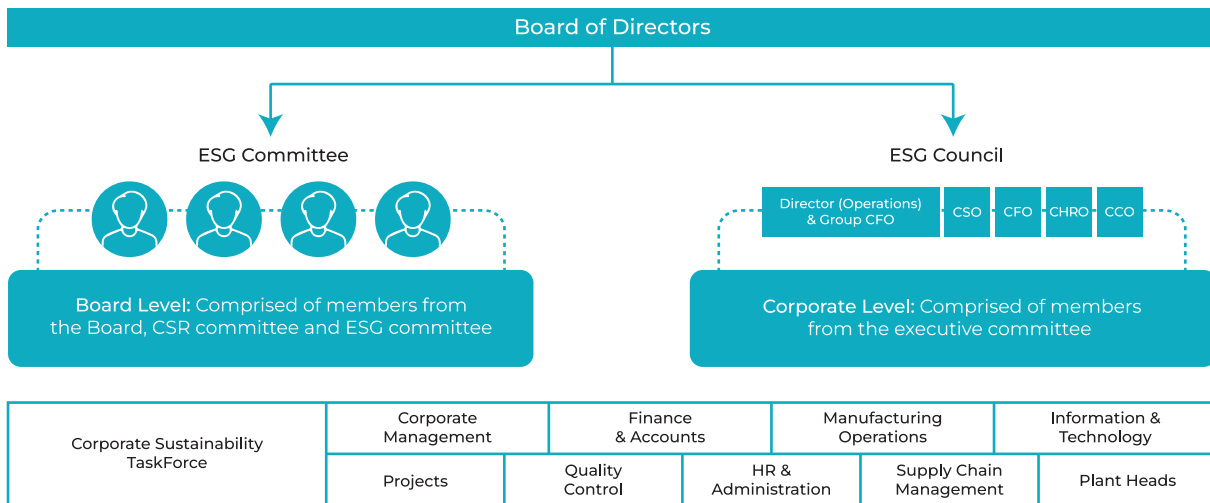


- ◆ No emissions or discharges may be made that are greater than what the ecosystem can absorb.
- ◆ Reactive judgments and ambiguous actions are preferable to planned, risk-mitigated, and proactive solutions that are clearly communicated to all stakeholders and the community at large.
- ◆ Sustainability requires that all exchanges, policies, procedures, and company choices incorporate human rights issues and standards. The non-negotiable set of fundamental ideals that human rights represent.
- ◆ Occupational health, safety, and employee well-being are crucial components for the firm to achieve its financial goals.
- ◆ For a business to be successful over the long term, stakeholders must be engaged in an inclusive, communicative, and transparent manner.
- ◆ Our corporate governance integrates & harmonizes financial performance, employee development, human rights, risk management, worker safety & well-being, business ethics, Corporate Social Responsibility (CSR), supply chain engagement, environmental management, and compliance.

Arrangement of Supervisory Organization

- ◆ The Committee ("ESG Committee"), corporate management ("ESG Council"), and site management ("Corporate Sustainability Task Force") will constitute the core of the structure for oversight. The ESG Committee of the Board will be the Apex Body to guide this journey.
- ◆ The ESG Committee will provide strategic supervision and guidance for the company's advancement toward its ESG goals, projects, and best practices. This will also include programs to use sustainable business strategies to address the problems caused by climate change.
- ◆ At the corporate management level, the ESG Council, a permanent body of senior management, will direct decision-making on pressing problems, prioritize objectives, and track outcomes. The ESG Council will be presided over by the Chief Strategy Officer. To ensure efficient operation, the ESG Council may designate one of its members to serve as co-chair. The Committee ensures representation from all key departments, including finance, human resources, operations, supply chain, and environmental health and safety. The ESG Committee will receive secretarial assistance from the Strategy Department in order to move the ESG journey forward.
- ◆ A team of three to four people (including the plant head) will be responsible for driving the ESG implementation at each site following the general direction and guidance provided by the ESG Council. The plant head will be responsible for overseeing the execution of the ESG framework at each site.





Risk Management Committee of the Board functions as the ESG Committee

ESG Committee Membership and Organization

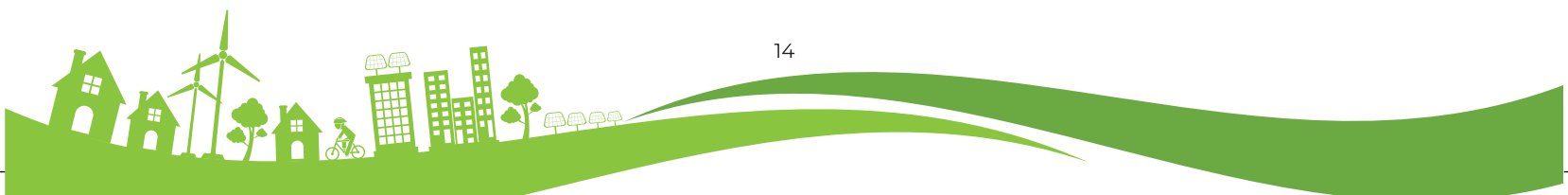
- ◆ ESG Committee is appointed by and serves at the discretion of the Board.
- ◆ ESG Committee consists of no fewer than five (5) members with the majority being independent directors.

Responsibility and Authority

- ◆ Oversee the development of the company's ESG Vision & Ambitions and regularly obtain updates on those aims.
- ◆ Examine the ESG Council and its operations. When necessary, the ESG Committee may establish and provide authority to subcommittees.
- ◆ Verify the company is taking the necessary steps to carry out and implement the initiatives necessary to achieve its ESG vision and aspirations.
- ◆ Review any regulatory requirements for Sustainability reporting and target setting under ESG.
- ◆ Authority to seek advice and help from internal or external experts, advisers. Access to any internal data required to carry out its duties.

Meetings & Quorum

- ◆ ESG Committee meets at least twice a year.
- ◆ Two members present forms the quorum for the meeting of the ESG Committee.
- ◆ Members of the ESG Council are invitees to all meetings of the ESG Committee.





ESG Council Duties & Responsibilities

- ◆ Assist in developing the organization's overall ESG strategy, and consider and suggest rules, procedures, and disclosures that follow the strategy.
- ◆ Prepare data and material for Board meetings on the Sustainability Performance Information.
- ◆ Maintain the consistency of the company's public disclosures on ESG issues, including any sustainability or reports.
- ◆ To visit places on a regular basis, either as a group or as individual members, to familiarize themselves with the operations and assess performance in relation to ESG matters.
- ◆ All pertinent information and documents in all departments of the company will be accessible to the ESG Council.
- ◆ To examine and evaluate this Charter annually and submit any recommended changes for approval.
- ◆ To seek advice or information from one or more experts it has selected while carrying out its obligations.



Council Meetings

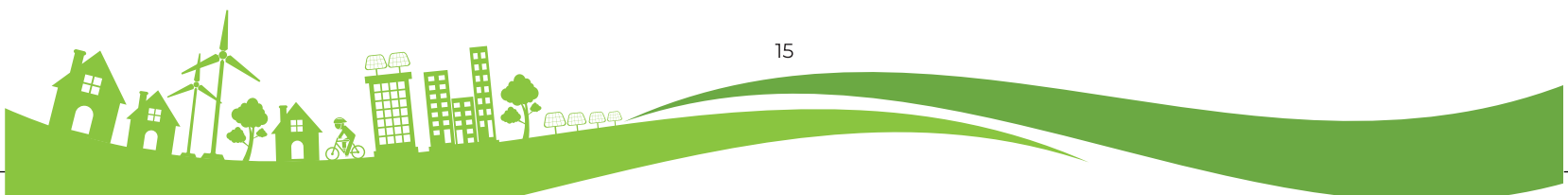
Meetings will be held on a monthly basis or on other occasions as deemed necessary or suitable.



Reporting to the Board

The ESG Council shall report to the ESG Committee on the following topics:

- ◆ The outcomes of the themes discussed in the ESG Council sessions, as well as recommendations as appropriate.
- ◆ The outcomes or findings of the ESG Council's ESG matter reviews and evaluations
- ◆ The ESG Council must inform the ESG Committee of key changes in the areas of its responsibility in a clear and timely manner.
- ◆ The ESG Council is responsible for keeping written records and documenting the actions it takes. These records will include the date and location of each meeting, a roster of attendees, and a concise overview of the topics covered in the meeting. Once reviewed and approved by the Chair and the meeting's secretary, the minutes will be signed by them and stored along with the rest of the ESG Committee's proceedings.

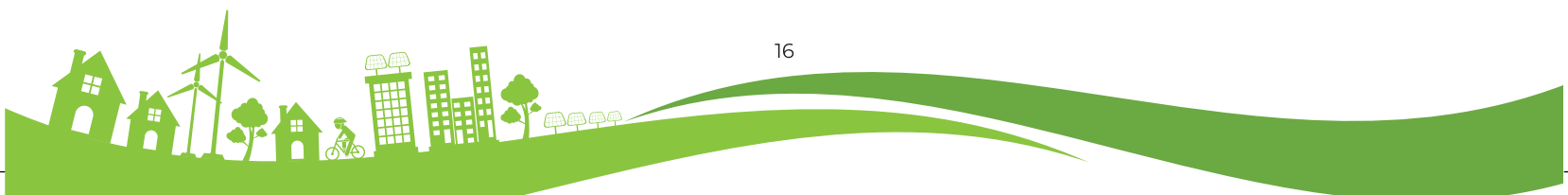


Corporate Sustainability Task Force

The Corporate Sustainability Task Force, directed by the Chief Strategy Officer, provides support to the ESG Council. The Corporate Sustainability Task Force will aid the ESG Council in steering the company's sustainability path. The Corporate Sustainability Task Force will be made up of sustainability professionals, essentially Functional Heads and Plant Heads whose role will be to:

- ◆ Enable the execution of the Company's ESG strategy as advised by the ESG Council.
- ◆ Stay aligned and informed on important risks, emerging trends, and stakeholder priorities.
- ◆ Collaborate with all essential departments to gather information, including Corporate Management, Finance & Accounts, Manufacturing Operations, Projects, HR & Admin, Quality Control, Information Technology, and Supply Chain Management.
- ◆ Prepare an ESG framework for each key department that is aligned with the company's ESG purpose statement, vision, and mission.
- ◆ The Corporate Sustainability Task Force will present the framework to the ESG Council, who will then present it to the ESG Committee for approval.
- ◆ Once approved, the ESG framework will be implemented by the Unit Head in the individual site and respective site department at each of the company's ten plant locations.
- ◆ The Corporate Sustainability Task Force will examine the success of the ESG framework on a regular basis, soliciting feedback from unit heads and department heads, and making required changes.
- ◆ The Corporate Sustainability Task Force will be in charge of all ESG initiatives across the organization. A few examples of initiatives include:
 - a. Energy and pollution reduction
 - b. Reduced water usage and effluent treatment.
 - c. Waste reduction, increased recyclability, and reuse of recycled products
 - d. Biodiversity and land use
 - e. Supply chain framework
- ◆ The Corporate Sustainability Task Force will have access to all essential data and documents in all Company offices.
- ◆ The Corporate Sustainability Task Force may seek assistance or information from experts and external consultants while fulfilling its obligations.
- ◆ Ensure accurate reporting of the company's ESG initiatives.
- ◆ Monitor success against ESG impact goals and priority ESG ratings, rankings, and awards from internationally known and independent agencies.

At each site, a plant site, Plant Head, or Unit Head will be in charge of implementing the ESG framework and the corresponding site departments. Under the overarching direction and guidance provided by the ESG Council, the Plant Head shall assemble a team of 3-4 key individuals (including the Plant Head) to drive ESG implementation.





ESG Focus Area

For an adequate ESG implementation and review process, we've established four pillars to guarantee the management of our roadmap while maintaining a vigilant eye on the ongoing advancement of our performance metrics. The critical concerns have been methodically grouped under these pillars, signifying our dedication to the core ESG sectors. Each focal area is accompanied by a unique array of performance indicators, objectives, and a timeline for achievement. This framework ensures our resolute commitment to holistic progress across all aspects of environmental, social, and governance responsibility.

Responsible Business

"We believe that responsible business contributes to the creation of customer value by effectively caring for people, ethics, and fairness while running a profitable business.."

Responsible Employment

"We emphasize on responsible employment because we believe that responsible employees work to advance the success of the company and strive to perform their daily duties well. Responsible employees are involved in their daily activities and foster a culture that accelerates individual careers while increasing company productivity."

Responsible Operation

"We strive to deliver high-quality products in an efficient manner while maintaining a safe and healthy culture. To ensure business continuity, we manage our environmental impact and plan for adverse conditions. Operating responsibly allows us to protect our people, customers, the environment, our company, and our good reputation."

Responsible Employment

"We believe that striving for social responsibilities enables individuals, organizations, and governments to positively impact development and business. So we focus on being socially accountable, acting ethically, and considering ourselves responsible for the society's development."



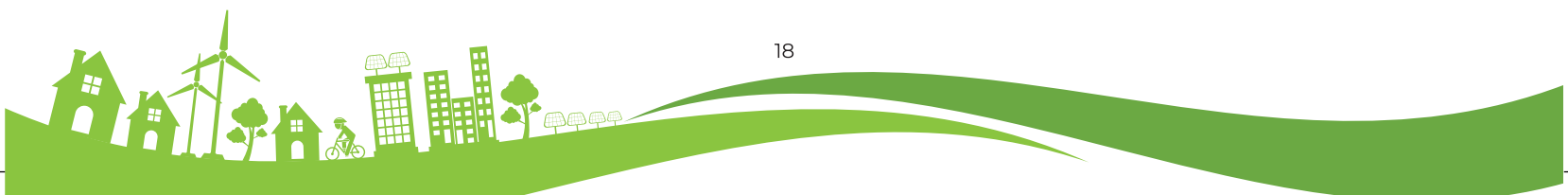


ESG Performance Metrics & Targets

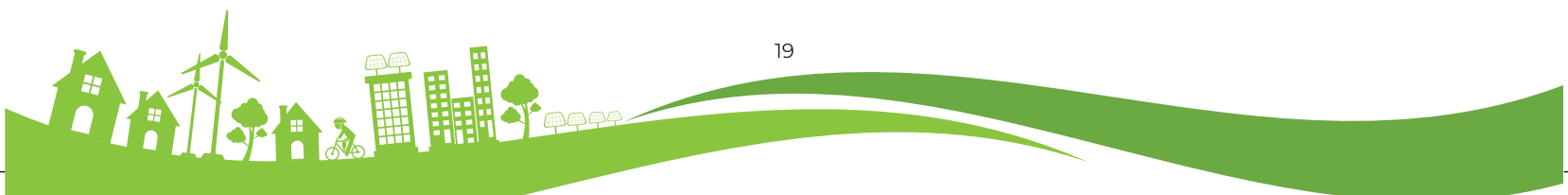
Defining suitable ESG goals enables our company to effectively showcase our enduring business outlook to clients, investors, and stakeholders. At APL Apollo, we take responsibility for enhancing long-term performance, and as such, we have established our ESG targets in alignment with this commitment.

In the FY22, Apollo became a participant of the Science Based Targets Initiative (SBTi), and our objective is to fulfill our obligations and stand out as a company that excels in both environmental and social performance.

	Performance Business	Responsible Operation	Responsible Employment	Responsibility toward Communities
Performance Metrics	<ul style="list-style-type: none"> • Number of cases in violation of codes of conduct • Average training hours per employee on Code of Conduct 	<ul style="list-style-type: none"> • Number of units used from renewable energy sources (solar, wind) • Number of sites where Rainwater Harvesting facility has been installed. • Number of sites where Zero Liquid Discharge (ZLD) Facilities have been installed • Measuring GHG Emissions • Air Emissions • Number of cases in Violation of environment regulations 	<ul style="list-style-type: none"> • Lost time injury • Average training hours per employee to site employees on health and safety • Average training hours per employee to corporate employees on health and safety • Regulatory compliance of labour laws • Average training hours per employee on human rights • Employee attrition • Average training hours per employee on behavior and technical aspects • Female to Male Ratio in permanent employees 	<ul style="list-style-type: none"> • CSR Strategy



	Performance Business	Responsible Operation	Responsible Employment	Responsibility toward Communities
<p>Target</p>	<ul style="list-style-type: none"> • Zero cases of violation of code of conduct • Yearly training on Code of Conduct for all employees 	<ul style="list-style-type: none"> • All plants to have access to renewable energy by 2025. • Rainwater harvesting to be installed at all unit by 2025. • All units to be ZLD facilities by 2025. • Maintain Sox, NOx, and PM within Permissible limits. • Zero incidents of non-compliance 	<ul style="list-style-type: none"> • Achieving Zero Incident and Zero Harm by 2025 • Provide 2 hour of Safety training (per employee) to corporate employees. • 100% compliance to all legal requirements pertaining to labour. • Provide 1 hour of training per employee on human rights per year. • Maintain attrition rate below 5% • Female workforce to be increased by 5% in the permanent employee category by 2025 	<ul style="list-style-type: none"> • CSR Strategy by 2025

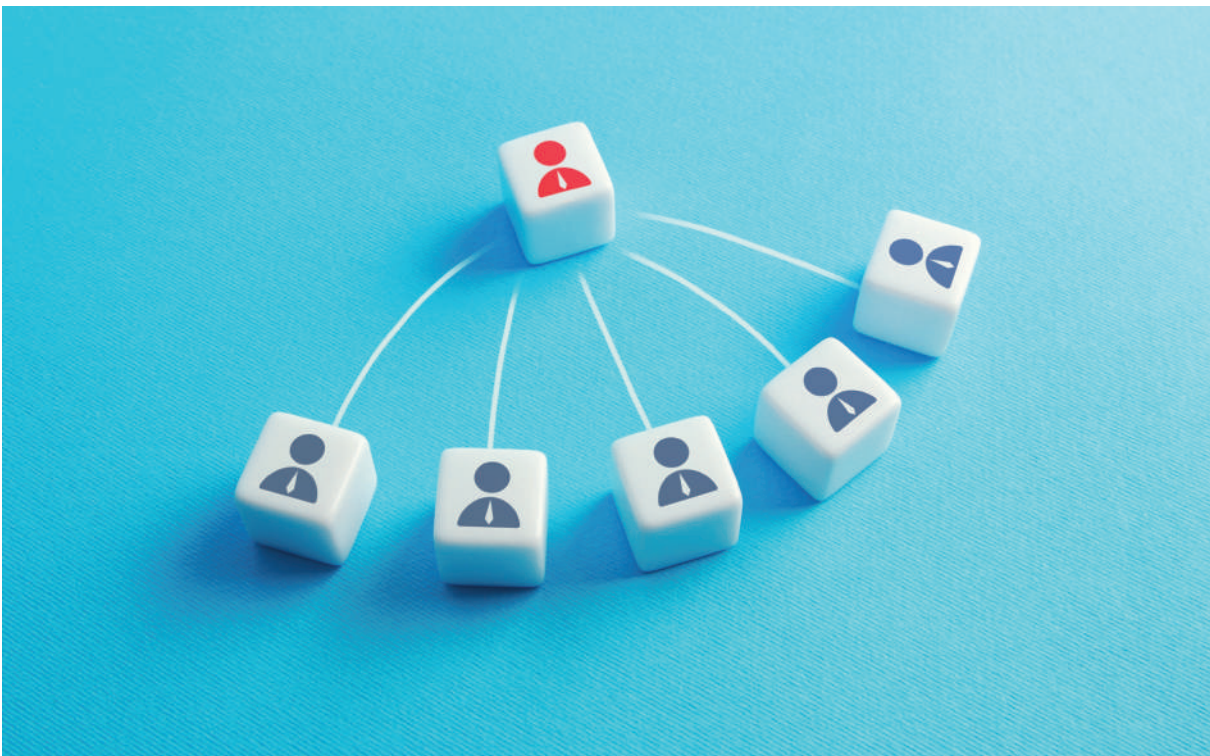


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Responsible Communication

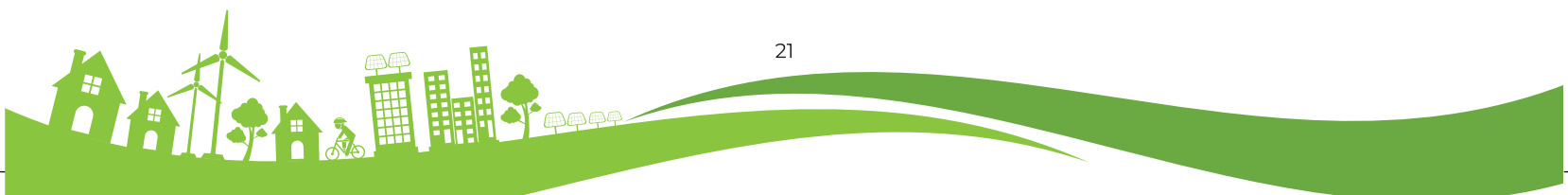
The primary goal of stakeholder communication is to guarantee that our company's objectives and concerns are well-understood. This process also aids in building an understanding of the individuals or groups that might be influenced, along with how they will engage with and construe the information disseminated by the organization. Additionally, it illuminates how stakeholders might react.

We firmly believe that by actively involving stakeholders, maintaining transparent communication channels, and engaging in purposeful dialogues, we can influence how our stakeholders perceive us and initiate increased support. Our commitment to this communication practice is evident in our regular disclosures on our website, which serve as a platform for sharing information with our stakeholders.



ESG Factbook

Environment					
Indicator	Unit of Measurement	FY20	FY21	FY22	FY23
ENVIRONMENTAL VIOLATIONS					
Violations of Legal Obligations/regulations	There have been no violations of environmental regulations				
Number of fines/Penalties related to the Above	Zero number of fines				
Environmental Liability accrued at the year end	There have been zero environmental liabilities				
EMISSIONS					
Scope 1 Emissions	Metric tonnes CO2e	14,906	10,844	24,486	29,260
Scope 2 Emissions	Metric tonnes CO2e	61,749	66,349	59,186	59,436
Scope 3 Emissions (Total)	Metric tonnes CO2e	-	-	42,661	47,535
▶ Scope 3- Purchased Goods & Services & Capital Goods	Metric tonnes CO2e	-	-	14,599	14,986
▶ Scope 3- Fuel & Energy related	Metric tonnes CO2e	-	-	16,210	18,413
▶ Scope 3- Waste generated in operations	Metric tonnes CO2e	-	-	619	975
▶ Scope 3- Business travel	Metric tonnes CO2e	-	-	62	119
▶ Scope 3- Employee Commute	Metric tonnes CO2e	-	-	2,927	1,825
▶ Scope 3- Transportation & Logistics	Metric tonnes CO2e	-	-	6,720	9,026
▶ Scope 3- End of life treatment of sold products	Metric tonnes CO2e	-	-	1,526	2,191
Nox Emissions	Metric tonnes	1.76	4.78	3.9	3.9
Sox Emissions	Metric tonnes	2.40	3.08	2.6	2.6
ENERGY CONSUMPTION					
Total Energy Consumption	GJ	551,952	370,026	807,365	925,167
Energy Consumed from Non-Renewable Sources	GJ	-	218,797	642,168	746,541
Energy Consumed from Electricity	GJ	-	-	269,707	301,368
Energy Consumed from Fuel	GJ	-	-	372,461	445,173
Energy Consumed from Renewable Sources (Electricity)	GJ	-	151,225	165,197	178,626
RAW MATERIAL					
Raw Material Consumption	Metric Tonnes	-	1,722,371	1,842,711	2,370,000
WATER MANAGEMENT					
Third Party Water Withdrawal	Kiloliters	-	-	117,583	130,942
Groundwater Withdrawal	Kiloliters	-	-	529,498	458,919
Total Water Withdrawal	Kiloliters	-	-	647,081	589,861
Total Water Consumption	Kiloliters	-	-	647,081	589,861
WASTE MANAGEMENT					
Total Waste Generated	Metric Tonnes	-	-	113,265	102,900
Total Waste Recycled & Reused	Metric tonnes	-	48,363	53,038	47,750
Total Waste Disposed	Metric tonnes	55,952	54,998	60,227	55,150

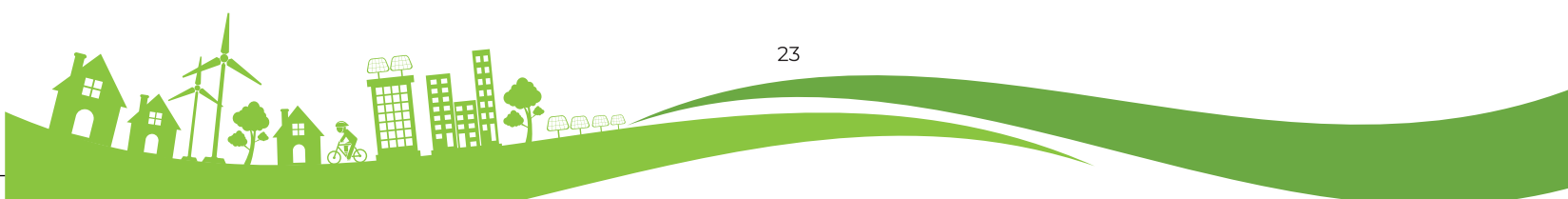


Social					
Indicator	Unit of Measurement	FY20	FY21	FY22	FY23
WORKFORCE					
Total Workforce	Number	2024	3216	3606	4317
Total contractual workers	Number	700	1259	2454	3119
Total Permanent Workforce	Number	1324	1957	1152	1198
Total Male Employees	Number	1315	1942	1141	1176
Total Female Employees	Number	9	15	11	22
Share of Women in the total workforce	Percentage (%)	-	-	1.5%	1.8%
Headcount by Nationality	Nationality (Indian)	100%	100%	100%	100%
Headcount by Race/Ethnicity	Asian	100%	100%	100%	100%
Workforce breakdown:	<30 years old (In %)	-	-	33.9%	30%
Age group	30-50 years old (In %)	-	-	55.1%	65%
	>50 years old (In %)	-	-	11%	5%
Headcount by Management Level	Senior Management (in %)	10%	10%	12%	13%
	Middle Management (In %)	50%	45%	48%	45%
	Junior Management (In %)	40%	45%	40%	42%
Non-management level (base salary) for women	INR	-	-	34,503	36,228
Non-management level (base salary) for men	INR	-	-	38,250	39,397
Employees represented by trade unions	Percentage (%)	-	-	18%	8%
EMPLOYEE EGAGEMENT					
Average hours per FTE- Training & Development	Hours	-	-	4.22	33.6
Average Hours spent on Training & Development by Gender	Male (In Hour)	-	-	8275	10735
	Female (In Hour)	-	-	435	565
Total training hours	Hours	-	-	8710	11300
Average Hours Spent on Training & Development by Training Type	Management	-	-	3049	3955
	Technical	-	-	5661	7345
Investment in training & development program	Million INR	-	-	50 million	50 million
Employee satisfaction Survey	Employee Participation (in %)	100%	100%	100%	100%





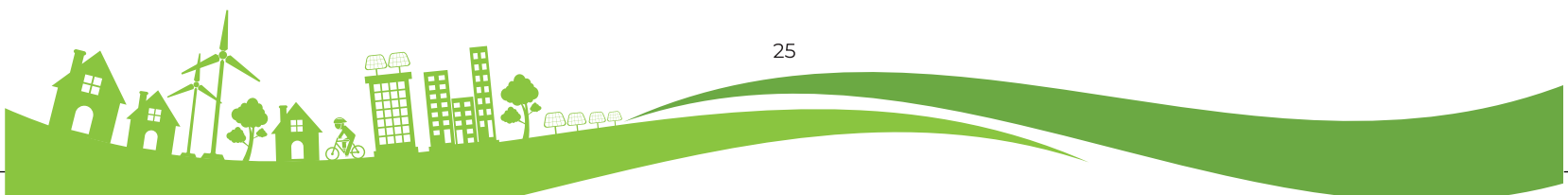
Social					
Indicator	Unit of Measurement	FY20	FY21	FY22	FY23
HUMAN CAPITAL RETURN ON INVESTMENT					
Total Revenue	Million INR	77,232	84,998	1,30,633	1,61,660
Total Operating Expenses	Million INR	71,037	76,914	1,19,650	1,49,382
Total Employee- Related Expenses (salaries & Benefits)	Million INR	1,422	1,296	1,530	2,062
Resulting HC ROI	Percentage	5.4%	7.2%	8.2%	7.0%
GENDER DIVERSITY					
Female Workforce by Age Group	Less than 30 Years	8	9	9	19
	Between 30-50 years	1	2	2	3
	More than 50 Years	0	0	0	0
HIRING					
Annual Hiring	New Hires Number	708	215	519	450
EMPLOYEE TURNOVER					
Total employee turnover rate	Percentage (%)	15%	4.5%	4.4%	4.2%
Employee Turnover Rate by Gender	Male Employees	-	4.1%	4.4%	4.2%
	Female Employees	-	5%	0%	0%
Employee Turnover Rate by Age Group	Less Than 30 Years	11%	14%	10%	2.2%
	Between 30-50 years	4%	2%	2%	2%
	More than 50 Years	nil	nil	nil	nil
Average revenue per employee	Million INR /employee	-	3.6	5.1	6.25
OCCUPATIONAL HEALTH & SAFETY					
Fatalities	Employees	0	0	0	0
	Contractors	0	0	0	0
High Consequences Work-Related Injury or Ill Health	Employees	-	-	2	2
	Workers	-	-	5	4
Total man days worked	Days	-	-	305	304
LTIFR-Employees	n/million hours worked	-	7.80	2.6	1.1
LTIFR-Workers	n/million hours worked	-	5.57	0	3.1
TRIFR-Employees	n/million hours worked	-	-	4	5
TRIFR-Workers	n/million hours worked	-	-	14	12
CORPORATE SOCIAL RESPONSIBILITY DATA					
A. PHILANTHROPIC CONTRIBUTIONS BY CATEGORY					
Community Contribution	INR Crore	0.13 crore INR (projects)	0.96 crore INR	2.82 crore INR	0.27 crore INR
B. PHILANTHROPIC CONTRIBUTIONS BY TYPE					
Employee Volunteering Hours	Hours	-	-	-	24



Governance					
Indicator	Unit of Measurement	FY20	FY21	FY22	FY23
BOARD STRUCTURE					
Executive Directors	Number	1	1	1	1
Other Non-Executive Directors	Number	4	4	4	4
Independent Directors on board	Number	5	5	5	5
Female Directors	Number	1	1	1	1
Board committees headed by Independent Directors in board	Number	5	5	4	5
Average Board Meeting Attendance	In %	95	95	95	95
Minimum Attendance Required of Board Members	In %	33	33	33	33
Average Board Tenure	Years	8	8	8	8
Number of Independent or Non-Executive Members with Industry Experience (e.g., Excludes Executives)	Number	4	4	5	5
CODE OF CONDUCT					
Written Acknowledgement from Employees	Percentage	100	100	100	100
Training Provided to Employees on Code of conduct	Percentage	100	100	100	100
Issues raised through whistleblower	Number	-	-	0	0
ANTI-COMPETITIVE PRACTICES & POLITICAL CONTRIBUTION					
Fines & Settlements	INR	No fines have incurred by APL Apollo			
Corruption & Bribery Cases	Number	There were zero corruption and bribery cases over the financial years			
Lobbying	INR	No case has incurred by APL Apollo			
Political Campaigns (Local, regional or National)	INR	Nil			
Trade Associations or Tax-exempt Groups (Think Tanks)	INR	Nil			



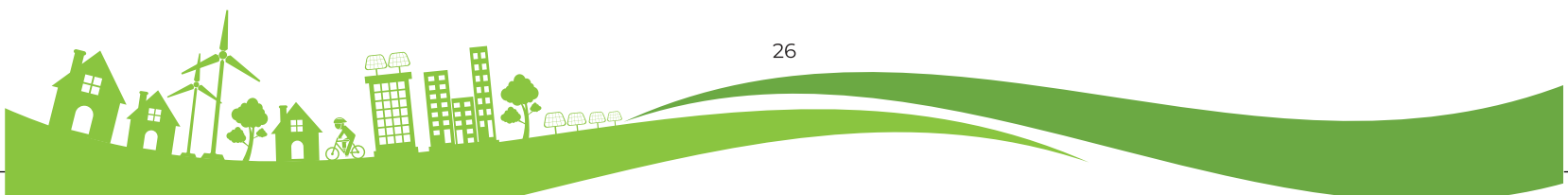
Governance					
Indicator	Unit of Measurement	FY20	FY21	FY22	FY23
TAX STRATEGY					
Revenue from operations	Million (INR)	77,232	84,998	130,633	161,660
Business Activity	USD million	931	1,024	1,574	1,948
Earnings Before Tax	Million INR	2,964	5,458	8,323	8,633
Reported Tax	Million INR	403	1,381	2,133	2,214
Effective Tax Rate	Percentage	14%	25%	26%	26%
Cash Taxes Paid / (Refund)	Million INR	816	1,195	1,993	2,161
Cash Tax Rating	Percentage	28%	22%	24%	25%
EBITDA	Million (INR)	4,774	6,787	9,452	10,215
Net Profit	Million (INR)	2,380	3,602	5,573	6,419
Market share	Percentage %	40%	50%	55%	55%
Sales volume	'000 tonnes	1,633	1,640	1,755	2,280
Operating cash flow	Million INR	5,095	9,771	6,506	9,670
Net working capital days	Days	29	9	7	5
Dividend payout	Million (INR)	411	0	0	875
Net worth	Million (INR)	13,562	16,947	24,525	30,056
Voting rights	No of shares (million)	25	125	250	277
CAPEX	Million (INR)	3014	2,798	5,869	8,424
Market capitalization	Billion (INR)	31.0	174.9	228.6	333.5
Manufactured capital (installed capacity)	Million TPA	2.5	2.6	2.6	3.6
Capital employed	Million (INR)	24,251	21,995	28,801	35,067
INFORMATION SECURITY					
Cyber Security breach	-	-	-	-	0





Performance Snapshot of FY23

Environment	Social	Governance
<p>APL Apollo has taken the initiative to report on climate related risks and opportunities in alignment to the recommendations given by TCFD</p>		
<ul style="list-style-type: none"> • 46% of total waste was recycled and reused. • 9% reduction in total water consumption • Grid power consumption reduced by 20% in FY23 compared to FY 22 • APL Apollo has taken a companywide no deforestation commitment. • Renewable energy consumption increased from 165,197 GJ in FY 22 to 178,626 GJ in FY 23 • 37% of total energy consumed is from renewable sources. • In two of APL Apollo's manufacturing facilities located in Malur, Karnataka, and Hosur, Tamil Nadu, more than 85% of their energy requirements were satisfied using renewable energy sources. • Total capacity of rainwater harvesting pits around 353 cubic meters • 2 zero liquid discharge facilities at Murbad and Malur 	<ul style="list-style-type: none"> • All plants are ISO 45001, and 9001 certified. • 111 million INR CSR expenditure • 6000 CSR beneficiaries in FY23 • 0 cases of human rights violation • Zero fatalities • 11,300 training hours in FY 23 • Average training hours per full time employee 33.6 • 100% of employees were provided with skill upgradation training. • 100% compliance to all legal requirements pertaining to labor. • 8% of total employees covered by collective bargaining agreement 	<ul style="list-style-type: none"> • 1,022 crore INR Economic Value retained. • Revenue, EBITDA, and Net Profit increased by 24%, 8% and 4%, respectively. • 0 Cases of Anti Bribery and Anti-Corruption • 0 Cases of data privacy breaches • 100% customer concerns resolved. • Additional items introduced during the fiscal year 2023 include color-coated products, structural steel tubes with diameters of 500x500 mm and 1000x1000 mm, CRCA black annealed tubes, and AluZinc tubes.





