

Business Responsibility and Sustainability Report

I. Details of the listed entity

1	Corporate Identity Number (CIN) of the Listed Entity	L40300MH1977PLC019594
2	Name of the Listed Entity	Lloyds Metals and Energy Limited
3	Year of incorporation	1977
4	Registered office address	Plot No. A 1-2,MIDC Area, Chugus , Chandrapur - 442505
5	Corporate address	A-2, 2 nd Floor, Madhu Estate, Pandurang Budhkar Marg, Lower Parel, Mumbai - 400013
6	E-mail	info.lmel@lloyds.in
7	Telephone	022-62918111
8	SECCP	www.lloyds.in
9	Financial year for which reporting is being done	01-04-2024 to 31-03-2025
10	Name of the Stock Exchange(s) where shares are listed	NSE and BSE
11	Paid-up Capital (In ₹)	₹ 52.32 Crores
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. Ajay Kamble 022-62918111 info.lmel@lloyds.in
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together)	Standalone basis
14	Name of assessment or assurance provider	Manubhai & Shah LLP
15	Type of assessment or assurance obtained	Reasonable Assurance

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	Iron Ore Mining	Mining of Iron ore for the DRI plant and supply to other steel Industries	80.21
2	Sponge Iron Manufacturing	Manufacturing of DRI and its supply and Distribution	14.43
3	Trading of Pellet	Trading of pellet	3.91
4	Power Generation	Captive Power Plant which powers the operations and the additional power generated is exported	1.45

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	Iron Ore Mining	7100	80.21
2	Sponge Iron Manufacturing	24102	14.43
3	Trading of Pellets	4662	3.91
4	Power Generation	35106	1.45

III. Operations

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

S. No.	Location	Number of plants	Number of offices	Total
1	National	3	1	4
2	International	0	0	0

19. Markets served by the entity:

a. Number of locations

S. No.	Location	Number
1	National (No. of states)	19
2	International (No. of countries)	5

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

3.91

c. A brief on types of customers

Iron ore & Direct Reduced Iron (DRI) is a vital raw material in steel production, primarily serving three key customer segments:

1. Iron ore mining
2. Steel manufacturing facilities:
 - Electric Arc Furnace (EAF) operators: These plants are major consumers of DRI.
 - Integrated steel mills: While predominantly reliant on blast furnaces using raw iron ore and coking coal, these mills also employ DRI to mitigate impurities in the blast furnace charge, enhance yield, and decrease greenhouse gas emissions.
3. Power distribution companies.

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No	Particulars	Total (A)	Male		Female	
			No.(B)	%(B/A)	No.(C)	%(C/A)
EMPLOYEES						
1	Permanent (D)	1341	1245	92.84	96	7.16
2	Other than Permanent (E)	30	27	90	3	10
3	Total employees (D + E)	1371	1272	92.78	99	7.22
WORKERS						
4	Permanent (F)	493	461	93.51	32	6.49
5	Other than Permanent (G)	506	502	99.21	4	0.7905
6	Total workers (F + G)	999	963	96.4	36	3.6

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	2	100	0	0
2	Other than Permanent (E)	0	0	0	0	0
3	Total differently abled employees (D + E)	2	2	100	0	0
Differently-abled Workers						
4	Permanent (F)	1	1	100	0	0
5	Other than Permanent (G)	0	0	0	0	0
6	Total differently abled workers (F + G)	1	1	100	0	0

21. **Participation/Inclusion/Representation of women:**

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	12	1	8.33
Key Management Personnel	4	0	0

22. **Turnover rate for permanent employees and workers (Disclose trends for the past 3 years)**

	FY 2025 (Turnover rate in current FY)				FY 2024 (Turnover rate in previous FY)				FY 2023 (Turnover rate in the year prior to the previous FY)			
	Male	Female	Other	Total	Male	Female	Other	Total	Male	Female	Other	Total
Permanent Employees	12.52	18.67	0	12.9	3.72	0.2	0	3.74	1	0	0	1
Permanent Workers	3.92	0	0	3.71	0.95	0	0	0.95	0	0	0	0

It is important to clarify that this higher turnover rate does not necessarily reflect a deterioration in employee retention or satisfaction. Rather, it is a mathematical result of the headcount growth, especially when onboarding and offboarding activities are clustered closely in time (e.g., temporary project hires or probationary period exits).

We anticipate this rate to normalize over the coming periods as hiring levels stabilize and retention strategies take effect among the newly onboarded employees.

V. Holding, Subsidiary and Associate Companies (including joint ventures)23. **(a) Names of holding / subsidiary / associate companies / joint ventures**

S. No	Name of the holding/ subsidiary/ associate companies/ joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Lloyds Logistics Private Limited (formerly known as Thriveni Lloyds Mining Private Limited)	Subsidiary	100	No
2	Lloyds Infinite Foundation	Subsidiary	100	No
3	Lloyds Surya Private Limited	Subsidiary	100	No

VI. CSR Details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No): Yes

(ii) Turnover (in ₹): 6,772.72 Crore

(iii) Net worth (in ₹): 6,403.08 Crore

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2025 (Current Financial Year)			FY 2024 (Previous Financial Year)		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	https://lloyds.in/investors/investor-policies/	NIL	NIL	Not received	NIL	NIL	Not received
Investors (other than shareholders)		NIL	NIL	Not received	NIL	NIL	Not received
Shareholders		NIL	NIL	Not received	NIL	NIL	Not received
Employees and workers		NIL	NIL	Not received	NIL	NIL	Not received
Customers		NIL	NIL	Not received	NIL	NIL	Not received
Value Chain Partners		NIL	NIL	Not received	NIL	NIL	Not received

