Date: 27th July 2026

The Manager
National Stock Exchange of India Ltd.
Exchange Plaza,
Plot No. C/1, G Block,
Bandra Kurla Complex,
Bandra (E), Mumbai – 400 051
[*Symbol: USHAMART*]

The Secretary
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street
Mumbai – 400 001
[*Scrip Code: 517146*]

Societe de la Bourse de
Luxembourg
35A Bouleverd Joseph II
L-1840, Luxembourg
[*Scrip Code: US9173002042*]

Dear Sir/Madam,

Sub.: Business Responsibility and Sustainability Report for the Financial Year 2025-26

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith the Business Responsibility and Sustainability Report (BRSR) for the Financial Year 2025-26, along with Independent Reasonable Assurance Statement provided by SGS India Private Limited, which also forms part of the Annual Report for the Financial Year 2025-26, submitted to the Exchanges.

The BRSR along with the Annual Report is also available on Company's website at www.ushamartin.com.

This is for your information and record.

Thanking you,

Yours faithfully,

For Usha Martin Limited

MANISH AGARWAL
Digitally signed by MANISH AGARWAL
Date: 2026.07.27 21:49:54 +05'30'

Manish Agarwal
Company Secretary & Compliance Officer

Enclosed: As above

Business Responsibility and Sustainability Report

SECTION A: GENERAL DISCLOSURE

I. Details of the listed entity:

1.	Corporate Identity Number (CIN) of the Listed Entity	L31400WB1986PLC091621
2.	Name of the Listed Entity	Usha Martin Limited
3.	Year of incorporation	1986
4.	Registered office address	2A Shakespeare Sarani, Kolkata – 700071
5.	Corporate address	Usha Martin Limited, 2A Shakespeare Sarani, Kolkata – 700071
6.	E-mail	investor@ushamartin.co.in
7.	Telephone	033 - 7100 6300
8.	Website	https://www.ushamartin.com
9.	Financial year for which reporting is being done	1st April 2025 to 31st March 2026 (FY 2025-26)
10.	Name of the Stock Exchange(s) where shares are listed	(i) In India, the Company's equity shares are listed on • BSE Limited • National Stock Exchange of India Limited (NSE) (ii) The GDRs of the Company are listed on the Societe de la Bourse de Luxembourg
11.	Paid-up Capital	INR 30,47,41,780
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. S B N Sharma Whole Time Director Tel. No. 033 - 7100 6300 Email: sbns@ushamartin.co.in
13.	Reporting boundary	Standalone basis
14.	Name of assessment or assurance provider	SGS India Private Limited ("SGS")
15.	Type of assessment or assurance obtained	Reasonable Assurance (for BRSR core indicators) and Limited Assurance (for other indicators)

II. Products/services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Manufacturing	Metal & Metal Products (Manufacturing of Wire Rope, Wire, Strands including Locked Coil)	94.56%

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

S. No.	Product/Service	NIC Code*	% of total Turnover contributed
1.	Wire Rope	2599	63.88%
2.	Wire & Strands	2599	17.13%
3.	LRPC Strand	2599	13.55%

** As per National Industrial Classification 2008*

III. Operations

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

Location	Number of plants	Number of offices	Total
National	3	6 *(Kolkata, Mumbai, Delhi NCR, Chennai, Bangalore and Hyderabad)*	9
International	4	16	20

**Includes plant/offices of our subsidiaries*

Business Responsibility and Sustainability Report

19. Markets served by the entity:

a) Number of locations

Locations	Number
National (No. of States)	28 States and 8 Union Territories
International (No. of Countries)	75

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

35%

c) A brief on types of customers

Usha Martin Limited is a globally recognized manufacturer of high-quality steel wires and wire ropes. The company caters to a broad spectrum of industries, including oil and gas, mining, elevators, heavy engineering, shipping, and logistics, with a strong operational presence across six continents.

IV. Employees

20. Details as of March 31, 2026

a) Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1.	Permanent (D)	580	555	95.69	25	4.31
2.	Other than Permanent (E)	84	82	97.62	2	2.38
3.	**Total employees (D + E)**	**664**	**637**	**95.93**	**27**	**4.07**
Workers						
4.	Permanent (F)	1,654	1,645	99.46	9	0.54
5.	Other than Permanent (G)	2,740	2,707	98.80	33	1.20
6.	**Total workers (F + G)**	**4,394**	**4,352**	**99.04**	**42**	**0.96**

b) Differently abled employees and workers

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Differently Abled Employees						
1.	Permanent (D)	-	-	-	-	-
2.	Other than Permanent (E)	-	-	-	-	-
3.	**Total differently abled employees (D + E)**	**-**	**-**	**-**	**-**	**-**
Differently abled Workers						
4.	Permanent (F)	-	-	-	-	-
5.	Other than Permanent (G)	-	-	-	-	-
6.	**Total workers (F + G)**	**-**	**-**	**-**	**-**	**-**

21. Participation/Inclusion/Representation of women

Particulars	Total (A)	No. & % of Females	
		No. (B)	% (B/A)
Board of Directors	7	1	14.29
Key Managerial Personnel (KMP)*	2	0	0

** KMPs includes Chief Financial Officer and Company Secretary.*

22. Turnover rate* for permanent employees and workers

Particulars	FY 2025-26			FY 2024-25			FY 2023-24		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	7.27	16.67	**7.66**	9.37	5.41	**9.24**	10.19	2.38	**10.18**
Permanent Workers	12.70	0	**12.65**	9.91	0	**9.89**	12.41	0	**12.39**

** The turnover rate includes employees who left the organization, whether voluntarily or through dismissal, retirement, or death in service.*

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

23. Names of holding/subsidiary/associate companies/joint ventures (As on March 31, 2026)

S. No.	Name of the Holding/Subsidiary/Associate Companies/Joint Ventures (A) @	Indicate whether Holding/Subsidiary/ Associate/Joint Venture*	% of shares held by listed entity	Does the entity indicated in column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)**
1	U M Cables Limited	Subsidiary	100	No
2	Bharat Minex Private Limited	Subsidiary	100	No
3	Gustav Wolf Specialty Cords Limited	Subsidiary	100	No
4	Usha Martin International Limited	Subsidiary	100	No
5	Brunton Wire Ropes FZCo.	Subsidiary	100	No
6	Usha Martin Americas Inc.	Subsidiary	100	No
7	Usha Siam Steel Industries Public Company Limited	Subsidiary	100	No
8	Usha Siam Specialty Wire Company Limited	Subsidiary	100	No
9	Brunton Wire Ropes Industrial Company Limited	Subsidiary	51	No
10	Usha Martin Singapore Pte. Limited	Subsidiary	100	No
11	Usha Martin Australia Pty. Ltd.	Subsidiary	100	No
12	PT Usha Martin Indonesia	Subsidiary	100	No
13	Usha Martin Vietnam Company Limited	Subsidiary	100	No
14	De Ruiter Staalkabel BV Sliedrecht	Subsidiary	100	No
15	Usha Martin Italia SRL	Subsidiary	100	No
16	Usha Martin Europe B.V.	Subsidiary	100	No
17	Usha Martin UK Limited	Subsidiary	100	No
18	Brunton Shaw UK Limited	Subsidiary	100	No
19	European Management and Marine Corporation Limited	Subsidiary	100	No
20	Pengg Usha Martin Wires Private Limited	Joint Venture	40	No
21	CCL Usha Martin Stressing Systems Limited	Joint Venture	49.99	No

@ During the financial year 2025–26, Usha Martin España S.L., a step-down wholly owned subsidiary of the Company, has been voluntarily dissolved. The order of dissolution was issued by the Commercial Registrar of Barcelona on 19th December, 2025.

**Includes step-down subsidiaries*

*** The subsidiary/joint venture companies define their own initiatives based on their specific content and have access to information and expertise residing with the parent company.*

Business Responsibility and Sustainability Report

VI. CSR Details

24. i. **Whether CSR is applicable as per section 135 of Companies Act, 2013:** Yes, but the Company is not required to statutorily incur any CSR spending due to the absence of net profits (calculated in accordance with Section 198 of the Companies Act, 2013) over the last three financial years.

However, the Company voluntarily carries out CSR activities through its CSR arm, the Usha Martin Foundation.

For more details, please refer to Principle 8.

ii. **Turnover (in Million INR.):** 23,120.30

iii. **Net worth (in Million INR.):** 17,888.98

VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redressal policy)*	FY 2025-26			FY 2024-25		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	Yes, community members can submit a formal application to the Usha Martin Foundation, the CSR wing of the Company, highlighting their grievances through a dedicated email ID: grievance@ushamartin.co.in.	0	0	-	0	0	-
Investors (other than shareholders)	Yes, the Company provides open communication channels to all investors to raise their complaints and queries against the Company. A designated official of the Company is allocated to look into the grievances of the investors.	0	0	-	0	0	-
Shareholders	Yes, the Company attends shareholder grievances/ correspondences and has a grievance redressal mechanism in place. 1. A dedicated email ID: investor@ushamartin.co.in is available to all shareholders to share their grievances/ complaints. 2. The website of the Company also has an exclusive section for Shareholders where all the information relating to the Company including the process for grievance redressal is uploaded. 3. Further, a designated official of the Company is allocated for correspondence with the shareholders and for looking into their queries, details of which are also available on the website of the Company.	11	2	Pending complaints as on year end were resolved as on date of this report.	21	0	All the complaints received during the year were resolved.

**The Company's policies are accessible at https://ushamartin.com/investor-relations/corporate-governance#committees*

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redressal policy)*	FY 2025-26			FY 2024-25		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Employees and workers	Yes, the Company has established a range of channels to address grievances, encompassing matters including human rights concerns, for both employees and workers. These channels allow employees and workers to: • Interact with the union regularly to redress grievances, if any. • Address shop floor level grievances to a Joint committee like Shop Council, a body comprising representatives from both management and workers, who meet every month to address the registered grievances. • Report any Whistle-blower related issues to the Chairperson of the Audit Committee. • Report grievances related to sexual harassment to the Internal Committee (IC). • Employees can report hazards, human rights concerns, and other misconduct by writing to grievance@ushamartin.co.in.	0	0	-	0	0	-
Customers	Yes, the Company's sales and service team records complaints in our Customer Complaint Management System (CCMS) for streamlined grievance handling. The Company also maintains a manual for handling customer complaints that vividly provides a flow on the systematic approach to handling customer grievances.	159	28	Pending complaints as on year end were resolved as on date of this report.	188	32	-
Value Chain Partners	Yes, Company's sustainable procurement policy and supplier code of conduct are extended to its value chain partners which enables them to comply with Company's business practices and raise concerns/grievances, if any Our value chain partners, including suppliers and other stakeholders, can direct their concerns to UML_Purchase@ushamartin.co.in.	0	0	-	0	0	-
Other (please specify)	-	-	-	-	-	-	-

The Company's policies are accessible at https://ushamartin.com/investor-relations/investor-information/corporate-governance#policies

Business Responsibility and Sustainability Report

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Climate stewardship	Risk	The Company produces steel wire and rope which is inherently energy intensive. Transitioning to renewable energy is critical for decarbonization, but challenges such as limited green energy availability and high adoption costs may hinder progress. These barriers could strain operational efficiency, escalate production expenses, and delay sustainability goals, posing financial and reputational risks. Tightening environmental regulations, evolving carbon pricing mechanisms and regulations, and the physical risks of extreme weather events affecting manufacturing continuity add further urgency.	UML recognises the operational and financial implications of climate change and has adopted a structured mitigation approach to address both current and future risks. The Company is working to reduce the carbon intensity of its steel wire and rope making processes as part of a long-term strategy, shifting toward cleaner energy alternatives, scaling renewable energy capacity to reduce dependence on fossil fuels, and optimizing production processes to minimize emissions associated with raw material consumption. Progress against these efforts is tracked and reported annually.	Negative
2.	Air emissions management	Risk	1. The Company's manufacturing processes generate air pollutants (PM, SO_x, NO_x), posing environmental and regulatory risks. 2. Non-compliance with permissible limits could trigger operational disruptions, regulatory penalties, or license revocations, while also damaging the company's reputation. 3. Additionally, lagging global sustainability expectations may lead to financial losses and competitive disadvantages as stakeholders increasingly prioritize low-emission practices.	UML is managing air emissions risk through several targeted interventions across its manufacturing operations: 1. Installation of Electrostatic Precipitators (ESPs) at power generating stations to control particulate matter emissions 2. Deployment of an Online Continuous Emissions Monitoring System (CEMS) to track pollutant concentrations in real time and ensure regulatory compliance 3. Establishment of a Continuous Ambient Air Quality Monitoring System (CAAQMS) at the captive power plant to enable immediate corrective action when pollutant levels exceed thresholds 4. Transition toward renewable energy sources to reduce overall emissions load from captive power generation 5. Ongoing evaluation of carbon capture and other emerging technologies to further reduce emissions	Negative