Research & Development at APL Apollo

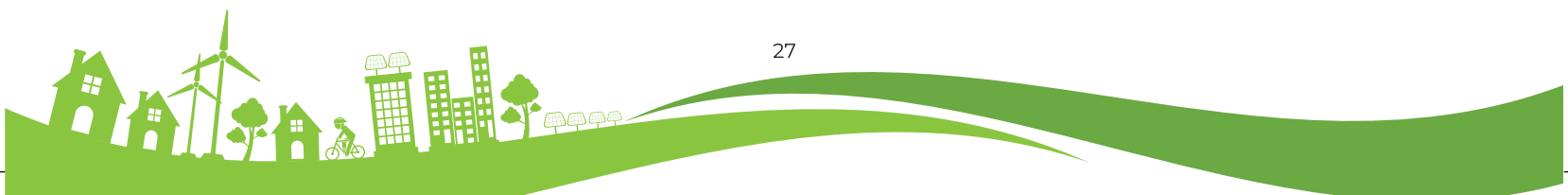
We believe that innovation is crucial for businesses to distinguish themselves. Our pursuit is to foster both organizational and economic expansion through innovation, recognizing its importance in thriving within today's competitive market landscape. A testament to our commitment are our ongoing research and development endeavors. These groundbreaking products are traditional construction materials like wood, aluminum, concrete, as well as conventional steel angles and channels, permeating diverse applications within the construction sector. Presently, we have 18 approved designs for our transformative creations.

Pioneering the adoption of cutting-edge technologies has been a hallmark of our journey. Our embrace of advancements like Strip Galvanizing lines, Cold Saws, High-speed mills sourced from Europe, and the revolutionary Rotary Sizing Mills underscores our commitment to producing premium-grade rolled tubes. We remain the first to introduce 'Direct Forming Mill Technology' and 'In-Line Galvanizing of Tubes' in India, catalyzing a new era of tube manufacturing within the nation. At the core of our production process is the utilization of High-Frequency Induction Welding (HFIW) technology, which forms the backbone of all our products. This procedure, known as the cold forming process (non-expanded), involves the integration of HR and HRPO strips sourced from contemporary hot strip mills. These strips seamlessly traverse through the MIG welder while a continuous flow is maintained via the horizontal/vertical coil accumulator, emblematic of our intrinsic commitment to precision. The inception of this journey is marked by cold embossing, an initial step that has been the hallmark of the APL Apollo seal of quality and reliability, setting the tone for the entire manufacturing process.



Innovation at APL Apollo

At APL Apollo, our core responsibility revolves around the manufacturing and distribution of structural tubes. This has been our dedication over the past decade – introducing groundbreaking products that have not only broadened the scope of structural tubes but have also expanded our foothold and influence within this sector. Total R&D spent in FY23 was 50 million INR, which is 0.3% of our total sales. The proportion of value-added products within our overall sales composition has undergone a marked elevation. Collaborative research conducted by IIT Roorkee, and APL Apollo has revealed that tubes can serve as highly efficient structural steel elements, enhancing the quality and sustainability of various infrastructure projects, including high-rise buildings, factories, warehouses, data centers, medical facilities, and more. This approach represents an effective means of constructing robust, long-lasting, and environmentally sustainable structures. Studies suggest that substituting reinforced concrete with steel structures could potentially result in a 60% reduction in emissions. Our revenue landscape has undergone a transformation, transitioning from a past dominated



by commodity products during FY18 to a present scenario wherein the value-added segment has emerged as the primary contributor during FY23, constituting a remarkable 56% of our revenue mix. This shift signifies not just a statistical transformation, but a testament to our resolute commitment to innovation and our responsiveness to evolving market demands.

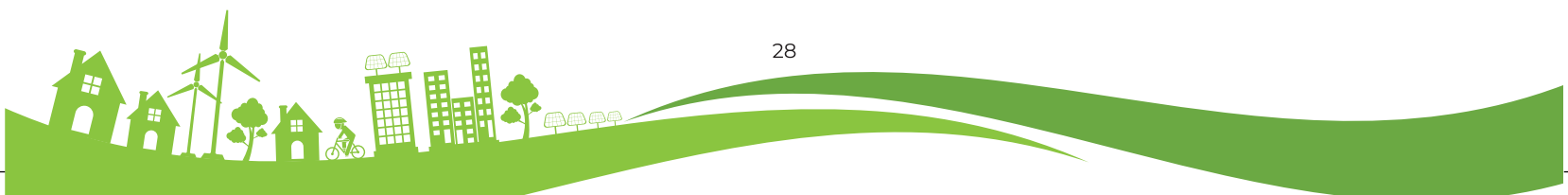
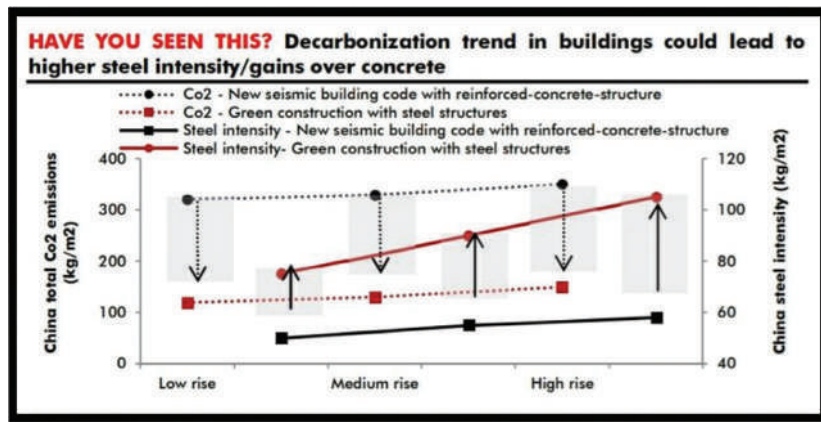
Pioneering the Path to an Environmentally Sustainable Tomorrow

Tubular construction leads to decarbonization Steel

The manufacturing process of Tubular Steel minimizes material waste, as the steel is modified to specifications throughout, reducing environmental impact. Utilizing steel tubular structures may alleviate restrictions imposed by the National Green Tribunal on building activities. In terms of environmental impact, Tubular Steel demonstrates a 37% reduction in pollution compared to the RCC frame, contributing to cleaner air and surroundings. Construction sector contributes 30% of direct and indirect Co2 emissions. Research indicates replacing reinforced concrete with steel structures can reduce emission by 60%.

Moreover, the use of Tubular Steel aligns with sustainability goals on a broader scale. Approximately 630 million tonnes of steel scrap are recycled annually, saving around 950 million tonnes of CO2 emissions. In summary, APL Apollo's Tubular Steel not only provides structural benefits but also significantly contributes to environmental sustainability in the construction industry.

APL Apollo is at the forefront of innovation and sustainability, leading the market with groundbreaking sourcing and manufacturing practices. A standout example is APL Apollo's Tubular Steel, a revolutionary product designed in cylinder or elongated rectangle shapes. This versatile material finds applications in various industries, including water and gas transportation, medical, military, aerospace, and construction, excelling in demanding conditions due to its exceptional impact resistance.



Tubular steel represents a leap into a greener future for building construction, offering an environmentally conscious alternative to traditional concrete. Unlike concrete, tubular steel construction is dust-free, significantly reducing environmental impact. This innovation not only addresses dust pollution but also contributes to lower emissions, aligning with the goal of decarbonizing building practices.

Recognized as one of the most environmental friendly construction materials, tubular steel meets the stringent standards set by the Indian Green Building Council (IGBC). Its mechanical stability ensures efficient construction, with an estimated timeframe of 45 days, highlighting its time-saving advantages. APL Apollo's tubular steel stands out for its multifaceted benefits across environmental, economic, and social dimensions, reinforcing the company's commitment to sustainability and pushing the boundaries of possibilities in the construction industry.

Environmental Benefits

Environment – Water

Court and Government orders – Over Ground Water

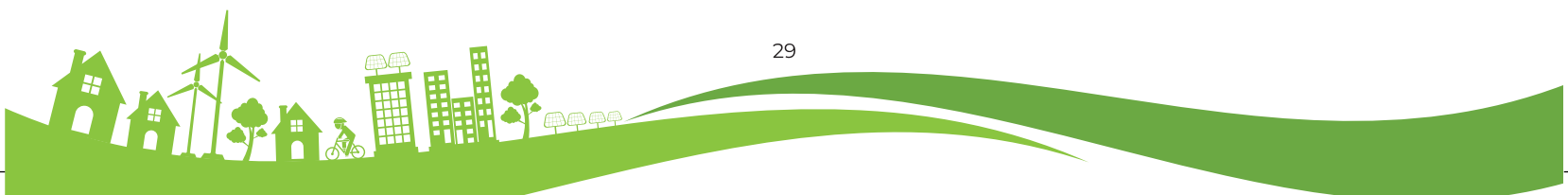
- ◆ NGT bans extraction of ground water for constructions in Noida.
- ◆ Builders must give an undertaking of not using groundwater for construction work in Punjab & Haryana.
- ◆ Water crisis in Chennai to impact construction activity projects may be delayed by months
- ◆ Groundwater for construction banned in Bangalore.
- ◆ Order to impose a ban on use of groundwater in construction will hit supply of housing

Structural Steel Tube in construction causes zero ground water consumption.



APL Apollo's Tubular Steel presents various advantages contributing to sustainable construction:

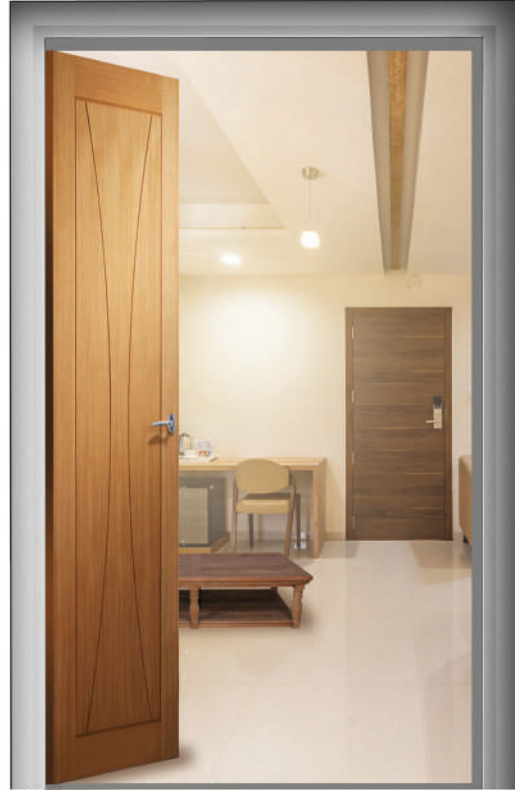
With its zero-dust properties, Tubular Steel offers a cleaner and healthier construction environment. In contrast to this, regular RCC construction contributes to dust pollution. The material's durability leads to fewer renovations and lower lifetime maintenance requirements, resulting in long-term cost savings. Additionally, Tubular Steel requires a minimal amount of water for foundations, promoting water efficiency in construction practices. In comparison to this RCC construction consumes a lot of water. Average ground water consumption of with RCC construction is 2 sq.m. Not only this but the RCC continuously soaks groundwater after construction.



Front Runner for Green Steel

APL Apollo stands at the forefront of groundbreaking initiatives in the construction industry by introducing a range of eco-friendly solutions. As a trailblazer, we have revolutionized the concept of ready-made Door Frame, Fence, Plank, Window Frame and Handrails for utilizing steel for sustainable construction practices. This innovative approach effectively replaces traditional wood applications, making a significant impact on building construction while conserving approximately 250,000 trees annually.

Maintaining a steadfast commitment to a greener planet, APL Apollo continues its efforts to contribute to environmental conservation. Pioneering the use of narrow and thicker color-coated galvanized sheets, we are proud to be the first company to embrace this eco-conscious technology. This advancement not only aligns with our mission to save trees but also reinforces the adoption of green steel in the construction industry. Moving forward, APL Apollo remains dedicated to pushing the boundaries of sustainable practices and making a positive impact on the environment.



Social Benefits

APL Apollo's Tubular Steel boasts several advantages that contribute to its safety, efficiency, and environmental considerations. With a high resistance to dynamic loads, the material ensures earthquake safety, providing structural stability even in seismic conditions. Its lightweight design adds to its appeal, facilitating easier handling and installation during construction.

A significant environmental contribution comes from the fact that 50% of steel produced is consumed by the housing and construction sector, emphasizing the material's widespread use in sustainable building practices. Tubular Steel's construction also addresses common issues, as its design eliminates leakage problems, ensuring durability and longevity of structures.

Quality control is paramount, with steel production taking place in a controlled atmosphere within a plant, ensuring the maintenance of high-quality standards. This not only contributes to the reliability of structures but also enhances the material's overall durability. The controlled manufacturing environment also safeguards workers, protecting them from respiratory infections during the production process.

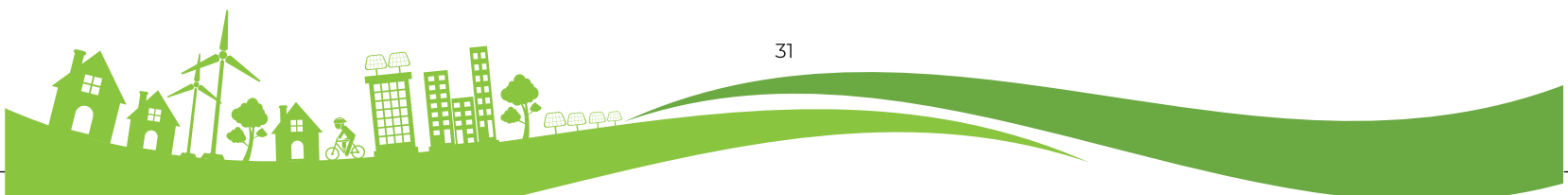
Tubular Steel's positive impact extends to employment, with 6 million people directly employed in the steel manufacturing sector. In terms of environmental impact, it demonstrates 12% less human toxicity (both cancer and non-cancer effects) compared to traditional RCC structures, highlighting its commitment to environmental and human well-being.

In essence, APL Apollo's Tubular Steel stands as a reliable, environmentally conscious choice in construction, offering seismic resilience, efficiency, and safety, while contributing significantly to the industry and minimizing environmental impact.

Economic Benefits

APL Apollo's Tubular Steel offers practical advantages in construction. Its adaptable design allows for faster construction, expediting project timelines and ensuring timely completion. The material's flexibility enables modifications at any point during construction, resulting in more precise and tailored structures that can adapt to evolving project needs. With tubular steel, larger span structures become easily achievable, promoting optimal material usage and efficient space utilization without compromising structural integrity. Since tubular steel construction produces no dust pollution, there will be no government construction bans throughout the winter. As a result, projects are finished on schedule and without incurring additional costs. However, due to dust pollution, RCC building projects are put on hold during the winter, which makes it difficult to manage labor costs during the idle period.

The symmetrical and uniform structure of tubular steel contributes to cost optimization, minimizing the need for additional materials and ensuring a balanced and cost-effective construction process. Structures are built on schedule as most of the work is conducted in a factory, mitigating weather-related delays, and ensuring consistent progress. Additionally, the construction process eliminates the need for on-site storage, streamlining logistics and contributing to a more organized and efficient construction environment. In essence, APL Apollo's Tubular Steel offers practical benefits, allowing for faster, flexible, and cost-effective construction while ensuring structural precision and adherence to project timelines.



Apollo Chaukhat

Traditionally, in India, doors and windows were often framed with wood. However, due to a growing demand for safety, longevity, and environmentally friendly options, the focus has now shifted towards steel frames, which outperform hardwood frames in the long-term. Responding to this shift, APL Apollo has introduced the Apollo Chaukhat – India's pioneering closed steel door and window frames crafted from premium steel for easy installation. The Apollo Chaukhat is available in two styles: modular and readymade.

This innovative product offers a range of substantial benefits. Notably, it excels in strength, durability, and quality without compromising on aesthetics. It exhibits remarkable resistance to weathering and aging, requiring minimal maintenance. The Apollo Chaukhat is impervious to water and moisture, ensuring longevity, and it aligns with environmentally conscious practices. Employing Direct Forming Technology, these frames are manufactured and can be tailored to customized dimensions.

The development of the Apollo Chaukhat serves multiple purposes. Beyond meeting market demands, it contributes to our commitment to reducing carbon emissions by lessening our reliance on traditional wooden frames, thereby preserving trees. This offering empowers consumers to make a responsible choice for their homes and workplaces, all while enhancing the quality and sustainability of their living spaces.



R&D Expenditure

Our dedication to innovation, coupled with our focus on quality and precision, has earned us distinguished recognitions, including certifications from renowned bodies like Underwriter Laboratories, CE, and SGS France—an esteemed designation as a recognized Export House. Our products have garnered endorsements from authoritative entities such as the Bureau of Indian Standards and British Standards, further affirming our commitment to excellence.



R&D spent in
FY 23

50 million INR



R&D Expenditure target in the
next 2 years

Approx. 70 million INR



New products developed
this year.

5



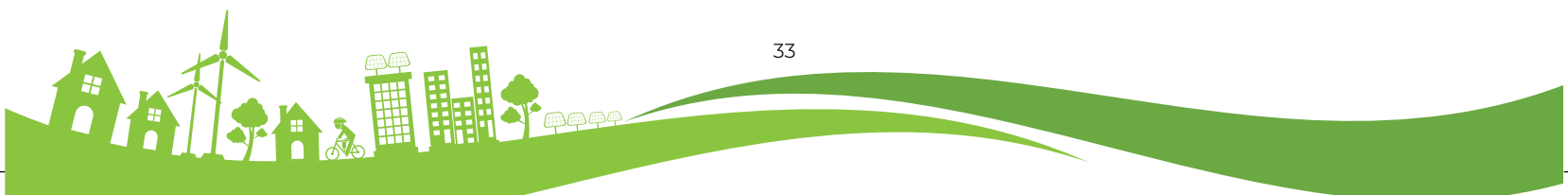
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Total R&D Expenditure as a
Percentage of Sales

0.3



Economic Performance

Economic growth brings about a positive effect, one that widens the horizon of possibilities for companies, empowering them to expand their customer base, enhance profitability, and explore fresh avenues for advancement.

Year after year, we remain resolute in our commitment to foster awareness regarding our lineup of value-added products. This effort is geared towards both the promotion of our portfolio's latest additions and the cultivation of a broader understanding among our stakeholders. As a direct outcome of these endeavors, the share occupied by value-added items within our sales composition has undergone a notable and promising ascent.

Our core values at APL Apollo is deeply rooted in the manufacturing and distribution of structural tubes. Yet, our true zeal lies in the innovative pursuit of solutions made for markets. This value has served as our guiding principle over the course of the last decade, and it is a principle we remain steadfastly committed to as we move into the future.

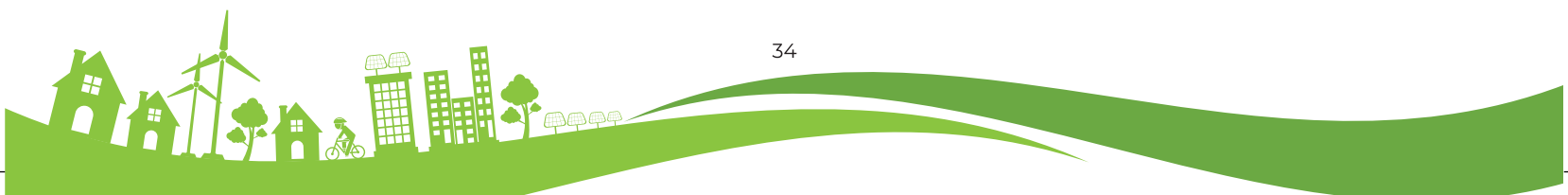
This commitment to innovation and market responsiveness has yielded results. Our revenue landscape has undergone a significant transformation, transitioning from an earlier emphasis on commodity-focused offerings in FY 2018 to a landscape wherein value-added products have risen to prominence in FY 2023. This transformation is not just a statistical change; it is a testament to our dedication to crafting meaningful solutions and driving progress in the field.

Economic Value Generated, Distributed, and Retained (in Crore INR)

Direct Economic Value Generated	FY 23	FY 22
Revenue	16,166	13,063
Other Income	47	41
Economic Value Distributed		
Operating Costs	14,938	11,965
Employee Wages & Benefits	206	153
Payment to Providers of Capital	1,385	875
Economic Value Retained	1,022	945

Entities included in the Consolidated Financial Statements

Sl. No.	Entities
1	Apollo Metalex Private Limited
2	Blue Ocean Projects Private Limited
3	APL Apollo Building Products Private Limited
4	APL Apollo Mart Limited
5	APL Apollo Tubes FZE
6	APL Apollo Tubes Company LLC



Tax & Strategy

Tax strategy and governance play an important role in the operational framework of APL Apollo Tubes, guiding the company's approach to managing its tax responsibilities effectively and responsibly. As a leading player in the steel industry, we understand the importance of upholding strong ethical standards and compliance with tax regulations. Our tax strategy is designed not only to ensure compliance with applicable tax laws but also to optimize our tax position in a manner consistent with our commitment to sustainability and corporate responsibility. This involves planning, transparency, and a proactive approach to tax governance to support our long-term growth objectives while contributing positively to the communities in which we operate. In this context, our tax strategy and governance framework are integral components of our overall corporate governance, aligning with our mission to create sustainable value for all stakeholders. Furthermore, we are dedicated in our commitment to comply with all tax-related regulations and requirements, upholding the highest standards of corporate citizenship and responsibility.

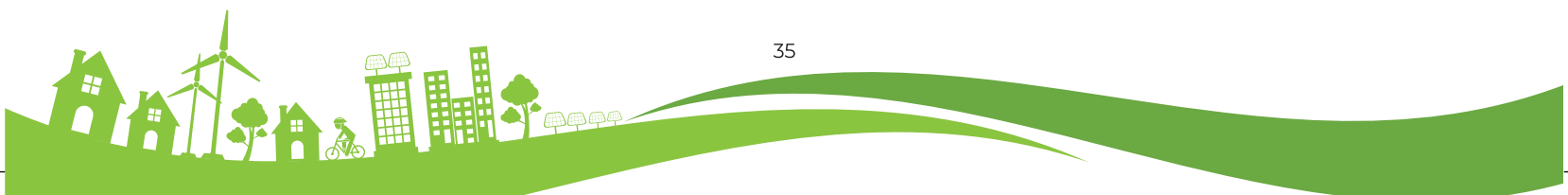
Deferred income tax assets and liabilities

Substantial managerial discretion is essential in assessing the recognition of deferred tax assets, contingent on the expected timing and intensity of forthcoming taxable earnings. The aggregate sum of deferred tax assets may fluctuate if projections of future taxable income or tax regulations undergo modification.

Recognition of deferred tax assets is contingent upon the likelihood of realizing deductible temporary differences. The company's assessment of deferred tax assets and liabilities is based on prevailing tax laws and rates, and, in some cases, business strategies, which include management's expectations regarding how and when the associated assets will be recovered. Changes in these assessments can impact the valuation of deferred tax assets or the amount of deferred tax liabilities, consequently affecting the tax expense in the Standalone Statement of Profit or Loss.

Provisions for tax liabilities involve making judgments about the interpretation of tax regulations, developments in legal precedents, and the potential outcomes of tax audits and appeals, all of which can carry significant uncertainties. Therefore, actual results may deviate from expectations, leading to adjustments in provisions, the valuation of deferred tax assets, cash tax settlements, and ultimately, the tax expense reflected in the Standalone Statement of Profit or Loss.







Tax Reporting	
Revenue	161,660 million INR
Profit Before Tax	8,633 million INR
Income Tax Accrued	2,214 million INR
Income Tax Paid	2,214 million INR

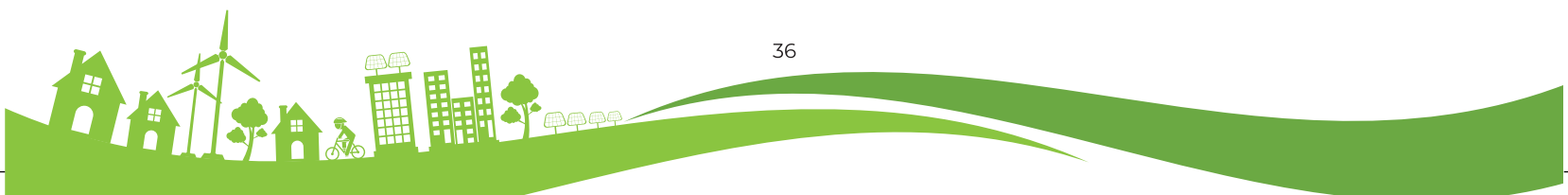


Stakeholder Engagement & Materiality Assessment

Stakeholders at APL Apollo

We have established comprehensive protocols throughout the organization to enhance transparency and purposeful interactions with our diverse stakeholders. Consequently, comprehending the viewpoints of those fundamental to our operations becomes imperative. This practice enhances our grasp of important matters and facilitates recognition of the distinct attributes that render stakeholders significant to our company, warranting a meaningful engagement approach. The valuable input we garner from these stakeholders also aids us in prioritizing challenges and aligning our strategic direction with their expectations. Our stakeholder engagement process has critically assessed the ESG (Environmental, Social, and Governance) concerns crucial for value creation, especially within the evolving global sustainability landscape.

Stakeholder Group	Importance to APL Apollo
 Investors	Investors play a vital role in the operations of APL Apollo, contributing essential capital, expertise, and a sense of responsibility to the company. Additionally, aligning with esteemed shareholders and investors enables the company to not only attract fresh investments but also to draw in new customers.
 Employees	Employees stand as vital stakeholders and a significant asset to APL Apollo. The dedicated workforce is the driving force behind the company's achievements and progress throughout the years.
 Suppliers	Given the inherent nature of our operations, vendors and suppliers play a crucial role within our supply and value chain. Their contributions facilitate a more streamlined and sophisticated business approach, all the while advancing our commitment to sustainable development.
 Customers/ Distributors	Customers hold paramount importance for us as they are the individuals who acquire and utilize the products and services offered by APL Apollo. Notably, our customers constitute a significant portion of the revenue that upholds and sustains our business endeavors.
 Communities	The local communities in close proximity assume a crucial role in the sustained prosperity of the company by granting us the Social License to Operate. Through fostering improved relationships, these communities are provided enhanced opportunities to develop employable skills and broaden their avenues for income generation.
 Government/ Regulators	They offer the company insights into the legal framework and regulations that necessitate compliance while we endeavor to generate value.



Stakeholder Engagement

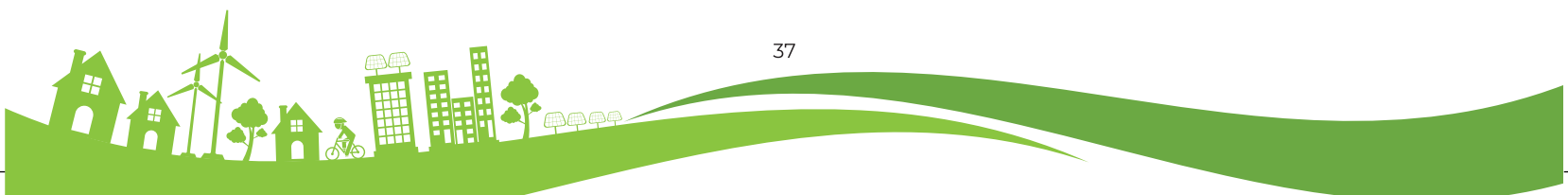
As required, the Company initiates communication with its esteemed stakeholders through various channels. The Company's website, in particular, acts as a hub for a wide range of information regarding its business operations, divisions, products, clientele, and investor relations, consistently refreshed. Additionally, comprehensive details concerning the Company's financial performance and obligatory disclosures regarding its operations are accessible on the Stock Exchanges' websites. These avenues of information are accessible to all Company stakeholders, reaffirming our commitment to transparency and openness.