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	Responsible Business Practices and Anticorruption	Risk	Given the nature of the mining and metals industry often operating in high-risk geographies, engaging with government authorities, and involving large-scale procurement—Lloyds Metals recognizes the critical importance of upholding responsible business practices and implementing stringent anticorruption measures. The risk of unethical conduct, bribery, or non-compliance with national and international regulations poses serious threats, including legal sanctions, license suspensions, reputational damage, and loss of stakeholder trust.	Lloyds Metals adopts a zero-tolerance approach to corruption and unethical practices, recognizing the potential risks to its operations, reputation, and stakeholder trust. To mitigate these risks, the company is implementing a comprehensive ethics and compliance framework, which includes: <ul style="list-style-type: none"> ■ Code of Conduct and Ethics Policies ■ Regular training and awareness programs ■ Robust internal controls and audit mechanisms ■ Whistleblower mechanisms 	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)
2	Sustainable Resource Management	Risk	As a company engaged in mining and metal production, Lloyds Metals operates in a resource-intensive sector where the efficient and sustainable use of natural resources is both a strategic necessity and a regulatory expectation. The risk of inefficient resource management—including over-extraction, waste generation, and water or energy inefficiency—can lead to increased operational costs, environmental degradation, stricter regulatory scrutiny, and reputational harm. Furthermore, resource scarcity and shifting environmental standards may disrupt supply chains and long-term operational viability.	<p>Lloyds Metals is committed to integrating sustainability principles into its resource management strategy to minimize environmental impact and ensure long-term operational resilience. The company's approach includes:</p> <ul style="list-style-type: none"> ■ Adoption of resource-efficient technologies in mining, beneficiation, and metal processing to reduce raw material and energy consumption. ■ Implementation of water conservation and recycling systems, particularly in water-stressed areas, to minimize freshwater withdrawal and improve reuse. ■ Waste management and circularity initiatives, including slag and byproduct reutilization, to reduce landfill use and enhance material efficiency. ■ Monitoring and reporting of key resource use metrics (e.g., energy, water, raw materials) to identify inefficiencies and guide continuous improvement. ■ Integration of environmental management systems (such as ISO 14001) across operations to ensure systematic resource oversight and compliance. ■ Engagement with suppliers and partners to encourage sustainable practices throughout 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)
3	Greenhouse Gas (GHG) Reduction and Climate Resilience	Opportunity	Lloyds Metals, operating in the mining and metals sector, faces increasing pressure from regulators, investors, and consumers to align with global climate goals. The shift toward sustainability presents an opportunity for the company to gain a competitive edge by proactively reducing its GHG emissions and improving climate resilience. By adopting innovative technologies and practices focused on carbon reduction, such as energy-efficient systems, renewable energy sources, and sustainable resource management, Lloyds Metals can lower operational costs, particularly energy expenses. Furthermore, transitioning to greener technologies could open new market opportunities, as demand for environmentally responsible metals rises from industries such as renewable energy and electric vehicles. As stakeholders, including investors, increasingly prioritize sustainability and low-carbon investments, the company's commitment to GHG reduction and climate resilience will enhance its reputation, foster long-term investor confidence, and improve its standing in global sustainability rankings.	-	Positive
4	Corporate Social Engagement	Opportunity	<p>As Lloyds Metals continues to expand its operations, particularly in resource-intensive industries like mining and metal production, fostering strong, positive relationships with local communities is increasingly recognized as a vital component of long-term business success. Corporate social engagement (CSE) offers a significant opportunity to build trust, enhance reputation, and ensure the company's social license to operate. By investing in initiatives that support local communities—such as educational programs, infrastructure development, healthcare, and job creation—Lloyds Metals can drive mutual value, ensuring that surrounding communities benefit from the company's presence while promoting sustainable local development.</p> <p>By actively engaging with communities, Lloyds Metals can reduce reputational risks, cultivate long-term relationships, and differentiate itself as a socially responsible leader in the metals industry, leading to increased customer loyalty and attracting like-minded investors focused on sustainability and ethical business practices.</p>	-	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)
5	Profitability and Growth	Opportunity	As Lloyds Metals continues to expand its operations within the mining and metals sector, there are significant opportunities to drive profitability and long-term growth. By optimizing operational efficiency, reducing costs through sustainable practices, and leveraging technological innovations, the company can improve its bottom line and enhance shareholder value. Investment in cutting-edge technologies—such as automation, energy-efficient processes, and data-driven decision-making—will not only streamline production but also position the company as a leader in operational excellence. Strategically focusing on profitability and growth will not only ensure financial stability but also allow Lloyds Metals to reinvest in future expansion, community development, and environmental stewardship. This balanced approach positions the company to achieve sustainable growth, enhance market leadership, and attract responsible investment, all while contributing to broader global economic goals.	-	Positive
6	Occupational Health and Safety	Risk	<p>Given the nature of Lloyds Metals' operations in the mining and metals sector, occupational health and safety (OHS) is a critical area of concern. The company's workforce is exposed to various hazards, including physical risks from machinery, chemicals, airborne particulates, and challenging environmental conditions. Failure to effectively manage these risks can lead to serious accidents, health issues, and injuries, which not only jeopardize employee well-being but also result in operational disruptions, legal liabilities, and reputational damage.</p> <p>A weak safety culture or inadequate safety practices could lead to increased absenteeism, lower employee morale, and difficulties attracting skilled talent. Additionally, non-compliance with OHS regulations and failure to meet industry standards can result in penalties, regulatory scrutiny, and loss of operational licenses.</p>	<p>Lloyds Metals is committed to safeguarding the health and safety of its employees by implementing a comprehensive occupational health and safety (OHS) management system designed to mitigate risks, prevent accidents, and ensure regulatory compliance. The company's approach includes:</p> <p>Implementation of a robust Health and Safety Policy, which sets clear standards for safety behavior, incident reporting, and risk assessment across all operational areas.</p> <ul style="list-style-type: none"> ■ Regular safety training and awareness programs for all employees, contractors, and management, focusing on hazard identification, safe work practices, and emergency response protocols. 	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)
				<ul style="list-style-type: none"> ■ Continuous risk assessments to identify potential hazards and vulnerabilities, with proactive measures to eliminate or reduce risks through engineering controls, administrative changes, and the use of personal protective equipment (PPE). ■ Investment in modern safety equipment and technology, such as automated machinery, air filtration systems, and real-time monitoring of environmental conditions, to mitigate exposure to hazardous materials and conditions. ■ Establishment of a culture of safety where employees are encouraged to report unsafe conditions or behaviors through anonymous channels, ensuring that all concerns are addressed promptly. ■ Regular audits and safety inspections to ensure compliance with local and international health and safety standards, and to monitor the effectiveness of safety measures and protocols. ■ Emergency preparedness and response drills that train employees in how to act in the event of accidents, fires, or other emergency situations, ensuring rapid and coordinated action. 	

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)
7	Human Rights	Risk	<p>As a global player in the mining and metals sector, Lloyds Metals is exposed to various human rights risks, particularly in areas with complex socio-political environments or where labor standards may be poorly enforced. Human rights risks may arise in areas such as worker exploitation, unsafe working conditions, child labor, forced labor, discrimination, and violations of community rights related to land use, health, and environmental impacts.</p> <p>Failure to adequately address these risks can lead to serious reputational damage, legal liabilities, and potential loss of business or market access. Violations of human rights—whether directly linked to the company's operations or its supply chain—could result in legal sanctions, community unrest, boycotts, and reduced investor confidence, particularly as stakeholders increasingly prioritize ethical business practices and adherence to international human rights standards.</p>	<p>Lloyds Metals recognizes the importance of ensuring that human rights are respected across its operations and supply chain. The company is committed to creating a safe, fair, and ethical environment for all employees, contractors, and local communities. The approach to mitigating human rights risks includes:</p> <ul style="list-style-type: none"> ■ Adopting a Human Rights Policy that clearly outlines the company's commitment to respecting and promoting human rights in line with international standards, including the UN Guiding Principles on Business and Human Rights and the ILO Conventions. ■ Human Rights Due Diligence processes to identify, assess, and address human rights risks at both the operational and supply chain levels. This includes evaluating potential impacts on workers' rights, local communities, and indigenous populations, especially in areas where the company operates or sources materials. ■ Regular supplier assessments and audits to ensure that all partners and vendors comply with Lloyds Metals' human rights standards. This includes monitoring for risks related to child labor, forced labor, discrimination, and unsafe working conditions. ■ Employee training and awareness programs to foster a culture of respect for human rights, where all staff understand their rights, responsibilities, and the company's policies on ethical treatment. This includes training on harassment, discrimination, and gender equality. 	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)
				<ul style="list-style-type: none"> ■ Community engagement and consultation processes, particularly in regions where the company's operations may affect local populations. By engaging with local communities and stakeholders, Lloyds Metals can proactively address concerns related to land rights, environmental impacts, and social issues, fostering mutual trust and cooperation. ■ Establishing grievance mechanisms to ensure that employees and community members have accessible, confidential, and safe channels to report human rights concerns or violations. These systems should allow for prompt investigation and resolution of complaints. ■ Regular reporting and transparency on human rights performance and due diligence activities, providing stakeholders with clear information on the company's efforts and progress in mitigating human rights risks. <p>By taking these steps, Lloyds Metals can create an ethical business environment, reduce the likelihood of human rights violations, and enhance its reputation as a responsible corporate entity. This approach not only ensures compliance with legal and ethical standards but also strengthens relationships with employees, local communities, investors, and other key stakeholders.</p>	

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	Air Pollution Management	Risk	<p>Lloyds Metals operates in the mining and metal processing industry, which inherently involves activities that can generate significant air pollutants, including particulate matter (PM), sulfur oxides (SOx), nitrogen oxides (NOx), and other hazardous emissions. Ineffective management of air pollution poses substantial risks, including regulatory non-compliance, environmental degradation, health impacts on workers and nearby communities, and reputational damage.</p> <p>Stricter environmental regulations and standards from national and international authorities are continuously evolving, and failure to comply can result in legal penalties, fines, or even suspension of operations. Additionally, poor air quality management can harm relationships with local communities and stakeholders, leading to resistance, protest, or loss of social license to operate</p>	<p>Lloyds Metals is committed to minimizing its environmental footprint by adopting a proactive and systematic approach to air pollution management. The company's mitigation strategy includes the following key components:</p> <ul style="list-style-type: none"> ■ Installation of advanced emission control systems such as electrostatic precipitators (ESPs), baghouse filters, scrubbers, and low-NOx burners to significantly reduce particulate matter and gaseous pollutants from smelting and processing operations. ■ Continuous Ambient Air Quality Monitoring (CAAQM) at and around operational sites to track emissions in real-time and ensure compliance with local and national air quality standards. ■ Regular environmental audits and impact assessments to identify sources of emissions and evaluate the effectiveness of current mitigation measures, allowing for timely improvements and upgrades. ■ Process optimization and cleaner production technologies, including the use of less polluting fuels, improved combustion efficiency, and closed-loop systems to reduce fugitive emissions. ■ Dust suppression techniques in mining and material handling areas—such as water spraying, enclosed conveyors, and green belt development around facilities—to minimize airborne particulates. ■ Employee training and operational protocols that emphasize compliance with environmental regulations and proper handling of materials to prevent accidental releases. 	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)
				<ul style="list-style-type: none"> ■ Engagement with local communities and regulators to maintain transparency, address concerns proactively, and demonstrate accountability through public reporting of air quality performance. ■ Integration of air pollution control into ESG reporting, reinforcing the company's commitment to sustainability and enhancing its reputation among investors and stakeholders. <p>By implementing these measures, Lloyds Metals aims to reduce its environmental impact, safeguard public health, comply with regulations, and reinforce its position as a responsible industry leader committed to sustainable growth.</p>	
9	Innovation in Technology and Operations	Opportunity	<p>As a key player in the mining and metal manufacturing sector, Lloyds Metals operates in an industry that is both resource-intensive and highly competitive. Embracing innovation in technology and operations presents a strategic opportunity to enhance productivity, reduce environmental impact, and strengthen market position. Advancements such as automation, digital monitoring systems, and energy-efficient production methods can streamline processes, lower operating costs, and minimize waste and emissions.</p> <p>Moreover, innovation enables Lloyds Metals to meet the growing market demand for sustainable and high-performance materials, particularly from sectors such as automotive, infrastructure, and renewable energy. It also provides differentiation in a commoditized market, opening doors to new revenue streams and export opportunities. By integrating innovation across its value chain, Lloyds Metals can future-proof its operations, attract forward-looking investors, and reinforce its position as a modern, agile, and responsible industry leader.</p>		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)
10	Skill Development	Opportunity	<p>At Lloyds Metals, we recognize that a skilled and capable workforce is fundamental to achieving operational excellence, driving innovation, and supporting sustainable growth. The mining and metals sector demands specialized technical competencies, safety awareness, and continuous upskilling to adapt to evolving technologies and regulatory standards.</p> <p>Skill development has been identified as a strategic priority to bridge local employment gaps, empower youth in the Gadchiroli region, and contribute to inclusive socio-economic development. By investing in structured training programs and vocational education, Lloyds Metals not only enhances productivity and quality but also reinforces its commitment to community upliftment and nation-building.</p>	-	Positive