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3.	Water Stewardship	Risk	The Company's operations are water-dependent for processes including cooling and cleaning, making consistent water availability critical to production continuity. Disruptions in water supply could halt operations, while non-compliance with tightening effluent discharge and water-use regulations may result in financial penalties, operational stoppages, or licence revocations. Additionally, climate-driven reductions in freshwater availability pose a longer-term risk to operational resilience, making water efficiency and recycling increasingly critical.	Water stewardship carries operational and regulatory risk for UML, given the dependence of wire drawing, cooling, and cleaning processes on consistent water availability and the tightening of discharge compliance standards across manufacturing sites. The Company manages this risk through the following measures: 1. Rainwater harvesting and rinse water cascading systems reduce freshwater withdrawal across operations. 2. Zero Liquid Discharge (ZLD) systems ensure all wastewater is treated and reused, eliminating discharge to the environment. 3. Effluent Treatment Plants (ETPs) and Sewage Treatment Plants (STPs) installed across facilities treat wastewater for reuse in gardening and other applications, reducing freshwater dependency. 4. Periodic audits of water management systems ensure regulatory compliance and drive operational efficiency improvements. 5. Closed-loop water recovery systems, process-level flow optimisation, and reuse of treated water across both Hoshiarpur and Ranchi plants have reduced groundwater withdrawal and freshwater dependency.	Negative
4.	Waste management and circular economy	Risk	1. The Company's steel rope and wire production generates hazardous waste (scrap metal, chemicals) and industrial effluents, creating environmental and compliance risks if improperly managed. 2. Ineffective treatment systems or disposal practices could lead to regulatory violations, ecosystem harm, and reputational damage. 3. Additionally, inadequate recycling efforts may exacerbate landfill dependence, undermining sustainability commitments and stakeholder confidence in the company's environmental stewardship.	Waste and circular economy risk at UML is managed through structured waste handling systems, resource recovery initiatives, and the progressive embedding of circular economy principles across operations: 1. Dedicated segregation and disposal systems for both hazardous and non-hazardous waste ensure compliance with environmental regulations across all facilities 2. Effluent Treatment Plants (ETPs) treat and recycle water for reuse within operations, reducing freshwater consumption and minimizing discharge impact 3. Circular economy principles are applied to packaging and material inputs — reusable steel pallets have replaced single-use wooden pallets on key dispatch routes, eliminating virgin timber consumption cycle on cycle 4. A buy-back system for Intermediate Bulk Containers (IBCs) used in chemical handling enables reuse.	Negative

Business Responsibility and Sustainability Report

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5.	Biodiversity management	Risk	The construction and expansion of production facilities, as well as the consumption of natural resources, could lead to the degradation of surrounding ecosystems. Additionally, operational water consumption and discharge, if inadequately managed, risk contaminating local water bodies and soil, further threatening proximate biodiversity.	UML recognises the potential impact of its operations on surrounding ecosystems and manages biodiversity risk through a combination of policy, conservation action, and long-term site-level programmes: 1. A dedicated Biodiversity Policy provides the framework for setting conservation targets and mitigating operational impacts on surrounding ecosystems. 2. Indigenous and native saplings have been planted across Ranchi and Hoshiarpur facilities, with 1,183 trees planted across 0.47 hectares to enrich local biodiversity. 3. Continuous expansion of greenbelt coverage across facilities, alongside development of a comprehensive biodiversity management plan to identify and mitigate nature-related risks. 4. Zero Liquid Discharge systems and Effluent Treatment Plants prevent contamination of surrounding soil and water bodies, protecting proximate ecosystems from operational discharge. 5. Tree plantation drives conducted at both Ranchi and Hoshiarpur facilities to strengthen green cover.	Negative
6.	Community engagement	Opportunity	Fostering inclusive and equitable community growth by empowering local communities to achieve self-reliance, improving the employability of local youth, and creating livelihood opportunities.	-	Positive
7.	Customer Centricity	Opportunity	An integral part of the Company's business is their customer, whose satisfaction and loyalty drive the Company's growth and success. This fosters a business ecosystem built on responsibility, integrity, and compliance, ensuring that the Company meet customer expectations and creates long-term value for all stakeholders.	-	Positive

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
8.	Responsible Sourcing	Risk	1. The Company's production supply chain, which involves raw materials, packaging, and logistics, is exposed to risks such as geopolitical instability, natural disasters, economic shifts, and regulatory changes. 2. Any failure to responsibly source raw materials could lead to legal issues, reputational damage, and potential disruptions in production. 3. As the demand for sustainable products grows, failure to incorporate circular economy principles in our sourcing strategy may hinder the Company's ability to meet environmental goals and the expectations of sustainability-focused consumers. 4. Poor supplier practices related to ethics, labor rights, and environmental responsibility could undermine the Company's commitment to sustainability and affect stakeholder trust.	UML's supply chain exposure is managed through binding supplier commitments and active engagement programmes: 1. A comprehensive Supplier Code of Conduct sets mandatory requirements across ethical practices, labour rights, environmental responsibility, safety, quality, and confidentiality 2. Critical suppliers are engaged through a Supply Chain Sustainability Programme, promoting responsible sourcing practices and continuous improvement 3. Circular economy principles are embedded in sourcing decisions to reduce waste and minimise environmental impact across the supply chain 4. Sourcing practices are designed to ensure both local and global supply chains align with UML's sustainability goals, delivering shared value across all stakeholder groups	Negative
9.	Retention and development of diverse talent	Opportunity	Retaining talent and enhancing their skills through continuous upskilling enables the company to maintain a stable, skilled, and adaptable workforce.	-	Positive

Business Responsibility and Sustainability Report

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
10.	Ensuring employee health and wellbeing	Risk	Inadequate implementation of health and safety measures, which could lead to workplace injuries, health issues, and reduced employee productivity.	Employee health and wellbeing is managed through a comprehensive occupational health and safety framework anchored in a Zero Harm commitment: 1. A dedicated OHS policy prioritises the health, safety, and wellbeing of all employees through comprehensive safety protocols, training programmes, and continuous risk assessments. 2. Regular medical check-ups, ergonomic assessments, and mental health support are provided to maintain workforce health and productivity. 3. Ongoing training on safe work practices, including Hazard Identification and Risk Assessment (HIRA) sessions, ensures employees are equipped to identify and respond to workplace hazards. 4. Human Body Static Charge Dissipators installed at all LPG Yard entry points at Ranchi reduce electrostatic risk, demonstrating a proactive approach to process safety and Zero Harm implementation.	Negative
11.	Upholding and protecting human rights	Risk	1. Any failure to uphold human rights standards could lead to legal liabilities, reputational harm, and a loss of stakeholder trust. 2. Additionally, there is a risk of non-compliance with international labor laws, especially within a global/national supply chain, which could negatively impact the company's operational stability and brand value.	Human rights risk at UML is managed through formal policy commitments, rigorous internal controls, and proactive workforce governance: 1. A comprehensive Human Rights Policy, aligned with ILO conventions and UN Global Compact principles, ensures strict adherence to the prevention of child labour, forced labour, and all forms of discrimination — publicly available on UML's website and accessible internally through the UConnect platform. 2. Rigorous internal controls include verification of employee ages during recruitment and clear communication of human rights policies at plant entry points. 3. Fair wages, workplace safety standards, and health benefits are guaranteed across the workforce to protect employee wellbeing. 4. Freedom of association and the right to collective bargaining are upheld without fear of retaliation. 5. Regular human rights training, including dedicated sessions led by external experts, an annual Human Rights Survey, and a structured employee grievance mechanism strengthen UML's ability to identify and mitigate risks across operations and the value chain.	Negative

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
12.	Creating diversity and inclusivity	Opportunity	As an equal opportunity employer, the company hires individuals based on their skills and expertise, regardless of age, gender, race, disability, or other factors. This approach ensures a skilled, knowledgeable, and capable workforce that can effectively navigate unforeseen market challenges.	-	Positive
13.	Fostering a safe work environment	Risk	1. Failure to maintain a safe work environment could result in workplace accidents, injuries, or fatalities, leading to financial losses, legal liabilities, and reputational damage. 2. Additionally, non-compliance with safety regulations or failure to implement effective safety measures could disrupt operations and negatively impact employee morale and retention.	A safe work environment at UML is maintained through a proactive, system-driven approach to occupational health and safety: 1. A comprehensive safety management system underpins all operations, with a strong emphasis on hazard prevention and proactive risk mitigation 2. Regular safety audits, training programmes, and awareness campaigns embed a culture of safety across the workforce 3. Safety Committee meetings are periodically conducted wherein worker representatives are actively involved in safety decision making , ensuring transparency and accountability at operational level. 4. Structured safety initiatives including near-miss capturing, behavioural mapping, and corrective action planning form the backbone of UML's hazard identification and accident prevention efforts	Negative

Business Responsibility and Sustainability Report

SECTION B - MANAGEMENT & PROCESS DISCLOSURES

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

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
c. Web Link of the Policies, if available	Please refer to Table 1								
2. Whether the entity has translated the policy into procedures. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4. Name of the national and international codes/certifications/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle	Please refer to Table 1 & 2								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	Details shall be provided in the Sustainability Report of FY 2025-26.								
6. **Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.**	The Company has a clear roadmap on material ESG aspects. The detailed performance against the roadmap/action plan shall be provided in the Sustainability Report of FY 2025-26.								

Governance, leadership and oversight

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

Dear Stakeholders,

I am pleased to present Usha Martin's Business Responsibility and Sustainability Report for FY 2025–26, prepared in accordance with SEBI's regulatory guidelines and aligned with the National Guidelines on Responsible Business Conduct (NGRBC). This report provides a transparent account of our environmental, social, and governance performance and reflects our continued commitment to responsible and inclusive growth.

This year marks an important milestone in our sustainability journey. Our Ranchi manufacturing facility received the EcoVadis Bronze Medal, our first formal third-party sustainability rating, and we completed our first full year as a signatory to the United Nations Global Compact. These recognitions validate our strategic direction and inspire us to continually strive for higher standards.

On the environmental front, we have taken concrete steps toward decarbonisation, including the partial commissioning of a 4 MWp rooftop solar PV installation at our Ranchi facility. In FY 2025-26, we obtained Environmental Product Declaration (EPD) certification for three key products: Powerform 8P, Minesform 8PVF and Oceanmax 35 - with the LCA studies conducted in alignment with ISO 14025 and EN 15804 + A2 standards. Building on this, we extended our LCA programme to our broader product categories of Steel Rope, Steel Wire, and LRPC Strand, with EPD certification for these categories expected in Q1 of FY 2026-27. Together, these milestones provide our customers and value chain partners with verified, science-based environmental data across both our specific products and our wider product range

Our people remain at the core of everything we do. We continue to build a safe, inclusive, and growth-oriented workplace guided by our safety-first vision, with sustained investment in learning, diversity, and employee wellbeing through the Usha Martin Learning Academy and our digital engagement platform, Uconnect. Our CSR arm, the Usha Martin Foundation, continued to create meaningful impact across education, livelihoods, and community development in Jharkhand, and was recognised this year with the Village Development Initiative Award.