Our Stakeholder Engagement process is further elaborated in the below sections:

Investors



Material Needs	Forms of Engagement	Frequency	How We Create Value
Sustainable growth & profit, mitigation of all material risks, good governance, and transparent disclosures.	Investor calls and presentations, press releases, general meetings, dissemination of annual reports of our company.	Quarterly, Annually, On-demand	<ul style="list-style-type: none"> ✓ Sound and transparent corporate governance policies ✓ Timely engagement with the stakeholders ✓ Transparent financial disclosures





Employees

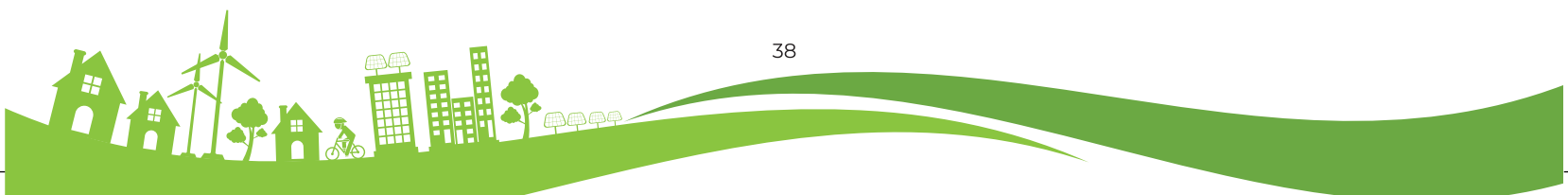


Material Needs	Forms of Engagement	Frequency	How We Create Value
Safe working environment, career growth opportunities, compensation packages, skill enhancement, diversity, equity, and inclusion	Trainings and coaching programs, personal interactions, employee portal, grievance redressal mechanism	Annually Quarterly On-demand	<ul style="list-style-type: none"> ✓ Understanding employee needs and creating a conducive work environment. ✓ Creating exhaustive learning and development strategy and operational framework. ✓ Focus on health and safety of employees in the workplace

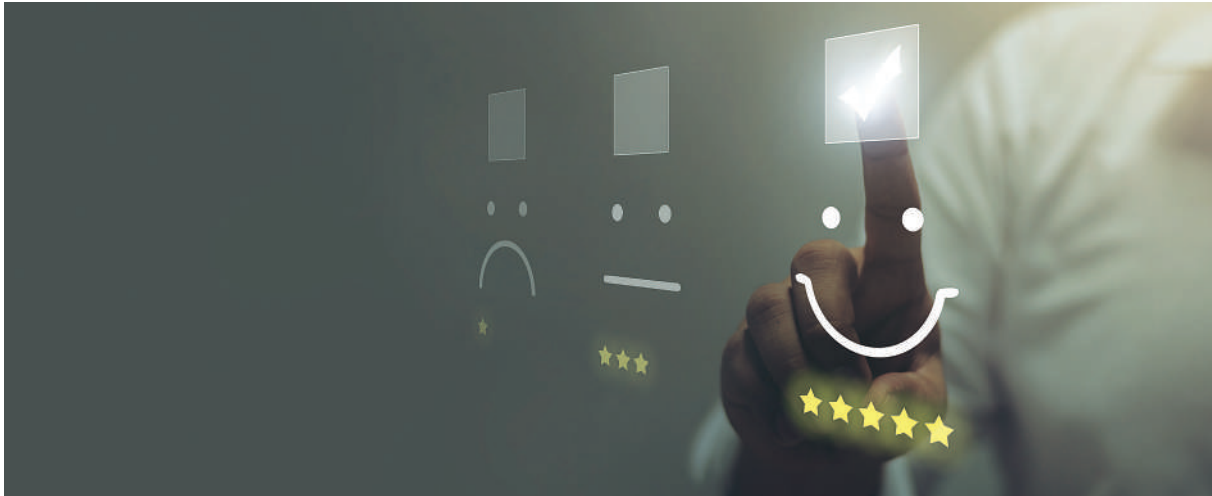
Suppliers



Material Needs	Forms of Engagement	Frequency	How We Create Value
Supplier code of conduct, timely payments, commitment on responsible sourcing and business ethics	Regular meetings with key suppliers by senior management, supplier visits and meets, and supplier tour of manufacturing facilities	Annually Quarterly On-demand	<ul style="list-style-type: none"> ✓ Regular meetings with the suppliers for product awareness ✓ Educating the suppliers on our company's code of conduct and human rights policies



Customers

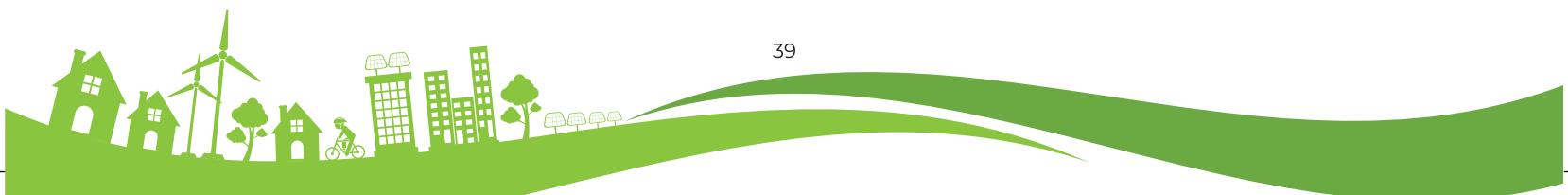


Material Needs	Forms of Engagement	Frequency	How We Create Value
Quality products which are affordable and reliable	One-on-one interactions, meetings, surveys, and customer hotline	Annually Quarterly On-demand	<ul style="list-style-type: none"> ✓ Developing products based on the market trends. ✓ Institutionalizing the culture of qualitative perfection in the products ✓ Establishing a customer grievance redressal mechanism

Communities



Material Needs	Forms of Engagement	Frequency	How We Create Value
Health and community welfare, giving back to society, and enhancing the livelihood and socio-economic development of individuals.	Need-based assessment surveys, field visits, trainings, CSR initiatives and surveys	Annually Quarterly On-demand	<ul style="list-style-type: none"> ✓ Empowering communities with community welfare projects ✓ Being transparent in our environmental and social disclosures ✓ Reducing the environmental impact of our operations

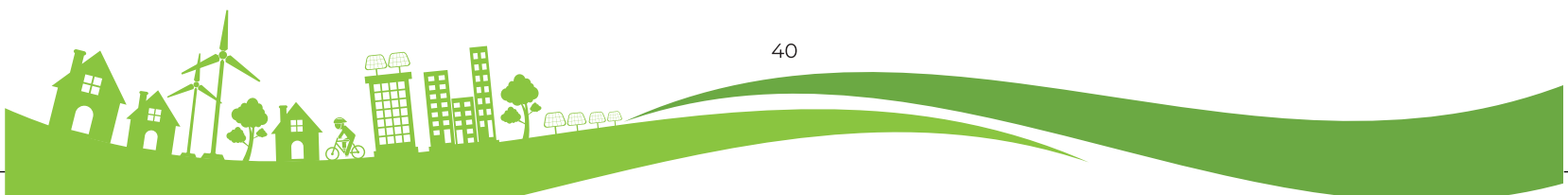




Government Regulators



Material Needs	Forms of Engagement	Frequency	How We Create Value
Compliances with all applicable laws and regulations, safeguarding natural assets, adhering to all labour laws and ethical standards of working.	Filings, correspondences, investor calls, meetings	Annually Quarterly Monthly On-demand	<ul style="list-style-type: none"> ✓ Transparent disclosures ✓ Timely filings and compliances ✓ Adhering to all the applicable labour laws and human rights practices





Materiality Assessment

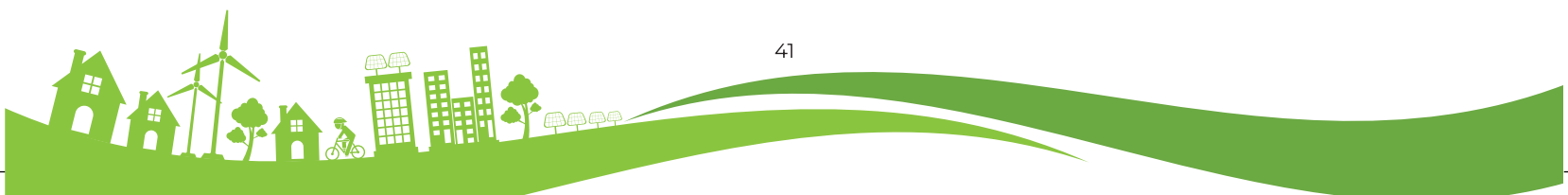
Following the GRI Guidelines, APL Apollo has embraced the principle of materiality. This principle entails assigning importance to factors that directly or indirectly influence the organization's capacity to generate, sustain, or diminish economic, environmental, and social value for itself, stakeholders, and society at large. In our commitment to comprehending the material ESG (Environmental, Social, and Governance) concerns important to our business and stakeholders, we have undertaken a thorough materiality assessment initiative. The objective of this endeavor is to pinpoint issues of significance to stakeholders across short-term, medium-term, and long-term horizons. This process represents the efficacy of our ESG strategy and execution, enabling a positive impact and risk mitigation, while harmonizing with stakeholder priorities. To accomplish this endeavor, we have actively engaged with a diverse spectrum of internal and external stakeholders.



Materiality Procedure

Embarking on a voyage towards sustainability and exemplary corporate citizenship necessitates a strong grasp of the materiality of ESG issues. Materiality entails the selection and prioritization of ESG factors that wield the most vital impact on a company's performance, reputation, and the creation of value. The steps outline the comprehensive procedure undertaken for conducting a thorough materiality assessment:

- ◆ Identification of Stakeholders
- ◆ Evaluating against Standards & Frameworks
- ◆ Materiality Survey
- ◆ Response Evaluation
- ◆ Diagnosis Assessment
- ◆ Final Materiality Matrix



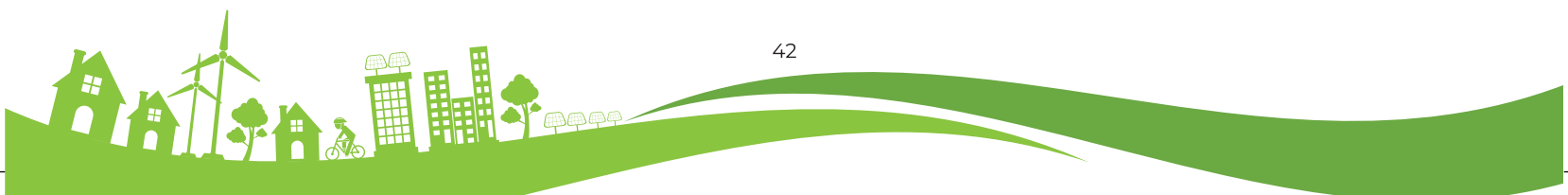


Materiality Matrix

The Materiality Matrix offers an evaluation of our sustainability strategy and performance, presenting a comprehensive idea of APL Apollo's operations. This matrix delineates the aspects that are integral to our organizational management and hold significance for our stakeholders. These concerns have been assessed and ranked based on their relevance, ranging from high to low, accounting for the viewpoints of both internal and external stakeholders.

Upon scrutinizing the matrix, we have adjusted our operations to prioritize issues that bear importance to our enterprise. It is vital to acknowledge that these challenges are interconnected and should not be treated in isolation, as they frequently exert interlinked and adverse impacts on one another.

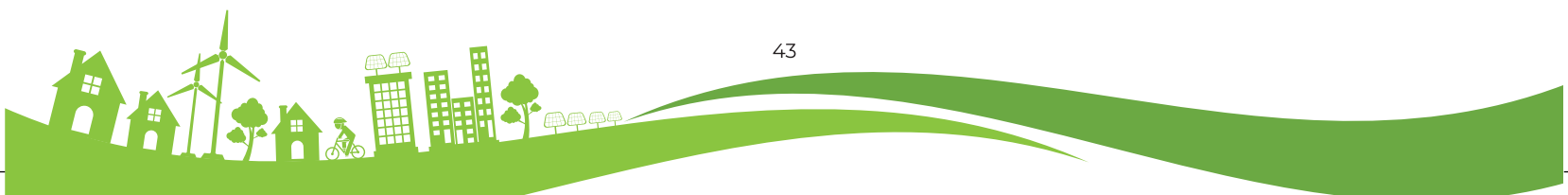
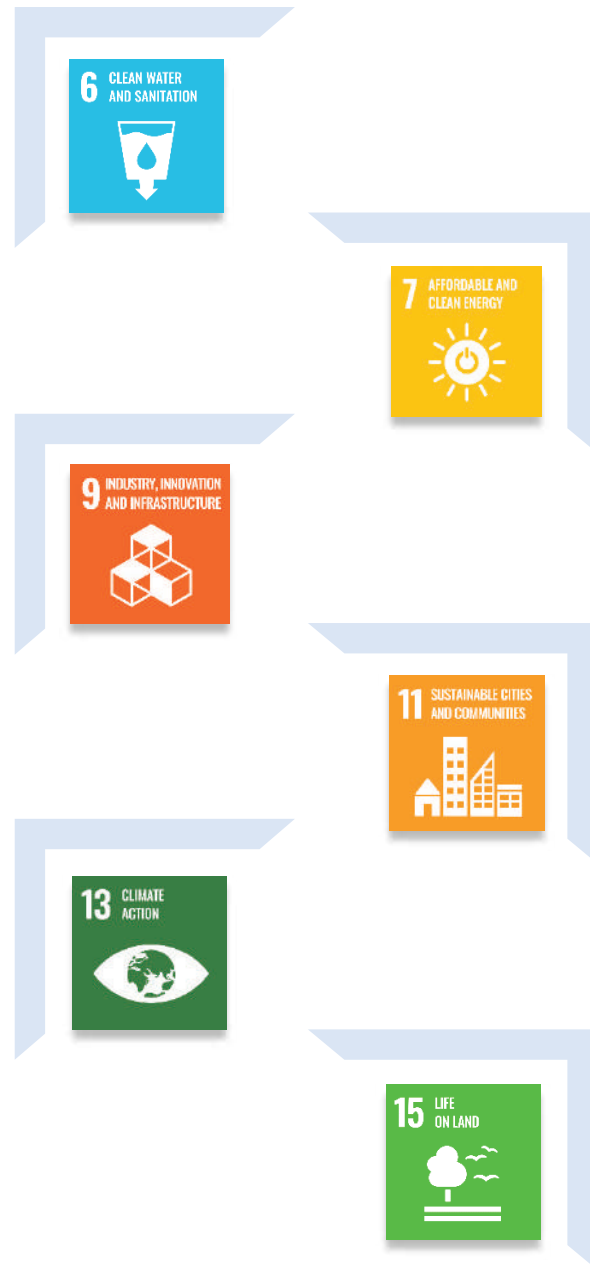
Effectively tackling these concerns mandates an integrated and holistic approach to sustainability management. We hold ourselves to elevated benchmarks in safeguarding our planet's well-being, fostering societal advancement, and advancing sustainable development.



Integrating Environmental Responsibility Steering towards conserving our environment

We have a robust environmental management system. This includes a comprehensive evaluation of the environmental impact of our operations, particularly in production and distribution. We actively implement measures to mitigate these impacts. To reinforce our environmental commitment, we undergo regular internal audits by designated company auditors and external audits by independent certified bodies. APL Apollo diligently follows numerous environmental laws governing various aspects of our operations, from chemical usage and emissions to waste handling and disposal.

Demonstrating our dedication to global standards, we hold ISO 14001:2004 certification for our Environmental Management System. We also conduct training programs to raise environmental awareness among employees and promote a culture of responsibility throughout our organization. We have crafted our business responsibility policy, delineating our dedication to safeguarding the environment through the implementation of sustainable initiatives. We consistently adhere to environmental regulatory standards, resulting in a non-compliance free record throughout FY23.



TCFD Report

Section 1: Introduction

This Climate Change Disclosure is prepared according to the four categories defined by the Task Force on Climate-related Financial Disclosures (TCFD): Governance, Strategy, Risk Management, and Metrics & Targets. We have addressed all 11 of the TCFD's recommendations and provided insights on our planned actions to be undertaken. When drafting this Disclosure, we reviewed the IPCC's Sixth Assessment Report and the TCFD's amended in October 2021 criteria.

Section 2: Governance

TCFD Recommendations

- ◆ Describe the Board's oversight of climate related risks and opportunities.
- ◆ Describe management's role in assessing and managing climate-related risks and opportunities.

APL Apollo Board Oversight of Climate Change

The Board of Directors at APL Apollo have implemented dedicated committees, with Executive Directors representing distinct facets of the business, to assess climate-related risks and opportunities, and recommend strategies. These committees, namely the ESG Committee and Risk Management Committee, play a pivotal role in this process. The ESG Framework, overseen by the ESG Committee, guides the identification and management of climate-related risks thereby ensuring a structured approach to decision-making. Updates are made to the framework as necessary, such as incorporating findings from the IPCC's Assessment Reports. The ESG Committee has a robust ESG governance structure involving three hierarchical levels: the Board (via the ESG Committee), Corporate Management (through the ESG Council), and the Sustainability Task Force and is responsible for shaping the objectives, reviewing actions, monitoring performance, assessing risks, and formulating mitigation plans.

Governance Structure for Climate change Oversight

The ESG oversight structure comprises three key components: the Board's ESG Committee, Corporate Management's ESG Council, and Sustainability Task Force. The ESG Committee, chaired by the Chief Sustainability Officer, leads and guides the company's ESG initiatives, focusing on sustainable strategies to address climate change challenges. At the corporate level, the ESG Council—comprising senior management with representation from key departments—sets priorities and monitors outcomes. The Corporate Sustainability Task Force comprises representatives from all plant and functional leadership roles, and their responsibility is to implement initiatives under the guidance of the ESG Council. The Governance Committee also addresses physical and transition risks within the ESG framework, ensuring effective oversight, risk management, and the pursuit of sustainable goals throughout the organization. Further details of these committees and teams can be found under the section on Driving Change: Sustainability Strategy and Performance.



Section 3: Strategy

TCFD Recommendations

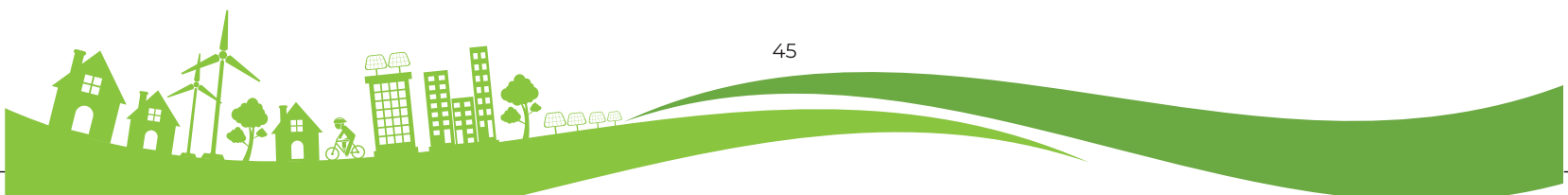
- ◆ Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long-term.
- ◆ Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.
- ◆ Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2 °C or lower scenario.

Within the ethos of APL Apollo, we adopt a comprehensive stance towards the pressing issue of climate change. Our strategy hinges on identifying vital areas where our role can wield maximal influence. This primarily entails our endeavors to facilitate substantial decarbonization within the real economy, propelling meaningful strides towards attaining ambitious net zero aspirations. Moreover, our initiatives encompass dynamic engagement with partners and a wide spectrum of stakeholders. Concurrently, we exhibit adeptness in navigating and mitigating climate-associated risks, ensuring the safeguarding of our firm's sustainability and resilience.

We have categorized the risks into three timeframes, namely- short (0-5 years), medium (5-10 years), and long (>10 years)

We have employed globally recognized scenario from two key sources:

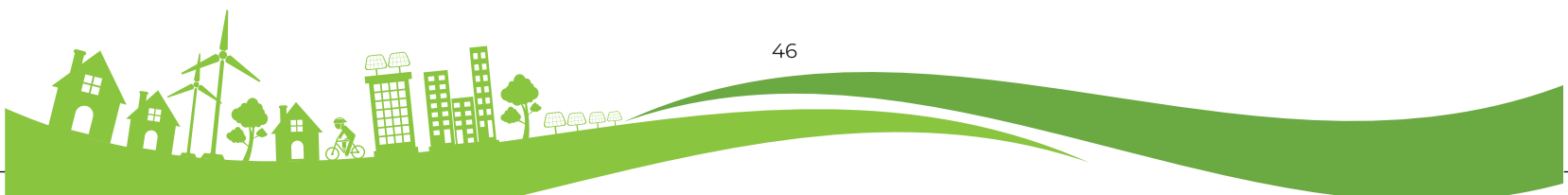
- ◆ For evaluating the physical repercussions of climate change stemming from varying concentrations of greenhouse gas (GHG) emissions in the atmosphere, we will place specific reliance on the frameworks provided by the Intergovernmental Panel on Climate Change (IPCC). These frameworks are encapsulated in the IPCC's Representative Concentration Pathways (RCP 8.5 and RCP 4.5).
 - RCP 4.5 stabilizes radiative forcing at 4.5 W/m² by 2100 and does not exceed that value. Modeled with Global Change Assessment Model (GCAM), it includes global long-term greenhouse gas emissions, short-lived species, and land-use changes in a global economic context.
 - RCP 8.5, an extreme scenario, depicts a business-as-usual approach with minimal to no emissions reduction efforts, resulting in a temperature rise of 3.7 °C by the century's end.
- ◆ The International Energy Agency (IEA), which models the consequences of climate-related policies and technologies on worldwide energy systems. We will incorporate the Net Zero Emissions by 2050 Scenario and the scenario representing stated policies for assessing transition risks.
 - The Net Zero Emissions by 2050 Scenario (NZE) is a prescriptive IEA scenario outlining a global energy sector pathway to achieve net-zero CO₂ emissions by 2050. Advanced economies are expected to reach net-zero emissions ahead of others.
 - The STEPS (Stated Policy Scenario) anticipate a continued global temperature increase, with temperatures projected to rise by 2 °C by 2050 and 2.6 °C by 2100.



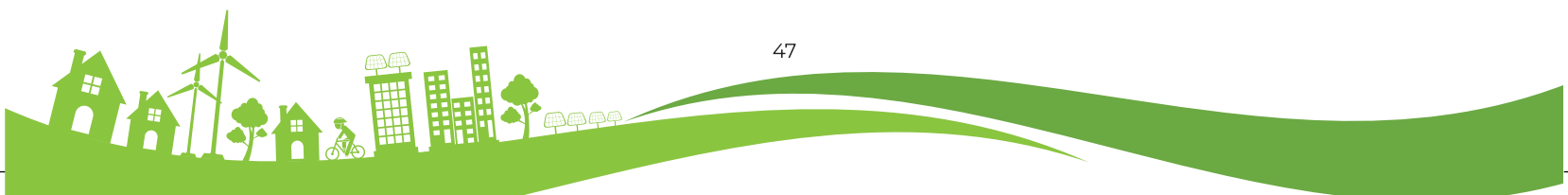


Physical Risk

Risk Type	Risk Description	Possible Impacts	Time - Horizon	Opportunities	Financial Implications
Acute Risk	<p>Cyclone & Flooding:</p> <p>Many of APL Apollo's locations are prone to cyclones and their aftermath, which often results into flooding. These locations include Bangalore, Hosur, Malur, Murbad, Raipur, and Sikandrabad. Over the years, these areas have experienced the impact of cyclones. For example, in 2018, Cyclone Fani affected Bangalore. Hosur faced several cyclones like Vardah in 2016 and Gaja in 2018. Malur experienced Cyclone Nilam in 2021 and Cyclone Vayu in 2018. While Raipur wasn't directly hit by cyclones, but in May 2021, Cyclone Tauktae, originating in the Arabian Sea, caused significant damage in various parts of Chhattisgarh, including Raipur. In August 2018, several areas in Uttar Pradesh, including Sikandrabad, were severely affected by flooding.</p> <p>It's worth noting that APL Apollo's new venture in Kolkata is consistently impacted by cyclones. For instance, Cyclone Amphan, which made landfall in 2020, wreaked havoc in various parts of the city.</p>	<p>Cyclone & Flooding can have several significant impacts:</p> <ul style="list-style-type: none"> • Damage to infrastructure: the damage caused by heavy cyclones and flooding can lead to expensive repairs and downtime. • Disruption of supply chains: transportation can be impacted during heavy cyclones leading to delays in the delivery of raw materials and the distribution of finished products. • Production interruption: severe weather events can force steel plants to shut down for safety reasons. 	Short-Medium Term Measures	<ul style="list-style-type: none"> • Infrastructure Resilience: Invest in resilient infrastructure design and construction, including flood barriers, elevated structures, and storm- resilient buildings. • Investing in measures which will facilitate the infiltration of surface runoff, reducing the risk of flooding while simultaneously contributing to the replenishment of the groundwater table. • Actively implement measures that will enable proactive response planning, including the possibility of setting production targets before the cyclone's landfall, achieving them, and temporarily shutting down the plant for safety reasons during the risk period. • Inventory Management: maintain strategic stockpiles of key raw materials and finished products to mitigate production interruptions. • Training & Drills: train employees on emergency procedures and conduct regular drills to ensure everyone knows how to respond effectively in case of a cyclone or flood. 	The financial impact of short-medium term measures is expected to range from low to medium.



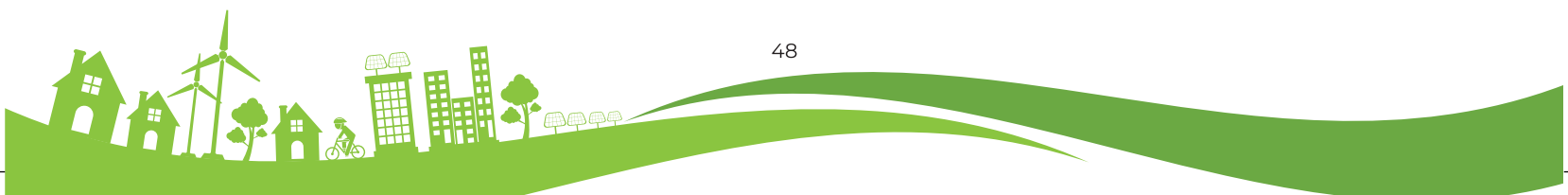
Risk Type	Risk Description	Possible Impacts	Time - Horizon	Opportunities	Financial Implications
Chronic Risk	<p>Heat Stress:</p> <p>Heatwaves could become a future concern due to the potential increase in the number of days with heat stress as temperatures rise. Plants in Dujana, Murbad, Raipur, and Sikandrabad locations have previously encountered extreme heat conditions. In 2019, Murbad and Raipur recorded temperatures as high as 48 degrees Celsius. In other locations, peak summer temperatures soar between 45 to 47 degrees Celsius.</p>	<p>Extreme heat conditions can have the following impacts:</p> <ul style="list-style-type: none"> • Worker health & safety: exposure to high temperatures can lead to heat-related stroke, which can be life-threatening. This can result in absenteeism and potential legal liabilities for the company. • Reduced workforce productivity: workers operating in extreme heat may experience reduced productivity due to discomfort and fatigue. This can lead to lower output and efficiency. • Increased health care costs: APL Apollo might have to face increased healthcare cost's due to workers heat related illnesses. • Heat stress could lead to an increase in the attrition rate, as employees may migrate to cooler parts of the country. 	Short - Medium Measures	<ul style="list-style-type: none"> • Invest in infrastructural changes that will build resilience against extreme heat conditions. • Work schedule adjustment: schedule all the physically demanding tasks during the cooler parts of the day. • Emergency response: establish clear instructions and procedures to tackle heat exhaustion and heat stroke. Ensure necessary supplies and personnel are readily available. • Cooling measures: provide access to cold water, isotonic drinks, and make sure to have dedicated resting areas for the employees and workers. • Medical monitoring: conduct regular medical check-ups for workers exposed to extreme heat due to their daily work. 	



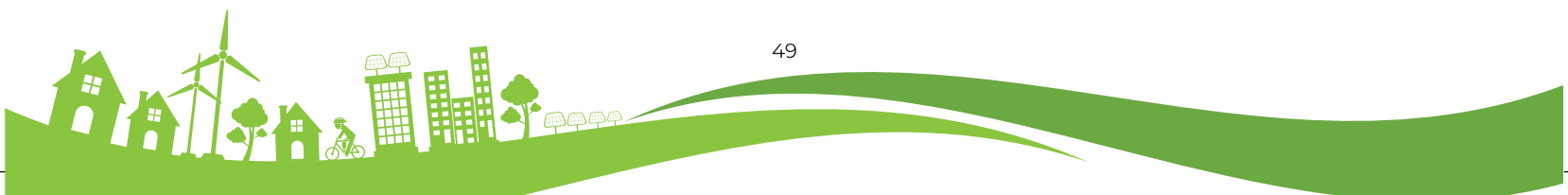


Transition Risk

Risk Type	Risk Description	Possible Impacts	Time - Horizon	Opportunities	Financial Implications
Technological Shift	<p>Technological advancements in low-carbon alternatives, coupled with increasing carbon pricing and regulatory constraints, will drive a transition from traditional industrial products to low-carbon alternatives. These changes will have a profound impact on the feasibility of existing products, manufacturing processes, and associated costs.</p> <p>Given the growing popularity of green hydrogen, it's imperative to factor it into any fuel-switching strategy. Additionally, the rising demand for green steel necessitates that APL Apollo invests in R&D for innovative technologies; failure to do so could result in the loss of clients.</p>	<ul style="list-style-type: none"> Transitioning to a low carbon technology often involves substantial upfront investments in new equipment, processes, and infrastructure. Implementing new technologies may require reskilling or upskilling the workforce. 	Medium to Long Term Measures	<ul style="list-style-type: none"> Allocate resources to research and develop innovative low-carbon technologies. Collaborate with research institutions, government agencies, and industry peers to share knowledge, resources, and best practices. Transition to more environmentally friendly fuels such as green hydrogen to minimize ecological impact. Invest in workforce development and training programs to ensure employees have the necessary skills to work with new technologies 	The financial implications for all the measures are significantly high because the shift in technology and its consequent installation, as well as employee upskilling, would require a heavy investment.



Risk Type	Risk Description	Possible Impacts	Time - Horizon	Opportunities	Financial Implications
Policy Restrictions	<p>Heightened industrial regulations will increase the environmental compliance pressure, pushing for decarbonization and tighter control of industrial emissions.</p> <p>Non-compliance with these regulations could result in significant financial penalties and potentially limit APL Apollo's access to global markets. Additionally, stringent rules regarding the carbon footprint of shipped goods may pose a significant challenge for the company.</p>	<ul style="list-style-type: none"> Adhering to stricter environmental regulations often requires significant investment in pollution control equipment and emission reduction technology. The need to retrofit or upgrade existing facilities to meet regulatory requirements can lead to operational delays. Non-compliance will lead to legal penalties, fines. Policy restrictions can influence investment decisions. Carbon taxes or cap-and-trade systems can impact the cost of emissions, affecting the overall cost structure. 	Medium to Long Term Measures	<ul style="list-style-type: none"> Develop strategies to manage and optimize the impact of carbon pricing mechanisms, such as carbon taxes or cap-and-trade systems. Invest in technologies and processes such as carbon capture and storage (CCS) that ensure compliance with existing and anticipated environmental regulations. Diversify product portfolio to include low-carbon products to cater to markets with stringent environmental requirements and regulations. 	Financial implications will range from medium to high.
Reputational Risk	<p>Exposure to cost or reputational risk as a result of political, economic, and regulatory activity.</p> <p>Companies in the industrial sector will suffer reputational harm if they are too late to respond to shifting consumer and shareholder demand for more sustainable materials, production processes, and disclosures.</p>	<ul style="list-style-type: none"> Non-compliance to regulatory norms and shareholder expectations could negatively impact brand image. This can eventually lead to a reduced customer and investor base. 	Short-, Medium - & Long - Term Measures	<ul style="list-style-type: none"> Transparent disclosures on website and yearly ESG report with set targets and progress tracker 	The financial implications can range from low to medium, as any breach in compliance will result in fines and penalties.



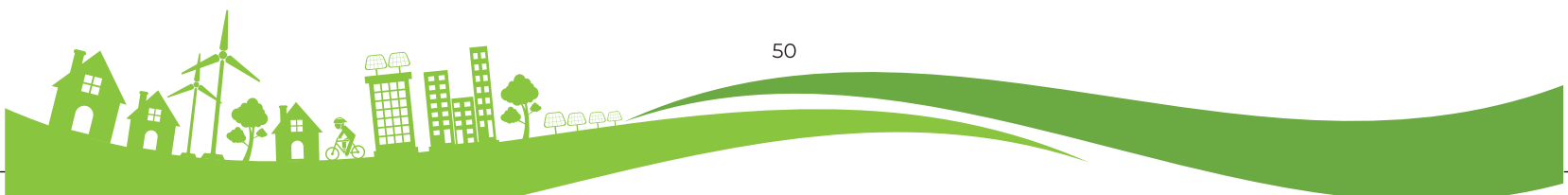
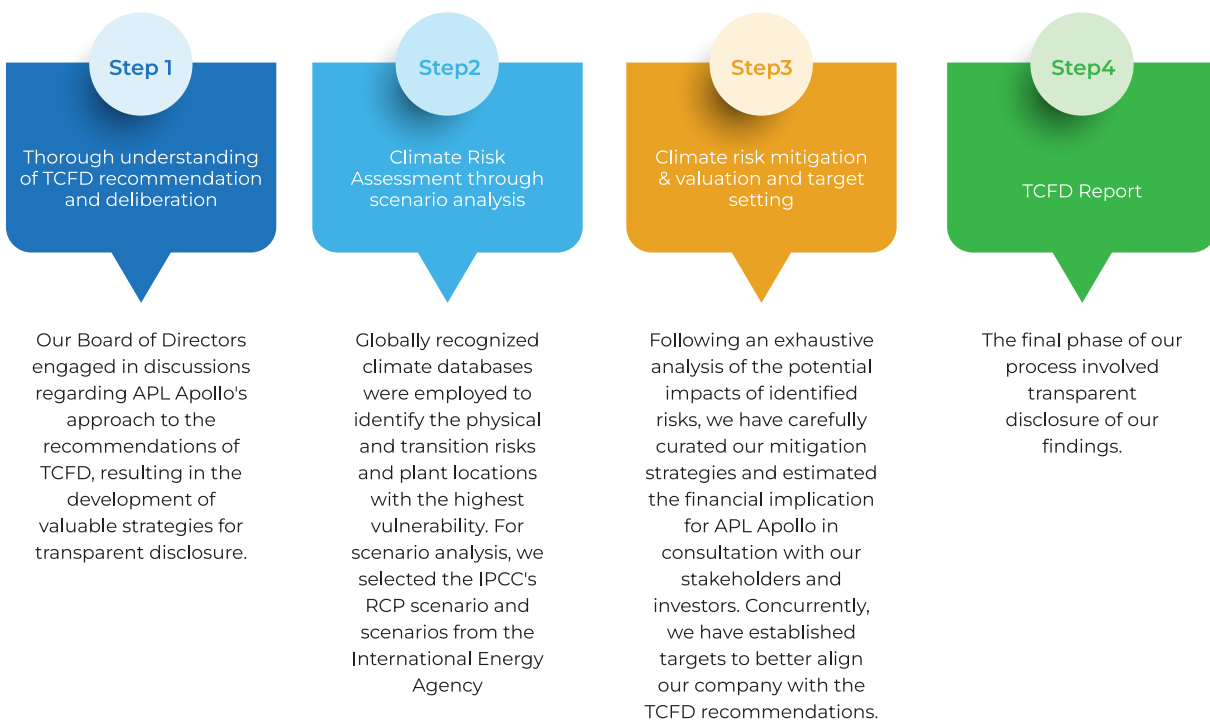


Section 4: Risk Management

TCFD Recommendations

- ◆ Describe the organization’s processes for identifying and assessing climate-related risks.
- ◆ Describe the organization’s processes for managing climate-related risks.
- ◆ Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization’s overall risk management.

APL Apollo has adopted a four-step approach to handle climate-related risks and identify opportunities. The ESG Committee and Risk Management Committee are the key protagonists responsible for discussing and deciding on climate-related risks, overseeing risk management at all levels, along with adopting and implementing mitigation measures. Additional details about these committees are available in the Corporate Governance section.



Section 5: Metrics & Targets

Climate-Related Metrics

TCFD Recommendations

- ◆ Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.
- ◆ Disclose Scope 1 and 2 (and Scope 3 if appropriate) GHG emissions and the related risks.
- ◆ Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.

We've set up essential performance indicators (KPIs) and, objectives to oversee our advancement in handling climate-related risks and capitalizing on opportunities. These encompass measurements associated with greenhouse gas emissions, energy usage, and renewable energy capacity. We will consistently monitor and disclose these metrics to offer transparency to our stakeholders. APL Apollo has computed its greenhouse gas (GHG) metrics following the Greenhouse Gas Protocol, which allows for the reporting of Scope 3 emissions across a comprehensive list of 15 distinct categories. Additional information regarding metrics is available in the section titled "Integrating Environmental Responsibility".