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1. Policy and Management Processes									
a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c. Web Link of the Policies, if available	https://lloyds.in/investors/investor-policies/								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4. Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	-	-	ISO 45001	-	-	ISO 14001	-	-	ISO 9001
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	-	-	-	-	-	-	-	-	-
6. Performance of the entity against the specific commitments, goals and targets along with reasons in case the same are not met.	-	-	-	-	-	-	-	-	-

Governance, Leadership & 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)

Commitment to Ethical and Sustainable Business Practices

At Lloyds Metals, we are dedicated to achieving our business goals with integrity, transparency, and accountability to all stakeholders. We firmly believe in acting responsibly while creating value for society, supporting community development, and safeguarding the environment for future generations. As a responsible corporate citizen, we embrace a comprehensive and integrated approach to incorporating Environmental, Social, and Governance (ESG) principles across our operations and value chain.

As a leading Direct Reduced Iron (DRI) manufacturer with an operational iron ore mine, Lloyds Metals is fully committed to advancing sustainable and responsible practices. ESG considerations have long been embedded in our mission, vision, and operational strategies.

Environmental Stewardship

Our Environmental Management System (EMS), aligned with ISO 14001 standards, addresses key environmental challenges such as energy use and emissions. Over the past year, we have more than doubled our reliance on renewable electricity, significantly reducing our carbon footprint. Initiatives such as Waste Heat Recovery Boilers and Sewage Treatment Plants highlight our focus on energy efficiency and sustainable water management.

Social Responsibility and Occupational Health

Guided by ISO 45001 standards, we foster a safe and healthy workplace, going beyond regulatory compliance to build a culture centered on safety, health, and well-being for all employees.

Governance and Ethical Conduct

Our commitment to ethical business is reinforced through our Quality Management System (QMS) under ISO 9001 standards. We maintain the highest standards of integrity, transparency, and accountability in all interactions, ensuring trust and confidence among our stakeholders.

Integrating ESG principles is an ongoing journey for Lloyds Metals – one that drives long-term value creation and delivers positive outcomes for our community, environment, and investors. We deeply appreciate the continued support of our stakeholders as we pursue these objectives.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Board of Directors
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes, The Company's Board of Directors and senior management consistently evaluate various aspects of their social, environmental, governance, and economic obligations. Oversight of social initiatives falls within the purview of the CSR Committee.

10. Details of Review of NGRBCs by the Company

Principles	Performance against above policies and follow up action	Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances
	P1 P2 P3 P4 P5 P6 P7 P8 P9	P1 P2 P3 P4 P5 P6 P7 P8 P9
Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee	All other committees - Department heads, business leaders, and senior directors regularly review the Company's policies either periodically or as necessary. During these evaluations, the effectiveness of the policies is assessed, and any necessary adjustments to policies and procedures are implemented accordingly.	Quarterly basis.
Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)non-compliances	The Company is in compliance with the extant regulations as applicable.	Quarterly basis.

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.	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
The Senior Management and Board Committees of the Company periodically examine the corporate charters and policies. External agency Manubhai & Shah LLP									

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

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business (Yes/No)	-	-	-	-	-	-	-	-	-
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	-	-	-	-	-	-	-	-	-
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	-	-	-	-	-	-	-	-	-
It is planned to be done in the next financial year (Yes/No)									

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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	-	-	-
Key Managerial Personnel	-	-	-
Employees other than BoD and KMPs	-	-	-
Workers	-	-	-

The Company is currently in the process of scheduling various training sessions for the aforementioned segments in the upcoming year.

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

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

Monetary					
For	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty / Fine	Principle 1 to 9	NA	NA	NA	NA
Settlement		NA	NA	NA	NA
Compounding Fee		NA	NA	NA	NA

Non-Monetary					
For	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	Principle 1 to 9	NA	NA	NA	NA
Punishment		NA	NA	NA	NA

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:

S.No.	Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
1	NA	NA

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

Yes, The Company has developed a comprehensive strategy to combat both corruption and bribery, aligning with the code of conduct of Lloyds Metals and Energy Limited as well as various other policies including the whistleblower policy, and adhering to Indian laws and regulations concerning anti-bribery and anti-corruption measures. This policy reinforces the Company's firm stance of zero tolerance towards corruption and bribery, emphasizing transparency in all transactions and facilitating ethical decision-making processes.

For further details, please visit the website: <https://lloyds.in/investors/investor-policies/>

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

	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NIL	NIL

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

	FY 2025 (Current Financial Year)		FY 2024 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	NIL	NA	NIL	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	NIL	NA	NIL	NA

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.

No

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

	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
Number of days of accounts payables	16.43	24.56

In the current financial year, the cost of goods and services procured includes material consumption, stock-in-trade purchases, and changes in inventory. Applying the same methodology, the corresponding figure for the previous year would have been 161.67 days instead of 24.56 days.

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 (Current Financial Year)	FY 2024 (Previous Financial Year)
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	2.83	4.03
	b. Number of trading houses where purchases are made from	6	6
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	2.83	4.03
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	7.45	4.14
	b. Number of dealers / distributors to whom sales are made	24	35
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	7.22	3.77
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	36.56	6.31
	b. Sales (Sales to related parties / Total Sales)	13.92	12.03
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	8.45	0.11
	d. Investments (Investments in related parties / Total Investments made)	0.21	0.34

Leadership Indicators

1. 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.

Please refer to company's code of conduct in which process is defined.

<https://lloyds.in/investors/investor-policies/>

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**

	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)	Details of improvements in environmental and social impacts
R&D	-	4.32	-
Capex	10.53	11.06	For Pollution control equipment, medical equipment, waste heat recovery system, waste management & infrastructure development.

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

Yes. Lloyds Metals has increasingly emphasized sustainable practices within its operations, aligning with broader environmental, social, and governance (ESG) goals. As part of this commitment, the company has initiated procedures aimed at promoting sustainable sourcing. These include engaging with suppliers who comply with environmental regulations, sourcing raw materials responsibly to minimize ecological impact, and integrating sustainability criteria into procurement processes.

The company also supports backward integration through its captive mines, enabling better oversight and control over environmental compliance and responsible mining practices. We are in process of finalising our Supplier Code of Conduct for ensuring that suppliers and business partners align with a company's values, legal requirements, and sustainability goals. It sets clear expectations on ethical business practices, labor standards, environmental stewardship, human rights, and anti-corruption measures.

- b. If yes, what percentage of inputs were sourced sustainably?**

We would like to clarify that a sustainable sourcing mechanism has been established, which includes the implementation of a Supplier Code of Conduct. This framework outlines our expectations regarding environmental, social, and ethical practices across our supply chain. The integration of this mechanism with our sourcing process is currently underway and will be formalized in due course to ensure full alignment and compliance throughout our procurement activities.

3. **Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for:**

- a. **Plastics (including packaging)**

To minimize environmental impact, we transport our products in bulk and therefore do not rely on plastic packaging materials.

- b. **E-waste**

E-waste is responsibly managed by partnering with authorized recyclers who ensure environmentally sound and sustainable recycling practices.

- c. **Hazardous waste**

Hazardous waste is managed through authorized recyclers who ensure safe handling and environmentally sustainable recycling & disposal in compliance with regulatory standards.

- d. **Other waste**

Most of the solid waste is internally reutilized across various processes, minimizing environmental impact and promoting resource efficiency.

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**

Not Applicable

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.

LCA for the products will be conducted in the next fiscal year.

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.