At Usha Martin, responsible business conduct is not a reporting exercise. It is how we make decisions, manage risk, and create value. This report reflects that belief, and we remain fully committed to living it in everything we do.

Regards,

S B N Sharma

DIN: 08167106

Whole Time Director

8.	**Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).**	Mr. S B N Sharma (DIN: 08167106) Whole Time Director Usha Martin Limited Tel. No. 033 - 7100 6300 Mail ID: sbns@ushamartin.co.in
9.	**Does the entity have a specified Committee of the Board/Director responsible for decision making on sustainability related issues? (Yes/No). If yes, provide details.**	Yes, the Company has established a "Sustainability Council" consisting of Directors and senior management personnel, responsible for overseeing the Company's overall sustainability performance. The Council plans and implements ESG initiatives, monitors progress in line with the 9 principles of the NGRBC (National Guidelines on Responsible Business Conduct) and other relevant international standards/frameworks.

Name	Designation	DIN number
Mr. S. B. N. Sharma (Whole-time Director)	Council Chairman	08167106
Mrs. Shreya Jhawar (Director – Strategy & Growth, UM Singapore)	Council Member	-
Mr. Chirantan Chatterjee (Whole-time Director)	Council Member	10506056
Mr. Abhijit Paul (Chief Financial Officer)	Council Member	-
Mr. Manish Agarwal (Company Secretary & Compliance Officer)	Council Member	-

Business Responsibility and Sustainability Report

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director/Committee of the Board/Any other Committee									Frequency (Annually/Half yearly/Quarterly/Any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow-up action	The Sustainability Council consisting of directors and senior management personnel of the company as well as the Risk Management Committee of the Board.									Quarterly								
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	The Sustainability Council consisting of directors and senior management personnel of the company as well as the Risk Management Committee of the Board.									Quarterly								

	P1	P2	P3	P4	P5	P6	P7	P8	P9
11. Has the entity carried out independent assessment/evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	The Company has not yet conducted an independent assessment of its policies by an external agency. However, we conduct regular internal audits and are exploring options for external evaluations in the coming years. The policies are periodically evaluated and updated by various department heads, business heads, and approved by the Sustainability Council, Board Committees and/or the Board.								

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

Not Applicable

Table 1: NGBRC principle wise policy mapping

Principle	Principle Description	UML Policy*	Name of the national and international codes/certifications/labels/standards*
P1	Ethics, Transparency and Accountability: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.	1. Code of Business Ethics and Conduct Policy 2. Code of Conduct for Board of Directors and Senior Management Policy 3. Supplier Code of Conduct 4. Vigil Mechanism and Whistleblower Policy 5. Human Rights Policy 6. Anti Bribery and Anti-Corruption Policy 7. Code of Conduct for the Board of Directors and Senior Management Personnel 8. Code of conduct to regulate, monitor and report of trading by designated persons and their immediate relatives	UNGC Principles, International Labor ILO Declaration on Fundamental Principles and Rights at Work, GRI Standard 2021

**Policies weblink: https://ushamartin.com/investor-relations/corporate-governance#policies*

Principle	Principle Description	UML Policy#	Name of the national and international codes/certifications/labels/standards*
P2	Product Lifecycle Sustainability: Businesses should provide goods and services in a manner that is sustainable and safe.	1. Environmental Policy 2. Sustainable Procurement Policy	ISO 14001:2015, UN SDGs, UNGC Principles
P3	Employee Well-being: Businesses should respect and promote the well-being of all employees, including those in their value chains.	1. Human Rights Policy 2. Occupational Health and Safety Policy 3. Supplier Code of Conduct 4. Prevention and Prohibition & Redressal of Sexual Harassment at Workplace Policy 5. Nomination and Remuneration Policy	Universal Declaration of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, UNGC Principles
P4	Stakeholder Engagement: Businesses should respect the interests of and be responsive to all its stakeholders.	1. CSR Policy 2. Human Rights Policy 3. Supplier Code of Conduct 4. Prevention Prohibition & Redressal of Sexual Harassment at Workplace Policy 5. Code of Business Ethics and Conduct 6. Vigil Mechanism and Whistle Blower Policy	Materiality assessment and stakeholder engagement in reference to GRI Standards, CSR disclosures pursuant to Section 135 of the Companies Act, 2013
P5	Promoting Human Rights: Businesses should respect and promote human rights.	1. Human Rights Policy 2. Prevention, Prohibition & Redressal of Sexual Harassment at Workplace Policy	Universal Declaration of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, UNGC Principles
P6	Protection of Environment: Businesses should respect and make efforts to protect and restore the environment.	1. Environmental Policy 2. Climate Stewardship Policy 3. Water Stewardship Policy 4. Biodiversity Policy 5. Sustainable Procurement Policy	ISO 14001: 2015 Environment Management System (EMS), UN SDGs United Nations Sustainable Development Goals (UNSDG), National/Local Regulations from MOEF&CC, GoI
P7	Responsible Policy Advocacy: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.	1. Code of Business Ethics and Conduct 2. Human Rights Policy 3. Anti Bribery and Anti-Corruption Policy	UN SDGs, UNGC Principles
P8	Support Inclusive Growth: Businesses should promote inclusive growth and equitable development.	1. Corporate Social Responsibility Policy 2. Human Rights Policy 3. Sustainable Procurement Policy 4. Code of Business Ethics and Conduct	UN SDGs, UNGC Principles, CSR disclosures pursuant to Section 135 of the Companies Act, 2013
P9	Providing Customer Value: Businesses should engage with and provide value to their consumers in a responsible manner.	1. Code of Business Ethics and Conduct 2. Information Security Policy 3. Supplier Code of Conduct Policy 4. Sustainable Procurement Policy	Universal Declaration of Human Rights, ISO 27001:2022, ILO Declaration on Fundamental Principles and Rights at Work, UNGC Principles

**The Company has diligently developed its policies, systems, and processes in reference to these standards and regulations. It remains our constant endeavour to ensure continuous enhancement and maximum possible alignment with these benchmarks, reflecting our commitment to ongoing improvement and adherence.*

#Policies weblink: https://ushamartin.com/investor-relations/corporate-governance#policies

Business Responsibility and Sustainability Report

Table 2: Other Certificates

S. No.	Certificates
1.	ABS - Manufacturing Assessment
2.	ABS - Product Design Assessment
3.	ABS - Equipment Certification Report
4.	American Petroleum Institute (API) Monogram Usage Authority
5.	Recognition for BV Mode II Scheme - Bureau Veritas Marine & Offshore
6.	China Classification Society - Works Approval
7.	Class NK – Approval of Manufacturing Process of Steel Wire Rope
8.	DNV - GL - Approval of manufacturer
9.	Lloyd - Approved manufacturer
10.	NABL Accreditation
11.	ISO 9001:2015
12.	Certificate of Conformity (In Metro, Brazil)
13.	Standards Organization of Nigeria Conformity Assessment Program
14.	Manufacturers Approval From PGCIL
15.	DGMS approval
16.	Bureau of Indian Standards
17.	ASQPE (Association for the Qualification of Prestressing and Equipment for Works and Civil Engineering) Certificate
18.	Quality Austria Certificate ISO 9001:2025
19.	TPM Certificate
20.	ISO 14001:2015 - EMS Certification
21.	ISO 45001:2018 - OHSMS Certification
22.	ISO/IEC 27001:2022-ISMS Certification
23.	SIRIM QAS International SDN. BHD., Malaysia
24.	BRIN, Indonesia (SNI)

SECTION C- PRINCIPLE WISE PERFORMANCE DISCLOSURES

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

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors and Key Managerial Personnel	2	Orientation and awareness sessions are conducted on focused ESG topics, including the Company's ESG initiatives, safety, health and environment, and legal and regulatory matters.	100
Employees other than BOD and KMPs	114	The training programs are conducted on various topics such as ESG capacity building, effective communication, ERP system proficiency, occupational health and safety, machine capacity analysis, team building, interpersonal development, role-based simulations and skill upgradation modules. There are dedicated awareness sessions on business ethics, regulatory compliance, Prevention of Sexual Harassment (POSH), HR and company polices.	89.46
Workers	129	Training programs are conducted covering ESG capacity building, business ethics, occupational health and safety, skill upgradation and HR practices. The safety trainings emphasize the importance of PPE tools and safety kit usage. Additionally, workers on the shop floor receive various technical training on product/machinery handling, usage, and different processes.	94.36

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

(Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website)

Monetary					
Type	**NGRBC Principle**	**Name of the regulatory/ enforcement agencies/ judicial institutions**	**Amount (In INR)**	**Brief of the Case**	**Has an appeal been preferred? (Yes/No)**
Penalty/Fines	1	Deputy State Tax Officer (Int.), Roving Squad, Commercial Taxes Department, Tamil Nadu.	1,34,935	Detention of goods for alleged discrepancy in the "bill to" and "ship to" address vis-à-vis GSTIN details of the customer and Levy of penalty under Section 129(1) of CGST Act, 2017 amounting to INR 1,34,935/-.	No
		Commercial Tax Officer, Sriperumbudur, Kancheepuram, Tamil Nadu.	20,000	Order u/s 73 of the CGST Act, 2017 pursuant to completion of GST Audit for FY 2021-22 levying penalty of INR 20,000/- for alleged claim of ineligible ITC.	No
		Excise And Taxation Officer-cum-State Tax Officer, Hoshiarpur - Ward No.3, Punjab.	50,000	Order u/s 73 of the CGST Act, 2017 pursuant to completion of GST Audit for FY 2021-22 levying penalty of INR 50,000/- for non-compliance with circular No. 170/02/2022-GST.	No
Settlement	-	-	-	-	-
Compounding fee	-	-	-	-	-

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Non-Monetary				
Type	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	-	-	-	-
Punishment	-	-	-	-

3. **Of the instances disclosed in Question 2 above, details of the Appeal/Revision preferred in cases where monetary or non-monetary action has been appealed.**

Case Details	Name of the regulatory/enforcement agencies/judicial institutions
Not Applicable	

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

Usha Martin Limited has established a comprehensive Anti-Bribery and Anti-Corruption (ABAC) Policy that reflects its commitment to conducting business with the highest standards of integrity, transparency, and ethical conduct. The policy strictly prohibits all forms of bribery and corrupt practices, whether direct or indirect, and is applicable to all employees, stakeholders, and third parties acting on behalf of the Company. It clearly outlines prohibitions relating to bribery, facilitation payments, inappropriate gifts and hospitality, and political or charitable contributions intended to improperly influence business decisions. A structured and confidential reporting mechanism is available for raising concerns, with appropriate safeguards in place to protect whistle-blowers from retaliation. The policy also defines the consequences of violations, which may include disciplinary action up to and including termination of employment.

To ensure effective implementation, the policy is reinforced through mandatory training programs and knowledge assessments aimed at strengthening awareness and promoting compliance across the organization. Oversight of the policy's implementation and periodic review rests with the Board of Directors, and it is updated from time to time to remain aligned with evolving regulatory requirements and global best practices.