APL Apollo has implemented a uniform and standardized set of emission and energy metrics

Total emission, Scope 1, 2, and 3, as per the Greenhouse Gas Protocol

Emission Intensity In Metric Tonnes of CO2 Equivalent/INR Crore

Energy Consumption from Renewable Sources

Energy Intensity Per Rupee of Turnover

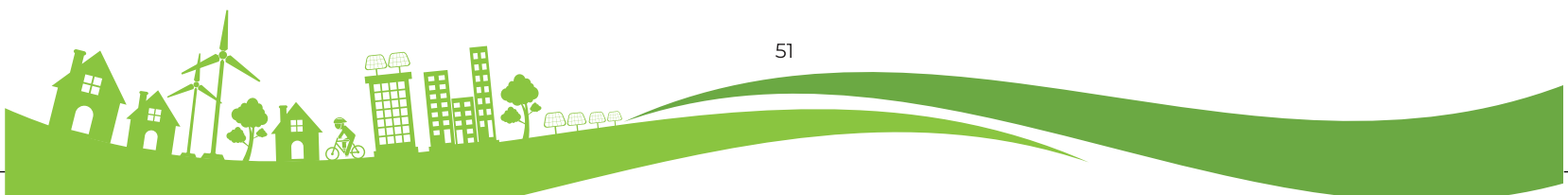
APL Apollo Targets

Net Zero by 2050

Reduction of Scope 1 and Scope 2 emissions per metric ton of steel produced by 25% by 2030

Achieve 47% renewable energy consumption by 2024-2025

All plants to have access to renewable energy by 2025



Our Contribution Towards Addressing Climate Change

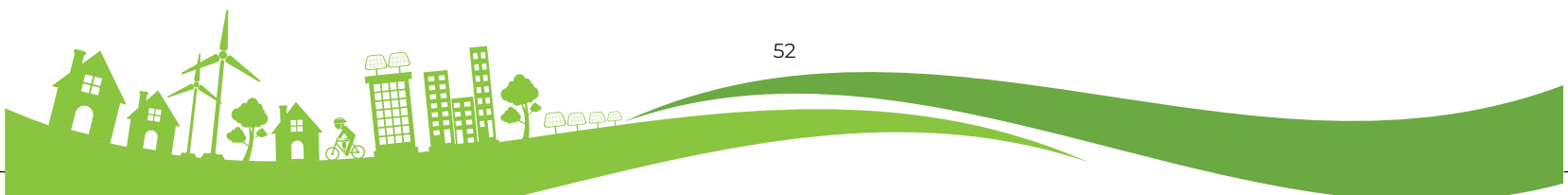
Rising frequency of extreme climatic events have brought the issue of climate change to the forefront and have caused disruption on a global economic scale. The warming planet poses multiple risks to businesses, from disrupted supply chains to increased insurance and labour costs. It is imperative for businesses to start acting and taking initiatives to mitigate adverse effects. We are dedicated to fostering innovation for low-carbon goods, services, and resilient supply networks powered by renewable energy. By collaborating toward these objectives, we foster eco-conscious competitiveness and unlock new business avenues.

Over the years, we have heavily invested in renewable energy at our production facilities, with ongoing expansion. Shifting from conventional furnace oil to LPG is another step in our commitment to reduce CO₂ emissions. As part of our ESG responsibilities, we persistently monitor and mitigate our emissions for minimal environmental impact.

Our Net Zero Strategy

APL Apollo has made a commitment to significantly reduce its Scope 1 and 2 emissions per metric ton of steel production by 25% by the year 2030, as measured against the 2022 baseline. Going beyond this, the company is dedicated to establishing short-term milestones and vigorously pursuing a Net Zero emissions target, meticulously following the guidelines set forth by the Science-based Targets Initiative. In doing so, APL Apollo is aligning its strategies and actions with the broader objective of realizing a 1.5 °C world.

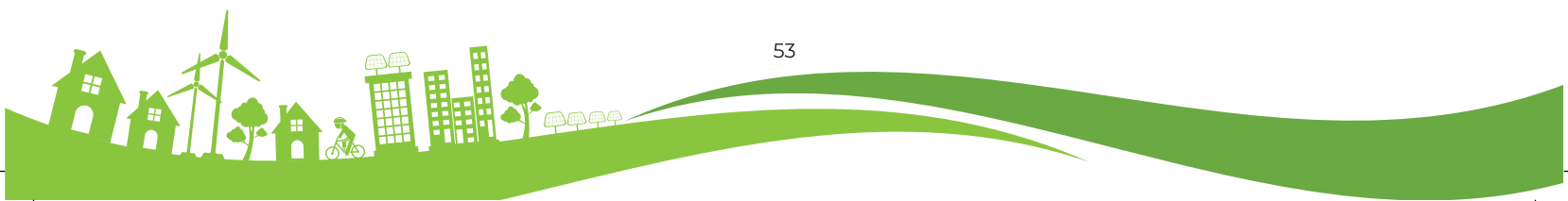
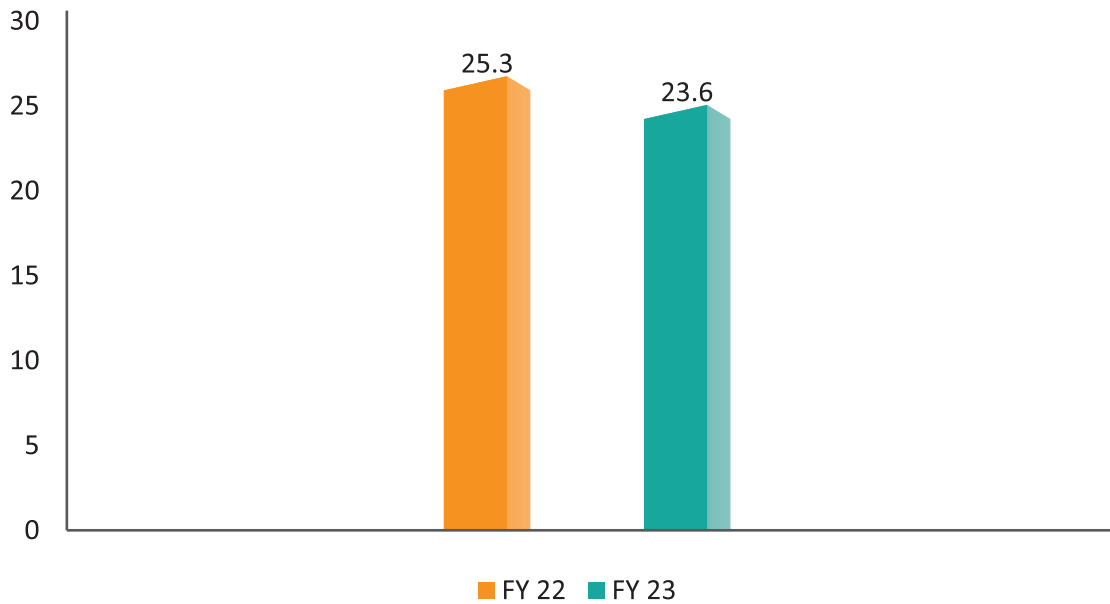
In addition to these ambitious emissions reduction goals, APL Apollo has set an overarching target of achieving a 47% renewable energy consumption rate by the year 2024-2025. This commitment reflects our dedication to a sustainable and environmentally responsible future. As the ultimate culmination of our efforts, the company is resolutely determined to transform into a Net Zero emissions enterprise by the year 2050, demonstrating a steadfast commitment to combatting climate change and promoting a greener world.



Water Stewardship

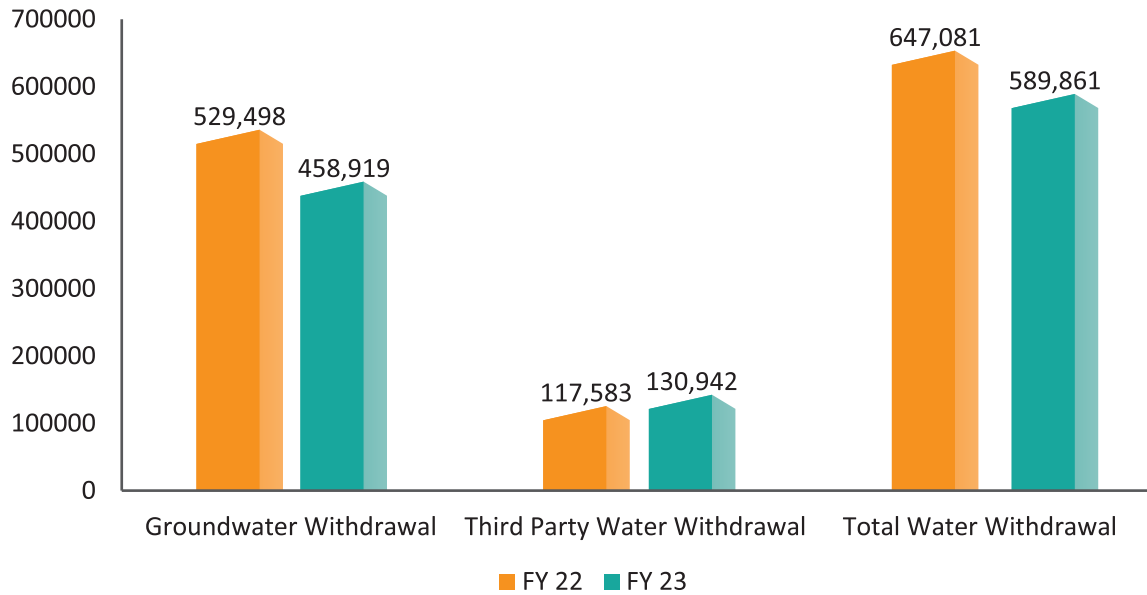
In line with our corporate philosophy is a commitment to advanced water management, that not only enriches the well-being of our communities but also fortifies our company's prosperity. Additionally, effective water conservation creates opportunities for an accelerated path to sustainability through a resilient value chain.

Water Intensity Per Rupee Turnover (Water Consumed (KI)/Turnover (INR Crore))

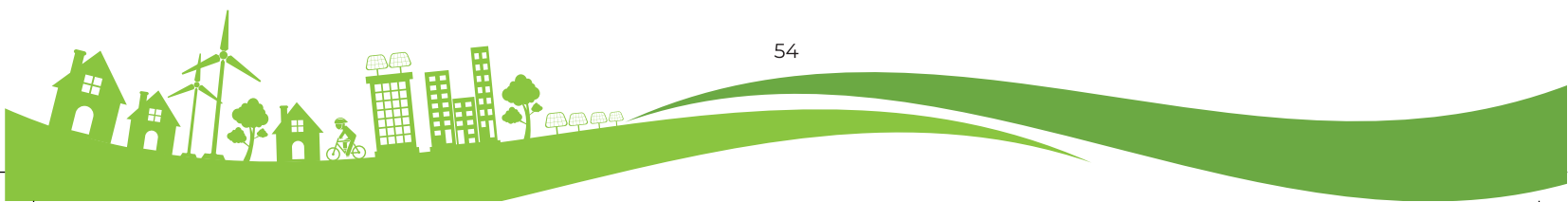




Water Management (In Kilolitres)



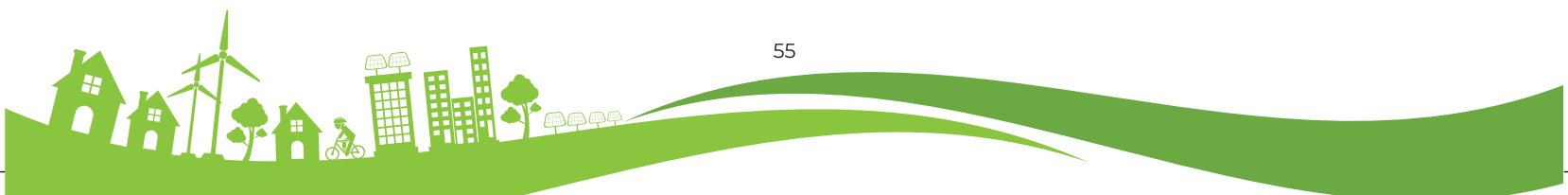
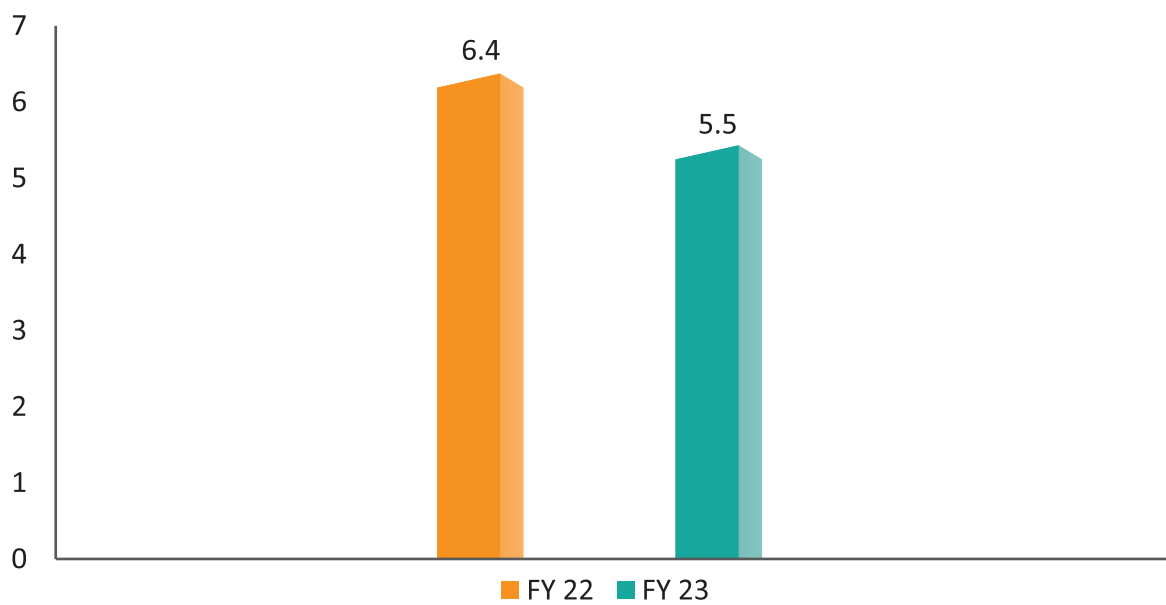
We have achieved a notable 9% year-on-year reduction in our overall water consumption, even as our production increased by a substantial 30%. Our operations division has enacted a comprehensive and diverse strategy to optimize water consumption and discharge disposal methods. Regular evaluation and analysis of our water resource management inform our published results, complete with strategies and annual targets for ongoing enhancement. Our collective water consumption for the year reached 589,861 kiloliters across all units, a notable reduction from last year's 647,081 kiloliters. Progress toward our goal of implementing rainwater harvesting (RWH) pits at all plants by 2025 is underway, with current RWH facilities established in two of our plants, collecting 353 cubic meters of rainwater throughout the year. We've submitted NOC applications to the government for other plants. Additionally, 9 of our facilities are equipped with Effluent Treatment Plants (ETP) to recycle water for operational use. Murbad and Malur plants boast Sewage Treatment Plants (STP) for effective sewage management. Our persistent efforts have yielded an 8% decrease in water output from the previous year. Further, we've instituted Zero Liquid Discharge (ZLD) units at Murbad and Malur, with intentions to transition all facilities to ZLD by 2025.



Reducing Carbon Footprint

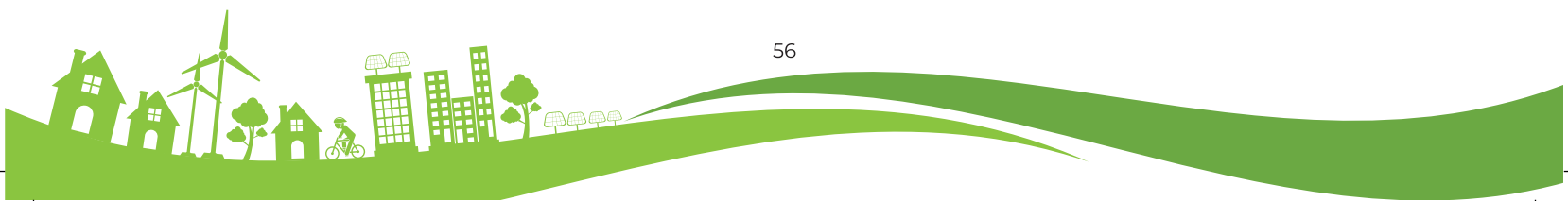
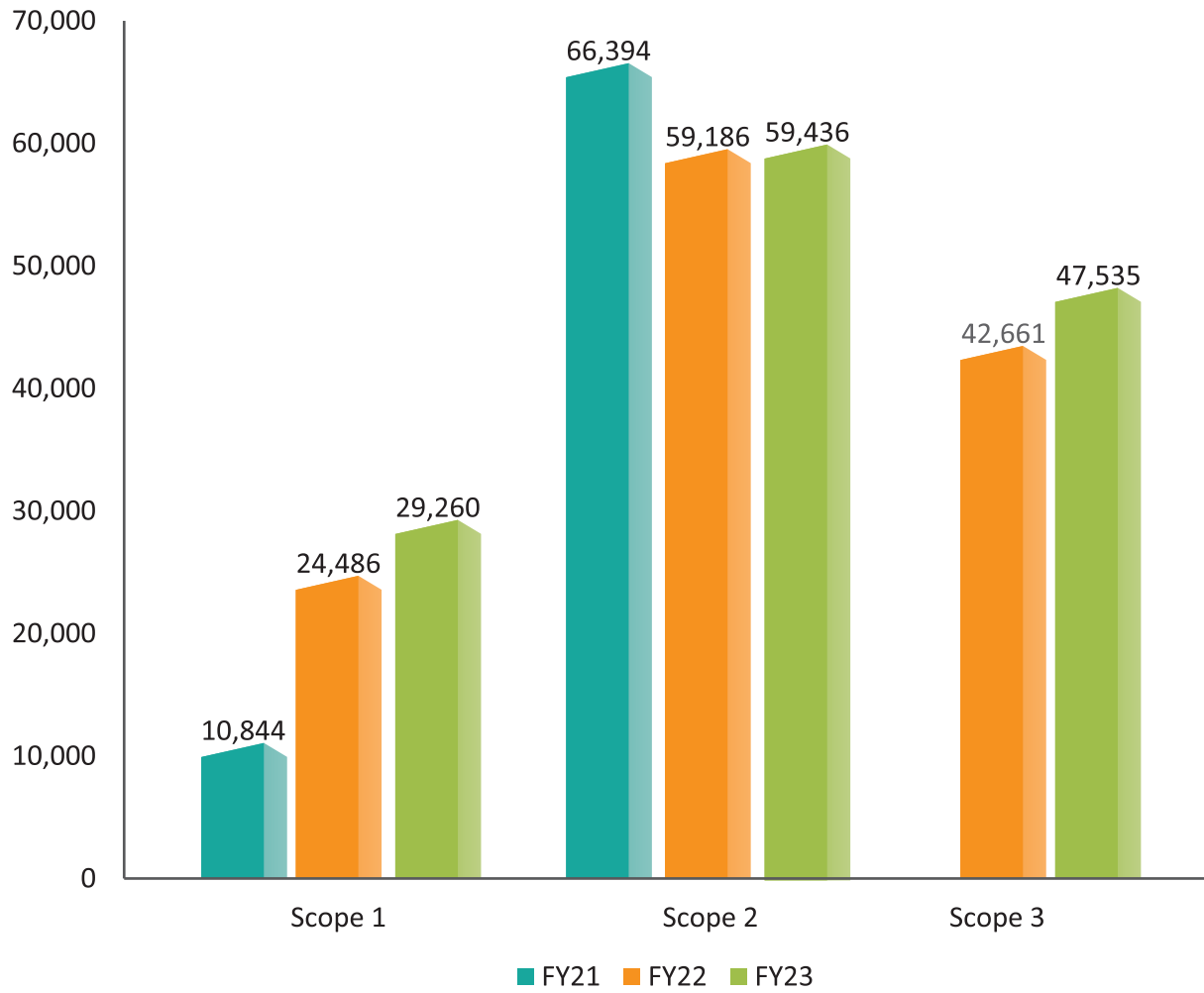
As a company committed to social and environmental responsibility, we consistently prioritize our carbon footprint and its consequences on the environment. Our achievement stems from responsible practices across all plants, regular emission monitoring, innovative products, and sustainable building materials that contribute to a greener and cleaner future by supporting sustainable infrastructure development.

Scope 1 & Scope 2 Emission Intensity (In Metric Tonnes of CO2 Equivalent/INR Crore)



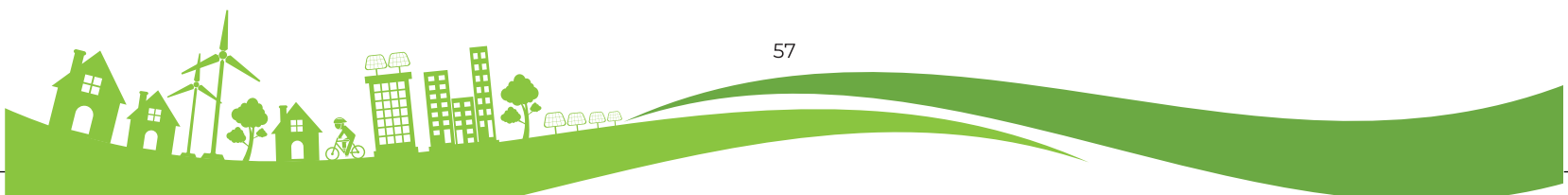
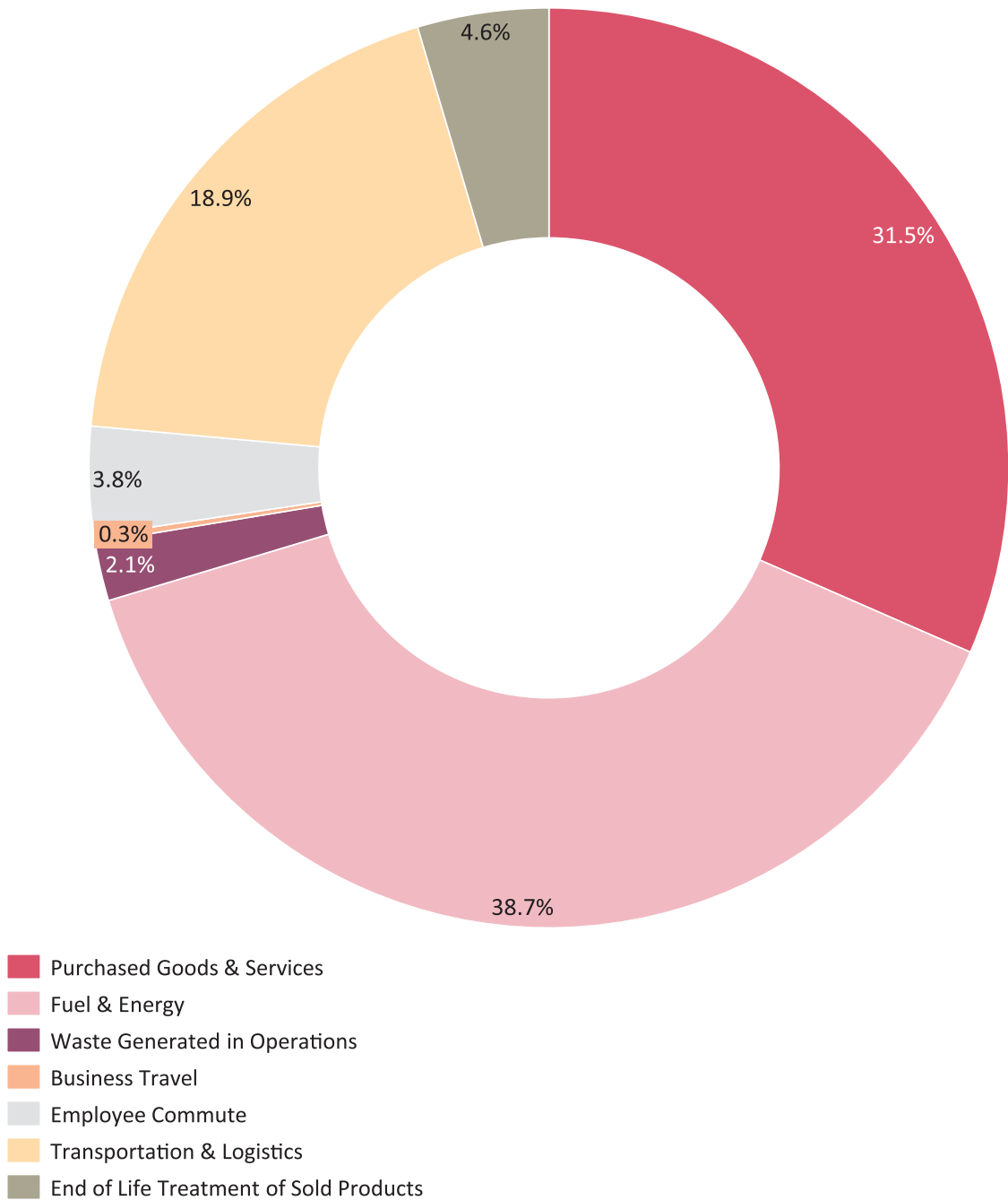


GHG Emissions (In Million Tonnes of CO2 Equivalent)



We rigorously track Scope 3 emissions across 8 categories out of 15, specifically involving purchased goods & capital goods, fuel & energy, waste generated in operations, business travel, Transportation & Logistics, employee commute, and end-of-life treatment of sold products.

Scope 3 Emission Across 7 Categories (In tCO₂e) for FY 23





Our Energy Profile

The global demand for energy is incessantly surging, leading to increased emissions, and rising global temperatures. Prioritizing energy conservation emerges as a solution to confront this escalating demand and its associated challenges. Our operational strategy centers around energy efficiency, acknowledging the limited nature of non-renewable resources. We continually strive to meet our needs through renewable sources across all operations.

Our commitment extends to curtailing total energy consumption, enhancing energy efficiency, and adopting sustainable energy alternatives. A well-defined strategy guides our pursuit of energy management objectives, with our business units implementing structured energy and carbon management programs.



In FY23, our renewable energy consumption is 37% of total electricity consumption. As part of our ongoing efforts, we have erected a state-of-the-art solar power facility with a capacity of 16.5 MW, which caters to the energy needs of all our establishments. Furthermore, at our Hosur site, we have established an independent wind power plant with a capacity of 8.3 MW, bolstering our commitment to sustainable practices.

Our dedication to this cause is further underscored by our contribution of surplus renewable energy back to the grid, reaffirming our resolute investment in fostering renewable energy sources.



Energy Saving Initiatives



At our Sikandrabad Unit 1 plant, we successfully raised the mill speed from 20 to 34 MPM, resulting in reduced energy consumption and a remarkable production increase of approximately 70%.

We employed a Programmable Logic Controller to oversee the speed control of the DC motor blower, ROT, and coolant motors.



To reduce power consumption and mitigate fire hazards, we have replaced conventional lighting fixtures with LED fittings across all our office and factory locations.

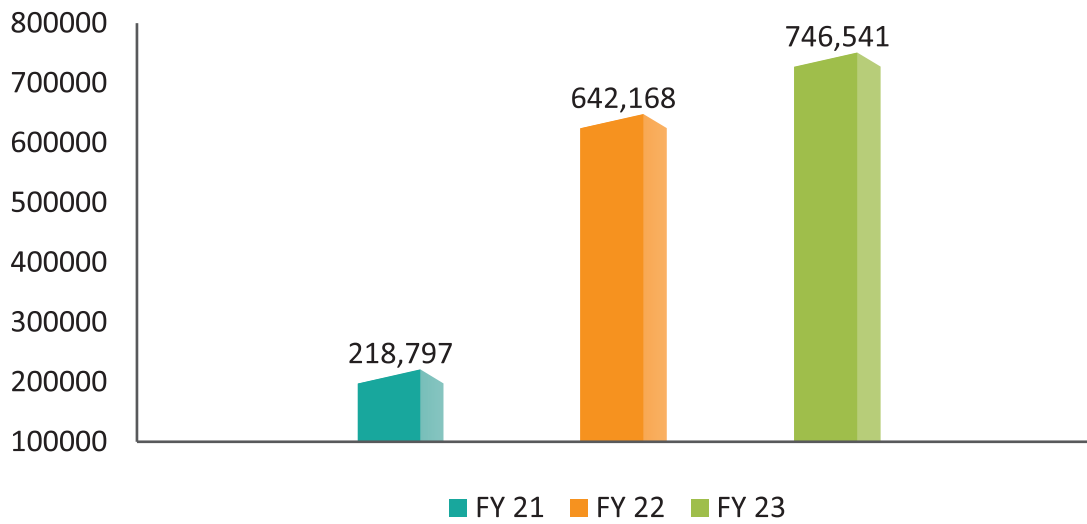


We are of the opinion that achieving an optimal energy portfolio necessitates a harmonious blend of both renewable and non-renewable energy sources. To realize this goal, we have significantly allocated investments towards procuring renewable energy across all our manufacturing facilities. The current breakdown of our renewable energy utilization, encompassing both fuel and overall energy consumption, is presented in the following portfolio.