LCA for the products will be conducted in the next fiscal year.

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 (Current Financial Year)	FY 2024 (Previous Financial Year)
1	Dolochar	36.73	-
2	Coal washery rejects	2.41	-

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

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:

% of employees covered by											
Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		No. (B)	% (B / A)	No. (C)	% (C / A)	No. (D)	% (D / A)	No. (E)	% (E / A)	No. (F)	% (F / A)
Permanent employees											
Male	1245	1127	90.52	1245	100	-	-	834	66.99	-	-
Female	96	81	84.38	96	100	96	100	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-	-
Total	1341	1208	90.08	1341	100	96	7.16	938	69.95	-	-
Other than Permanent employees											
Male	27	24	88.89	27	100	-	-	27	100	-	-
Female	3	2	66.67	3	100	3	100	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-	-
Total	30	30	100	30	100	3	10	27	90	-	-

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		No. (B)	% (B / A)	No. (C)	% (C / A)	No. (D)	% (D / A)	No. (E)	% (E / A)	No. (F)	% (F / A)
Permanent workers											
Male	461	152	32.97	461	100	0	0	308	66.81	-	-
Female	32	1	3.13	32	100	32	100	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-	-
Total	493	493	100	493	100	32	6.49	308	62.47	-	-
Other than Permanent employees											
Male	502	502	100	502	100	-	-	-	-	-	-
Female	4	4	100	4	100	4	100	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-	-
Total	506	506	100	506	100	4	0.7905	-	-	-	-

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

	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
Cost incurred on well-being measures as a % of total revenue of the Company	0.24	0.36

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

S. No	Benefits	FY 2025 (Current Financial Year)			FY 2024 (Previous Financial Year)		
		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.)
1	PF	100	100	Yes	100	100	Yes
2	Gratuity	100	100	No	100	100	No
3	ESI	9.7	49.55	Yes	9.06	95.04	Yes

3. Accessibility of workplaces.

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

The company has put in place the requisite facilities (ramps, wheelchairs etc.,) for people with disability.

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

Yes, the organization adheres to an equal opportunity policy in accordance with the Rights of Persons with Disabilities Act, 2016, which is integrated into our Human Rights policy. Every employee within the company is provided fair and equal opportunities for advancement. The policy prohibits discrimination based on any protected grounds as stipulated by relevant laws, encompassing race, caste, religion, color, marital status, gender, sexual orientation, age, nationality, ethnic origin, or disability.

<https://lloyds.in/investors/investor-policies/>

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100	100	100	100
Female	100	100	100	10
Total	100	100	100	100

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes
Other than Permanent Workers	Yes
Permanent Employees	Yes
Other than Permanent Employees	Yes

Grievance Redressal Mechanism for Employees and Workers

Yes, Lloyds Metals has a clearly defined grievance redressal mechanism in place to address concerns raised by various categories of employees and workers. The system is designed to ensure transparency, confidentiality, and timely resolution of issues, promoting a fair and inclusive workplace. Below is a brief overview of the mechanism:

Grievance Redressal Mechanism:

A dedicated group comprising HR representatives and senior management is constituted to address employee and worker grievances across operational levels.

Multiple Channels for Reporting:

Employees and workers can raise concerns through various channels including:

Suggestion/complaint boxes at the workplace

A dedicated email ID for grievance submissions

In-person submissions to supervisors or HR representatives

Postal mail

Anonymous Reporting:

To encourage openness, employees also have the option to report grievances anonymously through whistle blower mechanism, ensuring protection from retaliation. We have engaged a third-party agency to independently and anonymously manage grievances and complaints related to ethical misconduct, malpractice, or non-compliance.

Timely Investigation and Resolution:

All grievances are acknowledged promptly and investigated fairly. Resolutions are communicated within a defined timeframe, depending on the complexity of the issue.

Appeal Process:

If the complainant is not satisfied with the resolution, an appeal process is available to escalate the matter to higher authorities.

Awareness and Training:

Regular sessions are conducted to educate employees and workers about the grievance redressal mechanism, their rights, and the process to seek help. There are also elaborate HR Policies in place to guide employees on their rights & duties.

This system reflects Lloyds Metals' commitment to creating a respectful, safe, and supportive work environment where all concerns are addressed with due diligence and empathy.

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

Category	FY 2025 (Current Financial Year)			FY 2024 (Previous Financial Year)		
	Total employees / workers in respective category(A)	No. of employees / workers in respective category, who are part of association(s) or Union(B)	% (B / A)	Total employees / workers in respective category(C)	No. of employees / workers in respective category, who are part of association(s) or Union(D)	% (D / C)
Total Permanent Employees	-	-	-	-	-	-
Male	-	-	-	-	-	-
Female	-	-	-	-	-	-
Total Permanent Workers	493	101	20.49	369	104	28.18
Male	461	100	21.69	356	103	28.93
Female	32	1	3.13	13	1	7.69

8. Details of training given to employees and workers:

Category	FY 2025 (Current Financial Year)					FY 2024 (Previous Financial Year)				
	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	1272	1272	100	1272	100	1333	1333	100	1333	100
Female	99	99	100	99	100	69	69	100	69	100
Total	1371	1371	100	1371	100	1402	1402	100	1402	100
Workers										
Male	963	963	100	963	100	1235	1235	100	1235	100
Female	36	36	100	36	100	55	55	100	55	100
Total	999	999	100	999	100	1290	1290	100	1290	100

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

Category	FY 2025 (Current Financial Year)			FY 2024 (Previous Financial Year)		
	Total (A)	No.(B)	% B/A	Total (C)	No.(D)	% D/C
Employees						
Male	1272	905	71.15	1333	479	35.93
Female	99	45	45.45	69	-	-
Total	1371	950	69.15	1402	479	34.17
Workers						
Male	963	963	100	1235	1235	100
Female	36	36	100	55	55	100
Total	999	999	100	1290	1290	100

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

Yes, an Occupational Health and Safety Management System (OHSMS) has been implemented by the Lloyds Metals. The system is aligned with ISO 45001: 2018 standards, ensuring a structured and proactive approach to identifying, managing, and mitigating health and safety risks in the workplace.

Coverage of the System:

1. Establishing Occupational Health and Safety Objectives and policies for the organizational performance in view of continual improvement.
2. Emphasis on employee participation and consultation for all the Occupational Health and Safety Management initiatives.
3. Zero tolerance to all the applicable legal and regulatory compliances.
4. The OHSMS applies to all employees and workers, including contract and temporary staff, across all operational sites and facilities.
5. It encompasses risk assessments, safety audits, incident reporting, investigations, implementation of corrective and preventive actions, emergency preparedness, and employee training programs to promote a culture of safety and continuous improvement.
6. Regular internal and external audits are conducted to evaluate compliance and effectiveness.
7. The system is integrated with broader ESG and sustainability goals to support employee well-being and operational excellence.

b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?**Processes for Identifying Work-Related Hazards and Assessing Risks**

At Lloyds Metals, we have implemented a robust Occupational Health and Safety framework to systematically identify work-related hazards and assess risks, both on a routine and non-routine basis. The following processes are in place:

1. **Hazard Identification and Risk Assessment (HIRA):**
Comprehensive HIRA exercises are conducted periodically across all operations—including mining and DRI manufacturing units—to proactively identify potential hazards and implement appropriate control measures.
2. **Job Safety Analysis (JSA):**
For non-routine, high-risk, or maintenance activities, JSAs are carried out prior to execution. These help in understanding task-specific risks and in planning suitable safety protocols.
3. **Routine Safety Audits and Inspections:**
Scheduled internal and third-party safety audits, along with daily site inspections, are conducted to detect and correct unsafe conditions or behaviors. Findings are documented and corrective actions are tracked.
4. **Employee Involvement and Reporting:**
Employees and contract workers are actively encouraged to report near misses, unsafe practices, and hazardous conditions through a formal incident reporting system. This input is crucial for continuous risk assessment and prevention.
5. **Daily Toolbox Talks and Pre-Task Briefings:**
These are conducted before the commencement of shifts and specific jobs to communicate safety instructions, highlight potential risks, and reinforce standard operating procedures.

6. **Change Management Protocol:**

A structured change management process is followed whenever there is a modification in equipment, materials, workforce deployment, or operational procedures. This includes a fresh risk assessment and mitigation planning.

7. **Occupational Health & Safety Committee:**

A cross-functional safety committee, comprising representatives from management and workforce, meets regularly to review safety performance, discuss incidents, and recommend improvements.

8. **Standard Operating Procedures (SOPs):**

Each task has a documented SOP that outlines step-by-step processes, identifies potential hazards, and prescribes control measures, including required PPE and emergency actions.

9. **Permit to Work (PTW):**

The PTW system applies to activities such as hot work, excavation, working at heights, confined space entry and general works with or without involvement of LOTOTO (Isolation).