The Policy is available on the website of the Company: Link

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

Particulars	FY 2025-26	FY 2024-25
Directors	-	-
KMPs	-	-
Employees	-	-
Workers	-	-

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

Particulars	FY 2025-26		FY 2024-25	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	-	-		-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	-	-	-	-

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

NA

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

Particular	FY 2025-26	FY 2024-25
Number of days of accounts payables	40	34

9. **Open-ness of business**

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

Parameter	Metrics		FY 2025-26	FY 2024-25
Concentration of Purchases	a.	Purchases from trading houses as % of total purchases	5.41%	6.60%
	b.	Number of trading houses where purchases are made from	784	811
	c.	Purchases from top 10 trading houses as % of total purchases from trading houses	27.83%	31%
Concentration of Sales	a.	Sales to dealers/distributors as % of total sales	23.32%	29.84%
	b.	Number of dealers/distributors to whom sales are made	20	22
	c.	Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	89.30%	83.02%
Share of RPTs in	a.	Purchases (Purchases with related parties/Total Purchases)	0.03%	0.08%
	b.	Sales (Sales to related parties/Total Sales)	30.25%	31.54%
	c.	Loans & advances (Loans & advances given to related parties/Total loans & advances)	85.71%	80.76%
	d.	Investments (Investments in related parties/Total Investments made)	99.87%	99.87%

Leadership Indicators:

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

Total number of awareness programmes held	Topics/principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
2	The sessions covered an introduction to supply chain sustainability, the role and criticality of ESG in supply chain management, and expectations from suppliers on ESG performance. Discussions also included emerging trends in sustainable supply chains, organizational capabilities required for embedding sustainability into operations, Usha Martin's existing practices, peer initiatives, and our approach to ESG integration. The sessions further explored ESG-related risks associated with suppliers and approach for identifying and managing them.	70%*

**Usha Martin's supply chain sustainability initiative covers critical suppliers and encompasses capability building programmes, supplier ESG and risk assessments, supplier classification, and the issuance of corrective action plans where required.*

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

Yes. Usha Martin Limited has adopted and implemented a Code of Conduct for its Board of Directors and Senior Management, including personnel one level below the Executive Directors, to proactively identify and mitigate conflicts of interest. It requires disclosure of any material financial or commercial transactions that may result in a conflict, including dealings in Company securities or business relationships where a personal interest may influence decision-making.

In addition, the Company also has a Standard Operating Procedure (SOP) for Related Party Transactions, which provides a structured framework to ensure such transactions are undertaken transparently, with appropriate approvals and in compliance with applicable regulatory requirements.

Business Responsibility and Sustainability Report

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

Essential Indicators

1. **Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.**

Particulars	FY 2025-26	FY 2024-25	Details of improvements in environmental and social impacts
R&D	-	-	-
Capex	3.40%	5.76%	Initiatives and projects around energy efficiency, energy conservation, waste management, water management and employee safety detailed in subsequent principles. Major initiatives and project investment has been completed last year.

2. **(a) Does the entity have procedures in place for sustainable sourcing?**

Yes, Usha Martin Limited has a Sustainable Procurement Policy and a Supplier Code of Conduct to reinforce its commitment to responsible sourcing. Compliance with the Supplier Code of Conduct is mandatory for all suppliers. Additionally, the Company conducts periodic internal ESG assessments to evaluate the maturity of its critical suppliers across environmental, social, and governance parameters.

(b) If yes, what percentage of inputs were sourced sustainably?

Usha Martin screens over 70% of its suppliers by procurement value against defined ESG criteria, reflecting a systematic approach to embedding sustainability across its supply chain. The Company's Sustainable Procurement Policy forms the governance foundation for this effort, setting clear expectations for suppliers across ethical conduct, social responsibility, and environmental stewardship, covering areas such as fair labour practices, safe working conditions, waste reduction, resource efficiency, and the adoption of renewable energy where operationally feasible.

Supplier evaluation follows a structured process encompassing screening and classification based on procurement value and risk exposure, ESG assessment against defined environmental, social, and governance parameters, corrective action planning where gaps are identified, and capacity building support for critical suppliers. Usha Martin is currently strengthening this framework by formally embedding sustainability criteria into its supplier selection and ongoing evaluation methodology, moving towards a more continuous and integrated approach to supply chain sustainability.

3. **Describe the processes in place to safely reclaim your products for reusing, recycling, and disposing at the end of life, for (a) plastic (including packing) (b) e-waste (c) hazardous waste and (d) other waste.**

Usha Martin Limited operates in the specialty steel wire and wire rope sector and serves global markets with a continuous focus on adopting new technologies to strengthen its market position. As most of its products are made from steel or specialty steel, they are highly recyclable and retain considerable value at the end of their lifecycle.

While the use of recycled materials as process inputs is limited due to the nature of operations, the Company ensures responsible recycling and disposal of operational waste. Both hazardous and non-hazardous wastes are managed and disposed of through authorized vendors. In addition, the Company promotes circular practices by enabling the reuse of fly ash in infrastructure applications such as road construction and brick manufacturing.

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

Yes, Usha Martin Limited is registered on the Centralized Extended Producer Responsibility (EPR) Portal for Plastic Packaging as a brand owner and importer, in compliance with the Plastic Waste Management Rules, 2016. The Company files its annual reports against the EPR targets. reporting plastic waste category-wise within the stipulated timelines.

Leadership Indicators:

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

NIC	Name of Product/ Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective/ Assessment was conducted	Whether conducted by independent external agency (Yes/ No)	Results communicated in public domain (Yes/ No) If yes, provide the web-link.*
2599	Wire rope	63.88%	Cradle to gate	Yes	
2599	Wire & strands	17.13%	Cradle to gate	Yes	
2599	LRPC strand	13.55%	Cradle to gate	Yes	

** During FY 2025-26, the Company completed cradle-to-gate Life Cycle Assessments for the relevant products through an independent external agency.*

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

S. No.	Name of Product/Service	Description of risk/concern	Action Taken
Not applicable			

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

S. No.	Indicate Input Material	Recycled or re-used input material to total material	
		FY 2025-26	FY 2024-25
-	-	-	-

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

Not Applicable

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

Not applicable

Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains

Essential Indicators

1.a. Details of measures for the well-being of employees:

Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Employees											
Male	555	555	100	555	100	-	-	555	100	-	-
Female	25	25	100	25	100	25	100	-	-	-	-
Total	**580**	**580**	**100**	**580**	**100**	**25**	**100**	**555**	**100**	**-**	**-**
Other than Permanent Employees											
Male	82	82	100	82	100	-	-	82	100	-	-
Female	2	2	100	2	100	2	100	-	-	-	-
Total	**84**	**84**	**100**	**84**	**100**	**2**	**100**	**82**	**100**	**-**	**-**

Business Responsibility and Sustainability Report

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

Category	Total (A)	Health Insurance Number (B)	Health Insurance % (B/A)	Accident Insurance Number (C)	Accident Insurance % (C/A)	Maternity Benefits Number (D)	Maternity Benefits % (D/A)	Paternity Benefits Number (E)	Paternity Benefits % (E/A)	Day Care Facilities Number (F)	Day Care Facilities % (F/A)
Permanent workers											
Male	1,645	1,645	100	1,645	100	-	-	1,645	100	-	-
Female	9	9	100	9	100	9	100	-	-	-	-
Total	**1,654**	**1,654**	**100**	**1,654**	**100**	**9**	**100**	**1,645**	**100**	**-**	**-**
Other than Permanent Workers											
Male	2,707	2,707	100	2,707	100	-	-	-	-	-	-
Female	33	33	100	33	100	33	100	-	-	-	-
Total	**2,740**	**2,740**	**100**	**2,740**	**100**	**33**	**100**	**-**	**-**	**-**	**-**

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent):

	FY 2025-26	FY 2024-25
Cost incurred on well-being measures as a % of total revenue of the company	0.07%	0.07%

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

Benefits	FY 2025-26			FY 2024-25		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100	100	Y	100	100	Y
Gratuity	100	100	Y	100	100	Y
ESI	100	100	Y	100	100	Y
Others – NPS	12.59	0	Y	12.83	0	Y
Others – Superannuation	86.38	0	Y	88.58	0	Y

3. Accessibility of workplaces

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

Usha Martin Limited provides accessibility features across its premises, including ramps and wheelchairs, to support ease of mobility and promote an inclusive workplace environment in line with the principles of the Rights of Persons with Disabilities Act, 2016.

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

Usha Martin Limited is committed to maintaining a workplace built on fairness, equal opportunity, and respect across the entire employee lifecycle from hiring and onboarding to development and separation. The Company ensures equal opportunity, dignity at work and provides a safe and supportive environment that enables employees to perform and grow.

To reinforce its commitment to human rights, the Company has implemented a Human Rights Policy that promotes diversity and inclusion. The policy supports the creation of a workplace where individuals from diverse backgrounds can contribute and advance without prejudice, and it strictly prohibits discrimination or harassment on grounds such as race, gender, ethnicity, age, religion, disability, sexual orientation, gender identity or expression, political opinion, or any other characteristic protected under applicable laws.

In accordance with the Rights of Persons with Disabilities Act, 2016, the Company also promotes equal opportunity for persons with disabilities and accessibility features have been implemented across its premises to support ease of mobility and reinforce its commitment to inclusivity.

The Policy is available on the website of the Company: Link

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

Gender	Permanent employees		Permanent workers	
	Return to work rate in %	Retention rate in %	Return to work rate in %	Retention rate in %
Male	100	93.75	100	NA*
Female	NA**	NA*	NA**	NA*
Total	**100**	**93.75**	**100**	**NA**

**No permanent worker (male) and no permanent employee & worker (female) availed parental leave in previous financial year i.e. FY 2024-25, hence retention rate is not applicable.*

***No permanent employee and worker (female) availed parental leave in current financial year i.e. FY 2025-26, hence return to work rate is not applicable.*

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

Particulars	Yes/No (If yes, then give details of the mechanism in brief)
Permanent Workers Other than Permanent Workers Permanent Employees Other than Permanent Employees	Yes, Usha Martin Limited has established multiple channels to receive and address grievances of employees and workers, reflecting its commitment to employee welfare and transparent communication. Workers can raise concerns through regular interactions with the union, which serves as a platform for discussing and resolving workplace issues. Employees and workers may also approach the Human Resources Department through one-to-one meetings with the HR team or by communicating concerns directly to their immediate supervisors. In addition, a Shop Council comprising representatives from both management and workers meets monthly to review and resolve grievances raised at the shop floor level. Further, whistleblower-related concerns can be reported to the Chairperson of the Audit Committee to ensure transparency and accountability. Whistleblower concerns may also be reported at wb@ushamartin.co.in. Matters related to sexual harassment can be reported to the Internal Committee (IC), which provides a structured and confidential mechanism for addressing such grievances.

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

Category	FY 2025-26			FY 2024-25		
	Total employees/ workers in respective category (A)	No. of employees/ workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees/ workers in respective category (C)	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Permanent Employees						
Total Permanent Employees	**580**	**0**	**0**	**569**	**0**	**0**
Male	555	0	0	546	0	0
Female	25	0	0	23	0	0
Permanent Workers						
Total Permanent Workers	**1,654**	**1,267**	**76.60**	**1,666**	**1,255**	**75.33**
Male	1,645	1,261	76.66	1,663	1,255	75.47
Female	9	6	66.67	3	0	0

8. Details of training given to employees and workers:

Category	FY 2025-26					FY 2024-25				
	Total (A)	On Health and safety measures		On Skill Upgradation		Total (D)	On Health and safety measures		On Skill Upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	637	343	53.85	482	75.67	620	238	38.39	491	79.19
Female	27	15	55.56	22	81.48	26	9	34.62	21	80.77
Total	**664**	**358**	**53.92**	**504**	**75.90**	**646**	**247**	**38.24**	**512**	**79.26**
Workers										
Male	4,352	4,003	91.98	3,244	74.54	4,323	3,587	82.97	1,584	36.64
Female	42	28	66.67	19	45.24	32	14	43.75	0	0
Total	**4,394**	**4,031**	**91.74**	**3,263**	**74.26**	**4,355**	**3,601**	**82.69**	**1,584**	**36.37**

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

Category	FY 2025-26			FY 2024-25		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	%(D/C)
Employee						
Male	555	499	89.91	546	485	88.83
Female	25	19	76.00	23	12	52.17
Total	**580**	**518**	**89.31**	**569**	**497**	**87.35**
Workers						
Male	1,645	1,508	91.67	1,663	1,527	91.82
Female	9	3	33.33	3	3	100
Total	**1,654**	**1,511**	**91.35**	**1,666**	**1,530**	**91.84**

**Permanent employees and workers have been considered*

10. Health and safety management system:

a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/No). If yes, the coverage of such a system?