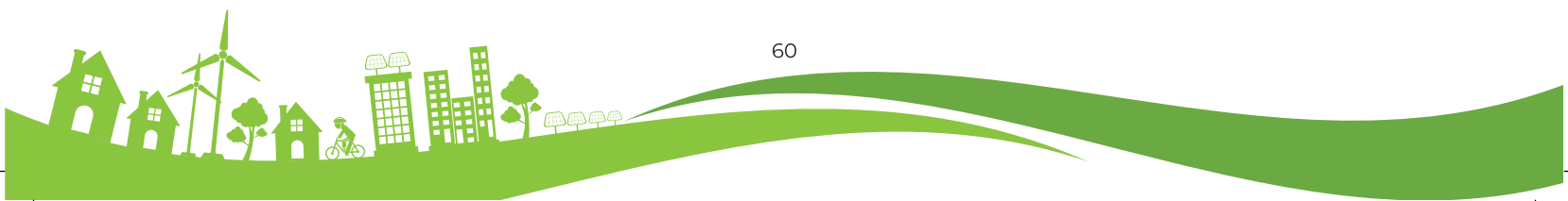
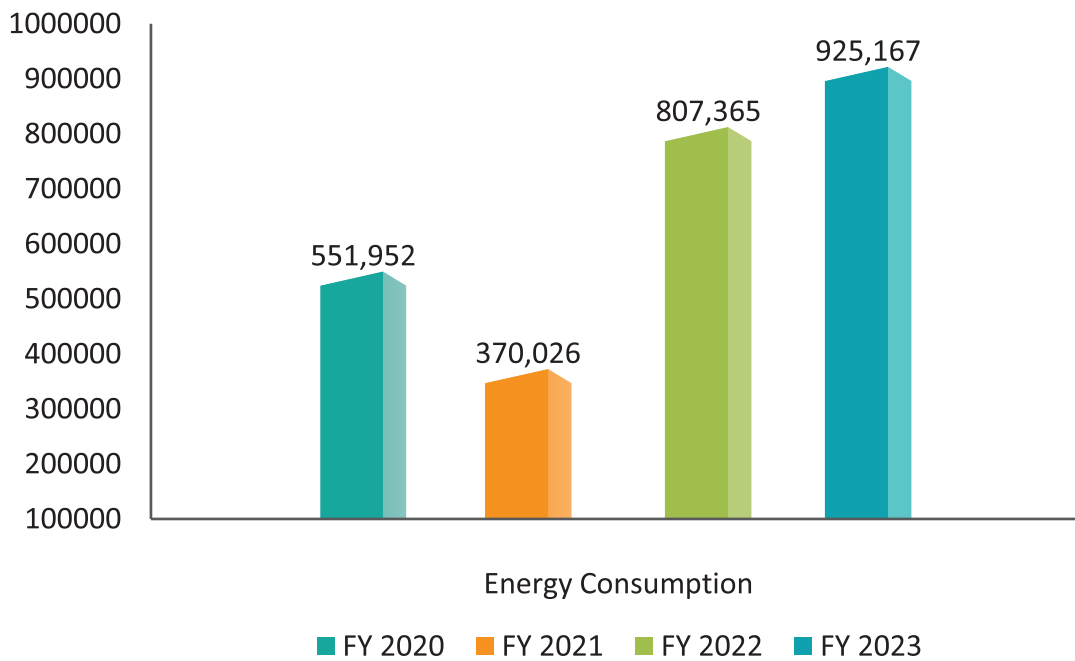




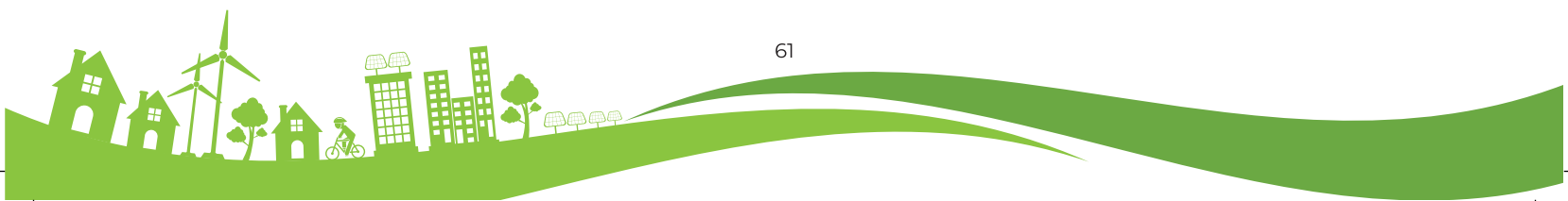
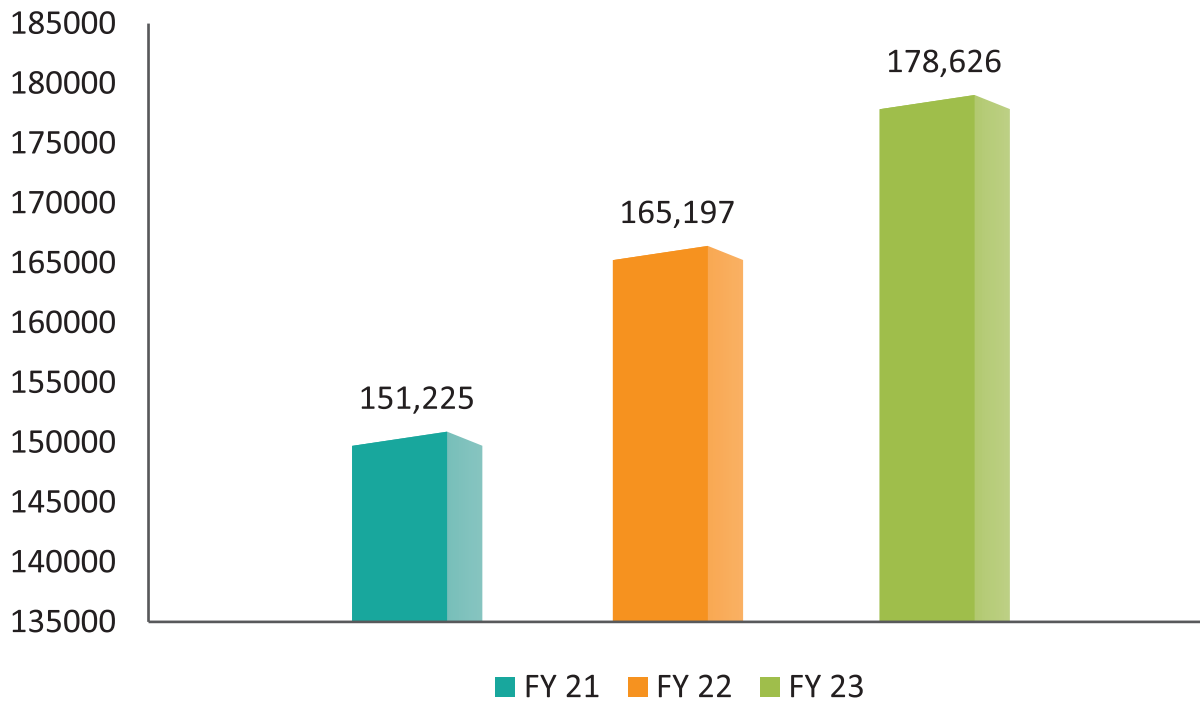
Energy Consumption From Non-Renewable Sources (In GJ)



Energy Consumption (In GJ)

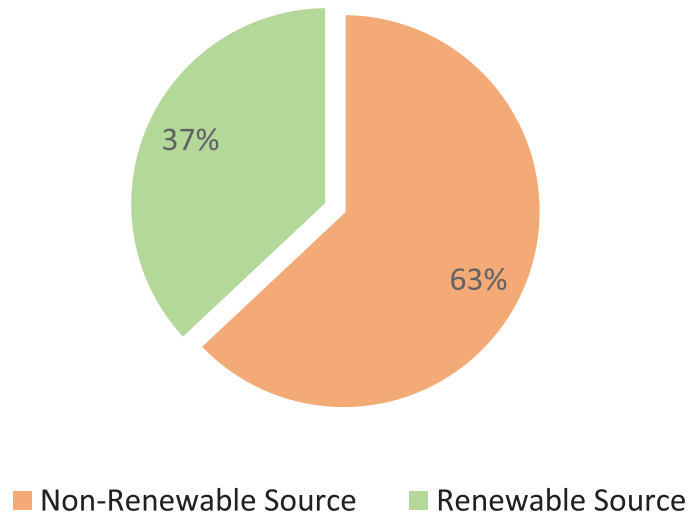


Energy Consumption From Renewable Sources (In GJ)

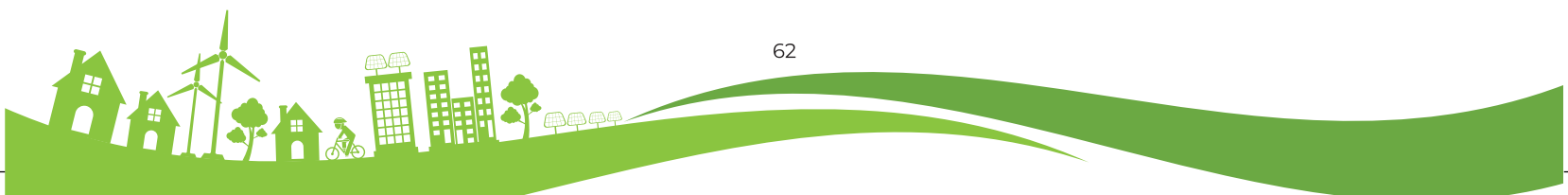
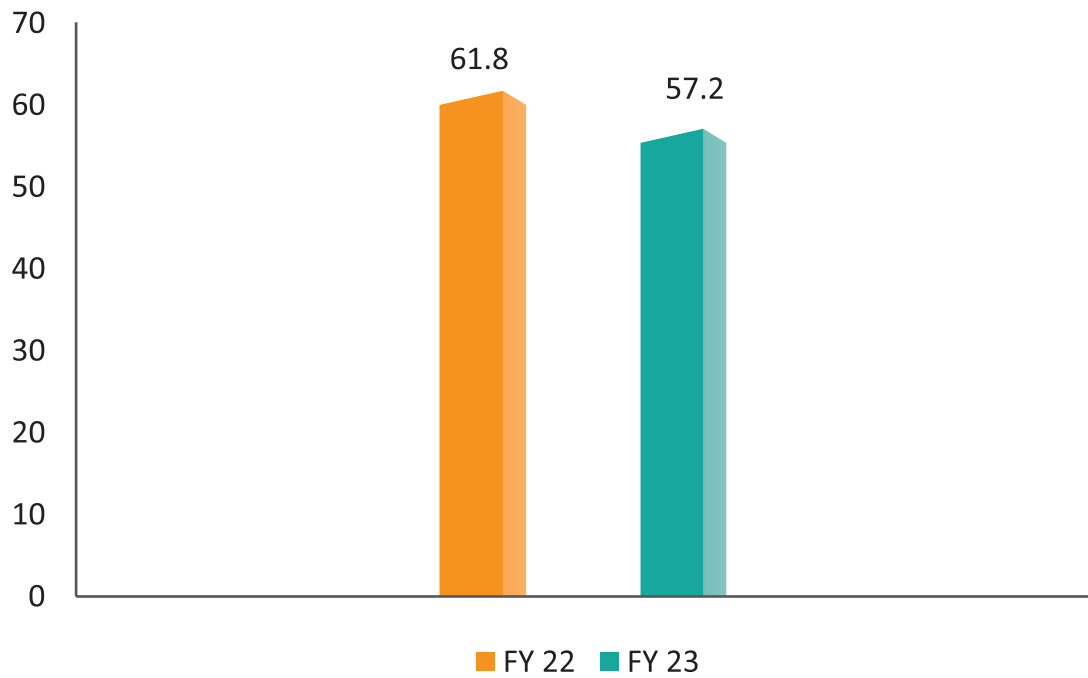




Renewable Energy Share in FY 23



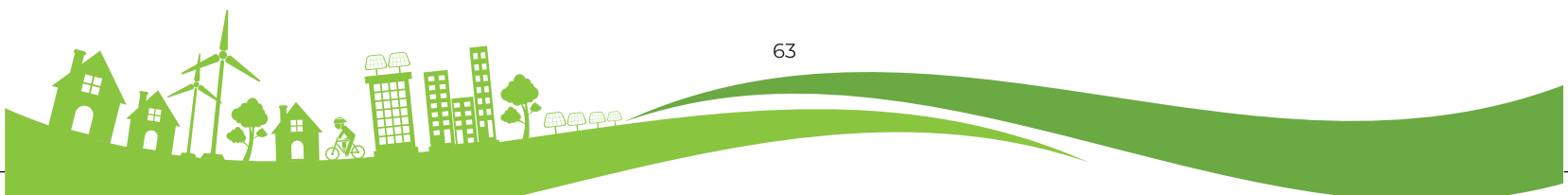
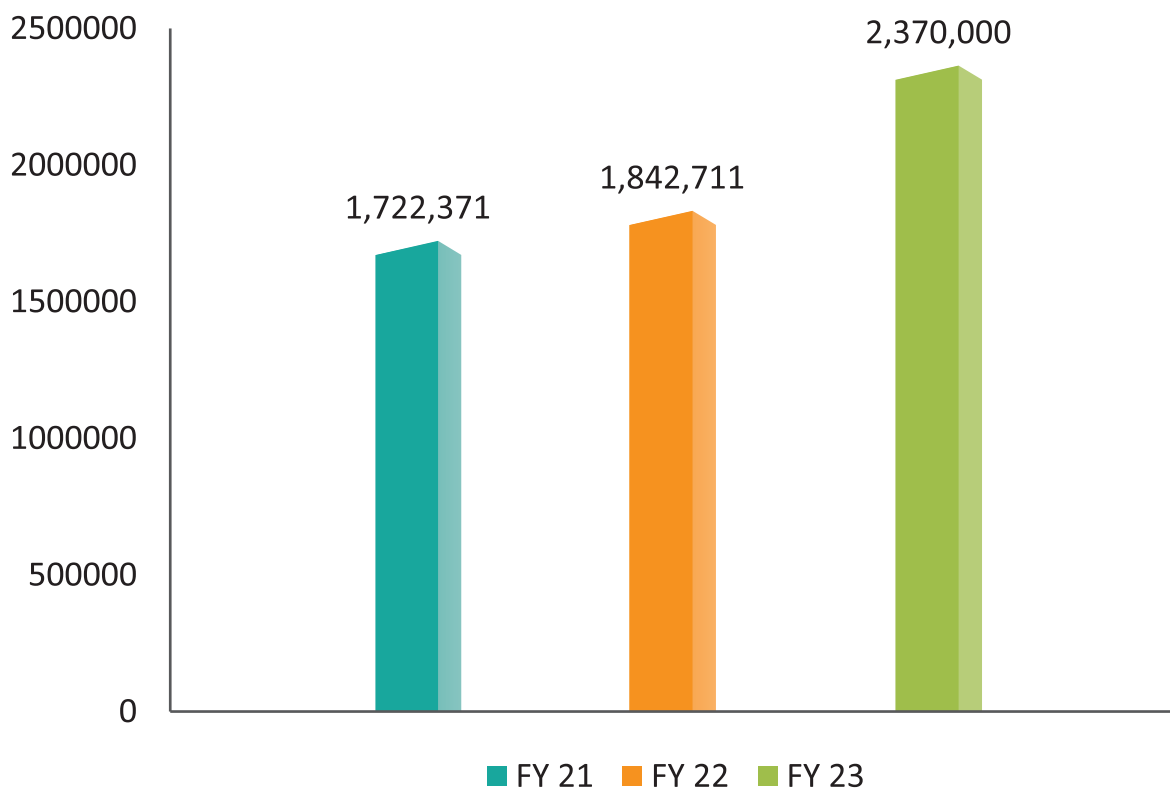
Energy Intensity Per Rupee of Turnover (GJ/INR Crore)



Our Raw Material Consumption

The oversight of raw materials stands as a pivotal benchmark within our organization. The monitoring of raw materials and the systematic generation of routine raw material consumption reports assume importance in shaping our material flow and inventory control strategies across our facilities. The establishment of robust material management protocols proves instrumental in punctually furnishing products to our valued customers. By fostering adept material management practices, we pave the way for timely deliveries, thus culminating in an upsurge in sales and overall profitability.

Raw Material Used (In Metric Tonnes)



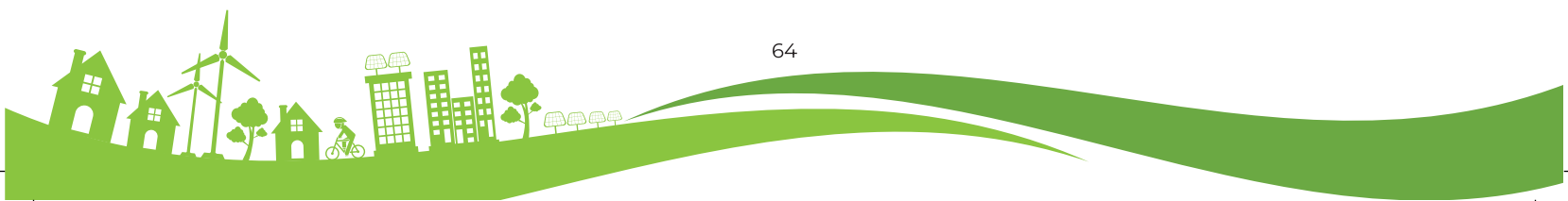
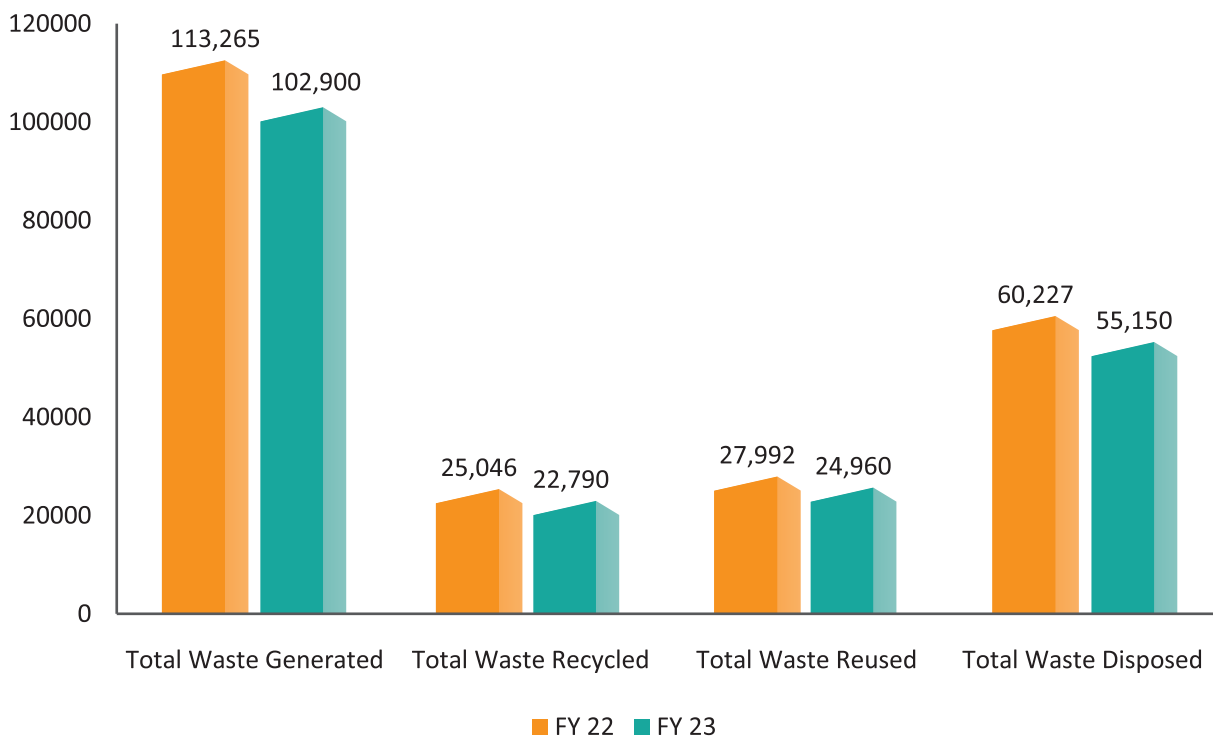


Waste Management

To curtail both our financial outlays and ecological footprint, we address our waste management challenges through a multi-faceted strategy encompassing monitoring, waste reduction, reuse, and recycling to the fullest extent possible. Our waste management performance is depicted in the profile below. Our recycling endeavors are an array of multiple components, including End Cuts, Melting Scrap, Rejection Pipes, Side Cuts, Waste Steel Scraps, Zinc Scraps, Wood Residue, Pipe End Cuts, and Canteen Waste. These materials find renewed purpose as raw materials in accordance with our commitment to responsible resource utilization.

The consequences of mishandling waste extend to the propagation of illnesses and the pollution of vital air and water resources. In recognition of these concerns, we have forged partnerships with a consortium of accredited vendors. These partners have been entrusted with diverse responsibilities including waste disposal, management of wastewater and sludge in designated areas, and the meticulous recycling of scrap materials.

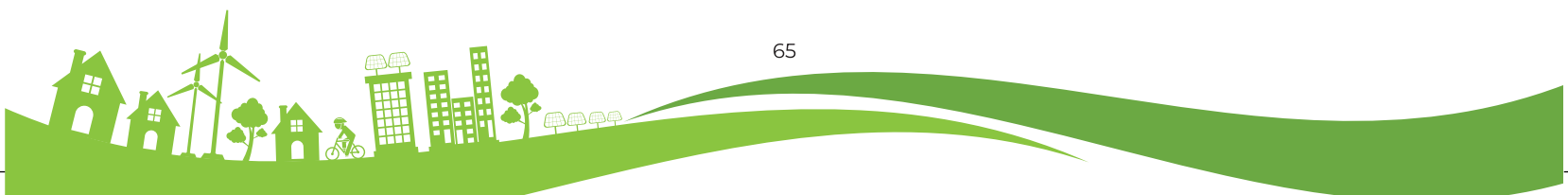
Waste Management (in Metric Tonnes)



Biodiversity

Recognizing our responsibility towards building a greener environment, we have embarked on a series of initiatives aimed at augmenting the tree cover. A significant endeavor in this regard involves our tree planting initiatives, wherein we have planted a total of 5000 plants across a 3.1-acre expanse of land allocated by the government in Gendupur Village, Sikandrabad. This location is in close proximity to our AMPL (A25/Plot 22) and APL A19 plants. To maximize the effectiveness of our afforestation endeavors, we have adopted the innovative Miyawaki technique, pioneered by Japanese botanist Akira Miyawaki. This method facilitates the creation of densely packed, natural forests, and we have committed an investment totaling 2,96,000 INR towards its implementation. The Miyawaki technique ensures a tenfold acceleration in plant growth and a remarkable thirtyfold increase in density compared to conventional plantations. Our approach encompasses the categorization of 1200 plants into four distinct groups, namely Trees with Canopies, Trees, Sub-trees, and Shrubs. This initiative unfolds as a comprehensive three-year strategy aimed at nurturing the development of these miniature forests.

Furthermore, our commitment extends beyond mere planting; we tend to the well-being of these mini forests on an ongoing basis. To amplify our impact, we also initiate plantation drives and gardening initiatives tailored for our employees, building a sense of active participation and responsibility in nurturing the environment. APL Apollo maintains rigorous oversight across all its business ventures, ensuring that none of them lead to the felling of trees. This commitment aligns with our company's core principle of strictly adhering to a no-deforestation policy. In line with this ethos, we are actively engaged in discussions to solidify a company-wide public commitment to the cause of no-deforestation. Notably, none of our operational plants are situated in proximity to or have any adverse impact on reserved or protected forest.



Being Socially Responsible

We firmly uphold the belief that our role extends beyond being mere pioneers in manufacturing goods that transcend industry standards. We enrich our value proposition by nurturing a culture that empowers our esteemed staff, propelling them to achieve excellence. To fuel their ability to consistently craft unparalleled products, we wholeheartedly invest in creating abundant avenues for the growth of each team member, all while ensuring their safety and well-being remain paramount.

Embedded at the core of our sustainability strategy at APL Apollo is a dedicated commitment to community development. Through our endeavors, we aim to alleviate prevailing challenges in critical areas such as healthcare, education etc. This pursuit leaves an indelible imprint, forging a positive legacy and contributing significantly to impact society.

Whether it's the communities we empower, the employees we nurture, the partners we collaborate with, or the investors who place their trust in us, the crux of our stakeholder relationships at APL Apollo is the seamless creation of value for all. This essence underscores our dedication to build relationships that transcend transactional boundaries, enriching the lives of stakeholders and contributing to a brighter, more sustainable future.

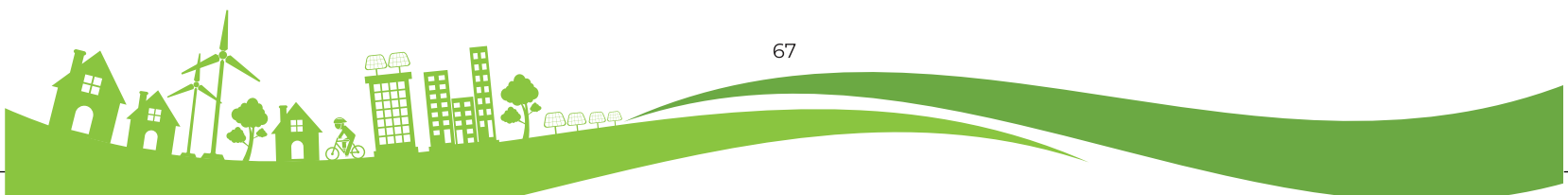
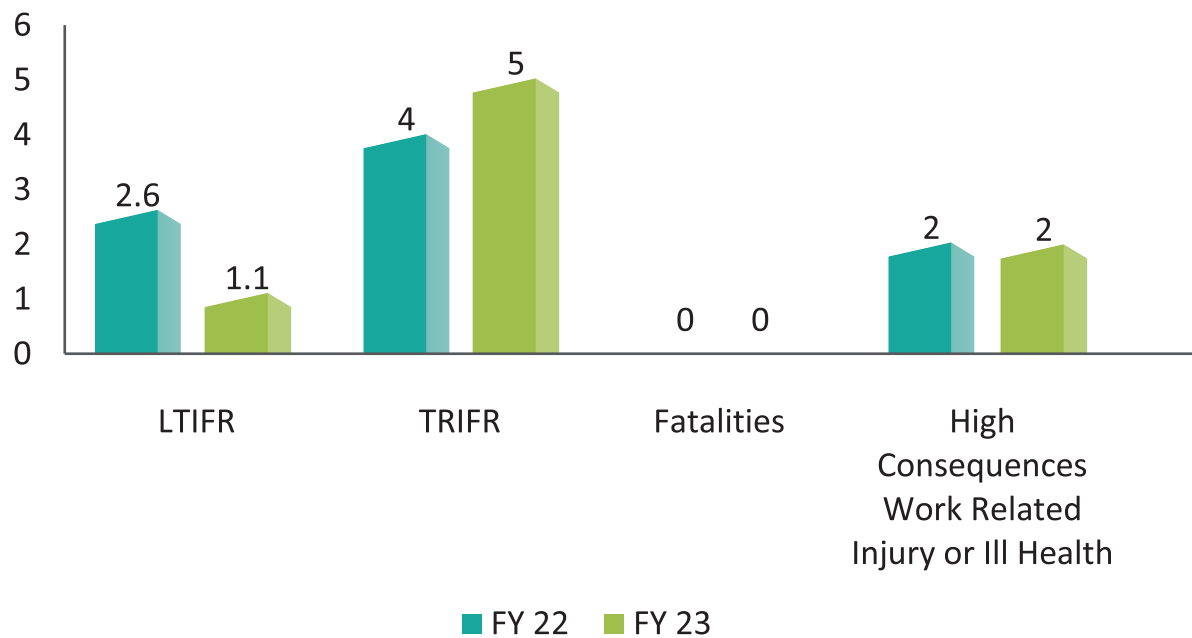


Health & Safety

At APL Apollo, our foremost priority is the safety and well-being of our employees. We are dedicated to ensuring that every employee returns home safely and in good health. Our commitment not only reduces absenteeism but also fosters a highly efficient and productive workplace. Research shows that companies focused on employee health and safety experience increased productivity. Workplace health and safety involve effective risk management, engaging leaders, managers, workers, suppliers, contractors, and customers. Strong leadership is crucial for sustainable development.

We have implemented a robust system for hazard identification, risk management, and incident investigation. We track key metrics like employee absenteeism, Total Recordable Incident Rates (TRIR), Lost-Time Injury Frequency Rates (LTIFR), fatality rates, and Near Miss Frequency Rates (NMFR) to reduce work-related accidents. Safety Committees at the plant level, with worker participation, elevate safety awareness and empower workers to contribute to hazard mitigation. They also receive training and access to information on work-related risks. We have established a mechanism for prompt accident and injury reporting to implement corrective actions swiftly. Additionally, we provide Group Medclaim insurance to all employees and their families, reinforcing our commitment to their well-being. APL Apollo holds the OHSAS 18001:2007 Health and Safety Management System certification, demonstrating our dedication to creating a safe environment for everyone associated with our company.

Health & Safety Indicator for Employees



Health & Safety Indicator for Workers



At APL Apollo, we've developed a detailed safety manual that guides our OHSAS policy. This manual outlines our commitment to occupational health and safety, and we conduct regular safety education and awareness training sessions, with mandatory attendance for all employees. We also conduct mock drills for emergency evacuations to ensure preparedness.

Our safety committee plays a crucial role in investigating accidents and incidents, reinforcing our commitment to proactive safety.

We conduct two types of safety audits:

- Internal Audits: Conducted twice a month by the Plant Head or Head of Department, with audit reports reviewed by Corporate HR.
- External Audits: Carried out quarterly by the ED Technical or VP Production for each location, with audit reports submitted to the COO.

This dual-audit approach ensures a comprehensive evaluation of our operations, promoting accountability and continuous improvement.

We offer various benefits to enhance employees' work-life balance, including a Group Health Insurance Top-Up Medclaim Policy for them and their dependent family members. We also provide Group Personal Accident Insurance coverage for employees' dependent family members in case of disability during their service. Additionally, we offer financial assistance to the family in the unfortunate event of an employee's accident or natural death during their service.

Accident Reporting & Investigation

The reporting and investigation of accidents and incidents are the crucial components of our safety protocols.

Reporting:

At every level, be it the Head Office, Branch Office, Warehouse, or Plant, any and all accidents, regardless of whether they resulted in injuries or fatalities, must be promptly reported to Corporate HR. These reports are also to be included in the monthly safety report. Any deliberate attempt to evade the reporting of accidents will be treated with the utmost seriousness and may lead to disciplinary action.

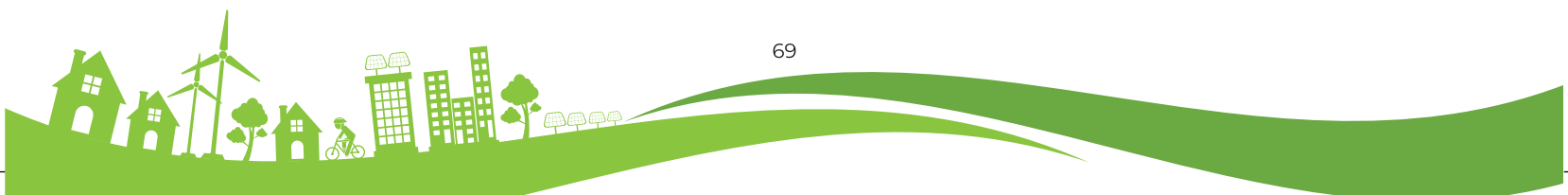
We categorize accidents for clarity:

- ▶ Fatal: Result in loss of life.
- ▶ Major: Cause serious injury, body part loss, or over 48 hours of hospitalization.
- ▶ Minor: Keep the person away from work for up to 48 hours.
- ▶ First Aid Accident: Require first aid, with no more than a day off work.
- ▶ Dangerous Occurrence: Unforeseen incidents potentially causing harm or damage.
- ▶ Near Miss Accident: Events with potential harm but no actual harm.

For fatal accidents, the HOD prepares a fact-finding report submitted to the Plant Head, Corporate HR, and Regional Head, detailing the incident, systemic gaps, and remedial measures. Other accidents follow the same format, submitted to the Plant Head, Corporate HR, Location HR, and Regional Head. These procedures highlight our commitment to safety and proactive accident prevention.

Safety Committee

The Safety Committee's primary goal is to promote safety and prevent injuries and losses throughout the company. Each location forms a Safety Committee with up to five members from various departments, chosen equitably by unit supervisors and front-line workers. Members can anonymously raise concerns about any committee member. The committee meets weekly with a predefined agenda, recording minutes shared with Corporate HR, COO, and VP Production within 48 hours. Meetings include reviewing past minutes, assessing the previous month's injury records, and investigating recurring patterns. The Safety Committee handles various responsibilities, including hazard identification, safety rule enforcement, performance measurement, injury reduction, awareness promotion, program development, safety measure proposals, self-inspections, employee hazard report reviews, safety training support, and creating safety incentive programs. Through these roles, the committee actively promotes a secure work environment.



Mock Drill

The objective of the mock drill is to assess the effectiveness of the Plant's Emergency Action/Response Plan; to evaluate the performance of key personnel designated as Emergency Response Team Members; and to identify and address deficiencies or deviations in the Emergency Management System for potential improvements.

This mock drill is applicable to all manufacturing unit employees and serves the purposes of allowing employees to practice emergency procedures in a controlled environment, confirming their understanding of and ability to carry out emergency duties, conducting headcounts, and evaluating and enhancing evacuation procedures.

Fire drills are conducted quarterly, focusing on elements such as emergency escape procedures, equipment shutdown procedures, headcount procedures, and preferred means of reporting emergencies.

Focusing on the well-being of our employees, we provide safety training to both our plant workers and corporate staff, with the objective of attaining a zero incident and injury rate by the year 2025.

Safety coverage encompasses all manufacturing plants and personnel comprehensively.

100% of employees and workers are provided with safety and skill upgradation training.



Upholding Human Rights

Human rights are fundamental ideals encompassing dignity, justice, equality, and respect, serving as a universal language. Upholding these principles enhances brand reputation and contributes to societal welfare. Businesses are incentivized to seamlessly integrate human rights into daily operations, from corporate offices to manufacturing facilities. We are committed to preventing child labor, harassment, forced labor, and discrimination at all levels. Swift corrective actions are taken against any violations.

APL Apollo has a comprehensive Business Responsibility Policy which addresses the Human Rights issues by firmly opposing issues like human trafficking, forced labor, child labor, and discrimination. Equal remuneration for all is emphasized, extending to our suppliers, with strict adherence mandated. Violations lead to contract termination, reinforcing our commitment to a fair, ethical, and responsible business environment.

We adhere to laws and regulations safeguarding employee and labour rights across our operations. We support employees' rights to establish trade unions as a protective measure against wage disparities, offering stability and support during disruptions. This holistic approach reflects our commitment to a harmonious work environment valuing every individual's contribution and well-being.



0 cases
of child labour



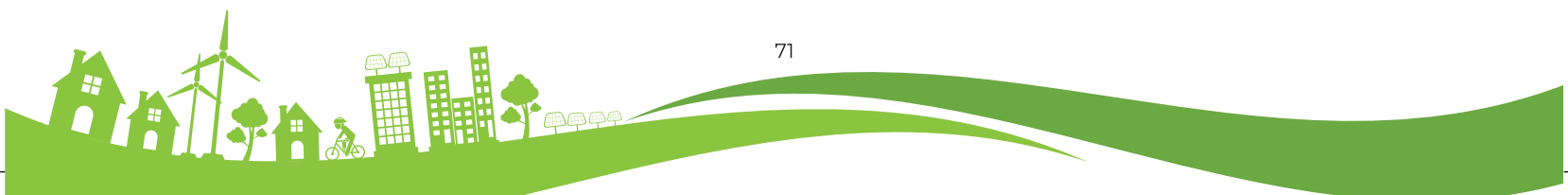
0 cases
of discrimination



0 cases
involuntary/forced labour



0 cases
of sexual harassment



Diversity & Inclusion

At APL Apollo, we're committed to fostering diversity, eradicating biases, and providing equal opportunities. We strongly oppose discrimination based on age, color, disability, origin, religion, race, gender, family/marital status, gender reassignment, sexual orientation, pregnancy, or maternity status. We focus on increasing female representation at all levels and support their advancement through leadership initiatives and a gender parity strategy.

We engage in ongoing conversations with female employees to understand their concerns, including sexual harassment, fair compensation, work-life balance, and career prospects. This helps identify areas for improvement and acknowledges their contributions. We annually celebrate International Women's Day to advocate for gender equality, challenge biases, and encourage individuals to combat gender stereotyping and discrimination.