These proactive systems ensure that hazard identification and risk mitigation at Lloyds Metals are not only part of compliance but an integral part of our operational culture. Our aim is to provide a safe, healthy, and resilient work environment for all our employees and stakeholders.

c. Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Yes/ No)

Yes, Lloyds Metals has well-defined processes in place that enable workers to report work-related hazards and, when necessary, remove themselves from potentially dangerous situations without fear of retaliation.

Key features of the process include:

1. **Open Hazard Reporting Mechanism:**

All workers—including contract and temporary staff—are encouraged to report unsafe conditions, near misses, or potential hazards through formal channels such as:

- Dedicated safety registers/logbooks
- Verbal or written communication to supervisors or safety officers
- Incident reporting forms available at all work sites

2. **Right to Refuse Unsafe Work:**

In alignment with our commitment to ISO 45001 and safety-first culture, workers have the right to stop or refuse work they believe poses a direct threat to their health or safety. This right is clearly communicated during onboarding and refresher safety trainings.

3. **Supportive Culture and Non-Retaliation Assurance:**

Lloyds Metals fosters an environment of openness where safety concerns are taken seriously and addressed promptly. Employees are assured of no punitive action or discrimination for reporting risks or withdrawing from hazardous tasks.

4. **Follow-up and Corrective Actions:**

All reported hazards are investigated by safety officers, and corrective/preventive actions are implemented in a timely manner. Workers are informed about the resolution status to ensure transparency.

5. **Monthly Mass Safety Gate Meeting:**

A monthly mass safety gate meeting is conducted on first working day of every month to encourage workers participation in safety initiatives and also collect feedback on any unsafe acts or conditions

6. **Safety Committee Meetings:**

Safety committee meetings are conducted with equal participation from management representatives and worker representatives to collect feedback from on ground working teams and resolve such identified issues.

These processes reflect Lloyds Metals' strong commitment to empowering its workforce to take an active role in maintaining a safe and healthy workplace.

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

Yes, employees and workers at Lloyds Metals have access to non-occupational medical and healthcare services as part of our broader commitment to employee well-being and holistic health support.

Key provisions include:

1. On-site Medical Facilities:

Fully equipped medical centres are available at our operational sites, providing not only occupational health services but also treatment for general health concerns unrelated to work.

2. Regular Health Check-ups:

In addition to statutory health screenings, periodic general health camps are organized in collaboration with external healthcare providers to address common lifestyle and chronic health issues.

3. Access to External Healthcare:

Employees are provided access to empanelled hospitals and clinics for non-occupational medical consultations, diagnostics, and treatment, either at subsidized rates or fully covered based on company policy.

4. Emergency Medical Support:

24/7 ambulance services and tie-ups with nearby hospitals ensure timely medical attention for both work-related and non-work-related health issues.

5. Health Awareness and Wellness Programs:

Awareness sessions on nutrition, mental health, stress management, and preventive healthcare are conducted regularly to promote a healthy lifestyle among employees and their families.

These initiatives reflect Lloyds Metals' commitment to going beyond compliance, ensuring the physical and mental well-being of our workforce both inside and outside the workplace.

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

Safety Incident/Number	Category	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR) (per one million person-hours worked)	Employees	NIL	NIL
	Workers	1.04	0.05
Total recordable work-related injuries	Employees	-	-
	Workers	23*	2
No. of fatalities	Employees	-	3
	Workers	-	-
High-consequence work-related injury or ill health (excluding fatalities)	Employees	-	-
	Workers	-	-

* Including in the contract workforce

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

At Lloyds Metals, ensuring a safe, healthy, and compliant work environment is a core organizational priority, embedded in our operational practices and safety culture. We have adopted a comprehensive approach to occupational health and safety, guided by international standards such as ISO 45001.

Key measures include:

1. Implementation of an Occupational Health and Safety Management System (OHSMS):

A structured safety management system is in place, covering hazard identification, risk assessment, incident investigation, and emergency preparedness. The system is aligned with ISO 45001 standards.

2. Regular Training and Capacity Building:

All employees and workers undergo safety induction, regular refresher training, and job-specific safety modules. Specialized sessions are held on fire safety, first aid, PPE usage, and chemical handling.

3. Routine Safety Audits and Inspections:

Scheduled internal and third-party safety audits, along with daily workplace inspections, help identify risks and ensure corrective actions are implemented promptly.

4. Safety Committees and Employee Engagement:

Functional safety committees at site level include representatives from both management and workers, fostering a culture of safety ownership. Employees are encouraged to participate in safety dialogues, tool-box talks, and awareness campaigns.

5. Emergency Response Preparedness:

Emergency drills (fire, evacuation, medical response) are conducted regularly. Dedicated response teams and readily available equipment ensure swift action in case of incidents.

6. Health Monitoring and Medical Support:

On-site occupational health centres provide medical services, while periodic health check-ups ensure early detection of health issues. Workers also have access to non-occupational medical care and wellness programs.

7. Safe Work Procedures and PPE Compliance:

Standard Operating Procedures (SOPs) are enforced for all critical activities. Adequate PPE is provided and its usage is strictly monitored to prevent injuries.

8. Community of Practices:

Establishing Safety Governance Structure and Community of Practices to drive safety initiatives with an aim to drive safety through line function for sustainability of safety initiatives and improvement in the safety maturity of the organization.

9. Technological Advancements:

Focus on engineering controls in various risk mitigation strategies to implement the best technology available in the industries to achieve our objective of zero harm

These measures underscore Lloyds Metals' unwavering commitment to creating a safe, secure, and health-conscious work environment that prioritizes the well-being of every individual across our operations.

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

Category	FY 2025 (Current Financial Year)			FY 2024 (Previous Financial Year)		
	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	NIL	NIL	No Complaints	NIL	NIL	No Complaints
Health & Safety	NIL	NIL	No Complaints	NIL	NIL	No Complaints

14. Assessments for the year:

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

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.

The organization adheres to standard operating procedures to meet state and local regulations and to ensure that health and safety protocols are upheld by employees, customers, and any other visitors across all its premises.

Leadership Indicators

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

a. Employees (Y/N)

Yes

b. Workers (Y/N)

Yes

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

Due Diligence and Onboarding Checks

All vendors, suppliers, and service providers undergo a robust due diligence process during onboarding. This includes verification of tax registrations (GST, PAN, TDS applicability, etc.) and legal compliance history.

Contractual Obligations

Contracts and purchase agreements include clear clauses mandating partners to comply with all statutory obligations, including timely deduction and deposition of applicable taxes and dues.

Periodic Compliance Declarations

Value chain partners are required to submit periodic declarations or certificates confirming the deduction and remittance of statutory dues such as GST, TDS, EPF, ESI, and other relevant levies.

Reconciliation and Monitoring

Regular reconciliation is performed between the entity's records and government tax portals (e.g., GSTN, TRACES) to verify that statutory dues deducted by the entity or its partners have been correctly deposited.

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

Category	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
Employees	0	0	0	0
Workers	0	0	0	0

4. **Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)** Yes, **Lloyds Metals** recognizes the importance of supporting employees during career transitions, including retirement and separation. The company has implemented measures to facilitate continued employability and smooth career endings through structured support programs.

Transition Assistance Initiatives Include:

1. Retirement Support:

- Employees retiring from service are provided with assistance in accessing their **statutory benefits** such as provident fund, gratuity, and pension schemes.
- One-on-one counselling is provided by the HR and Finance teams to help employees with **financial planning**, documentation, and post-retirement formalities.

2. Voluntary Separation and Retirement Planning:

- Employees opting for voluntary retirement are supported with guidance on available options and implications.
- In selected cases, **early retirement planning sessions** and awareness workshops are conducted.

3. Outplacement and Employability Support (where applicable):

- In cases of role redundancies or non-voluntary separation, the company explores opportunities for **redeployment within other business units**.
- Professional counselling, referral support, and skill mapping are provided to help affected employees explore new employment opportunities.

4. Skill Development and Upskilling:

- As part of our continued employability efforts, Lloyds Metals invests in **ongoing training programs** that equip employees with skills relevant to emerging technologies and roles, aiding long-term career sustainability.

5. Compliance with Labour Regulations:

- All career transition activities are carried out in compliance with applicable **labour laws**, industrial relations guidelines, and **fair employment practices**.

Lloyds Metals is committed to responsible workforce management and strives to ensure dignity, transparency, and fairness in all career transition processes.

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100%
Working Conditions	100%

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

Lloyds Metals acknowledges the importance of maintaining high standards of health and safety across its value chain. Periodic assessments are conducted to evaluate the working conditions and occupational safety practices of value chain partners, particularly in mining, logistics, and material handling operations.