Yes, Usha Martin Limited has implemented an Occupational Health and Safety Management System aligned with the ISO 45001 standard. across all its manufacturing sites. The system ensures compliance with applicable occupational health and safety regulations and supports the provision of a safe and healthy workplace for employees.

In line with ISO 45001, the Company has established an Occupational Health and Safety (OHS) Policy reflecting its commitment to achieving "zero harm." The policy applies to employees, contractors, suppliers, and other stakeholders involved in operations across manufacturing units, offices, and project sites. It focuses on identifying and eliminating potential hazards, promoting a strong safety culture, and regularly monitoring and reviewing safety performance.

The Head of OHS is responsible for implementing and managing the policy across the organization, while the Board of Directors provides oversight to ensure alignment with organizational objectives and regulatory requirements. The policy is reviewed annually and updated as necessary to address evolving risks and regulatory developments.

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

Usha Martin Limited has established systematic processes to identify work-related hazards and assess associated risks for both routine and non-routine activities. The Company conducts regular Hazard Identification and Risk Assessment (HIRA) exercises to evaluate workplace risks, which are categorised as high, moderate, or acceptable. Based on the risk classification, appropriate control measures are implemented to ensure risks remain within permissible limits.

In addition, insights from incident investigations, observations of unsafe acts or conditions, and structured safety assessments such as Job Safety Analysis (JSA) and Management of Change (MOC) are used to strengthen risk identification and mitigation practices. Recommendations from external safety consultants are also incorporated to enhance overall safety management.

Regular safety audits and inspections are carried out across facilities to detect and address potential hazards, supported by a formal reporting mechanism that enables employees to report safety concerns. These risk assessments are reviewed and updated periodically, particularly when new equipment, processes, or projects are introduced, ensuring continuous improvement in workplace safety practices.

c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N)

Yes, Usha Martin Limited has established processes that enable workers to report work-related hazards and take timely actions to mitigate associated risks. Employees and workers are encouraged to report unsafe conditions, unsafe acts, and near-miss incidents, which are subsequently analyzed and investigated to implement appropriate corrective and preventive measures.

The workplace also displays visual Standard Operating Procedures (SOPs), referred to as cardinal rules, which outline safe work practices across key safety areas such as electrical safety and lockout–tagout (LOTO), work at height, road safety, and mechanical safety and ensuring work and workplace safety.

In addition, QR codes have been installed at multiple locations on the shop floor to facilitate real-time reporting of safety observations. These reports are reviewed by the Safety team, which then initiates necessary actions to address and mitigate unsafe conditions.

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

Yes, Usha Martin Limited provides employees and workers with access to non-occupational medical and healthcare services as part of its commitment to employee well-being. The Company offers medical support for various health conditions and has implemented several measures to safeguard employee health.

These include 24-hour ambulance availability to respond to workplace incidents, periodic medical health camps, and health awareness sessions conducted by experienced medical professionals. In addition, employees and workers are supported through health and accident insurance coverage as well as special leave provisions to address medical needs both during and beyond regular working hours.

11. Details of safety-related incidents:

Safety Incident/Number	Category	FY 2025-26	FY 2024-25*
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.71	0.71
	Workers	3.47	4.31
Total recordable work-related injuries	Employees	1	1
	Workers	35	40
No. of fatalities	Employees	0	0
	Workers	0	0
High consequences for work-related injury or ill health (excluding fatalities)	Employees	0	0
	Workers	2	0

**The safety data for FY 2024-25 has been restated to align with the definitions provided in the BRSR guidance.*

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

Usha Martin Limited maintains high standards of workplace health and safety through the implementation of an Occupational Health and Safety Management System aligned with ISO 45001. The Company has established an on-site emergency control plan under its disaster management framework to ensure prompt response to incidents, prioritizing immediate medical assistance and minimizing impact on people, property, and the environment.

To strengthen workplace safety, the Company conducts regular safety audits, hazard identification exercises, and periodic risk assessments. Employees are empowered to report hazards and stop unsafe work, reinforcing a proactive safety culture. The organization also promotes safety awareness through leadership engagement and ensures that all employees undergo annual safety training, contractors and suppliers are also actively involved in safety management practices.

The effectiveness of the safety management system is monitored through multiple mechanisms, including physical verification of system implementation, external audits for certification and re-certification, and regular site safety observations. The Company also encourages employees to share suggestions for improving safety performance and conducts safety awareness initiatives and safety perception surveys. In addition, standard operating procedures (SOPs) and policy frameworks aligned with applicable standards and regulatory requirements are implemented to ensure continuous improvement in workplace health and safety.

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

Type	FY 2025-26			FY 2024-25		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0	-	0	0	-
Health & Safety	0	0	-	0	0	-

14. Assessments for the year:*

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

**Assessment by Internal team of UML for its manufacturing sites.*

15. **Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks/concerns arising from assessments of health & safety practices and working conditions.**

Usha Martin Limited undertakes corrective and preventive actions to address safety-related risks identified through health and safety assessments, with a focus on strengthening workplace safety and minimizing incidents. Key initiatives include:

1. Installation of second-layer protection through shunt buttons on more than 235 machines to safeguard personnel, equipment, and materials in case of emergency switch failure.
2. Conducted Behaviour-Based Safety (BBS) training for over 3,000 employees to promote safe work practices and enhance safety awareness.
3. Deployment of more than 15 shrouded busbar systems (fully enclosed DSL) in place of open DSL for overhead cranes to reduce the risk of sparks and prevent electrocution hazards.

Leadership Indicators

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

Yes, Usha Martin Limited provides a GPA policy to employees and workers in the event of partial or permanent disability or other adverse incidents, including accidental death, if such cases are reported across its facilities. This support is extended to ensure financial assistance to affected individuals or their families.

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

Usha Martin Limited undertakes several measures to ensure that statutory dues are appropriately deducted and deposited by its value chain partners. The Company performs reconciliation of annual balances to verify statutory deductions and ensure compliance. Additionally, mandatory statutory details are collected and verified during the onboarding of new vendors to strengthen compliance with applicable regulatory requirements.

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

Particular	Total number of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2025-26	FY 2024-25	FY 2025-26	FY 2024-25
Employees	0	0	0	0
Workers	2	0	2	0

Note: The workers who sustained high-consequence work-related injuries have been redeployed in suitable roles within Usha Martin.

4. **Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment?**

Yes.

Business Responsibility and Sustainability Report

Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders

Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the entity

Usha Martin Limited is committed to building long-term and meaningful relationships with its stakeholders. The Company recognizes that transparent, open, and ethical communication with stakeholders is essential for strengthening trust, supporting sustainable business growth, and achieving the triple bottom line.

Key stakeholder groups are identified based on two primary criteria: the level of influence stakeholders have on the value created by the organization, and the extent of the Company's business impact on those stakeholders.

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

S. No.	Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website, Other)	Frequency of engagement (Annually/Half yearly/Quarterly/ others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
1.	Senior Management & Key Managerial Personnel (KMP)	No	Emails, physical one-to-one meetings, official communication channels, online meetings	Daily	Envisioning sectoral growth of the organization, business performance, corporate strategy
2.	Employees	No	Emails, meetings, official communication channels, employee pulse survey, performance reviews	Daily	Employee engagement for career development and growth, health and safety, training and upskilling, grievance resolution
3.	Workers	No	Safety meetings, noticeboards, counselling, Worker training sessions	Daily	Health and safety training and upskilling, awareness programs, grievance resolution
4.	Communities	Yes	Website, Community visit and CSR projects, local charities, volunteerism and social media	Quarterly, need based	Community development, self-sustainability, livelihood support, Sustainable Development Goals, CSR projects
5.	Investors	No	Shareholder meetings, capital market engagements, AGM Investor outreach sessions, exchange filings, regulatory disclosures, periodic financial briefings, official communication channels, media releases, corporate website, quarterly briefings, annual reports	Quarterly, need based	Communication on financial performance, growth outlook, investor queries and concerns, corporate strategy and governance.
6.	Vendors and Suppliers	No	Emails, telephonic conversations, meetings, supplier assessment and review, training and support programs	Weekly, need based	Maintaining strong relationships with value chain partners, embedding sustainability in the supply chain and promoting responsible sourcing, improvement across the vendor base focusing on safety, quality, delivery performance, productivity enhancement, and sustainability
7.	Customers	No	Emails, telephonic conversations, physical meetings, advertisements, website, social media, Customer Complaint Management System (CCMS), customer satisfaction index	Weekly, need based	Understand customer requirements, creating awareness on product and applicability, alignment of business operations to such requirements

Leadership Indicators

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

   Usha Martin Limited maintains structured processes to facilitate consultation between stakeholders and the Board on economic, environmental, and social matters. Different departments within the organization are assigned specific responsibilities for stakeholder engagement, using multiple channels such as surveys, workshops, online meetings, newsletters, emails, investor calls, and regular interactions with CSR teams to gather feedback and address stakeholder concerns.

   Both formal and informal mechanisms are used to ensure that stakeholder expectations are well understood and incorporated into business decisions. The Board has also constituted a Sustainability Council comprising Directors and Senior Management to oversee stakeholder engagement and sustainability-related discussions. Feedback and key insights from these engagements are periodically communicated to the Board, enabling informed strategic decision-making.

   For shareholders, the Company ensures transparent communication through channels such as annual reports, its website, annual correspondence, and the Annual General Meeting (AGM), providing opportunities for meaningful dialogue on the Company's performance, strategy, and future plans.

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

   Yes, Usha Martin Limited utilizes stakeholder consultations to support the identification and management of key environmental and social topics. Inputs received from stakeholders are considered while developing policies, ensuring regulatory compliance, and strengthening the Company's sustainability strategies. The stakeholder engagement framework is designed to promote inclusivity, accountability, and responsible decision-making.

   Through regular interactions with stakeholders, the Company is able to identify potential risks, understand emerging concerns, and implement appropriate mitigation measures. Efforts are continuously made to integrate stakeholder expectations into business operations while tracking progress on key sustainability issues identified through these engagements.

   As part of its materiality assessment process, the Company engages with key stakeholders to identify and prioritize environmental and social topics. Based on the feedback received, material issues are evaluated based on their significance to both stakeholders and the business, and these priorities are subsequently integrated into the Company's strategic plans and sustainability initiatives

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

   Usha Martin Limited identifies and prioritizes its stakeholder groups based on the extent of their influence on, and impact from, its business activities. The Company remains committed to engaging with all stakeholders in a fair, transparent, and inclusive manner ensuing that they are treated equitably without discrimination.

   Through its engagement processes, the Company seeks to understand the concerns of vulnerable or marginalized stakeholder groups and ensures that their issues are addressed in an equitable and non-discriminatory manner. It also focuses on maintaining transparent communication and providing timely and relevant disclosures to build trust and strengthen stakeholder relationships.

Business Responsibility and Sustainability Report

Principle 5: Businesses should respect and promote human rights.