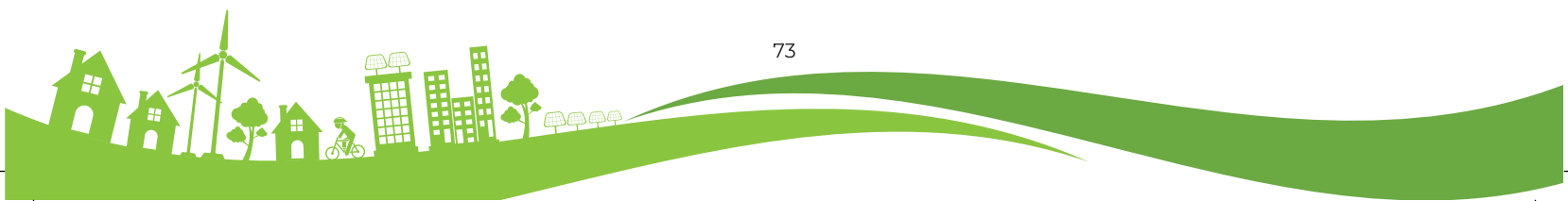
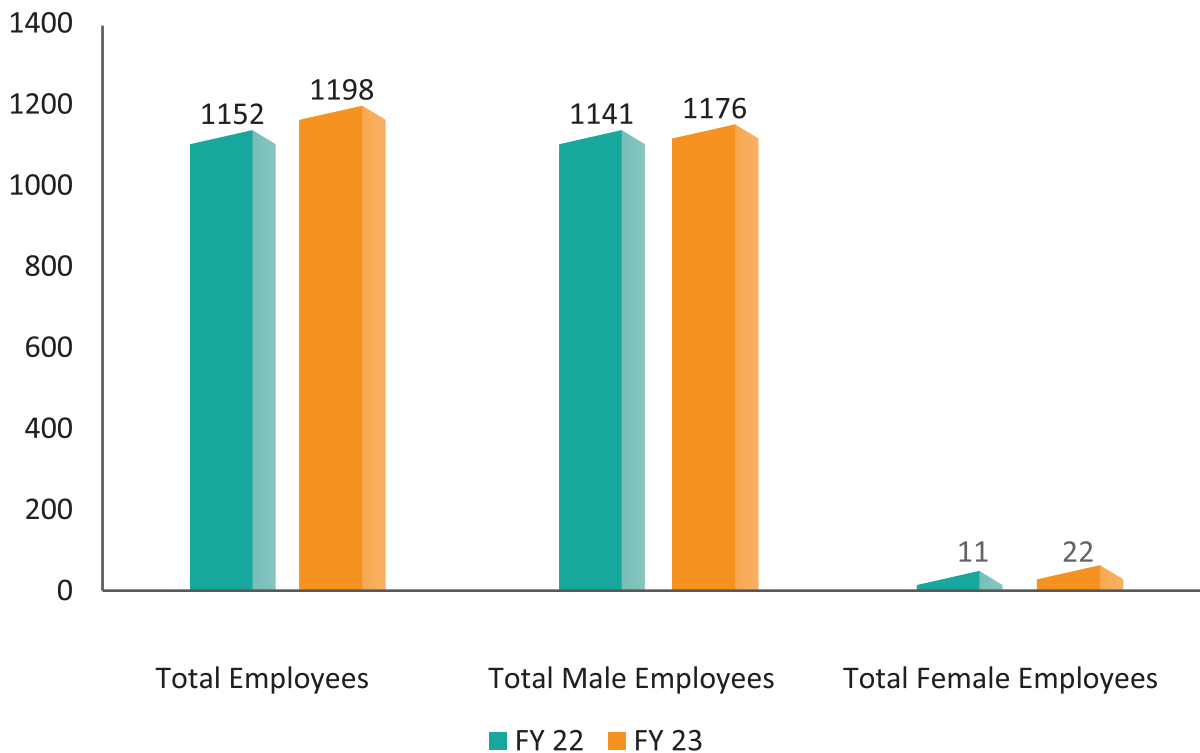
In line with our commitment, we aim to increase the representation of female employees in the permanent workforce category by 5% before 2025. This goal reflects our determination to create an inclusive and equitable workplace that recognizes and harnesses the potential of every individual, regardless of background or gender.



Human Capital Development

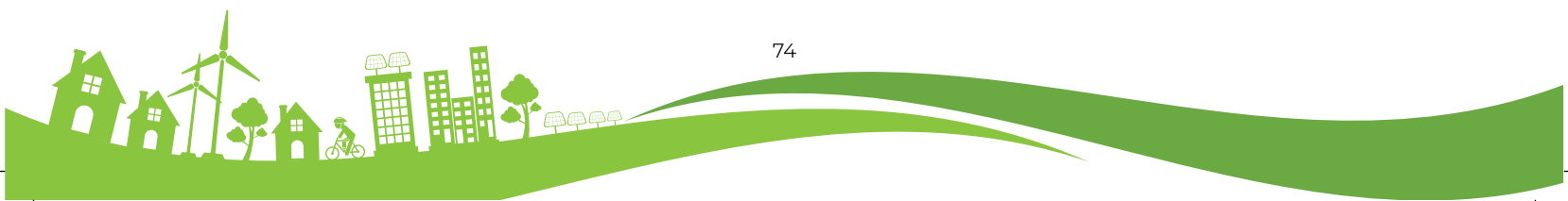
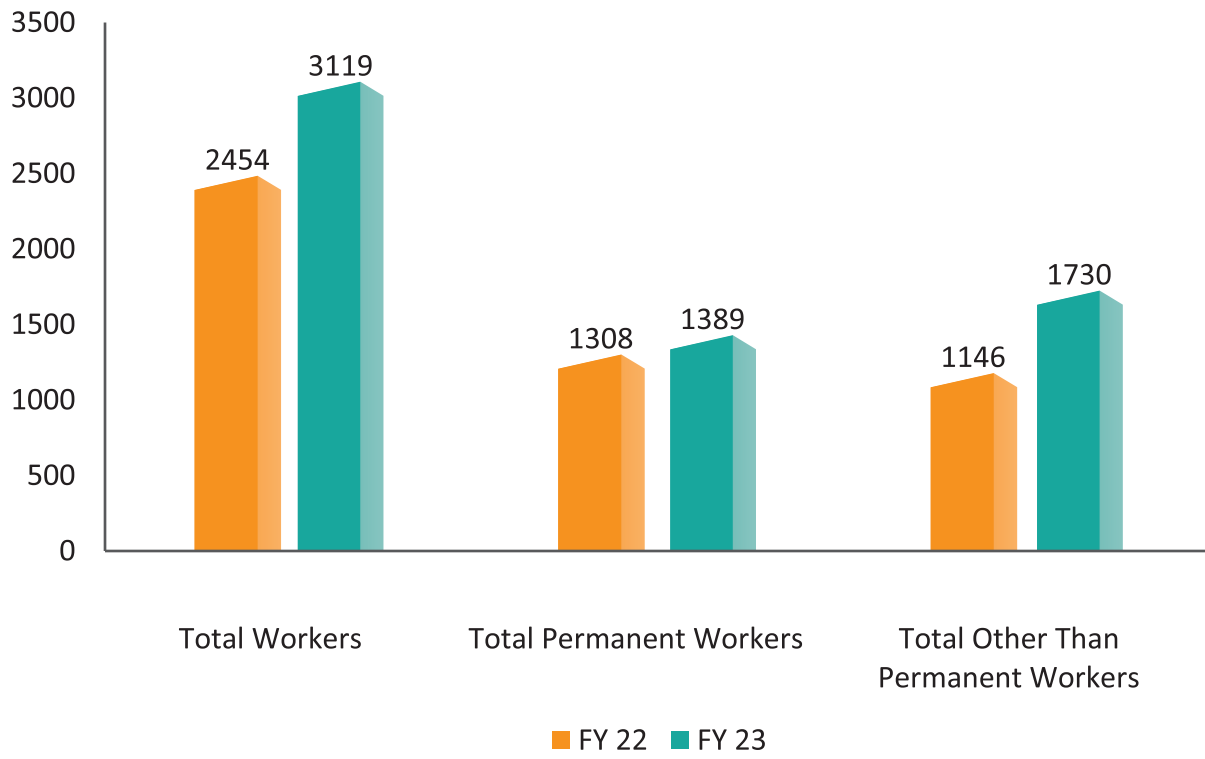
At APL Apollo, employees and workers play a crucial role in our success. We believe in continuous upskilling and comprehensive training to empower our workforce and achieve mutual success. Building trust and acknowledging their dedication is essential. Effective performance management is key, using the Balanced Scorecard technique to align staff objectives with organizational goals. A well-executed Performance Management System (PMS) offers clarity, encourages feedback, and enhances employee retention. We believe in recognizing and rewarding contributions to motivate and foster a culture of continuous improvement. Training is vital to expand knowledge and enhance proficiency, including safety protocols. It boosts confidence, sparks innovation, and improves performance. We are committed to providing ongoing training to keep our employees at the forefront of industry advancements, enabling us to thrive in a competitive landscape. Our investment in training reflects our dedication to equipping our workforce with the skills and knowledge needed for innovation and excellence.

Total Workforce (Employees)





Total Workforce (Workers)



Employee Engagement

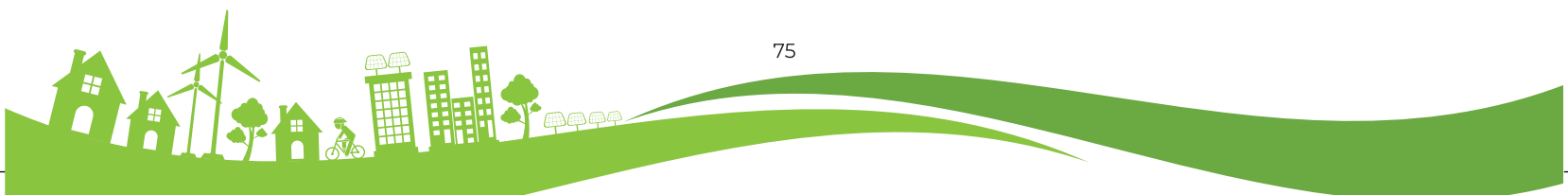
In the current landscape, effective employee engagement and involvement are paramount. At APL Apollo, we actively foster engagement to empower individuals in achieving their aspirations. This approach reduces retention rates, enhances productivity, fosters communication, and cultivates a thriving workplace culture. We are committed to endorsing work-life balance and mental well-being, creating a content and proficient workforce.

Our ethos revolves around a corporate culture that is healthful, inclusive, empathetic, tolerant, and respectful. We value the unique attributes, insights, and skills of our employees, recognizing their collective contribution to our success as an inclusive organization. Increased involvement positively impacts revenue generation, job satisfaction, and employee retention.

Our approach extends beyond the workplace, encompassing employee volunteering and healthcare initiatives. These initiatives, combined with our focus on workplace inclusivity, create an environment that promotes productivity and personal and professional growth. This engagement strategy reflects our commitment to empower, fulfill, and inspire our workforce to reach their full potential.

Employee Volunteering

Cultivating a culture of employee volunteerism has the potential to boost morale, improve the workplace environment, and shape brand perception. This practice fosters connections among colleagues and instills pride in the workplace. Its impact extends beyond our organization, influencing our reputation within the broader community and among prospective employees.



Employee Grievance Redressal Mechanism

A proficient grievance management system allows employees to voice their concerns. We believe that without an effective grievance procedure, unaddressed dissatisfaction can lead to detrimental consequences and disruptive behavior. Addressing and resolving issues promptly is crucial. We empower our managers with grievance management training to mitigate adverse effects on employee well-being and performance, maintaining a harmonious work environment. Managers adeptly handle grievances, collecting data to understand their nature. This data is documented to formulate remedies, preventing dissatisfaction from escalating.

We have an employee grievance system in place across all our office and factory locations. In factories, the HR Department holds regular meetings with workers to record and resolve grievances within 48 hours (Turnaround Time). If the HR Department can't address the issue, it is escalated to the Plant Head. Our clear escalation matrix ensures prompt and effective resolution of employee concerns, reflecting our commitment to a supportive and responsive work environment.



Hiring & Onboarding

At APL Apollo, we create an environment that fosters individual growth and active engagement in our company's expansion. Our employees' commitment not only helps us navigate challenging commercial landscapes but also strengthens our resilience. Our culture is characterized by innovation, excellence, collaboration, transparency, and open communication. We have multiple avenues for dialogue and feedback, facilitating continuous improvement. We regularly evaluate and adapt our HR policies based on insights from diverse communication channels and industry best practices, ensuring transparency in communication, including onboarding for new hires.

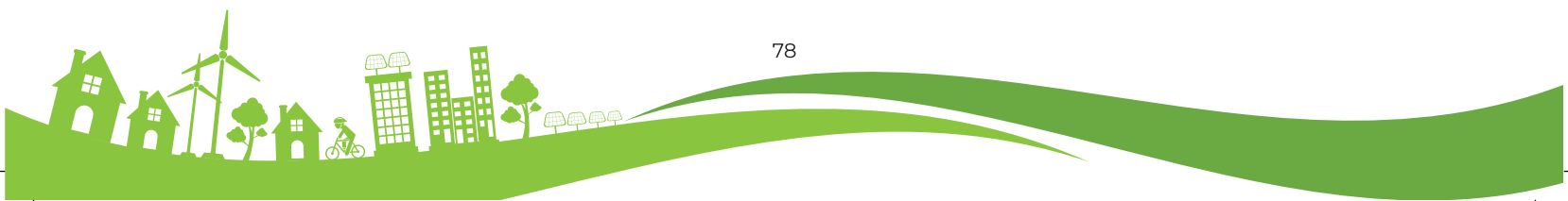
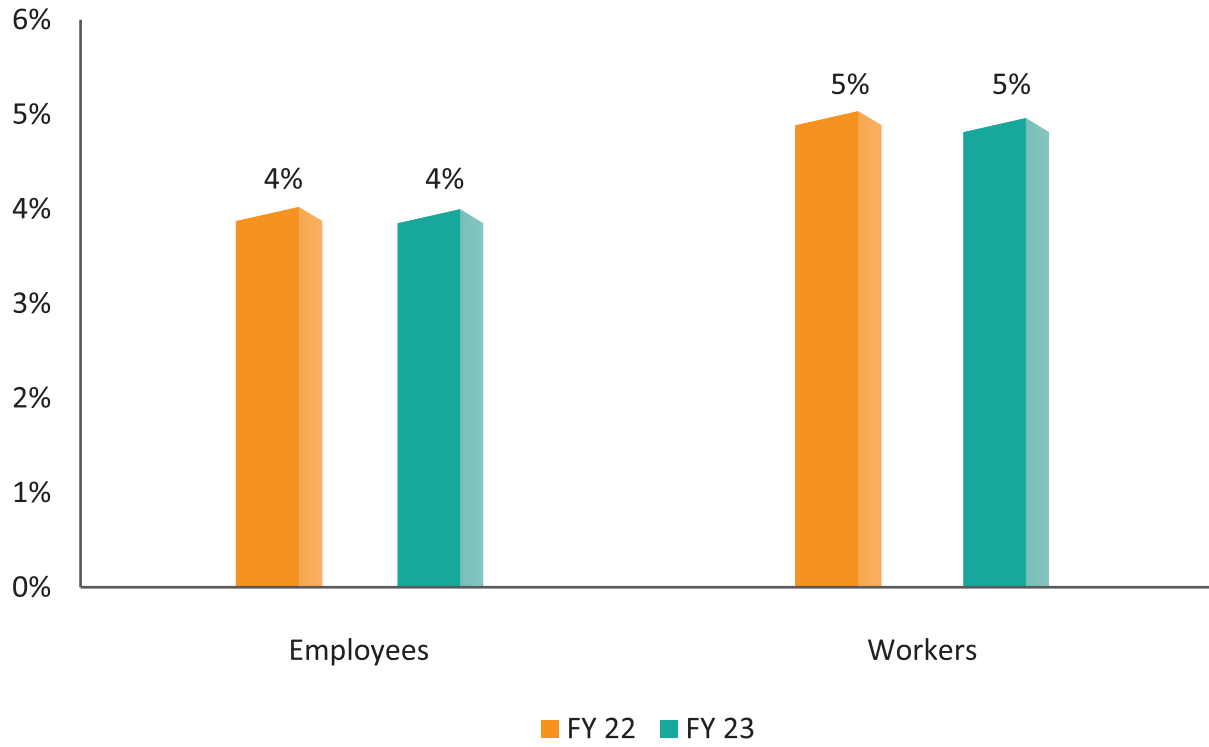
Our recruitment process selects skilled professionals aligned with our values, leading to enhanced revenue generation, reduced turnover, lower rehiring costs, efficient training utilization, and increased company efficacy. We prioritize candidates with technical competence who resonate with our organizational philosophy. We offer competitive compensation, diverse career advancement opportunities, and entitlements to nurture a dedicated workforce. This approach underscores our commitment to creating an environment where employees thrive, grow, and actively contribute to APL Apollo's ongoing success.

450
New Hires in FY23

16% increase in female diversity
across workforce in FY23



Workforce Turnover Rate



Local Community Development

Community development is our central objective, fostering interconnectedness and mutual growth within our surroundings. We operate in a socially responsible manner, nurturing the well-being of our community. We actively engage with the community, especially where our operations are located, seeking their perspectives on our activities. Our approach includes a board-approved CSR committee guided by a comprehensive CSR policy. This policy defines the committee's composition, roles, responsibilities, and the framework for uplifting marginalized segments of society. The committee evaluates the CSR policy periodically, establishes a transparent regulatory mechanism, and recommends funding for CSR initiatives. Our CSR efforts go beyond profit margins, reflecting our commitment as conscientious corporate citizens addressing broader social issues. In April 2022, we established the APL Apollo Foundation with necessary approvals, including 12A, 80G, CSR-1, and others. While our CSR obligation currently falls below statutory impact assessment thresholds, we monitor expenditure, validate it through direct verification, and certify it through designated Chartered Accountants. We are also moving toward large-scale initiatives like hospitals and schools through the APL Apollo Foundation to directly reach beneficiaries and create a meaningful and lasting impact on society.

At APL Apollo, we believe in establishing dependable mechanisms for addressing grievances to preemptively tackle issues and maintain the confidence of local communities. Our interactions with these communities are based on mutual respect and open communication, allowing us to actively seek and incorporate their perspectives into our business operations. We have a formalized grievance management system designed to receive, investigate, address, and resolve complaints or grievances from affected communities promptly, equitably, and consistently.

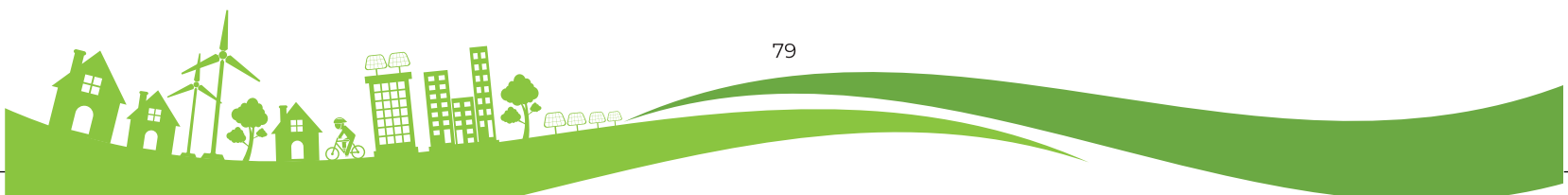
Our commitment to transparency and accountability is evident in our diligent tracking and addressing of community concerns. In the past fiscal year, we achieved a noteworthy milestone: zero complaints from the community. This underscores our proactive approach to community engagement and the effectiveness of our grievance mechanisms.

111 million INR CSR Expenditure

6000 CSR Beneficiaries in FY23

12 successfully implemented CSR Projects

CSR Strategy to be formulated by 2025



In FY23, our projects were relatively small, but we have ambitious goals for enhancing our social and environmental impact assessments and community engagement in FY24. These goals include conducting comprehensive social impact assessments, environmental monitoring, and stakeholder engagement plans, as well as disclosing the results of these assessments. Our local community development initiatives have included projects such as cowsheds, borewells, eye care camps, and providing higher education in various regions. We are committed to ensuring the inclusion of vulnerable groups in our community consultation committees and processes. Additionally, we have established works councils, occupational health and safety committees, and other worker representation bodies to address impacts, along with formal local community grievance processes. These initiatives reflect our dedication to enhancing our social and environmental responsibility in the coming year. No adverse reports have arisen in FY23 from either the Corporate Governance and CSR Team of Group Companies or the APL Apollo Foundation.



Our Ongoing CSR Activities

Museum of Solutions (MuSo)

We've collaborated with the JSW Foundation in Mumbai to support the establishment of the 'Museum of Solutions' (MuSo). This initiative in Mumbai spans over 60,000 square feet and eight storeys, aligning with the UN Sustainable Development Goals and the new National Education Policy. MuSo focuses on nurturing children's knowledge, skills, and problem-solving abilities to empower them to tackle real-world challenges. Our involvement reflects our commitment to corporate social responsibility (CSR) and our dedication to promoting education, especially special education and vocational skills for improved employment prospects. By partnering with the JSW Foundation, we aim to enhance the impact of the MuSo project and drive positive change in education and sustainable development.

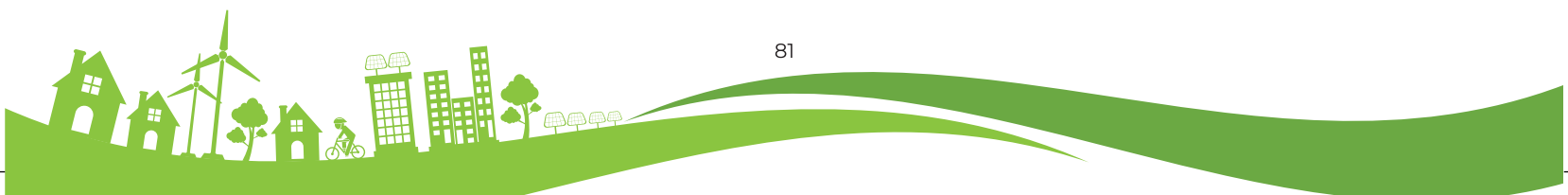
Health care Initiatives

Committed to community well-being, our efforts in community health focus on promoting healthy lifestyles, preventing diseases, and providing health benefits. We expand community health programs to bridge disparities and ensure equitable access to health resources.

- ◆ We've established a medical university in Jhajjar, Haryana, in collaboration with the Maharaja Agrasen Hospital Charitable Trust, to address the shortage of medical professionals and expand health services, especially to underserved populations.
- ◆ We've constructed a labor/medical room at the Sewa Bharati Lala Deep Chand Memorial Hospital, in partnership with Sewa Bharti, Delhi - Regd. Society, to enhance the quality of care for patients.
- ◆ We've partnered with the Shri Aksharapurushottam Public Charitable Trust to upgrade and modernize the Charitable Eye Hospital - Praukhswami Eye Hospital, Mumbai Bochasanwasi, improving the diagnosis and treatment of eye-related conditions.
- ◆ We have conducted an eye care campaign through Vardan Sewa Sansthan.



Our commitment to community health reflects our responsibility as a corporate entity and our dedication to contributing to a healthier society.





Supporting Education

Education is at the heart of our CSR initiatives, driven by our belief that it not only facilitates learning and cultural enrichment but also plays an important role in improving human well-being, knowledge, health, living standards, social equity, and overall productivity. We prioritize education as a key driver of societal progress.

- ◆ In partnership with Plaksha University and the Reimagining Higher Education Foundation (RHEF), we support the transformative cause of education. Plaksha University is dedicated to revolutionizing engineering and technology education. We're contributing Rs. 50 million to build the APL Apollo Student Activity Center on the Plaksha campus and granting undergraduate scholarships to deserving students.
- ◆ We've partnered with the Bharat Lok Shiksha Parishad to support 30 Ekal Vidyalayas across Uttar Pradesh, creating opportunities for underprivileged individuals to explore various subjects and foster critical thinking and intellectual growth.
- ◆ We've provided education to underprivileged children through Vishwa Prakash Mission.

Our commitment to education reflects our dedication to societal well-being, progress, and a brighter future.





Community Welfare

Empowering local communities through grassroots initiatives is crucial for achieving community-driven progress and sustainable growth. These initiatives are rooted in shared vision and priorities within specific geographic areas and emphasize local strengths, collaboration, intentionality, and adaptability to effect systemic change.

- ◆ Our partnership with the Dhyani Foundation has supported marginalized communities with sustenance, established schools for underserved populations, and extended compassion to animals in need.
- ◆ Provided support in setting up of borewell, cowshed, sound system in schools etc. in Kesda and Ringni villages of Raipur.
- ◆ Collaborating with the Chinmaya Organization, we've initiated a robust Rural Development program, recognizing its vital role in individual lives and the nation's economic progress.
- ◆ Through the Earth Savors Foundation, we've built a shelter home that aids abuse survivors in recovery, self-esteem rebuilding, and regaining independence. We've also provided sustenance to the shelter home's residents.
- ◆ Our involvement in International Humanitarian Aid has facilitated refugee rehabilitation and poverty alleviation, contributing positively to our home country's national reconciliation and peace.
- ◆ Supporting the "Samuhik Vivah" initiative in collaboration with Shri Ganesh Steels, we've furnished utensils for collective celebrations, fostering communal togetherness.

These initiatives demonstrate our commitment to community-driven progress, collaborating with local entities to promote sustainable growth, inclusivity, and positive change from the grassroots level up.

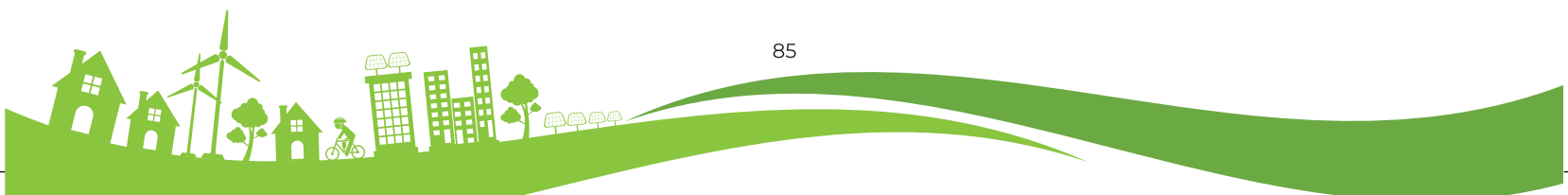
Supply Chain Management

Operating in the global steel sector, supply chain management plays a pivotal role in managing economic, social, and environmental risks that can impact our operations and industries we serve. Our commitment to sustaining stakeholder confidence in our activities drives us to maintain high standards in supply chain management. Our procurement and contracting processes align our long-term objectives with those of our suppliers and industry customers. Our Supply Chain team oversees these processes and evaluates prospective vendors and customers using market intelligence and technical insight. Nurturing relationships with key suppliers and customers is a top priority. We evaluate our supply chain ecosystem against Environmental, Social, and Governance (ESG) criteria, ensuring ethical collaborations. We prioritize local sourcing to enhance operational efficiency, empower communities, and ensure timely product deliveries. Our Supplier Chain Policy, available on our official website (www.aplapollo.com) reflects our commitment to excellence and ethical stewardship in the supply chain. Approximately 95% of our suppliers adhere to strong social compliance standards, and we thoroughly assess new suppliers before onboarding them. We source 5-7% of our materials from MSMEs and small-scale producers and primarily engage with Tata and JSW for significant cost savings on freight.



Governance

APL Apollo's operation relies on a robust system, strong leadership, and detailed regulations. We have a history of transparency and equitable governance, creating enduring value for stakeholders and generating wealth. We prioritize providing shareholders with quick access to accurate information about our financial and operational performance. Our commitment to ethical corporate governance is central to our ethos, guiding our decision-making. Corporate governance for us isn't just about compliance but an intrinsic rhythm that drives us to create lasting value for our shareholders, customers, employees, and the community we serve.



Corporate Governance

The Company adheres to corporate governance requisites as mandated by SEBI Listing Regulations. These requisites encompass shareholder rights, stakeholder involvement, transparency, disclosure, board responsibilities, and regulatory obligations. Corporate governance involves frameworks, mechanisms, procedures, and relationships that guide organizational direction and management. APL Apollo is dedicated in its commitment to optimal governance standards, ensuring accountability, ethical conduct, transparency, and equity among stakeholders. This commitment is realized through rigorous board governance, internal controls, and audit procedures. Our corporate governance ethos goes beyond procedural compliance; it promotes fairness, civic responsibility, and integrity as the foundation of all operations. These principles have guided our journey, shaped our actions, and emphasized the importance of our employees and stakeholders in our ongoing success.



Uphold Highest Level of Integrity and Transparency While Orchestrating Company's ESG Initiatives



Ensure Compliance to Business Code of Conduct and Ethics Across Our Value Chain



Promote Equal Opportunity For All



Continue to Comply with Regulatory Frameworks

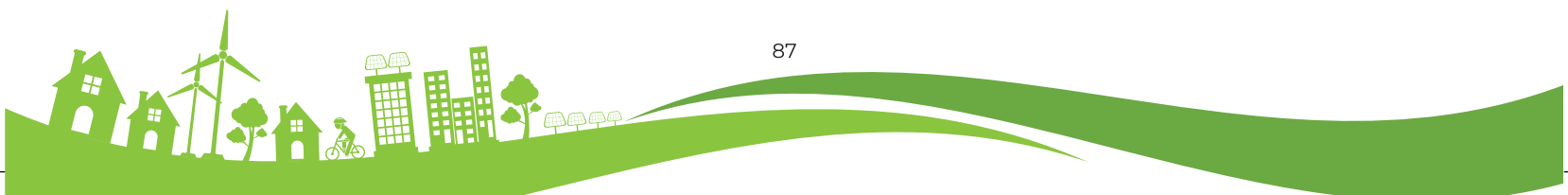
APL Apollo's Code of Governance

Corporate Governance encompasses legal frameworks, regulations, best practices, and systematic structures that enable efficient and ethical organizational functioning, resulting in value creation for stakeholders. It is rooted in the ethical foundation of business operations, fostering sustainable value. APL Apollo's culture is deeply embedded with effective Corporate Governance practices. The company upholds a legacy of impartiality, transparency, and ethics. Sound Corporate Governance is an ongoing journey, emphasizing transparency, accountability, fairness, and ethics. The company's framework, transactions, protocols, and disclosures align with these principles, supported by a robust system of checks and balances. The Nomination and Remuneration Committee has established a comprehensive Remuneration Policy to ensure competitive, performance-linked compensation for Directors, Key Managerial Personnel, and employees, fostering motivation and aligning with the company's objectives. APL Apollo integrates ESG factors into performance evaluations for senior leadership, offering Performance-Linked Bonuses and incentives to employees across corporate and plant operations.

Board of Directors

The Company places significant value on a diverse board, recognizing its crucial role in guiding and overseeing management. The Board is vested with authority and responsibilities per SEBI Listing Regulations, which mandate specific composition criteria for the top 2000 listed entities. These regulations require a minimum of 6 directors on the board, with a balanced mix of executive and non-executive directors. For the top 1000 listed entities, at least one independent woman director is mandated. Additionally, a minimum of half the board members must be non-executive directors. In cases with a non-executive chairman, at least one-third of the board should be independent directors. If there is no conventional non-executive chairperson, independent directors should constitute at least half the board, even if the chairperson is connected to the promoters or individuals in managerial roles. The Board's central role within the Corporate Governance framework involves vigilant oversight to ensure management actions consistently align with the interests of all stakeholders.

SL. No.	Name of the Director	Category
1.	Mr. Sanjay Gupta	Executive Chairman
2.	Mr. Ashok K. Gupta	Director
3.	Mr. Vinay Gupta	Director
4.	Mr. Rahul Gupta	Director
5.	Mr. Deepak Goyal	Director
6.	Mr. H.S. Upendra Kamath	Independent Director
7.	Ms. Asha Anil Agarwal	Independent Director
8.	Ms. Neeru Abrol	Independent Director
9.	Mr. Anil Kumar Bansal	Independent Director
10.	Mr. Abhilash Lal	Independent Director
11.	Mr. Virendra Singh Jain	Independent Director





Mr. Sanjay Gupta
Executive Chairman

With approximately 26 years of extensive experience spanning various segments of the steel industry, Shri Sanjay Gupta has played a significant role. Under his visionary and dynamic leadership, the company has undergone a remarkable transformation, progressing from a manufacturer of structural steel tubes to a worldwide leader in branded steel products. His entrepreneurship skills, inherited from his late father, Shri Sudesh Gupta, have been instrumental in guiding the company's growth. Under his stewardship, the organization continues to expand significantly, striving to attain international recognition.



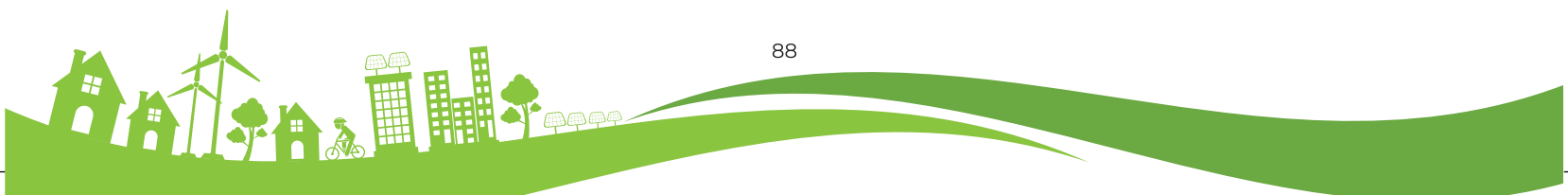
Mr. Ashok K. Gupta
Director

Mr. Ashok K. Gupta possesses a master's degree in physics and has successfully completed his PGDBA from AIMA. As an industry veteran, he boasts an impressive career spanning over three decades, during which he has held management roles in esteemed organizations such as SAIL, Jindal, Bhushan Steel, the L.N. Mittal Group, Apollo Pipes Ltd., and Shalimar Paints Limited. He has consistently served as the driving force behind the company's growth engine, delivering consistently profitable results for the organization.



Mr. Vinay Gupta
Director

Drawing upon over twenty years of industry experience, Mr. Vinay Gupta possesses extensive expertise in the manufacturing and trading of various steel products, including pipes, tubes, sheets, and more. He has been entrusted with the role of spearheading the company's endeavors in the pre-galvanized sector and international markets.