Where risks or concerns have been identified—such as gaps in personal protective equipment (PPE) usage, inadequate training, or lack of emergency preparedness—corrective actions have been initiated. These include:

- **Mandatory training programs** on workplace safety and hazard awareness for contractor staff and suppliers.
- **Regular safety audits** and compliance checks to ensure adherence to established health and safety protocols.

- **Upgradation of infrastructure** such as installation of ventilation systems, fire safety equipment, and provision of PPE.
- **Collaboration with suppliers** to develop customized health and safety improvement plans aligned with company standards.
- **Monitoring mechanisms** to track progress and ensure implementation of corrective measures over time.

Through these steps, Lloyds Metals aims to foster a safer and more compliant value chain, in line with its sustainability and ESG commitments.

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.

Identifying key stakeholder groups is a critical part of an entity's governance and sustainability strategy. The following structured processes are used to determine and prioritize stakeholders:

1. Mapping the Value Chain

LMEL begins by analyzing our entire value chain—from raw material sourcing to end-of-life product disposal. This helps identify all parties that interact with or are impacted by the organization's operations, directly or indirectly.

2. Internal Cross-Functional Consultation

Key departments such as operations, finance, HR, legal, sustainability, and customer service contribute insights on who the relevant stakeholders are. This ensures a comprehensive understanding from different functional perspectives.

3. Stakeholder Impact and Influence Analysis

Stakeholders are evaluated based on:

Impact: How significantly the entity's actions affect them.

Influence: Their ability to affect the entity's decisions or performance.

This is often visualized using a Stakeholder Matrix (high/low influence vs. high/low impact).

4. Regulatory and Compliance Considerations

Stakeholder groups mandated by legal, regulatory, or ESG reporting requirements (e.g., investors, regulatory bodies, local communities) are identified to ensure compliance and accountability.

5. Industry Benchmarking

LMEL reviews stakeholder engagement practices of peer organizations or industry standards (e.g., GRI, SASB, ISO 26000) to ensure no key group is overlooked.

6. Direct Engagement and Feedback

Engagements such as surveys, interviews, and focus group discussions with customers, employees, suppliers, and community members help validate their relevance and concerns. This participatory approach ensures stakeholders are not only identified but also accurately understood.

7. Periodic Review and Update

Stakeholder identification is an ongoing process. As the business evolves, LMEL periodically reviews and updates its stakeholder list to reflect changes in operations, geography, or social expectations.

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	Communities	No	Group meeting	As and when required	<ul style="list-style-type: none"> - To explain the various measures launched by the company for the well-being of the community. - Understand their needs so LMEL can provide help as required for developing need-based community projects. - Improving grievance redressal mechanism
2	Shareholders	No	Annual general meeting	Annually	<ul style="list-style-type: none"> - To discuss the balance sheet and investment approved by the board. - To inform how the company's current performance and its near-term plans
3	Employees and workers	No	Through training / Personal meetings / Notice board/ workshop/ Feedback sessions/ Recreation club	Regular basis	<ul style="list-style-type: none"> - To inform new developments, plans, and goals of the company. - Grievance redressal. Welfare activities ongoing/ future. - Gather feedback on Health and Safety.
4	Customers	No	Email	As and when required	<ul style="list-style-type: none"> - Customer meets are arranged to understand market trends and market demand. - Improve customer relations. - Customers also connect on a required basis through multiple grievance redressal mechanisms to take regular feedback on LMEL quality and logistics issues.
5	Value Chain Partners	No	Email/Phone	As and when required	<ul style="list-style-type: none"> - To enhance relations with value chain partners. - Resolve issues concerning each other to achieve long-term goals. - Communicate implementation of code of business conduct and ethics. - Mechanism to receive Whistleblower complaints. - To make value chain partners aware of company policies

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.

At Lloyds Metals, stakeholder engagement is a core component of our governance framework, particularly on matters relating to economic performance, environmental responsibility, and social impact. The Board of Directors is committed to maintaining open and transparent channels of communication with all key stakeholders, including investors, regulators, employees, local communities, and industry partners.

Consultation Processes:

1. Direct Engagement:

The Board, through designated committees such as the Stakeholder Relationship Committee and Corporate Social Responsibility (CSR) Committee conducts periodic meetings with stakeholders. These engagements include public consultations, stakeholder roundtables, and community forums to gather feedback on current operations and strategic initiatives.

2. Delegated Consultations:

In cases where consultation is delegated, senior management and relevant functional heads are responsible for engaging with stakeholders on specific topics. For instance, environmental officers engage with local environmental bodies and community leaders on ecological concerns, while HR and CSR teams consult on social welfare programs.

3. Feedback Mechanisms:

Insights and feedback gathered during these consultations are documented and reported back to the Board through formal reporting mechanisms. This includes:

- Periodic presentations by functional heads during Board meetings.
- Reports submitted to the Stakeholder Relationship and CSR Committees for review and strategic input.
- Integration of stakeholder concerns into risk assessments and policy development.

4. Board Oversight and Response:

The Board evaluates this feedback within the context of corporate strategy, compliance requirements, and sustainability goals. Where appropriate, the Board directs policy adjustments, allocates resources for targeted initiatives, or commissions further stakeholder engagement to address complex issues.

Through this structured approach, Lloyds Metals ensures that stakeholder voices are not only heard but actively shape our decision-making processes to foster sustainable and inclusive growth.

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, stakeholder consultation is actively used by Lloyds Metals to support the identification and management of environmental and social topics.

Details and Examples:

Lloyds Metals engages with a diverse set of stakeholders—including local communities, regulatory bodies, employees, and NGOs—to gather insights on material environmental and social concerns. These consultations play a critical role in shaping our policies and operational practices.

Examples of Incorporation:

1. Environmental Impact Management:

During stakeholder consultations in areas surrounding our mining and processing sites, community members raised concerns about dust and water usage. Based on this input, Lloyds Metals:

- Installed advanced dust suppression systems.
- Initiated water recycling and rainwater harvesting projects to reduce freshwater withdrawal.
- Updated its Environmental Management Plan to include stricter controls on air and water quality.

2. Community Development Initiatives:

Feedback from local community meetings highlighted the need for employment opportunities and educational support. In response:

- We launched targeted skill development programs aligned with the needs of local youth.
- Increased investments in school infrastructure and scholarship schemes in nearby villages.

3. Occupational Health and Safety:

Consultations with employees and labor representatives emphasized the need for enhanced safety training. As a result:

- Lloyds Metals expanded its HSE (Health, Safety & Environment) training modules.
- Strengthened incident reporting systems and safety audits across all operational units.

These inputs are reviewed by the ESG and CSR Committees and incorporated into our broader sustainability strategy and risk management processes, ensuring that our policies remain responsive, inclusive, and forward-looking.

Principle 5

Businesses should respect and promote human rights

Essential Indicators

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

Category	FY 2025 (Current Financial Year)			FY 2024 (Previous Financial Year)		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	1341	1341	100	1046	991	94.74
Other than permanent	30	30	100	356	345	96.91
Total Employees	1371	1371	100	1402	1336	95.29
Workers						
Permanent	493	493	100	369	369	100
Other than permanent	506	506	100	921	921	100
Total Workers	999	999	100	1290	1290	100

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

Category	FY 2025 (Current Financial Year)					FY 2024 (Previous Financial Year)				
	Total(A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No.(B)	% B/A	No.(C)	% C/A		No.(E)	% E/D	No.(F)	% F/D
Employees										
Permanent	1341	-	-	1341	100	1046	2	0.1912	1044	99.81
Male	1245	-	-	1245	100	992	1	0.1008	991	99.9
Female	96	-	-	96	100	54	1	1.85	53	98.15
Other	-	-	-	-	-	-	-	-	-	-
Other than permanent	30	-	-	30	100	356	1	0.2809	355	99.72
Male	27	-	-	27	100	341	1	0.2933	340	99.71
Female	3	-	-	3	100	15	-	-	15	100
Other	-	-	-	-	-	-	-	-	-	-
Workers										
Permanent	493	-	-	493	100	369	33	8.94	336	91.06
Male	461	-	-	461	100	356	25	7.02	331	92.98
Female	32	-	-	32	100	13	8	61.54	5	38.46
Other	-	-	-	-	-	-	-	-	-	-
Other than permanent	506	-	-	506	100	921	396	43	525	57
Male	502	-	-	502	100	879	373	42.43	506	57.57
Female	4	-	-	4	100	42	23	54.76	19	45.24
Other	-	-	-	-	-	-	-	-	-	-

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

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	12	17200018	1	-
Key Managerial Personnel	4	11930076	-	-
Employees other than BoD and KMP	1272	574992	99	321600
Workers	963	219252	36	189288

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

	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
Gross wages paid to females as % of total wages	2.9	2.8

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

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

LMEL has a grievances committee which conducts monthly meetings and addresses issues related to human rights.