Essential Indicators

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

Category	FY 2025-26*			FY 2024-25		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	580	145	25.00	569	417	73.29
Other than Permanent	84	6	7.14	77	28	36.36
Total Employees	**664**	**151**	**22.74**	**646**	**445**	**68.89**
Workers						
Permanent	1,654	305	18.44	1,666	1,420	85.23
Other than Permanent	2,740	314	11.46	2,689	1,586	58.98
Total Workers	**4,394**	**619**	**14.09**	**4,355**	**3,006**	**69.02**

**Human rights training is conducted on a 2-year cycle, FY 2024-25 was a primary training year and FY 2025-26 is a non-training year. The coverage for FY 2025-26 reflects refresher sessions conducted and specific targeted training only.*

2. Details of minimum wages paid to employees and workers:

Category	FY 2025-26					FY 2024-25				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Permanent Employees										
Male	555	0	0	555	100	546	0	0	546	100
Female	25	0	0	25	100	23	0	0	23	100
Other than Permanent Employees										
Male	82	0	0	82	100	74	0	0	74	100
Female	2	0	0	2	100	3	0	0	3	100
Permanent Workers										
Male	1,645	0	0	1,645	100	1,663	0	0	1,663	100
Female	9	0	0	9	100	3	0	0	3	100
Other than Permanent Workers										
Male	2,707	0	0	2,707	100	2,660	117	4.40	2,543	95.60
Female	33	0	0	33	100	29	3	10.34	26	89.66

3. Details of remuneration/salary/wages

a. Median remuneration/wages:

Category	Male		Female	
	Number	Median remuneration/ salary/wages of respective category (in INR)	Number	Median remuneration/ salary/ wages of respective category (INR)
Board of Directors (BoD)	6	70,16,602	1	31,00,000
Key Managerial Personnel (KMP)	2	75,05,510	0	-
Employees other than BoD and KMP*	550	9,39,929	25	6,61,260
Workers*	1,645	4,74,931	9	2,03,174

**Permanent employees and workers have been considered*

b. **Gross wages paid to females as % of total wages paid by the entity:**

	FY 2025-26	FY 2024-25*
Gross wages paid to females as % of total wages	1.59	1.59

**The FY 2024–25 figures have been restated to incorporate data pertaining to permanent employees and workers*

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

Yes, a designated mechanism is in place to address human rights-related concerns within the organization. Complaints or issues can be reported to the Human Resources Department or the respective Department Heads. For direct submission of such concerns, a dedicated email ID (grievance@ushamartin.co.in) is in place.

The Head of the Human Resources Department is responsible for overseeing and implementing actions related to human rights matters. All complaints are reviewed and addressed in accordance with the Company's certified standing orders to ensure appropriate and timely resolution.

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

Usha Martin Limited has established internal mechanisms to effectively address grievances related to human rights issues, in line with its Human Rights Policy. Regular training programs and awareness initiatives are conducted to educate employees about their rights and responsibilities, while periodic surveys are undertaken to assess employee awareness, perceptions, and the effectiveness of human rights practices within the workplace.

Employees and workers are encouraged to report any actual, potential, or perceived human rights violations to the appropriate authorities, such as their respective Department Head or the Head of Human Resources. Multiple grievance redressal channels are available to ensure concerns are addressed promptly and transparently.

These mechanisms include regular engagement with the union to discuss and resolve worker grievances, escalation of shop floor issues to the Shop Council, a joint committee comprising representatives from management and workers that meets monthly to address concerns and the whistle-blower mechanism, through which issues can be reported directly to the Chairperson of the Audit Committee. Complaints related to sexual harassment can also be reported to the Internal Committee (IC), which provides a formal process for investigation and resolution.

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

Particulars	FY 2025-26			FY 2024-25		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	-	0	0	-
Discrimination at workplace	0	0	-	0	0	-
Child Labor	0	0	-	0	0	-
Forced Labor/Involuntary Labor	0	0	-	0	0	-
Wages	0	0	-	0	0	-
Other human rights related issues	0	0	-	0	0	-

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

Particulars	FY 2025-26	FY 2024-25
	Filed during the year	Filed during the year
Total complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees/workers	0	0
Complaints on POSH upheld	0	0

Business Responsibility and Sustainability Report

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

   Usha Martin Limited has established a structured and confidential reporting mechanism, managed by the Human Resources Department, to ensure fair disciplinary procedures and protect complainants in cases of discrimination and harassment. All complaints are documented and handled in an impartial manner, and appropriate remedial actions are taken after verification, including corrective measures or policy improvements where necessary.

   The mechanism is designed to safeguard complainants from any form of retaliation or adverse consequences. Additionally, the Company extends necessary support and rehabilitation to individuals affected by human rights violations.

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

   Yes, human rights requirements are embedded within the organization's business agreements and contractual frameworks. The entity addresses and mitigates potential human rights concerns through established policies and effective grievance redressal mechanisms. A comprehensive Human Rights Policy has been developed and extended to value chain partners, and it is publicly accessible on the organization's website.

   In addition, a Supplier Code of Conduct has been implemented to ensure that the principles of ethical business conduct and respect for human rights are upheld by all suppliers providing goods and services.

10. **Assessments for the year**

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

This is on the basis of the internal audits conducted by UML.

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

    No human rights risks or concerns were identified during the assessments. Nevertheless, the Company continues to strengthen preventive measures by embedding human rights requirements within its business agreements and contractual arrangements.

    Human rights risks are addressed through established policies and grievance redressal mechanisms. A comprehensive Human Rights Policy is in place and is extended to value chain partners, with the document made publicly accessible on the Company's website. In addition, a Supplier Code of Conduct has been implemented to ensure that all suppliers of goods and services adhere to the organization's ethical business principles and human rights standards.

Leadership Indicators

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

   As part of its continuous commitment to strengthening human rights practices, the Company has enhanced training and awareness programs on human rights for its workforce.

   In addition, periodic human rights surveys are conducted across all locations to assess potential risks and strengthen the implementation of human rights standards within the organization.

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

   The Company undertakes human rights risk assessment surveys for its employees across all plants and office locations.

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

   The Company's premises and plants are equipped with accessibility features, including ramps and other necessary provisions, to facilitate ease of access and mobility for differently abled visitors.

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

Essential Indicators

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

Parameter	Units	FY 2025-26	FY 2024-25
From renewable sources			
Total electricity consumption (A)	GJ	-	-
Total fuel consumption (B)	GJ	21,734	33,866
Energy consumption through other sources (C)	GJ	-	-
Total energy consumed from renewable sources (A+B+C)	GJ	21,734	33,866
From non-renewable sources			
Total electricity consumption (D)	GJ	1,07,053	1,04,514
Total fuel consumption (E)	GJ	22,70,241	21,75,910
Energy consumption through other sources (F)	GJ	-	-
Total energy consumed from non-renewable sources (D+E+F)	GJ	23,77,294	22,80,424
Total energy consumed (A+B+C+D+E+F)	GJ	23,99,028	23,14,289
Energy intensity per rupee of turnover (Total energy consumed/Revenue from operations)	GJ/INR	0.00010	0.00011
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumption/Revenue from operations adjusted for PPP)	GJ/USD	0.0021	0.0022
Energy intensity in terms of physical output	GJ/MT	13.63	13.53

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: *Yes, Reasonable assurance by SGS India Private Limited*

2. **Does the entity have any sites/facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.**

No, PAT scheme is not applicable for the Company.

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

Parameter	Units	FY 2025-26	FY 2024-25
Water withdrawal by source			
(i) Surface water	KL	8,03,855	8,49,066*
(ii) Ground water	KL	1,73,744	1,92,843
(iii) Third party water	KL	44,546	40,757**
(iv) Seawater/desalinated water	KL	-	-
(v) Others	KL	-	-
Total volume of water withdrawal (i + ii + iii + iv + v)	**KL**	**10,22,146**	**10,82,666****
Total volume of water consumption	**KL**	**10,19,927**	**10,80,668****
Water intensity per rupee of turnover (Total Water consumed/Revenue from operations)	**KL/INR**	**0.00004**	**0.00005**
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/Revenue from operations adjusted for PPP)	**KL/USD**	**0.0009**	**0.0010**
Water intensity in terms of physical output	**KL/MT**	**5.79**	**6.31**

**The surface water withdrawal has been restated for FY 2024-25 to include rainwater harvested as per GRI guidance, which was earlier reported in 'Others'.*
*** The total water withdrawal (third-party) and total water consumption has been restated to account for water withdrawal and consumption at corporate offices.*

Note: The water related data for corporate offices is estimated by taking average water withdrawal as per National Building Code, 2016 and water consumption by domestic water supply, WHO and it reported under third-party water withdrawal.

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: *Yes, Reasonable assurance by SGS India Private Limited*

Business Responsibility and Sustainability Report

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

Parameter	Units	FY 2025-26	FY 2024-25*
Water discharge by destination and level of treatment			
(i) To Surface water	KL	-	-
- No treatment	KL	-	-
- With treatment – please specify level of treatment	KL	-	-
(ii) To Groundwater	KL	-	-
- No treatment	KL	-	-
- With treatment – please specify level of treatment	KL	-	-
(iii) To Seawater	KL	-	-
- No treatment	KL	-	-
- With treatment – please specify level of treatment	KL	-	-
(iv) Sent to third parties	KL	2,219	1,998
- No treatment	KL	Wastewater from Usha Martin's corporate facilities is discharged into the building-connected water system and routed to sewage treatment plants managed by the landlord or local authorities, which fall outside the Company's operational boundary.	
- With treatment – please specify level of treatment	KL		
(v) Others	KL	-	-
- No treatment	KL	-	-
- With treatment – please specify level of treatment	KL	-	-
Total water discharged	**KL**	**2,219**	**1,998**

**The figures for FY 2024-25 have been restated to reflect the presence of Effluent Treatment Plants (ETPs) and Sewage Treatment Plants (STPs) at the Ranchi and Hoshiarpur facilities, where treated water is recycled and reused within the plant premises. Consequently, water discharge is limited to Usha Martin's corporate office locations.*

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: *Yes, Reasonable assurance by SGS India Private Limited*

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

The Company is committed to reducing water withdrawal by 50% by FY 2029–30, using FY 2024–25 as the baseline. As part of this initiative, it is progressively implementing Zero Liquid Discharge (ZLD) systems across its operations.

A ZLD system has been operationalized in a section of its Ranchi facility, enabling reuse of treated wastewater for landscaping, manufacturing, sanitation, and dust suppression. The Company plans to extend ZLD implementation to other facilities by leveraging existing STPs and ETPs.

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

Parameter	Units	FY 2025-26	FY 2024-25*
Nox	MT	68	80
Sox	MT	51	66
Particulate Matter (PM)	MT	22	30
Persistent organic pollutants (POP)	MT	-	-
Volatile organic compounds (VOC)	MT	-	-
Hazardous air pollutants (HAP)	MT	-	-
Others- please specify	MT	-	-

**Data for FY 2024-25 has been restated due to change in calculation methodology.*

7. **Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity:**

Parameter	Units	FY 2025-2026	FY 2024-25*
Total Scope 1 emissions* (Break-up of the GHG into CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3, if available)	tCO_2e	1,97,244	1,87,529*
Total Scope 2 emissions (Break-up of the GHG into CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3, if available)	tCO_2e	21,113	21,106
Total Scope 1 and Scope 2 emissions intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations)	tCO_2e/INR	0.000009	0.000010
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations adjusted for PPP)	tCO_2e/USD	0.00019	0.00020
Total Scope 1 and Scope 2 emission intensity in terms of physical output	tCO_2e/MT	1.24	1.22

**Scope 1 emissions have been restated to exclude biogenic emissions.*

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: *Yes, Reasonable assurance by SGS India Private Limited*

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

The Company remains committed to reducing its greenhouse gas (GHG) emissions, benchmarked against the FY 2024-25 baseline. In FY 2025-26, this commitment translated into several concrete initiatives across energy transition, fuel switching, and operational efficiency.

A significant milestone was the completion of installation of 2.2 MWp on-site solar power at Ranchi plant, representing Phase I of a larger 4 MWp project. With Phase I to begin operation from April 2026, Phase II, covering the remaining 1.8 MWp capacity, is expected to be commissioned within FY 2026-27. Once fully operational, the installation will meaningfully increase the share of renewable energy in the plant's energy mix while improving long-term energy cost resilience. The Company also continued its efforts to reduce reliance on the coal-based Captive Power Plant (CPP) through this structured and phased transition to clean energy.

On fuel switching, the Company transitioned its canteen fuel system from liquefied petroleum gas (LPG) cylinders to piped natural gas (PNG) at its Ranchi facility. Operating at an average consumption of approximately 220 SCM per day, the PNG system delivers a cleaner combustion profile, improved safety through centralised monitoring, and an estimated 13–15% reduction in associated GHG emissions. This initiative serves as a replicable model for similar transitions across other facilities.