Mr. Deepak Goyal
Director



Mr. Deepak Goyal has served as the Chief Financial Officer of the company since February 18, 2015. His association with the company spans a decade, having joined APL in 2013. Prior to this, he gained valuable experience during his nine-year tenure with Surya Roshni Limited. He is also a member of ICAI.

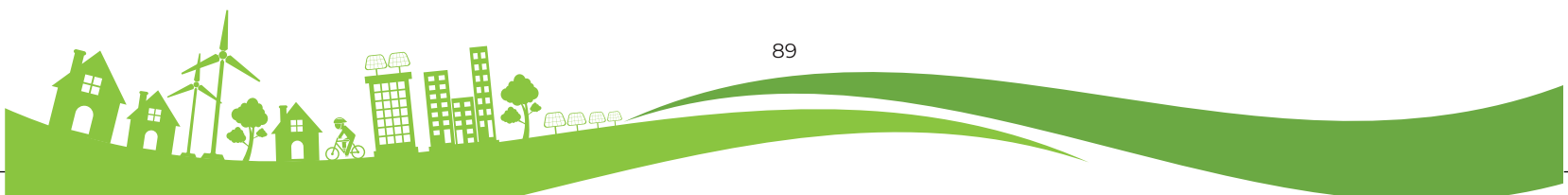
With nearly two decades of expertise in the structural steel tubes manufacturing business, Mr. Goyal has taken on various roles, including operational management, marketing, and institutional sales. He played an exceptional role in formulating corporate strategy, financial planning, overseeing corporate affairs, managing information technology, human resources, and investor relations for the APL Group.

Mr. Rahul Gupta
Director



Mr. Rahul Gupta holds a B.Com. (Hons.) degree from Delhi University. He has further enriched his knowledge through executive courses in Management from renowned B-Schools such as the London School of Economics and the Indian Institute of Management, Ahmedabad (IIMA).

With approximately 7 years of experience in the structural steel tubes manufacturing industry, Mr. Gupta has made his mark as a promising entrepreneur. His expertise encompasses various aspects, including operational management, marketing, and institutional sales. His contributions were recognized when he received the 'Young Achiever Award' for Organization Building at the Global HR Summit in 2017. Presently, he serves on the Board of SG Finserve Limited and various other group companies.





Mr. H.S. Upendra Kamath Independent Director

Kamath is a distinguished banking professional with an illustrious career spanning over four decades in the Indian Banking Industry. With a remarkable tenure of 35 years at Union Bank of India (UBI), he began his journey in 1973 as a Probationary Officer and served various departments and eventually rose to the position of General Manager in UBI. Thereafter, he served in two other Public Sector Banks namely Canara Bank as ED and in Vijaya Bank as CMD. Throughout his extensive career, he held diverse roles and successfully managed operations at various levels, including Zonal Office, Branch Offices, Regional Office and the Head Office of UBI. His outstanding contributions to the banking sector have earned him numerous accolades and recognitions. Notable among these are the “Best Customer Friendly Banker Award 2012,” SIDBI’s CGFTMSE award, “National Award for Excellence in Lending to Micro Enterprises,” and the “IT Leadership Award 2013” by Amity University. With a Certified Associate of Indian Institute of Bankers (CAIIB) qualification and a Bachelor of Commerce (B. Com) degree, he possesses a wealth of expertise in critical areas such as MSME, Retail Banking, Priority Sector, Recovery and Legal, Risk Management, International Banking, Treasury, Credit-Monitoring, and Administration.



Ms. Asha Anil Agarwal Independent Director

Asha Anil Agarwal is a former Principal Chief Commissioner of Income Tax in the Indian Revenue Service, Ministry of Finance, Central Government India. Ms. Agarwal brings with her around four decades of rich experience in the Indian Revenue Service. Her impressive knowledge of Taxation, Finance and General Management are strongly backed by her rich professional expertise.





Ms. Neeru Abrol
Independent Director

As a Chartered Accountant, Ms. Abrol brings to the table nearly four decades of extensive professional experience in diverse sectors and roles. She has a distinguished career that includes 26 years of dedicated service with the Steel Authority of India Ltd, where she held critical management positions. This tenure has afforded her insights into the intricacies of the steel industry and its operational intricacies.

Ms. Abrol's remarkable career also features her past roles as the Chairperson and Managing Director, as well as Director of Finance, at National Fertilisers Ltd. Presently, she serves as a Director on the boards of TCNS Clothing Co Limited, Apollo Pipes Ltd, Stecol International Pvt Ltd, among other companies. Additionally, she actively participates in various non-governmental organizations (NGOs).

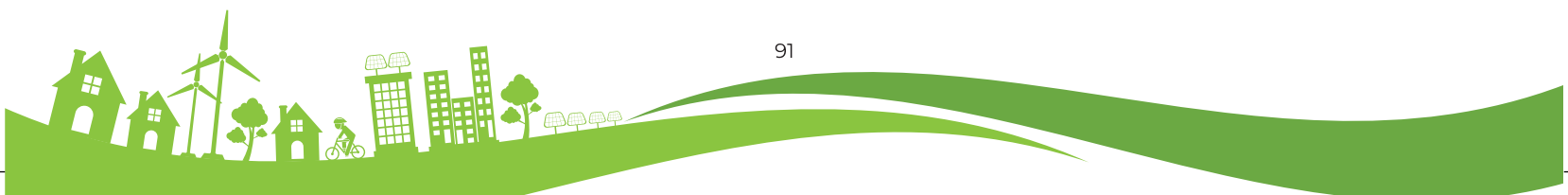
Throughout her illustrious career, Ms. Abrol has garnered multiple awards and accolades, including the prestigious 'Business Achiever' recognition twice from ICAI and the 'Outstanding Woman Manager in Public Sector Enterprises' accolade from SCOPE.



Mr. Anil Kumar Bansal
Independent Director

As a former executive director of the Indian Overseas Bank, Mr. Anil Kumar Bansal brings a wealth of experience spanning four decades in the banking industry. His invaluable expertise aids the organization in making critical financial decisions, underpinned by his extensive knowledge of banking practices, the Indian economy, corporate affairs, and risk assessment, which are firmly rooted in his extensive professional background.

Presently, Mr. Bansal holds the position of Director at GVFL Trustee Co Pvt. Ltd. and SG Finserve Ltd. He has also previously served as an Independent director on the boards of Canara HSBC Oriental Bank of Commerce Life Insurance Company Limited, CARE Ratings Limited, NABARD, IFCI Venture Capital Funds Limited, and GVFL Trustee Co Pvt. Ltd.





Mr. Abhilash Lal Independent Director

Possessing a background in mechanical engineering and a postgraduate degree from IIM Bangalore, Mr. Abhilash Lal boasts an impressive professional career spanning 33 years. Throughout his journey, he has held senior positions in a wide spectrum of financial services domains, encompassing banking, consulting, real estate, private equity, and restructuring. His leadership roles have encompassed various aspects, including business development, strategic planning, and operational management across different institutions.



Mr. Virendra Singh Jain Independent Director

Mr. V.S. Jain has successfully completed his tenure as a member of the Public Enterprises Selection Board (PESB), an entity established by the Government to formulate effective managerial policies for central public sector enterprises and offer recommendations to the Government regarding appointments to senior management positions at the board level.

Throughout his distinguished career, he has held several key roles, including Chairman of the Steel Authority of India (SAIL) and the position of Executive Director at the Indian Oil Corporation (IOC). He has also contributed his expertise as an independent director on the Boards of Rashtriya Ispat Nigam Ltd., Essar Oil Ltd., and the National Multi-Commodity Exchange of India. Currently, he serves on the Board of Dalmia Bharat Ltd.

Mr. Jain holds fellow membership status with both the Institute of Chartered Accountants of India and the Institute of Cost Accountants of India.



The Board holds a crucial role in supervising the Company's operations, meeting regularly to fulfill its obligations. It systematically evaluates information per relevant legislation and SEBI Listing Regulations, covering matters in Schedule II. Directors receive a comprehensive agenda well in advance of meetings, allowing for thorough preparation. The agenda includes essential information, with additional documents presented during meetings when necessary. The Board makes timely strategic decisions, focusing on financial accuracy, control mechanisms, risk management, and talent identification. Independent Directors provide valuable expertise and counsel. Meetings occur at least quarterly, with additional sessions as needed, often at the Corporate Office in Ghaziabad. Urgent matters or situations challenging physical meetings are resolved through a circulation process, with records maintained for subsequent meetings.

Performance Evaluation of the Board

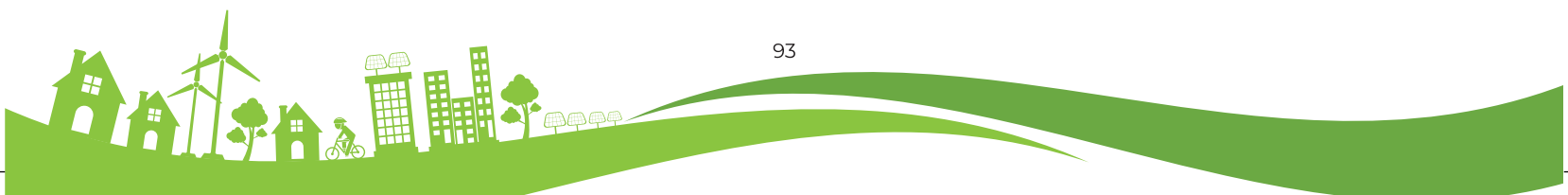
The Board of Directors conducted an annual performance assessment, adhering to Companies Act, 2013, and Listing Regulations. Board performance was evaluated through input from all directors, considering aspects like composition, processes, information flow, and overall function. Committee performance was assessed based on criteria including composition, terms, meeting effectiveness, and member participation. Individual directors were evaluated on criteria like attendance, contributions, and diligent execution of duties. Independent directors evaluated all non-independent directors. Following this comprehensive evaluation process, the Board expressed its contentment with its own performance, that of its committees, and the collective performance of the individual directors.

Compliance Framework

APL Apollo prioritizes corporate governance, which guides the Company's direction and management. Corporate governance aligns the interests of various stakeholders, including shareholders, management, customers, suppliers, financiers, government entities, and the community. The Board is at the core of APL's governance structure, possessing a blend of skills, knowledge, and industry expertise to lead the Company effectively and create enduring value for shareholders. APL Apollo has established committees that provide regular updates to the Board to strengthen corporate governance practices.

Number of Board Meetings Held

Throughout the fiscal year 2022-23, a total of four board meetings took place, specifically on May 13th, 2022, July 27th, 2022, November 9th, 2022, and February 2nd, 2023. It's important to note that the time interval between any two successive meetings did not exceed one hundred and twenty days.



Board Committee

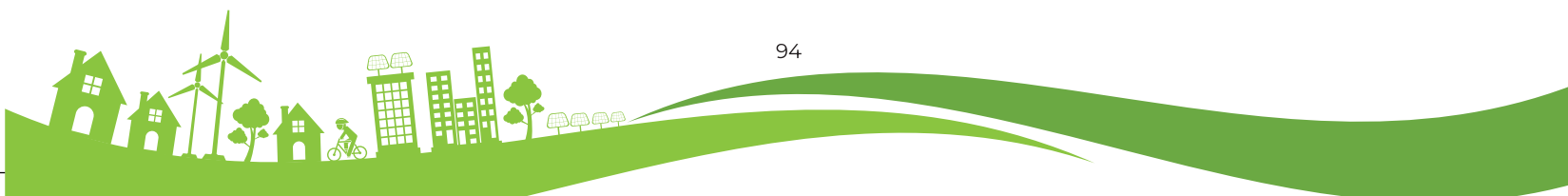
The Board Committees have been instituted to address specific issues or activities that are of concern to the Company and warrant closer scrutiny. These committees hold a crucial position within the Company's governance structure. They have been formed with the explicit approval of the Board to fulfill their well-defined roles. The Board assumes responsibility for the actions of these committees and supervises the execution of their responsibilities.

Audit Committee:

The establishment of the Audit Committee aligns with the mandates of the Listing Regulations and Section 177 of the Companies Act, 2013. The scope, authority, responsibilities, and framework of the Audit Committee encompass the domains specified in Regulation 18 in conjunction with Part C of Schedule II of the Listing Regulations, as well as Section 177 of the Companies Act, 2013, and other directives determined by the Board of Directors. Among its various functions, the Audit Committee primarily supervises financial reporting, including the assessment of quarterly, semi-annual, and annual financial outcomes of the Company. Additionally, the committee examines the Company's financial and risk management policies, internal control mechanisms, and internal audit systems. These matters are deliberated through interactions with both internal and external auditors, as well as the management.

Throughout the review period, the Audit Committee convened on four occasions, on May 13th, 2022, July 27th, 2022, November 9th 2022 & February 2nd 2023. The composition of the Audit Committee as of March 31st, 2023, as well as the attendance records of its members during meetings, are as follows:

Sl. No.	Name of the Director	Designation	Number of Meetings Attended
1	Mr. Anil Kumar Bansal	Chairperson	4
2	Mr. Abhilash Lal	Member	4
3	Mr. Vinay Gupta	Member	4
4	Ms. Neeru Abrol	Member	4

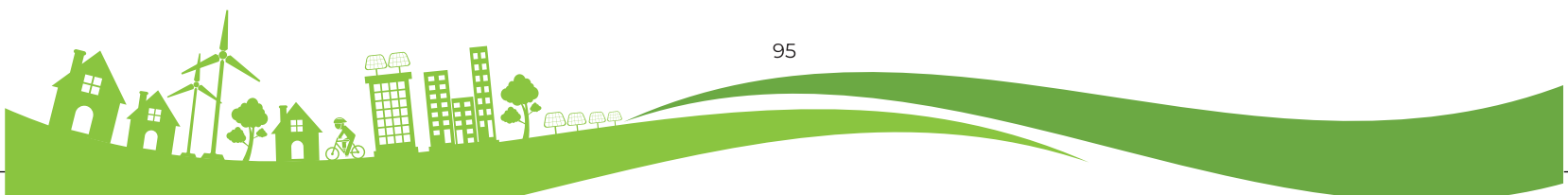


Nomination & Remuneration Committee:

The Nomination and Remuneration Committee plays a crucial role in the identification of potential Directors and senior management individuals in line with the criteria stipulated by the Board. This committee also conducts evaluations of each Director's performance, formulates a remuneration policy for Directors, key managerial personnel, and other employees, and addresses matters related to Board Diversity. The jurisdiction, responsibilities, and mandates of the Nomination and Remuneration Committee encompass the areas specified in Regulation 19 in conjunction with Part D of Schedule II of the Listing Regulations, as well as Section 178 of the Companies Act, 2013, and additional directives as determined by the Board of Directors. Operating within its terms of reference, this Committee takes charge of matters pertaining to the appointment and reappointment of Directors, as well as their remuneration. The recommendations formulated by the committee in these regards are subsequently presented to the Board for approval.

Throughout the year, the Nomination and Remuneration Committee convened once, on March 12th, 2023. This meeting was attended by all committee members. The composition of the Nomination and Remuneration Committee as of March 31st, 2023, along with the attendance details of its members, are as follows:

Sl. No.	Name of the Director	Designation	Number of Meetings Attended
1	Ms. Neeru Abrol	Chairperson	1
2	Mr. Vinay Gupta	Member	1
3	Mr. Virendra Singh Jain	Member	1



Stakeholder Relationship Committee:

In accordance with Regulation 20 of the Listing Regulations and the stipulations outlined in Section 178 of the Act, the Company has established a committee dedicated to managing stakeholder relationships. Throughout the year, a solitary meeting of the Stakeholders' Relationship Committee took place, on February 1st, 2023. The configuration of the Stakeholders' Relationship Committee as of March 31st, 2023, is detailed below:

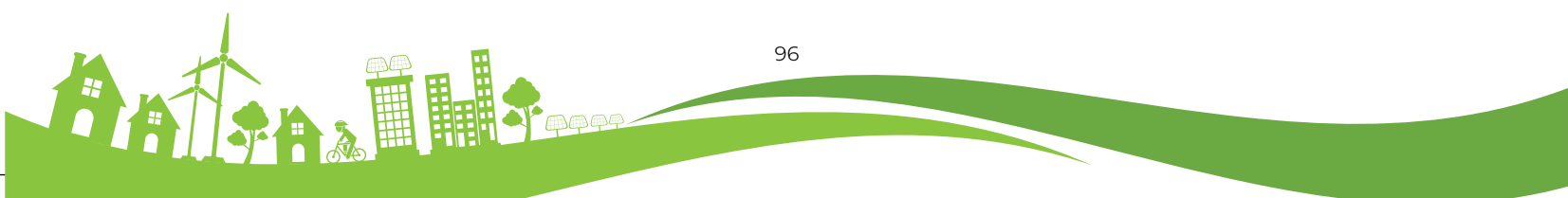
Sl. No.	Name of the Director	Designation	Number of Meetings Attended
1	Mr. Anil Kumar Bansal	Chairperson	1
2	Mr. Abhilash Lal	Member	1
3	Mr. Ashok Kumar Gupta	Member	1

CSR Committee:

The Board of Directors of the Company has established the Corporate Social Responsibility (CSR) Committee in accordance with the regulations set forth in Section 135 of the Companies Act, 2013, along with the guidelines outlined in the Corporate Social Responsibility (CSR) Rules, 2014, subject to any amendments made subsequently.

In the course of the year, the CSR Committee convened for two meetings, specifically on May 12th, 2022, and November 9th, 2022. The following details pertain to the committee's composition and the attendance of Directors during these meetings:

Sl. No.	Name of the Director	Designation	Number of Meetings Attended
1	Mr. Anil Kumar Bansal	Chairperson	2
2	Mr. Ashok Kumar Gupta	Member	2
3	Mr. Virendra Singh Jain	Member	2



Risk Management Committee:

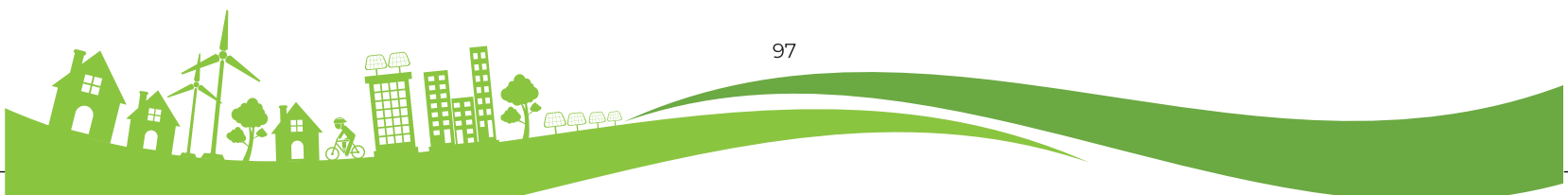
The Company possesses an officially sanctioned Risk Management Policy and has established a Risk Management Committee in accordance with the requisites outlined in the SEBI Listing Regulations. This committee is tasked with supervising the entirety of the risk management process, encompassing tasks such as risk identification, assessment of potential impacts, ensuring the effective execution of mitigation strategies, and producing reports on risks. The primary objective of this committee is to aid the Board of Directors in carrying out their supervisory duties concerning enterprise risk management.

Throughout the year, the Risk Management Committee convened for two meetings, scheduled on July 18th, 2022, and January 11th, 2023. The subsequent details encompass the composition of the committee and the presence of Directors during these gatherings:

Sl. No.	Name of the Director	Designation	Number of Meetings Attended
1	Mr. Virendra Singh Jain	Chairperson	2
2	Mr. Abhilash Lal	Member	2
3	Mr. Anil Kumar Bansal	Member	2
4	Mr. Ashok Kumar Gupta	Member	2
5	Ms. Neeru Abrol	Member	2

Board Diversity

APL Apollo acknowledges its obligation to maintain a diverse board of directors. Diversity encompasses various factors, including professional backgrounds, business perspectives, skills, knowledge, gender, age, cultural and educational backgrounds, ethnicity, and length of service. A diverse board enhances decision-making capabilities. The optimal board composition includes a mix of executive and non-executive directors, including Independent Directors with expertise in various disciplines. The Board should have at least three members with financial literacy and at least one member with expertise in accounting or related financial management. Additionally, the Board must include at least one female director. APL Apollo is in the process of developing a board diversity policy to be implemented in the upcoming financial year, 2024.



Business Ethics

At APL Apollo, we believe in the impact of robust corporate governance and ethical business policies on stakeholder support. We continuously enhance our systems and procedures to align with the evolving business landscape, ensuring accountability and transparency. We adhere to the National Guidelines on Responsible Business Conduct (NGRBC) in our code of conduct and comply with legal mandates, corporate governance standards, and best practices. We have a strong stance against any violations, safeguarding our reputation and fostering a harmonious workplace. As a publicly traded entity, compliance is a top priority. We meet all compliance demands from governments and regulatory bodies, supported by a robust internal control framework. The Board oversees compliance, and a dedicated team ensures adherence. Our commitment to compliance is integrated into senior management KPIs, and we have compliance teams at our plants. We fulfilled all compliance obligations in the fiscal year ending March 31st, 2023. We refrain from funding political campaigns, parties, or lobbyists and discourage compromising activities. Our Anti-Bribery and Anti-Corruption Policy and training modules promote a vigilant corporate culture. Agreements with vendors and third-party providers include Anti-Bribery and Anti-Corruption requirements, reinforcing our commitment to ethical business conduct.

Do's



Accept or offer any gift and/or entertainment only in line with the Code and the Operational Guidelines for Gift Entertainment & Sponsored Travel

Adhere to Group's Anti-Bribery & Anti-Corruption Policy

Don'ts



Make any payment to or for anyone that could be tantamount to bribe/corruption

Receive/accept a gift, entertainment, etc. from a prospective customer of the Group

Offer gifts and/or entertainment to any person to obtain or retain business or for influencing any decision or action of the recipient improperly



Policy Charter

Policies that foster ethical business practices



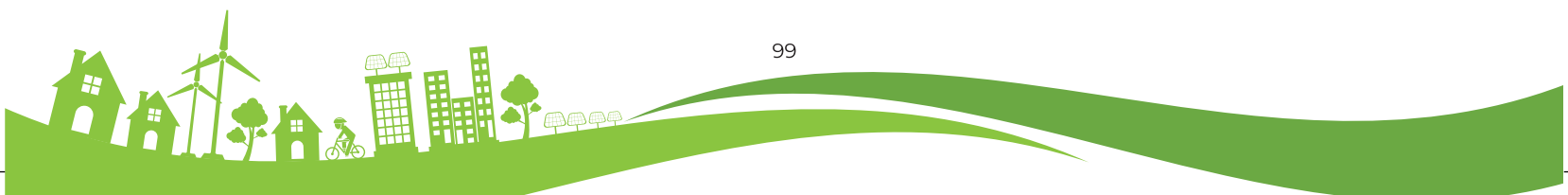
Code of Conduct

Our Code of Conduct functions as a set of principles that acquaints colleagues with the workplace protocols we adhere to. It encompasses various aspects including anticorruption measures, technology utilization, managing conflicts of interest, and upholding the privacy of consumers, among others.



Whistle Blower Policy

The Company has established a whistleblower policy or vigil mechanism that serves as a channel for Directors and employees to reach out to the Chairman of the Audit Committee on the Board. This mechanism enables the reporting of valid concerns related to unethical conduct, confirmed, or suspected fraudulent activities, breaches of the Code of Conduct or Ethics Policy, as well as any other instances of unethical or improper behaviour.





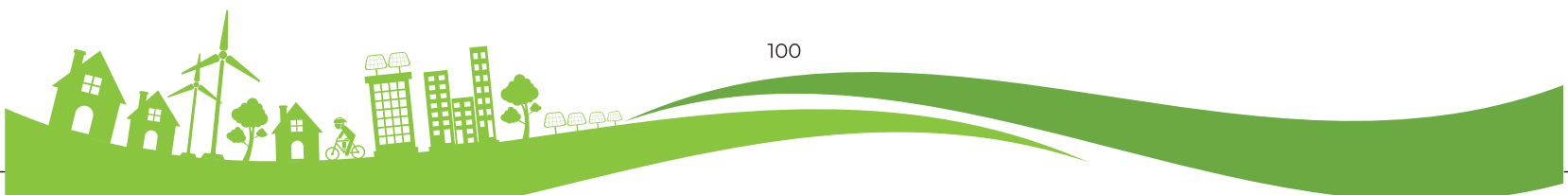
Prevention of Sexual harassment Policy

APL Apollo has established a comprehensive policy designed to proactively thwart any form of gender-based misconduct and to cultivate an inclusive workplace for its female employees. This policy offers clear guidelines, processes, procedures, and avenues for submitting, addressing, and resolving complaints related to purported instances of sexual harassment. The management has formed a dedicated Complaints Committee tasked with reviewing and addressing these complaints.



Investor Protection Policy

At APL Apollo, the investor protection policy operates through a dual-window approach, designed to extend investor services, and promptly address any investor grievances, all in pursuit of upholding absolute transparency across our operations. Abhipra Capital Limited, serving as the Registrar and Share Transfer Agent (RTA) of the Company, is entrusted with the responsibility of handling shareholder requests and addressing any grievances that may arise. Furthermore, a dedicated Stakeholders Relationship Committee is dedicated to the resolution of complaints raised by shareholders and investors. This committee undertakes a thorough evaluation of the grievance redressal mechanism, examines reports provided by the RTA, ensures compliance with various SEBI regulations, and periodically reports significant concerns, if any, to the Board. This comprehensive approach reaffirms our commitment to safeguarding investor interests and maintaining a seamless flow of information.





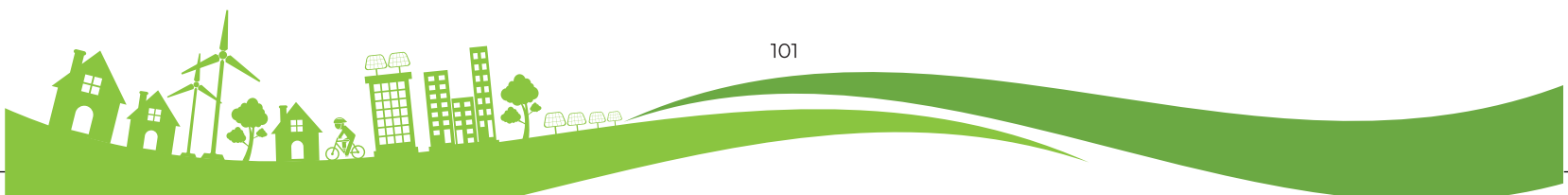
Stakeholder Grievance Mechanism

APL Apollo is dedicated to fostering conscientious conduct and contributing to the betterment of both society and the environment. The company adheres to a comprehensive Code of Conduct that extends to all its employees and partners within the value chain. A well-defined mechanism for addressing stakeholder grievances is in place, providing stakeholders with an open platform to express their concerns and grievances with the company.



Health & Safety Policy

An established health and safety policy outlines the prescribed approach for shaping workplace choices, directing efforts toward the enhancement of well-being, and supporting the maintenance of the utmost standards in workplace health and safety.





Human Rights Policy

We are currently in the process of formulating a dedicated Human Rights policy; nonetheless, our Business Responsibility policy encompasses various facets tied to safeguarding human rights. Our company views human rights as fundamental, universal, interrelated, and indivisible. Within our sphere of influence, we actively promote awareness and actualization of human rights throughout our value chain. We firmly prohibit any engagement in child labor, forced labor, or compulsory labour across all our operations. Our hiring practices are rooted in equitable job opportunities for every individual. Selections are made based on job-related qualifications and the capacity to perform the role, devoid of considerations such as race, color, religion, gender, national origin, age, sexual orientation, gender identity, disability, genetic information, citizenship, marital status, or any other criteria prohibited by law.



Collective Bargaining Policy

A comprehensive collective bargaining policy is in place within our company, encompassing agreements involving an employer, a consortium of employers, or one or more employers' organizations. This policy delineates the rights and responsibilities of the involved parties, contributing to harmonious and productive industries and workplaces. Additionally, it plays a pivotal role in eradicating disparities and enhancing labour safeguards at an elevated level.



Risk Management

In recent years, businesses have faced unprecedented challenges in a changing global landscape. To navigate this environment and ensure the well-being of our people, effective risk management is crucial. Our company has a strong risk management framework, including a dedicated committee, to assess and mitigate risks regularly. We've categorized risks into clusters, covering areas like strategy, operations, financial performance, liquidity, shareholder value, and reputation. These risks can impact various aspects of our business, making effective risk management essential for long-term success. We provide targeted risk management training across our organization, considering environmental risks and adhering to standards like OHSAS 18001, ISO 9001, and ISO 14001. Cybersecurity risk is overseen by a dedicated Chief Information Officer.

Here are some primary risks we face and measures we've taken to mitigate them:

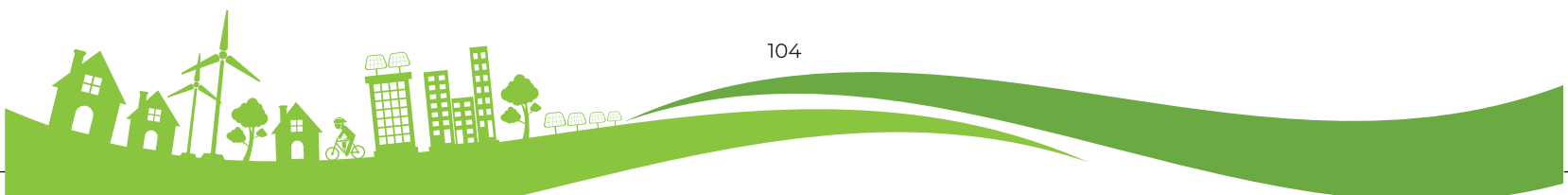
Risk Heading	Risk Description	Risk Category	Mitigation Measures
Growth Risk	After reaching the size it already has, sustaining business growth may become challenging.	Financial Risk	<ul style="list-style-type: none"> • Grow business volumes of existing products by increasing capacities, with simultaneous widening and deepening of the distribution network. • Increase the sales of high-value products over the coming years. • Expand geographic presence among international markets





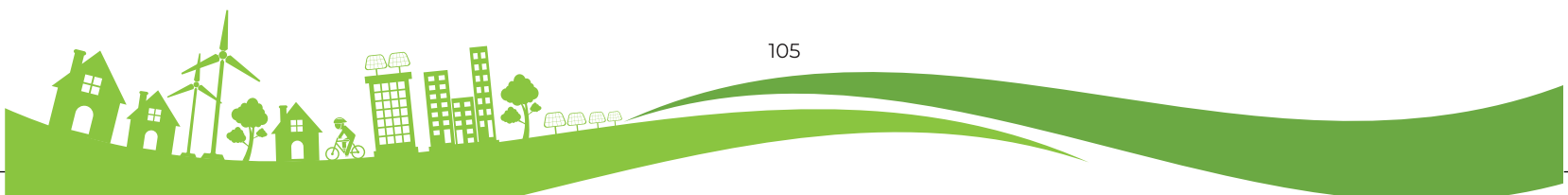
Risk Heading	Risk Description	Risk Category	Mitigation Measures
Margin Risk	Persistent inflationary headwinds could dent business profitability	Financial Risk	<ul style="list-style-type: none"> • Intensify market creation efforts of super-value-added products from the Raipur facility to increase their sales volumes in the overall sales mix. • Sustain cost optimization measures across all plants. • Ramp up utilization at the Raipur facility in FY24 and FY25

Risk Heading	Risk Description	Risk Category	Mitigation Measures
Capacity Risk	A shortfall in manufacturing capacity impedes business growth	Operational Risk	<ul style="list-style-type: none"> • Undertake de-bottlenecking exercise to increase capacity select plant. • New operating facilities at Kolkata and Dubai to commence operations in FY24. • Increased volumes to come from the Raipur facility as asset utilization improves.