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

Category	FY 2025 (Current Financial Year)			FY 2024 (Previous Financial Year)		
	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	No complaints	0	0	No complaints
Discrimination at workplace	0	0		0	0	
Child Labour	0	0		0	0	
Forced Labour/Involuntary Labour	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, in the following format:

	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
Total Complaints reported under Sexual Harassment on 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

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

Lloyds Metals is committed to fostering a safe, respectful, and inclusive workplace. The company has established robust mechanisms to handle complaints related to discrimination and harassment while ensuring that complainants are protected from any form of retaliation.

Key measures include:

- **Confidential Reporting Channels:** Employees can report incidents through secure and confidential mechanisms, including an Internal Complaints Committee (ICC) constituted as per the POSH Act, and dedicated grievance redressal systems.
- **Non-Retaliation Policy:** Lloyds Metals enforces a strict non-retaliation policy, ensuring that no adverse action is taken against individuals who report concerns in good faith.
- **Awareness and Training:** Regular sensitization sessions are conducted to educate employees on workplace rights, the grievance process, and protection mechanisms.
- **Monitoring and Follow-up:** All complaints are handled with due diligence, and periodic reviews are undertaken to ensure that complainants face no indirect consequences such as exclusion, demotion, or undue pressure.

Through these efforts, the company ensures a supportive environment where individuals feel safe to voice concerns without fear of retribution.

Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases is mentioned in the POSH and Human Rights Policy.

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

Yes

10. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child Labour	100%
Forced Labour/Involuntary Labour	100%
Sexual Harassment	100%
Discrimination at Workplace	100%
Wages	100%

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

Not Applicable

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	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
	Value	Value
From renewable sources (GJ)		
Total electricity consumption (A)	417.87	3,59,712.00
Total fuel consumption (B)	6,562.81	-
Energy consumption through other sources (C)	-	-
Total energy consumed from renewable sources (A+B+C)	6,980.67	3,59,712.00
From non-renewable sources (GJ)		
Total electricity consumption (D)	61,089.56	32,024.17
Total fuel consumption (E)	81,38,139.10	58,073.84
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewable sources (D+E+F)	81,99,228.66	90,098.01
Total energy consumed (A+B+C+D+E+F)	82,06,209.34	4,49,810.01
Energy intensity per rupee of turnover (Total energy consumed/ Revenue from operations)	0.0001212	0.0000069
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	0.0025033	0.0000020
Energy intensity in terms of physical output - Production in mass	0.82	0.0449825
Energy intensity (optional) -	-	-

This note is intended to explain the notable variance in the reported energy consumption figures for FY 2024-25 as compared to the previous financial year.

The increase (or decrease) in energy consumption observed in FY 2024-25 is primarily attributable to a change in the energy accounting methodology. In alignment with updated internal reporting standards and industry best practices, Lloyds Metals has revised its energy data consolidation and reporting framework to ensure greater transparency, accuracy, and alignment with ESG and regulatory expectations.

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, Manubhai & Shah LLP has carried out a reasonable assurance of the above parameter as a part of its BRSR Core assurance as per SSAE 3000

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

Yes, our Ghugus unit is registered under the BEE PAT scheme, classified within the main sector 'Iron & Steel' and the sub-sector 'Sponge Iron'. In PAT Cycle-2, we were assigned an energy intensity target of 0.6889 toe/tonne, which we successfully surpassed by achieving an actual intensity of 0.659 toe/tonne.

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

Parameter	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
	Value	Value
Water withdrawal by source (in kilolitres)		
(i) Surface water	1,465,706	1,324,234
(ii) Groundwater	12,090	15,870
(iii) Third party water	-	162.93
(iv) Seawater / desalinated water	-	-
Others	-	-
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	14,77,796	1,340,266.93
Total volume of water consumption (in kilolitres)	14,77,796	1,327,592.93
Water intensity per rupee of turnover (Total water consumption / Revenue from operations)	0.0000218	0.000020
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	0.0004508	0.000006
Water intensity in terms of physical output- Production in mass	0.15	0.13
Water intensity (optional) -	-	-

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, Manubhai & Shah LLP has carried out a reasonable assurance of the above parameter as a part of its BRSR Core assurance as per SSAE 3000.

4. Provide the following details related to water discharged

Parameter	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
	Value	Value
(i) To surface water	-	-
- No treatment	-	-
- With treatment	-	-
- Primary treatment	-	-
- Secondary treatment	-	-
- Tertiary treatment	-	-
(ii) To Groundwater	-	-
- No treatment	-	-
- With treatment	-	-
- Primary treatment	-	-
- Secondary treatment	-	-
- Tertiary treatment	-	-

Parameter	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
	Value	Value
(iii) To Seawater	-	-
- No treatment	-	-
- With treatment	-	-
- Primary treatment	-	-
- Secondary treatment	-	-
- Tertiary treatment	-	-
(iv) Sent to third-parties	-	-
- No treatment	-	-
- With treatment	-	-
- Primary treatment	-	-
- Secondary treatment	-	-
- Tertiary treatment	-	-
(v) Others	-	12,674
- No treatment	-	-
- With treatment	-	12,674
- Primary treatment	-	12,674
- Secondary treatment	-	-
- Tertiary treatment	-	-
Total water discharged (in kilolitres)	-	12,674

Lloyds Metals is committed to sustainable water management and environmental stewardship. We are proud to report that 100% of the wastewater generated across our operations is effectively treated and reused, ensuring zero liquid discharge from our facilities. Our integrated wastewater management approach includes the use of Sewage Treatment Plants (STPs) and Effluent Treatment Plants (ETPs), which treat water to prescribed standards before it is repurposed for various non-potable applications such as:

- Cooling tower makeup
- Dust suppression
- Green belt development
- Industrial process reuse

This closed-loop water management system significantly reduces our freshwater dependency and supports our long-term sustainability and resource conservation goals.

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, Manubhai & Shah LLP has carried out a reasonable assurance of the above parameter as a part of its BRSR Core assurance as per SSAE 3000.

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

Yes, Lloyds Metals has implemented a Zero Liquid Discharge (ZLD) mechanism as part of its commitment to sustainable and responsible environmental practices. The ZLD system ensures that no industrial wastewater is discharged outside the plant premises, promoting complete recycling and reuse of treated water within operational processes.

Coverage and Implementation Details:

Scope and Coverage:

The ZLD mechanism is implemented across key operational units and ancillary facilities. It also extends to domestic wastewater generated from administrative and worker facilities.

Treatment Infrastructure:

Effluent Treatment Plants (ETPs) treat process wastewater to regulatory standards.

Sewage Treatment Plants (STPs) handle domestic sewage and ensure safe, treated water output.

Reuse and Recirculation:

Treated water is reused for non-potable applications such as:

- Cooling tower operations
- Dust suppression
- Green belt irrigation
- Process water supplementation

Monitoring and Compliance:

A robust monitoring mechanism is in place, with regular internal assessments and third-party audits to ensure consistent compliance with ZLD norms and applicable environmental regulations.

Through the adoption of ZLD, Lloyds Metals not only reduces its environmental footprint but also contributes to water conservation and resource efficiency as part of its long-term ESG objectives.

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

Parameter	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
	Value (MT)	Value (MT)
NOx	1,319.54	313.62
SOx	2,348.86	600.66
Particulate matter (PM)	214.26	46.19
Persistent organic pollutants (POP)	-	-
Volatile organic compounds (VOC)	-	-
Hazardous air pollutants (HAP)	-	-

The substantial variation observed in the air emission figures reported for FY 2024–25, as compared to FY 2023–24, is attributed to a change in the emissions accounting methodology implemented during the current reporting period. This change was part of a broader effort to improve the accuracy, completeness, and alignment of our environmental reporting with updated regulatory guidelines and global ESG frameworks.

This year-on-year increase in reported emissions should not be interpreted as a deterioration in performance but rather as a more accurate representation of our actual environmental impact due to methodological enhancements. Lloyds Metals continues to invest in emission control technologies and energy efficiency measures and remains committed to long-term sustainability and environmental compliance.

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, Manubhai & Shah LLP has carried out a reasonable assurance of the above parameter as a part of its BRSR Core assurance as per SSAE 3000.

Any contextual information necessary to understand how the data has been compiled, such as any standards, methodologies, assumptions and/or calculation tools used.

The air emissions data reported by Lloyds Metals has been compiled using a structured and standardized approach to ensure transparency, accuracy, and alignment with national and international environmental reporting frameworks. Emission estimations have been carried out in accordance with guidelines issued by the Central Pollution Control Board (CPCB), Ministry of Environment, Forest and Climate Change (MoEF&CC), and relevant ISO standards (such as ISO 14064 and ISO 14001).