In parallel, an extensive energy-saving programme was implemented at the wire and wire rope plant in Ranchi, targeting a 10% reduction in total power consumption. Key interventions included restructuring the power distribution network from a 33kV/11kV/415V to a more efficient 33kV/415V configuration — saving approximately 2 lakh units of electricity annually — replacement of 250W sodium vapour lamps with 120W LED systems, installation of variable frequency drives (VFDs), and upgrading of slip-ring and conventional motors, collectively delivering a reduction of approximately 1,866 kW in connected load. These measures contributed to lower Scope 2 emissions alongside meaningful reductions in operating costs and transmission losses. The Company continues to develop its broader GHG reduction roadmap, encompassing decarbonisation strategy identification, technology evaluation, and prioritisation of further initiatives for implementation.

Business Responsibility and Sustainability Report

9. **Provide details related to waste management by the entity:**

Parameter		Units	FY 2025-26	FY 2024-25
Total Waste generated				
Plastic waste (A)		MT	36	37
E-waste (B)		MT	8	3
Bio-medical waste (C)		MT	0.16	0.25
Construction and demolition waste (D)		MT	10,938	4,366
Battery waste (E)		MT	1	0.37
Radioactive waste (F)		MT	-	-
Other Hazardous waste. Please specify, if any. (G)	Used oil	MT	70	6
	ETP sludge	MT	717	813
	Spent acid	MT	6,738	7,970
	Copper sludge	MT	0.20	0.78
	Zinc dross	MT	330	242
	Zinc Ash	MT	317	312
	Phosphate Sludge	MT	118	117
	Acid Sludge	MT	10	6
	Lead Waste	MT	398	308
	Oily clothes	MT	4	3
	Empty lubricant MS drum	MT	102	71
Other Non-hazardous waste generated (H). (Break-up by composition i.e. by materials relevant to the sector)	Coal ash	MT	76,551	85,154
	Metal scrap	MT	193	1,924
	Rubber scrap	MT	3	0.44
	Wooden pellets	MT	190	124
	Carton	MT	13	6
	Steel wire scrap	MT	15,718	13,324
	Bags	MT	-	17
	Electric cable and goods scrap	MT	148	-
Total (A+B + C + D + E + F + G + H)		**MT**	**1,12,601**	**1,14,804**
Waste intensity per rupee of turnover *(Total waste generated/Revenue from operations)*		MT/INR	0.000005	0.000005
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) *(Total waste generated/Revenue from operations adjusted for PPP)*		MT/USD	0.00010	0.00011
Waste intensity in terms of physical output		MT/MT	0.64	0.67
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)				

Parameter			Units	FY 2025-26	FY 2024-25
Category of waste					
(i)	Recycled	Used oil	MT	70	6
		Zinc dross	MT	328	234
		Lead waste	MT	394	319
		Spent acid	MT	1,688	4,333
		Metal scrap	MT	194	1,988
		Rubber scrap	MT	3	0.44
		Wooden pellets	MT	-	132
		Carton	MT	13	6
		Steel wire	MT	14,988	14,243
		E-waste	MT	8	3
		Battery waste	MT	2	0.37
		Zinc ash	MT	315	306
		Empty lubricant MS drum	MT	121	65
		Bags	MT	-	12
		Plastic scrap	MT	87	37
		Electrical cable and goods scrap	MT	144	-
		Coal ash*	MT	76,900	84,761
(ii)	Re-used	Wooden pellets	MT	191	4
		Construction and demolition waste	MT	10,938	4,366
(iii)	Other recovery operations		MT	-	-
Total			**MT**	**1,06,383**	**1,10,814**
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)					
Category of waste					
(i)	Incineration	Bio-medical waste	MT	0.16	0.20
		Oily clothes	MT	4	4
(ii)	Landfilling	ETP sludge	MT	708	814
		Phosphate sludge	MT	117	117
		Copper sludge	MT	0.20	0.78
		Acid sludge	MT	6	7
		Spent acid (Treatment, Storage, and Disposal Facility-TSDF)	MT	5,075	2,997
(iii)	Other disposal operations		MT	-	-
Total			**MT**	**5,910**	**3,940**

**Coal ash has been reclassified from waste re-used to waste recycled, as it is not utilized for its originally intended purpose.*

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: *Yes, Reasonable assurance by SGS India Private Limited*

Business Responsibility and Sustainability Report

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

Environmental management practices focus on conserving natural resources and ensuring responsible waste management across operations. The Company monitors the generation and handling of hazardous waste at its production facilities and ensures compliance with applicable regulatory requirements by maintaining waste levels within prescribed limits.

Efforts are undertaken to segregate, monitor, and safely dispose of waste generated at various facilities, with the principles of Reduce, Reuse, and Recycle (3R) embedded across the value chain. Waste is categorized into hazardous and non-hazardous streams to ensure proper handling and treatment. Non-hazardous waste primarily includes plastic waste, scrap metal, coal ash, construction and demolition waste, and biomedical waste.

Hazardous waste is disposed of through authorized third-party vendors in accordance with applicable waste management guidelines issued by regulatory authorities such as the Central and State Pollution Control Boards. In addition, biomedical waste and e-waste are also channelized through authorized vendors to ensure safe and compliant disposal.

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

Not applicable

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes/No)	Results communicated in public Domain (Yes/No)	Relevant Web Link
Not Applicable. No EIA was undertaken during the reporting period					

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

Yes, the organization complies with all applicable environmental laws, regulations, and guidelines in India, including the Water (Prevention and Control of Pollution) Act, 1974, Air (Prevention and Control of Pollution) Act, 1981, and relevant provisions under the Environment (Protection) Act, 1986 along with its associated rules.

Compliance with protocols prescribed by the State Pollution Control Boards is maintained, and technological improvements are integrated into production processes to minimize environmental impacts. The organization has also obtained the required Consent to Establish (CTE) and Consent to Operate (CTO) under the applicable environmental regulations and ensures timely renewal of these operational permits.

Sr. No.	Specify the law/regulation/ guidelines which was not complied with	Provide details of the non-compliance	Any fines/penalties/action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
Nil				

Leadership Indicators

1. **Water withdrawal, consumption and discharge in areas of water stress (in kiloliters): For each facility/plant located in areas of water stress, provide the following information:**

   (i) Name of the area:

   (ii) Nature of operations

   (iii) Water withdrawal, consumption and discharge

   Not applicable. No facility/plant is in areas of water stress.

2. **Please provide details of total Scope 3 emissions & its intensity:**

Parameter	Unit	FY 2025-26	FY 2024-25*
Total Scope 3 emissions (Break-up of the GHG into CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3, if available)	tCO_2e	2,08,113	2,45,043
Total Scope 3 emissions per rupee of turnover	tCO_2e/INR	0.000009	0.000011
Total Scope 3 emission intensity (optional)	tCO_2e/MT	1.18	1.43

**The scope 3 value has been restated due to change in calculation methodology.*

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

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

   Not Applicable

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

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of initiative (Savings in Rs. Million)
1	On-Site Solar Power Installation	Completion of installation of 2.2 MWp on-site solar power at the Ranchi plant, representing Phase I of a larger 4 MWp project. Phase I is scheduled to begin operation from April 2026, substituting grid-sourced electricity with solar power. Phase II, covering the remaining 1.8 MWp capacity, is expected to be commissioned within FY 2026-27. The Company also continued reducing reliance on the coal-based Captive Power Plant (CPP) through this phased transition to clean energy.	Direct reduction in Scope 1 emissions, increased share of renewable energy in the plant's energy mix, and improved long-term energy cost resilience upon full commissioning.
2	Transition of the canteen fuel system from LPG cylinders to piped natural gas (PNG) at the Ranchi facility.	The PNG system operates at an average consumption of approximately 220 SCM per day, offering a cleaner combustion profile and improved safety through centralised monitoring.	An estimated 13–15% reduction in associated GHG emissions. This initiative serves as a replicable model for similar transitions across other facilities.
3	Implementation of an extensive energy-saving programme targeting a 10% reduction in total power consumption.	Key interventions included restructuring the power distribution network from 33kV/11kV/415V to a more efficient 33kV/415V configuration, replacement of 250W sodium vapour lamps with 120W LED systems, installation of variable frequency drives (VFDs), and upgrading of slip-ring and conventional motors.	Savings of approximately 2 lakh units of electricity annually, a reduction of approximately 1,866 kW in connected load, lower Scope 2 emissions, and meaningful reductions in operating costs and transmission losses.

Business Responsibility and Sustainability Report

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

   Usha Martin Limited is committed to establishing and maintaining a robust Business Continuity Management System (BCMS) to ensure operational resilience. The framework is designed to identify potential threats and implement appropriate mitigation measures, while being integrated into operational and technological systems to enable the swift recovery of critical business functions in the event of disruptions. This helps minimize the impact on operations, customers, and stakeholders while protecting the organization's reputation.

   The objective is to develop, implement, test, and maintain Business Continuity Plans for critical functions to ensure continuity of operations within acceptable levels of disruption. Efforts are also focused on building awareness of business continuity among employees and relevant stakeholders through training and consultations. The effectiveness of the BCMS is periodically evaluated to support continuous improvement and strengthen a culture of preparedness and resilience across the organization.

6. **Number of Green Credits that have been generated or procured:**

   a. **By the company:** Nil

   b. **By their top 10 value chain partners (in terms of value of purchases and sales, respectively)** – Nil

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

Essential Indicators

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

   The Company actively participates in several trade and industry chambers and associations to enhance its market reach, build strong peer relationships, and engage in discussions on industry best practices, sectoral developments, and regulatory matters.

   Such participation fosters a collaborative ecosystem that supports sustainable value creation and enables the Company to gain insights for informed decision-making. Currently, the Company is an active member of 5 trade associations and industry chambers.

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

Sr. No.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/ associations (State/National)
1	Bengal Chamber of Commerce and Industry	State
2	Confederation of Indian Industry	National
3	Federation of Indian Export Organization	National
4	Engineering Export Promotion Council of India	National
5	Camera di Commercio di Brescia (Chamber of commerce in Brescia, Italy)	International

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

   No adverse orders were received from regulatory authorities.

Leadership Indicators

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

   Not Applicable

Principle 8: Businesses should promote inclusive growth and equitable development

Essential Indicators

1. **Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year**

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web link
Not Applicable. No SIA was undertaken during the reporting period					

2. **Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity**

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

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

The Company has established a dedicated Community Grievance Redressal Mechanism to promote transparency, accountability, and responsiveness. This mechanism enables local communities and stakeholders to raise concerns, seek clarifications, and report grievances through accessible channels.

Grievances can be submitted through the following platforms:

- Helpline: 0651-7180652
- Email: grievance@ushamartin.co.in

All grievances are acknowledged, assessed, and addressed in a timely and fair manner through a defined resolution process. In case further assistance is required or if any issue remains unresolved, concerned stakeholders from the community may escalate the matter by reaching out to the designated contact person at UML

Name: Dr. Mayank Murari

Designation: General Manager

Email: mayank_murari@ushamartin.co.in

Phone: 0651-7180652

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

Particulars	FY 2025-26	FY 2024-25
Directly sourced from MSMEs/small producers	7.67%	6.06%
Directly from within India	93.74%	95.57%

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

Location	FY 2025-26	FY 2024-25*
Rural	82.69%	77.44%
Semi-urban	-	-
Urban	-	-
Metropolitan	17.31%	22.56%

**The FY 2024–25 figures have been restated to incorporate data pertaining to permanent employees and workers, and to align the classification of our plant locations in accordance with the RBI classification system.*

Business Responsibility and Sustainability Report

Leadership Indicators

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

S. No.	Details of negative social impact identified	Corrective action taken
	Not applicable	

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

S. No.	State	Aspirational District	Amount Spent (INR)
1	Jharkhand	Ranchi	2,88,82,332*

**This is a voluntary spending by the Company through Usha Martin Foundation, CSR arm of the Company.*

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

   Usha martin Limited does not have any Preferential Procurement Policy as the Company believes in providing equal opportunities to all its suppliers.