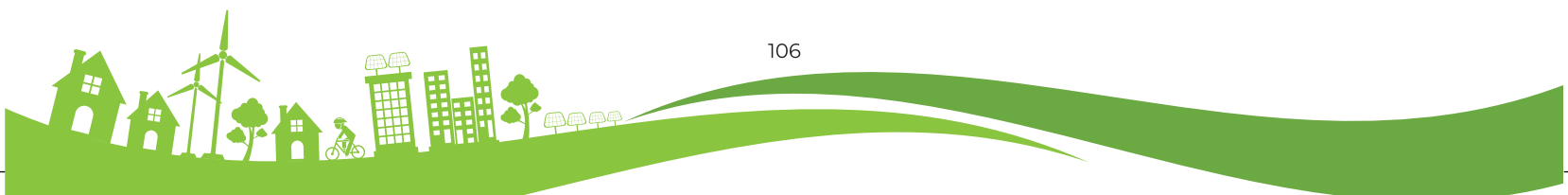
Risk Heading	Risk Description	Risk Category	Mitigation Measures
Dealer Attrition Risk	A drop in dealer base could impact the ability to sell increased volumes	Operational Risk, Financial Risk	<ul style="list-style-type: none"> • Continue to enhance the product basket with a larger proportion of value-added products. • Provide other facilities such as financing to support their business growth. • Strengthen branding investment to create a demand pull for products, driving their volumes

Risk Heading	Risk Description	Risk Category	Mitigation Measures
ESG Focus Risk	ESG is now emerging as a vital determinant for business sustainability	Operational, Health & Safety, and Strategic Risk	<ul style="list-style-type: none"> • Performed significantly well in the DJSI score for FY22 with a better than-industry scoring. • Committed to further improving the scoring in the current year through targeted measures. • Drawn out a comprehensive environmental management plan to reduce carbon footprint in the current decade

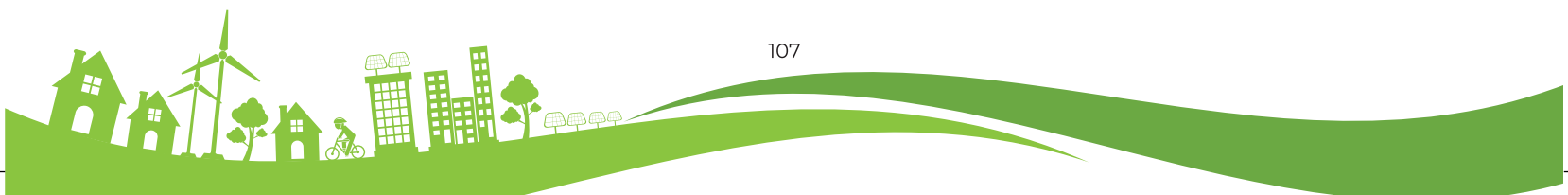




Risk Heading	Risk Description	Risk Category	Mitigation Measures
Talent Risk	Attrition of skilled and committed people could impact business performance	Human Capital Risk, Operational Risk	<ul style="list-style-type: none"> • Role Clarity: Introduced the concept of defining role based KRAs and KPIs (across functions in the organization helping employees take ownership) • Performance Management System: Introduced Quarterly Appraisal Process to align employee performance with the organization objective. • Rewarding Performance: Launch of lucrative incentive policy (over and above CTC) which encourages employees to go beyond. • Policies: Creating an inclusion culture through employee feedback on HR policies and revisiting the same in line with industry best practices. • Employee Well Being: Organizing health check up camps across manufacturing units and strongly advocating safety compliances. • Engagement Initiatives: Engaging employees in various sports initiatives to encourage healthy competition and promote teamwork. Developing a detailed engagement plan for better employees bonding.



Risk Heading	Risk Description	Risk Category	Mitigation Measures
Cyber Security Risk	In a digitally-platformed business environment, securing the IT network, infrastructure and solutions is critical	IT Risk	<ul style="list-style-type: none"> • Identify and assess risks: Conduct a thorough risk assessment to identify potential cybersecurity threats and vulnerabilities. • Implement strong access controls: Ensure that access to critical systems and sensitive data is limited to authorized individuals. Implement multi-factor authentication (MFA) for all user accounts, regularly review and update user privileges, and enforce strong password policies. • Educate employees: Conduct regular cybersecurity awareness training for all employees. Promote a culture of security consciousness throughout the organization. • Use strong encryption and secure network protocols: Encrypt sensitive data both in transit and at rest to prevent unauthorized access. Utilize secure network protocols and virtual private networks to protect data while in transit. • Perform security testing and audits: Regularly conduct vulnerability assessments, penetration testing, and security audits to identify weaknesses in our systems and address them proactively. • Stay informed and adapt: Stay updated on the latest cybersecurity threats, trends, and best practices.



Cyber Security

At APL, we prioritize cybersecurity and take proactive measures to protect our operations from the escalating risks of cyberattacks, especially in the context of the growing online trade and transactions landscape. Our business relies heavily on IT infrastructure, rendering us more susceptible to cyber threats. To fortify ourselves, we have established comprehensive policies and plans. Furthermore, our Information Technology management systems



adhere to the rigorous ISO 27001:2013 standards. Our cybersecurity management team conducts breach assessments through various means, including safeguarding against phishing attacks, reinforcing our cybersecurity ecosystem, implementing continuous self-assessment, and monitoring, and benchmarking against industry peers. Among our 1,198 employees, 180 are based at our corporate office, while the remainder are stationed at various plant locations. Therefore, we are actively in the process of developing an all-encompassing IT security policy that will cater to the needs of both our plant locations and corporate office.

Customer Centricity

At APL Apollo, we hold the belief that the sustainability of our business hinges on contented consumers, with exceptional customer experiences serving to amplify brand recognition. We recognize that an enhanced customer relationship contributes to a strong company culture. Valuable customer insights play an important role in refining processes, elevating quality standards, optimizing service performance, and driving cost efficiencies.



Our engagement with clients is a continuous endeavor encompassing various avenues such as sharing information, understanding market dynamics, addressing consumer complaints and grievances, hosting regional meetings, conducting dealer visits, undertaking need-based interactions, and facilitating customer engagements through visits by our marketing team and senior management. This multifaceted approach not only aids in the development of products shaped by customer feedback and demands, but also reinforces a culture of relentless quality enhancement and the establishment of an effective claims and complaint management system. Additionally, it reinforces a commitment to treating consumers equitably. We are pleased to share that during the fiscal year spanning FY22-23, 100% of customer concerns were resolved successfully.



Our Certifications















The following certifications endorse the quality of our company's products and processes:

- ✓ ISO 9001:2015 Integrated Management System
- ✓ ISO 14001:2004 Environmental Management Systems
- ✓ OHSAS 18001:2007 Health and Safety Management System
- ✓ S 1161: Structural Application
- ✓ IS 1239: Water and Gas Application
- ✓ IS 3589: Water, Gas, and Sewerage
- ✓ IS 3601: General Engineering
- ✓ IS 4270: Water Wells and Casing Pipes
- ✓ IS 4923: Structural tubes for the infrastructural purpose
- ✓ IS 9295: Idlers for conveyors



Our Product Portfolio

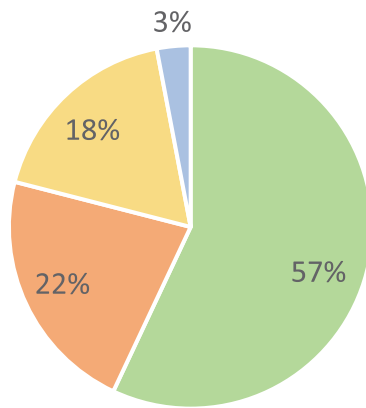
We believe in the importance of exceptional products and invest in research and development to drive innovation. Understanding our customers' needs is crucial for creating products that resonate with them and foster customer loyalty. We aim to minimize our carbon footprint by combining technology with a well-calibrated product portfolio. Here are some of our key products that reflect our commitment to sustainability:

Product Category	Construction Type	Application	Brands
Apollo Structural	Residential Buildings & Independent Homes Commercial Buildings, Warehouses & Factories	Structural, Piling, Sheds, Handrails, Gates, Fencing, Balcony Grills, Staircase, Light Structures	   
Commercial Building, Warehouse & Factories	Infrastructure	Structural for Metros, Airports, Stadiums, Stations etc.	 
	Industrial & Agriculture	Heavy Equipment	
Apollo Z	Residential Buildings & Independent Homes Commercial Buildings, Warehouses & Factories	Galvanized structural steel tubes for coastal markets	
Apollo Tricoat	Residential Buildings & Independent Homes Commercial Buildings	Door Frame, Staircase Steps, Furniture, Plank, Designer Tubes, Fencing, Electrical Conduits	   
Apollo Galv	Commercial Buildings Industrial & Agricultural	Galvanized Structural, Greenhouse Structures, Plumbing, Firefighting	  



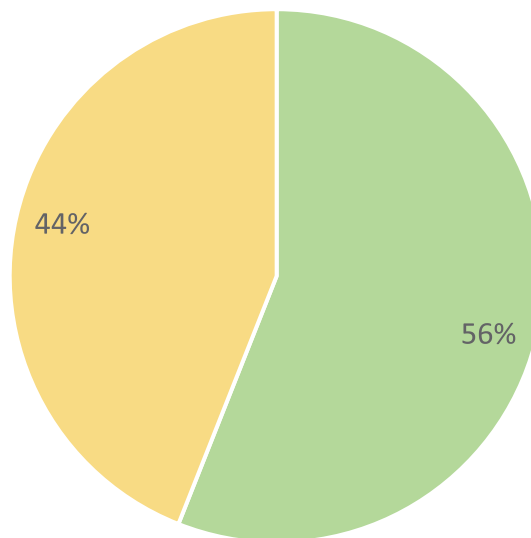


Sales Mix by User Segment

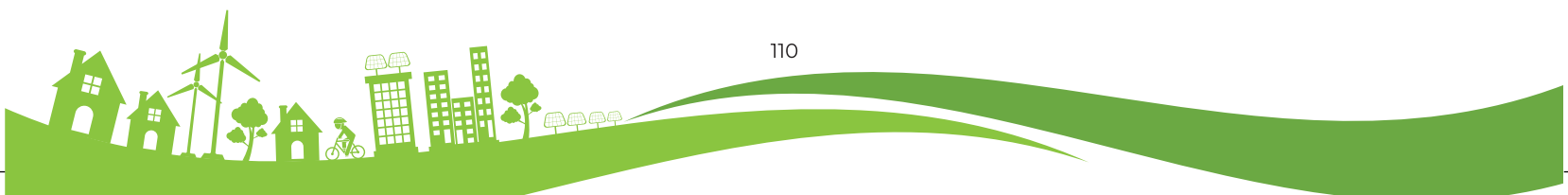


- Building Material (Housing)
- Building Material (Construction)
- Infrastructure
- Others (Industrial & Agri)

Sales Mix by Product Type



- Value-Added Products
- Commodity Products

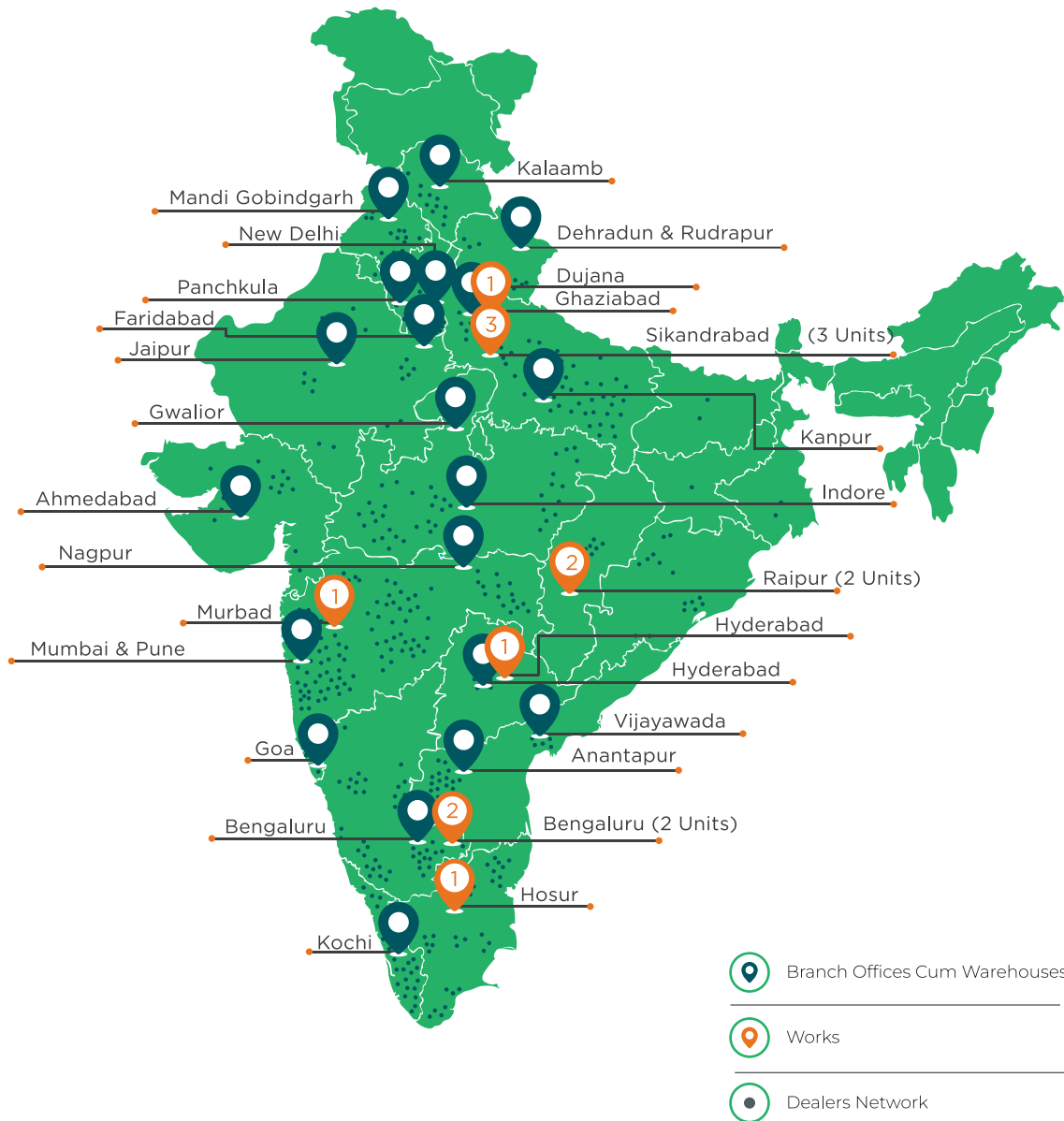


Market Presence

Our capacity to effectively cater to markets spanning the entire nation hinges greatly on the robustness of our supply chain networks. The visual representation provided below offers insight into the strategic interplay among our administrative hubs, production facilities, and distribution networks, all of which collectively shape our expansive geographical footprint.

Locations:

- ▶ Mandi Gobindgarh
- ▶ New Delhi
- ▶ Panchkula
- ▶ Faridabad
- ▶ Jaipur
- ▶ Gwalior
- ▶ Ahmedabad
- ▶ Nagpur
- ▶ Kalaamb
- ▶ Dehradun & Rudrapur
- ▶ Dujana Ghaziabad
- ▶ Sikandrabad (3 Units)
- ▶ Kanpur
- ▶ Indore



This intricate network of strategically positioned entities substantiates our omnipresence across the nation. Notably, our branch offices span 29 cities, forming a vital link in our overarching operational framework. Through this extensive network, we diligently extend our services to over 2000+ cities and towns nationwide.

11
Manufacturing facilities

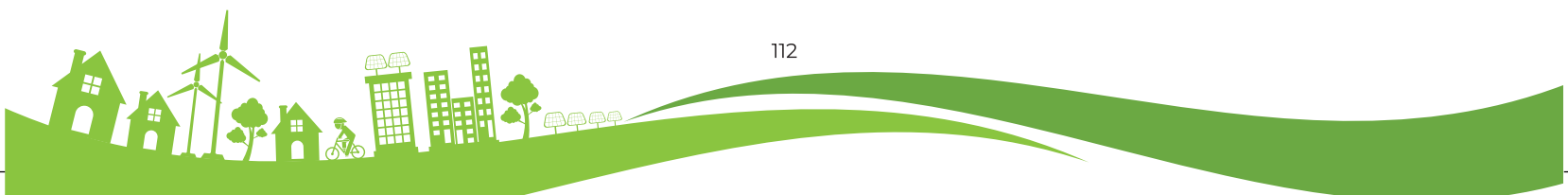
50,000
Retailers

29
Sales offices

~200,000
Fabricators, architects &
engineers

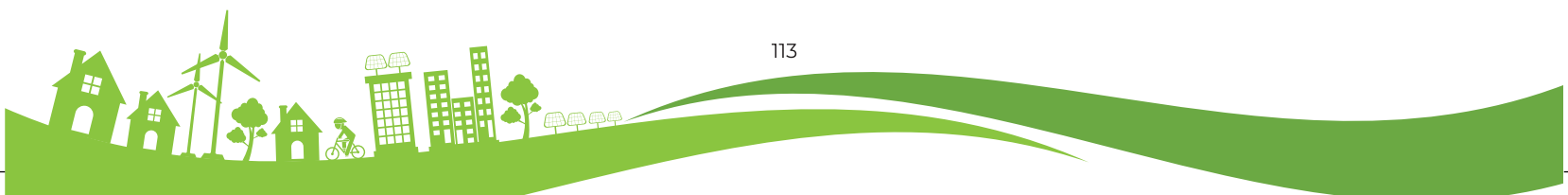
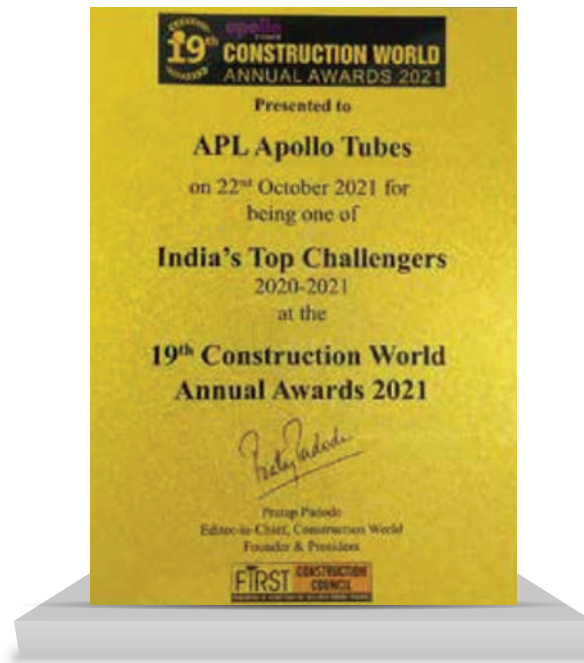
800+
Distributors

2000+
Cities and towns in which
APL products are available



Awards & Accolades

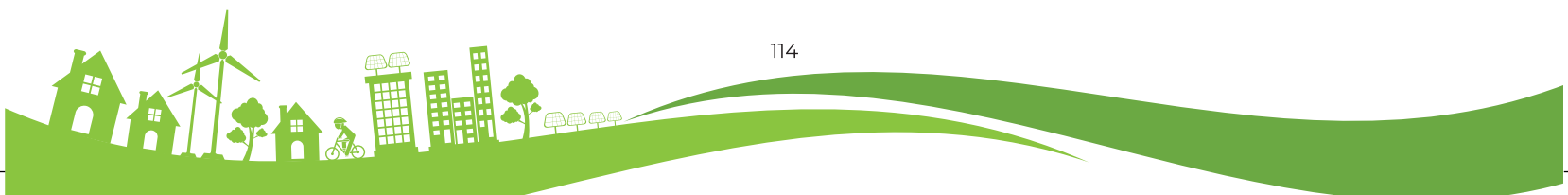
Our enduring pursuit of excellence has been a driving force behind our continuous efforts to set our products apart, offer exceptional services, and establish a unique identity for our organization. A testament to these endeavors is our recognition in FY 2021 as India's premier contenders at the 19th Annual Construction World Annual Awards, presented by the esteemed FIRST CONSTRUCTION COUNCIL (FCC). This acknowledgment underlines our commitment to standing out in the industry and achieving remarkable distinctions.





We were honored to be bestowed with the prestigious title of "India's Greatest Brands 2021-22" in the manufacturing category within the building material industry. This esteemed recognition was conferred upon us by Asia One, further attesting to our significance and excellence in this sector.

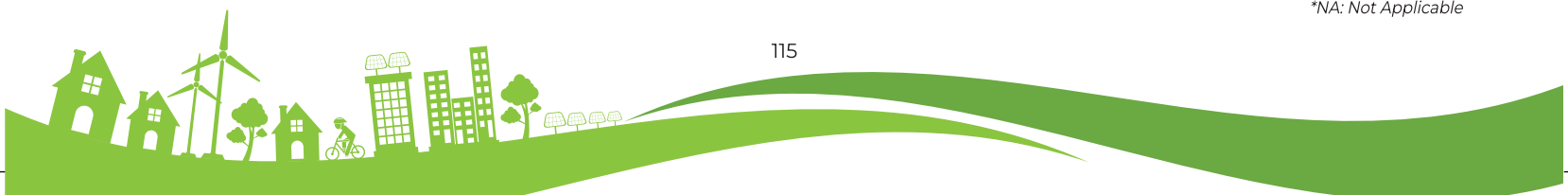
In the year 2021-22, we were honored to be presented with the accolade for the "Best Structural Steel Tube Producer Company" by D-Arc Build, reaffirming our commitment to excellence in this field.



GRI Index

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORTING SECTION/ EXPLANATION	PAGE NO.
General disclosures			
GRI 2: General Disclosures 2021			
The Organization and its reporting policies	2-1 Organizational details	About APL Apollo	3
	2-2 Entities included in the organization's sustainability reporting	About APL Apollo	3
	2-3 Reporting period, frequency and contact point	Reporting Scope & Boundary and Management's Responsibility	2
	2-4 Restatements of information	Reporting Principles & Framework	1
Activities and workers	2-6 Activities, value chain and other business relationships	Our Product Portfolio & Market Presence	109-112
	2-7 Employees Development	About APL Apollo & Human Capital	1, 73 & 74
	2-8 Workers who are not employees	Human Capital Development	73 & 74
Governance	2-9 Governance structure and composition	Corporate Governance & Highlights	7 & 87
	2-10 Nomination and selection of the highest governance body	Corporate Governance	93 & 95
	2-11 Chair of the highest governance body	Corporate Governance	87
	2-12 Role of the highest governance body in overseeing the management of impacts	Corporate Governance, Driving Change: Sustainability Strategy & Performance	8-20 & 94-97
	2-13 Delegation of responsibility for managing impacts	Corporate Governance	8-20 & 94-97
	2-14 Role of the highest governance body in sustainability reporting	Driving Change: Sustainability Strategy and Performance	8-20
	2-15 Conflicts of interest	BRSR Reference	Page 148 of the Annual Report
	2-16 Communication of critical concerns	Corporate Governance	99
	2-17 Collective knowledge of the highest governance body	Corporate Governance	88-92
	2-18 Evaluation of the performance of the highest governance body	Corporate Governance	93
	2-19 Remuneration policies	Annual Report Reference	Page 119 of the Annual Report
2-20 Process to determine remuneration	Annual Report Reference	Page 119 of the Annual Report	
Strategy, policies and practices	2-22 Statement on sustainable development strategy	Driving Change: Sustainability Strategy and Performance	8-20
	2-23 Policy commitments	Corporate Governance	98-102
	2-24 Embedding policy commitments	Corporate Governance	98-102
	2-25 Processes to remediate negative impacts	*NA	
	2-26 Mechanisms for seeking advice and raising concerns	Employee Grievance Redressal Mechanism, Policy Charter	76 & 99
	2-27 Compliance with laws and regulations	Corporate Governance	98
	2-28 Membership associations	About APL Apollo	3
Stakeholder Engagement	2-29 Approach to stakeholder engagement Assessment	Stakeholder Engagement & Materiality	36-42
	2-30 Collective bargaining agreements	Performance Snapshot of FY23 & Corporate Governance	26 & 102
Material topics			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Stakeholder Engagement & Materiality Assessment	36-42
	3-2 List of material topics	Stakeholder Engagement & Materiality Assessment	36-42
Topic Standard - Economic performance			
GRI 3: Material Topics 2021	3-3 Management of material topics	Economic Performance	42 & 34
GRI 3: Material Topics 2021	201-1 Direct economic value generated and distributed	Economic Performance	34
	201-2 Financial implications and other risks and opportunities due to climate change	TCFD Report	44-51
	201-3 Defined benefit plan obligations and other retirement plans	Annual Report Reference	1, 51, 15, 21, 55, 194
	201-4 Financial assistance received from government	*NA	
GRI 202 - Market presence			
GRI 202: Market Presence 2016	3-3 Management of material topics	Market Presence	42 & 111
	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Not reported this year	
	202-2 Proportion of senior management hired from the local community	Not reported this year	

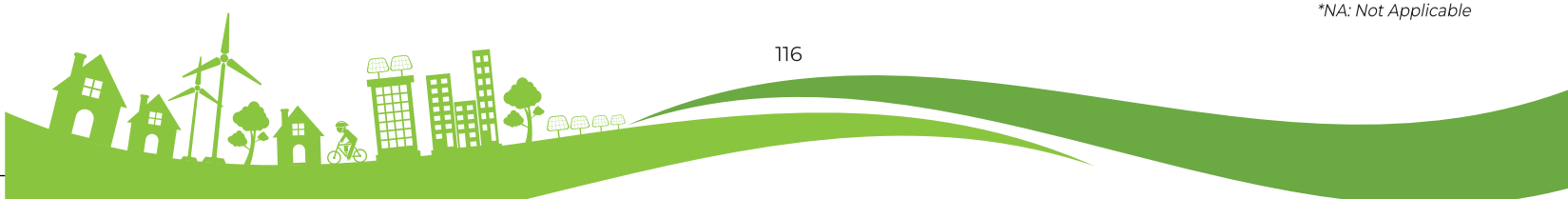
*NA: Not Applicable





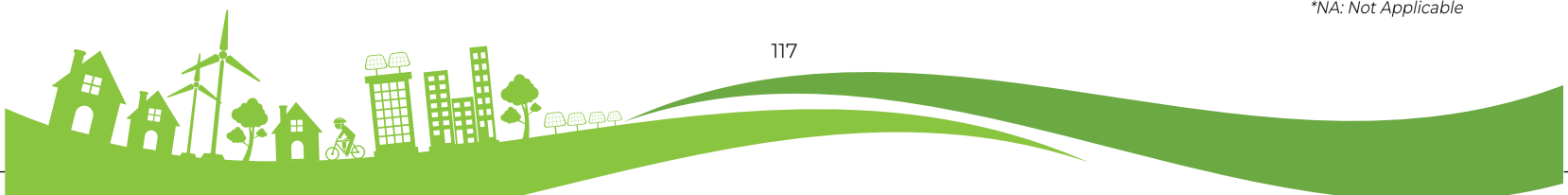
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORTING SECTION/ EXPLANATION	PAGE NO.
Indirect economic impacts			
GRI 3: Material Topics 2021	3-3 Management of material topics	Local Community Development	42, 79-83
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Local Community Development	79-83
	203-2 Significant indirect economic impacts	Local Community Development	79-83
Procurement practices			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42 & 84
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Supply Chain Management, Annual Report Reference	Page 84 of this report Page 168 of the Annual Report
Anti-corruption			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42 & 98
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Not reported this year	
	205-2 Communication and training about anti-corruption policies and procedures	Corporate Governance	98
	205-3 Confirmed incidents of corruption and actions taken	BRSR Reference	Page 148 of the Annual Report
Anti-competitive behavior			
GRI 3: Material Topics 2021	3-3 Management of material topics	*NA	
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	*NA	
Tax			
GRI 3: Material Topics 2021	3-3 Management of material topics	Tax & Strategy	42 & 35
GRI 207: Tax 2019	207-1 Approach to tax	Tax & Strategy	35
	207-2 Tax governance, control, and risk management	Not reported this year	
	207-3 Stakeholder engagement and management of concerns related to tax	*NA	
	207-4 Country-by-country reporting	*NA	
Topic Standard - Environment			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42 & 63
GRI 301: Materials 2016	301-1 Materials used by weight or volume	Our Raw Material Consumption	63
	301-2 Recycled input materials used	Our Raw Material Consumption	63
	301-3 Reclaimed products and their packaging materials	Not reported this year	
Energy			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42, 58-62
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Our Energy Profile	58-62
	302-2 Energy consumption outside of the organization	Our Energy Profile	58-62
	302-3 Energy intensity	Our Energy Profile	62
	302-4 Reduction of energy consumption	Our Energy Profile	58-62
	302-5 Reductions in energy requirements of products and services	Our Energy Profile	58-62
Water and effluents			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42, 53 & 54
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	*NA	
	303-2 Management of water discharge-related impacts	Water Stewardship	53-54
	303-3 Water withdrawal	Water Stewardship	53-54
	303-4 Water discharge	Water Stewardship	53-54
	303-5 Water consumption	Water Stewardship	53-54
Biodiversity			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42, 65
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	*NA	
	304-2 Significant impacts of activities, products and services on biodiversity	Biodiversity	65
	304-3 Habitats protected or restored	Biodiversity	65
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	Not Applicable, IUCN Red List species and national conservation list species with habitat in areas that have not been impacted by APL Apollo's operations	

*NA: Not Applicable



GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORTING SECTION/ EXPLANATION	PAGE NO.
Emissions			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42, 55-57
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Reducing Carbon Footprint	56
	305-2 Energy indirect (Scope 2) GHG emissions	Reducing Carbon Footprint	56
	305-3 Other indirect (Scope 3) GHG emissions	Reducing Carbon Footprint	56 & 57
	305-4 GHG emissions intensity	Reducing Carbon Footprint	55
	305-5 Reduction of GHG emissions	Reducing Carbon Footprint	55-57
	305-6 Emissions of ozone-depleting substances (ODS)	*NA	
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	ESG Factbook	21
Waste			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42 & 64
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Waste Management, ESG Factbook	64
	306-2 Management of significant waste-related impacts	Waste Management, ESG Factbook	64
	306-3 Waste generated	Waste Management, ESG Factbook	21, 64
	306-4 Waste diverted from disposal	Waste Management, ESG Factbook	21, 64
	306-5 Waste directed to disposal	Waste Management, ESG Factbook	21, 64
Supplier environmental assessment			
GRI 3: Material Topics 2021	3-3 Management of material topics	*NA	
GRI 306: Waste 2020	308-1 New suppliers that were screened using environmental criteria	Not reported this year	
	308-2 Negative environmental impacts in the supply chain and actions taken	Not reported this year	
Topic Standard - Social			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Hiring & Onboarding	77-78
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Employee Engagement	75
	401-3 Parental leave	BRSR Reference	Page 152 of the Annual Report
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GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42
GRI 402: Labour/ Management Relations 2016	402-1 Minimum notice periods regarding operational changes	Employee Engagement	75
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GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42, 67-70
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Health & Safety	67-70
	403-2 Hazard identification, risk assessment, and incident investigation	Health & Safety	67-70
	403-3 Occupational health services	Health & Safety	67-70
	403-4 Worker participation, consultation, and communication on occupational health and safety	Health & Safety	67-70
	403-5 Worker training on occupational health and safety	Health & Safety	67-70
	403-6 Promotion of worker health	Health & Safety	67-70
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Health & Safety	67-70
	403-8 Workers covered by an occupational health and safety management system	Health & Safety	67-70
	403-9 Work-related injuries	Health & Safety	67
	403-10 Work-related ill health	Health & Safety	67
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GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42, 73-74
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Human Capital Development	73-74
	404-2 Programs for upgrading employee skills and transition assistance programs	Human Capital Development	73-74
	404-3 Percentage of employees receiving regular performance and career development reviews	Not reported this year	

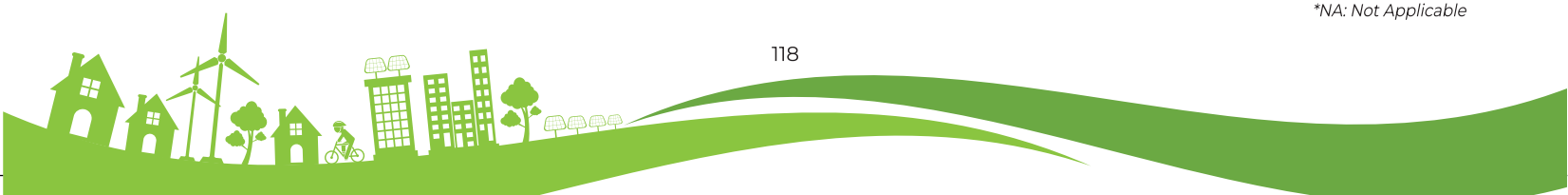
*NA: Not Applicable





GRI STANDARD/ OTHER SOURCE	DISCLOSURE	REPORTING SECTION/ EXPLANATION	PAGE NO.
Diversity and equal opportunity			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42 & 72
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Upholding Human Rights	72
	405-2 Ratio of basic salary and remuneration of women to men	ESG Factbook	22-23
Non-discrimination			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42 & 72
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	BRSR Reference	Page 159 of the Annual Report
Freedom of association and collective bargaining			
GRI 3: Material Topics 2021	3-3 Management of material topics	*NA	
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	*NA	
Child labour			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42 & 71
GRI 408: Child Labour 2016	408-1 Operations and suppliers at significant risk for incidents of child labour	Upholding Human Rights	71
Forced or compulsory labour			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42 & 71
GRI 409: Forced or Compulsory Labour 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	Upholding Human Rights	71
Security practices			
GRI 3: Material Topics 2021	3-3 Management of material topics	*NA	
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	Not reported this year	
Rights of indigenous peoples			
GRI 3: Material Topics 2021	3-3 Management of material topics	*NA	
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	*NA	
Local communities			
GRI 3: Material Topics 2021	3-3 Management of material topics	Materiality Assessment	42, 79-83
GRI 413: Rights of Indigenous Peoples 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Local Community Development	79-83
	413-2 Operations with significant actual and potential negative impacts on local communities	*NA	
Supplier social assessment			
GRI 3: Material Topics 2021	3-3 Management of material topics	*NA	
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Not reported this year	
	414-2 Negative social impacts in the supply chain and actions taken	Not reported this year	
Public policy			
GRI 3: Material Topics 2021	3-3 Management of material topics	*NA	
GRI 415: Public Policy 2016	415-1 Political contributions	*NA	
Customer health and safety			
GRI 3: Material Topics 2021	3-3 Management of material topics	Customer Centricity	42 & 108
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Customer Centricity	108
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Customer Centricity	108
Marketing and labeling			
GRI 3: Material Topics 2021	3-3 Management of material topics	*NA	
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	*NA	
	417-2 Incidents of non-compliance concerning product and service information and labeling	*NA	
	417-3 Incidents of non-compliance concerning marketing communications	*NA	
Customer privacy			
GRI 3: Material Topics 2021	3-3 Management of material topics	Customer Centricity	42 & 108
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	BRSR Reference	Page 167 & 168 of the Annual Report

*NA: Not Applicable





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