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

   Not Applicable

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

   Not Applicable

4. **Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:**

   Not Applicable.

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

   Not Applicable.

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

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Natural Resource Management	2,042	59%
2	Health and Sanitation	11,668	90%
3	Education and Learning	8,226	49%
4	Livelihood and Entrepreneur	272	90%
5	Skill Development & Training	2,096	84%
6	Infrastructure, sports and others	8,028	25%

Principle 9: Businesses should engage with and provide value to their consumers in a responsible manner

Essential Indicators

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

Usha Martin Limited places a strong and responsive customer grievance redressal mechanism to ensure timely and effective resolution of customer's complaints. Complaints are typically initiated through the sales team, while complex matters or those involving government interactions are escalated to the corporate office for further review.

All customer complaints are systematically recorded and tracked in the Customer Complaint Management System (CCMS) through the Company's CRM platform by the sales and service teams, enabling systematic monitoring and resolution. Complaints are categorised based on their nature, allowing the relevant departments to undertake root cause analysis and implement appropriate corrective and preventive actions.

In cases involving batch-specific issues, line managers are promptly informed to ensure corrective action at the source. The Company has also developed a standardized procedures for handling customer grievances and with the CRM-based system supporting efficient capture, analysis, and closure of customer complaints efficiently.

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

Particulars	As a percentage to total turnover*
Environmental and social parameters relevant to the product	100
Safe and responsible usage	100
Recycling and/or safe disposal	100

**for steel wire ropes only*

The Company maintains high standards of quality, safety, and product integrity, and strives to deliver exceptional products, services, and expertise to ensure a seamless customer experience. Products are supported with guidance on safe handling, storage, disposal, and usage. The Company also undertakes periodic customer training and engagement to promote safe use and effectively address customer requirements.

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

Particulars	FY 2025-26			FY 2024-25		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	0	0	-	0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of essential services	0	0	-	0	0	-
Restrictive Trade Practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-		0	0
Other#	159	28	-	188	32*	-

**Subsequently resolved*

#Customer complaints

Business Responsibility and Sustainability Report

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

Particulars	Number	Reasons for recalls
Voluntary recalls	0	-
Forced recalls	0	-

5. **Does the entity have a framework/policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.**

Yes, Usha Martin Limited has implemented a comprehensive Information Security Policy, which includes IT security considerations and is publicly available on its website, reflecting a zero-tolerance approach to non-compliance in data security matters.

The Company recognizes information as a critical asset and is committed to ensuring its confidentiality, integrity, and availability. The policy establishes a robust framework to safeguard information assets, including data, systems, networks, and intellectual property, from unauthorized access, disclosure, alteration, or destruction. Key measures include data classification, access controls, secure data handling practices, employee awareness and training, and structured incident management, along with a mechanism for reporting potential breaches.

The policy is applicable to all stakeholders, including employees, contractors, vendors, and other third parties. Oversight rests with the Board of Directors, which periodically reviews and strengthens the information security framework to ensure its effectiveness and regulatory compliance.

Our Headquarter, the data processing hub for the entire group, has successfully completed and obtained the ISO/IEC 27001:2022 certification, moving forward, the Company has plans to obtain ISO/IEC 27001:2022 for all UML sites.

The link of the policy is available at the company's website at Link

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

The Company has not reported any instances related to unethical advertising, cybersecurity breaches, customer data privacy violations, or product stewardship concerns during the reporting period. Additionally, an annual information security audit is conducted by an independent third-party agency to ensure continued compliance with applicable regulatory requirements and to strengthen the organization's information security framework.

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

Particulars	Number
Number of instances of data breaches	0
Percentage of data breaches involving personally identifiable information of customers	0
Impact, if any, of the data breaches	-

Leadership Indicators

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

Usha Martin Limited follows the principle of responsible marketing and complies with all applicable national and international legal requirements. It proactively provides comprehensive information about its products and services to stakeholders, including details on responsible usage, product specifications, and the potential environmental impacts associated with the products.

Particulars	Link
Website	https://www.ushamartin.com
Product brochures	https://ushamartin.com/downloads#brochures
Products and Solutions	https://ushamartin.com/products-solutions
LinkedIn	https://www.linkedin.com/company/usha-martin-limited/mycompany/
Facebook	www.facebook.com/ushamartinofficial
X	https://x.com/UshaMartinLtd

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

Usha Martin Limited provides technical training to customers on the proper handling and use of its products. It also offers detailed guidance on product knowledge, safe storage and handling practices, and product applications through technical documentation and interactive training sessions.

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

The Company provides customers with guidance materials on product storage, handling, maintenance, and discard criteria to promote safe and informed usage. It also conducts periodic training and awareness initiatives to enhance customer understanding and ensure effective product handling.

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

Yes, all required information mandated under applicable industry requirements is displayed on the product labels. In addition, the organization conducts an annual Customer Satisfaction Survey to gather feedback on its products and services across both domestic and international markets.

Independent Reasonable Assurance Statement

Independent Assurance Statement to Usha Martin Limited on its BRSR Core Indicators for FY 2025-26

The Board of Directors,
Usha Martin Limited,

2A - Shakespeare Sarani,
Kolkata – 700071.

NATURE OF ASSURANCE

SGS India Private Limited (hereinafter referred to as 'SGS India') was engaged by Usha Martin Limited (the 'Company') to conduct an independent assurance of the Company's Business Responsibility and Sustainability Reporting (BRSR) (the 'Core Report') for the reporting period of April 1, 2025, to March 31, 2026. SGS India has conducted a Reasonable level of Assurance for the BRSR core indicators. This assurance engagement was conducted in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised) and ISAE 3410.

REPORTING FRAMEWORK

The Report has been prepared following

1. Master Circular for compliance with the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 by listed entities
2. Greenhouse Gas Protocol Standard.

INTENDED USERS OF THIS ASSURANCE STATEMENT

This Assurance Statement is provided with the intention of informing all Usha Martin Limited internal and external Stakeholders.

RESPONSIBILITIES

The information in the report and its presentation is the responsibility of the management of the Company. SGS India has not been involved in the preparation of any of the material included in the report.

Our responsibility is to express an opinion on the text, data, and statements within the defined scope of assurance, aiming to inform the management of the Company, and in alignment with the agreed terms of reference. We do not accept or assume any responsibility beyond this specific scope. The Statement shall not be used for interpreting the overall performance of the Company, except for the aspects explicitly mentioned within the scope.

ASSURANCE STANDARD

SGS has conducted a Reasonable level of Assurance for BRSR core parameters under 9 ESG Attributes, including all essential indicators as specified under BRSR standards and amendments made as on date. This engagement was performed in accordance with the International Standard on Assurance Engagement (ISAE) 3000 (revised) and ISAE 3410 (Assurance Engagements other than Audits or Reviews of Historical Financial Information).

Our evidence-gathering procedures were designed to obtain a 'Reasonable' level of assurance, which is a high level of assurance in accordance with ISAE 3000(revised) standard, but is not absolute certainty. It involves obtaining sufficient appropriate evidence to support the conclusion that the information presented in the report is fairly stated and is free from material misstatements.

STATEMENT OF INDEPENDENCE AND COMPETENCE

The SGS Group of companies is the world leader in inspection, testing, and assurance, operating in more than 140 countries and providing services including management systems and service certification; quality, environmental, social, and ethical auditing and training; and environmental, social, and sustainability report assurance. SGS India affirms our independence from Usha Martin Limited, being free from bias and conflicts of interest with the organization, its subsidiaries, and stakeholders.

The assurance team was assembled based on their knowledge, experience, and qualifications for this assignment, and comprised auditors registered with ISO 26000, ISO 20121, ISO 50001, SA8000, RBA, QMS, EMS, SMS, GPMS, CFP, WFP, GHG

Verification, and GHG Validation Lead Auditors, and experience on the SRA Assurance.

SCOPE OF ASSURANCE

The assurance process involved assessing the quality, accuracy, and reliability of BRSR Indicators (KPIs) within the report for the period April 1, 2025, to March 31, 2026. The reporting scope and boundaries include 1-Head office Kolkata, Ranchi, Hoshiarpur & 5 regional offices spread across different states in India.

ASSURANCE METHODOLOGY

The assurance comprised a combination of desktop review, interaction with the key personnel engaged in the process of developing the report, on-site visits, and remote verification of data. Specifically, SGS India undertook the following activities:

- Assessment of the suitability of the applicable criteria in terms of their comprehensiveness, reliability, and accuracy.
- Interaction with key personnel responsible for collecting, consolidating, and calculating the BRSR core and essential indicators, and assessing the internal control mechanisms in place to ensure data quality.
- Application of analytical procedures and verification of documents on a sample basis for the compilation and reporting of the KPIs.
- Assessing the aggregation process of data at the Head Office level.
- Critical review of the report regarding the plausibility and consistency of qualitative and quantitative information related to the KPIs.

LIMITATIONS

SGS India did not come across any limitation to the agreed scope of the assurance engagement. SGS India verified data on a sample basis; the responsibility for the authenticity of the data entirely lies with the Company. The assurance scope excluded forward-looking statements, product- or service-related information, external information sources, and expert opinions. SGS India has not been involved in the evaluation or assessment of any financial data/performance of the company. Our opinion on financial indicators is based on the third-party financial reports audited by the Company. SGS India does not take any responsibility for the financial data reported in the audited financial reports of the Company.

The assurance scope excludes:

- Disclosures other than those mentioned in the assurance scope.
- Data reviews outside the operational sites as mentioned in the reporting boundary.
- Validation of any data and information other than those presented in "Findings and Conclusions."
- The assurance engagement considers an uncertainty of ±5% based on the materiality threshold for Assumption/ estimation/measurement errors and omissions.
- The Company's statements that describe the expression of opinion, belief, aspiration, expectation, aim to future intention provided by the Company, and assertions related to Intellectual Property Rights and other competitive issues.
- Mapping of the Report with reporting frameworks other than those mentioned in the Reporting Criteria above.

FINDINGS AND CONCLUSIONS

Based on the procedures we have performed and the evidence we have obtained, we are satisfied that the information presented by the Company in its report (as per the table below) is complete, accurate, reliable, fairly stated in all material respects, and is prepared in line with the BRSR requirements.

Independent Reasonable Assurance Statement

The list of BRSR Core Indicators that were verified within this assurance engagement is given below:

Sr.No.	BRSR Core Attribute	BRSR Core Indicator
1	Greenhouse gas (GHG) footprint	≈ Total scope 1 emissions Total scope 2 emissions ≈ GHG emission intensity (scope 1 +2)
2	Water footprint	≈ Total water consumption Water consumption intensity ≈ Water discharge by destination and levels of treatment
3	Energy footprint	≈ Total energy consumed ≈ % of energy consumed from renewable sources Energy intensity
4	Embracing circularity	≈ Plastic waste
		≈ E-waste
		≈ Bio medical waste
		≈ Construction and demolition waste
		≈ Battery waste
		≈ Radioactive waste
		≈ Other hazardous waste
		≈ Other non-hazardous waste
		≈ Total waste generated
		≈ Waste intensity
		≈ Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations.
		≈ For each category of waste generated, the total waste disposed of by the nature of the disposal method
5	Employee well-being and safety	≈ Spending on measures towards the well-being of employees as a % of the total revenue of the Company ≈ Details of safety-related incidents for employees
6	Enabling gender diversity in business	≈ Gross wages paid to females as % of wages paid. Complaints on POSH ≈
7	Enabling inclusive development	≈ Input material sourced from MSMEs/ small producers as % of total purchases. ≈ Job creation in smaller towns: Wages paid to people employed in smaller towns as % of total wage cost
8	Fairness in engaging with customers and suppliers	≈ Instances involving loss/breach of data of customers as a percentage of total data breaches or cybersecurity events. ≈ Number of days of accounts payable
9	Openness of business	≈ Concentration of purchases & sales done with trading houses, dealers, and related parties ≈ Loans and advances & investments with related parties

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30th April, 2026

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30th April, 2026