Air emissions data is supported by data from Continuous Emission Monitoring Systems (CEMS) installed at key stacks, wherever mandated. Supplementary calculations were performed using in-house digital tracking systems and custom spreadsheets vetted by the environmental management team. Quality checks and periodic audits are conducted to validate data integrity. The emissions data includes both point-source (e.g., stacks, kilns) and fugitive emissions, covering all major operational facilities including the DRI plant and captive power plants.

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

Parameter	Unit	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	6,96,745.33	2,04,154.54
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	12,336.66	6,369.25
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO ₂ equivalent/ rupee	0.0000105	0.000003
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)	Metric tonnes of CO ₂ equivalent/ rupee	0.0002163	0.0000009
Total Scope 1 and Scope 2 emission intensity in terms of physical output- Production in mass	Metric tonnes of CO ₂ equivalent/MT	0.07	0.02
Total Scope 1 and Scope 2 emission intensity (optional)-	-	-	-

The substantial variation in reported Greenhouse Gas (GHG) emissions between FY 2024–25 and FY 2023–24 is primarily attributable to an updated GHG accounting methodology adopted by Lloyds Metals in the current reporting period. This methodological enhancement is part of our commitment to more robust, transparent, and standardized ESG reporting in line with international best practices and evolving stakeholder expectations.

The observed increase or decrease in GHG emissions does not reflect a sudden operational shift or deterioration in environmental performance, but rather a refinement in data capture and reporting methodology. These improvements aim to ensure greater transparency and alignment with SEBI's BRSR framework, global ESG standards, and internal sustainability goals.

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, Manubhai & Shah LLP has carried out a reasonable assurance of the above parameter as a part of its BRSR Core assurance as per SSAE 3000.

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

Yes, Lloyds Metals has initiated multiple projects and operational measures aimed at reducing Greenhouse Gas (GHG) emissions, in alignment with our commitment to sustainable industrial practices and our broader Environmental, Social, and Governance (ESG) objectives.

Key GHG Reduction Initiatives:

Use of Biomass in Process Fuel Mix:

As a partial replacement for fossil fuels in our captive power plant at Ghugus, Lloyds Metals has begun integrating biomass-based fuels (such as bamboo dust) into the combustion process. This initiative helps reduce net carbon emissions due to the carbon-neutral nature of biomass.

Adoption of Electric Vehicles (EVs) and Electrified Equipment:

We are progressively replacing diesel-operated vehicles and machinery with Electric Vehicles (EVs) and battery-operated equipment for in-plant logistics and material handling. This transition helps lower Scope 1 emissions associated with fossil fuel combustion.

Conversion to Electrically Powered Systems:

Several conventional fuel-based mobile equipment, have been converted to electrically operated alternatives, contributing to cleaner and more energy-efficient operations. Where feasible, the electricity will be sourced from renewable sources, further reducing indirect (Scope 2) emissions.

Use of High-Grade, Low-Ash Coal:

To improve combustion efficiency and reduce specific GHG emissions per unit of production, high-quality, low-ash coal has been adopted in place of conventional grades. This shift minimizes unburned carbon, reduces particulate emissions, and enhances thermal efficiency.

Energy Efficiency and Emissions Monitoring Systems:

In addition to fuel substitution, the company has deployed real-time energy monitoring and emissions tracking systems to optimize operations, reduce wastage, and support timely decision-making for emission control.

These projects form an integral part of our ongoing decarbonization roadmap, with measurable benefits in lowering our carbon footprint while maintaining operational efficiency and product quality. Lloyds Metals continues to explore and invest in cleaner technologies to align with national climate goals and global best practices for emissions reduction.

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

Parameter	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
	Value	Value
Total Waste generated (in metric tonnes)		
Plastic waste (A)	17.78	1.52
E-waste (B)	0.330	0.286
Biomedical waste (C)	3.03	NA
Construction and demolition waste (D)	0	NA
Battery waste (E)	8.05	NA
Radioactive waste (F)	0	NA
Other Hazardous waste. Please specify, if any. (G)	83.42	85.29
Other Non-hazardous waste generated (H). Please specify, if any. (Breakup by composition i.e., by materials relevant to the sector)	3,28,684.94	9,81,617
Total (A+B + C + D + E + F + G + H)	3,28,797.56	9,81,704.10

Parameter	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
	Value	Value
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.00000485	0.0000151
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.00010030	0.0000044
Waste intensity in terms of physical output - Production in mass (Metric ton/MT)	0.0328807	0.0981737
Waste intensity (optional) –	-	-
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tons)		
Category of waste		
(i) Recycled	-	-
(ii) Re-used	3,24,662.92	8,57,531
(iii) Other recovery operations	-	-
Total	3,24,662.92	8,57,531
For each category of waste generated, total waste disposed by nature of disposal method (in metric tons)		
Category of waste		
(i) Incineration	9.00	-
(ii) Landfilling	0.10	1,24,172.80
(iii) Other disposal operations	-	-
Total	9.01	1,24,172.80

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, Manubhai & Shah LLP has carried out a reasonable assurance of the above parameter as a part of its BRSR Core assurance as per SSAE 3000.

Any contextual information necessary to understand how the data has been compiled, such as any standards, methodologies, assumptions and/or calculation tools used.

The waste data reported by Lloyds Metals has been compiled through a systematic and transparent process, adhering to applicable national regulations and environmental management standards. The objective is to ensure accurate quantification, categorization, and responsible disclosure of all waste generated, handled, and disposed of by the company.

Contextual Information:

1. Standards and Frameworks Followed:

- The data compilation process follows guidelines issued by the Central Pollution Control Board (CPCB) and the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
- Waste management and reporting practices are aligned with our ISO 14001:2015-certified Environmental Management System (EMS).
- Categorization of waste (hazardous, non-hazardous, recyclable, and inert) is done in line with the Solid Waste Management Rules, 2016 and industry-specific CPCB norms.

2. Data Collection and Sources:

- Waste data is collected from all operational areas including the DRI planta and mining site.
- Volumes are recorded based on actual measurements, such as weighbridge logs, disposal records, and manifests maintained for both on-site and off-site handling.
- Records from authorized vendors (for treatment, recycling, and disposal) are also consolidated to ensure full traceability and compliance.

3. Calculation Methods and Assumptions:

- Where direct measurements are not feasible, waste quantities are estimated based on material input-output ratios, batch production logs, and standard waste generation norms as per process type.
- Conservative estimates are used to ensure data accuracy without under-reporting.

4. Monitoring and Verification:

- Internal audits and monthly waste tracking dashboards are used to monitor and validate waste generation and disposal trends.
- All hazardous waste is handled and transported as per prescribed protocols with supporting documentation (Form 10, Form 13, etc.) to ensure compliance and traceability.

5. Boundary of Reporting:

- The reporting covers all waste generated within the operational control of Lloyds Metals, including manufacturing, processing, maintenance, and mining-related activities.

Lloyds Metals remains committed to continual improvement in waste management, minimization, and recycling efforts, in line with our ESG goals and regulatory compliance.

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

Our Waste Management approach in a DRI Production plant includes recycling of trade effluents for coal washery sections and reused in cooler of kiln and domestic effluent is used for gardening. And Non-Hazardous Waste like ESP sludge is reused in process and accretion material is used internal road construction and dedusting system dust, fly ash and bottom ash is sold to brick manufacturing plants. In iron ore mines waste oil (lube) and empty MS drums are sold to the authorized local vendor for recycling.

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

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
1	Surjagarh Iron Ore Mine	Iron ore Mining	Yes

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

S. No	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
1	1.2 MTPA Steel plant & 4 MTPA Pellet Plant	EIA Notification, 2006	January, 2025	Yes	Yes	https://parivesh.nic.in/
2	2 x 4.5 MTPA Iron Ore Grinding Unit, 10 MTPA Thickening & Filtration Unit and 2 X 4 MTPA Iron Ore Pellet Plant	EIA Notification, 2006	November, 2024	Yes	Yes	https://parivesh.nic.in/

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

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

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.**

Seven

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

S.No.	Name of the trade and industry chambers associations	Reach of trade and industry chambers/ associations (State/National)
1	BIGMINT TECHNOLOGIES PRIVATE LIMITED	National
2	CONFEDERATION OF INDIAN INDUSTRY	National
3	STEEL MANUFACTURES ASSOCIATION	National
4	SPONGE IRON MANUFACTURERS ASSOCIATION	National
5	PELLET MANUFACTURERS ASSOCIATION OF INDIA	National
6	VOLZA GLOBAL	National
7	VIDARBHA INDUSTRIES ASSOCIATION	State

- 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**

Not applicable as no adverse orders received from regulatory authorities.

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.**

Not applicable.

- 2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:**

An action plan is being developed to support and elevate all communities in our surrounding areas.

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

The CSR team visits the communities in and around LMEL operations to gather complaints. If any are found, they're carefully evaluated and investigated to gather relevant information and assess their validity before being resolved.

A structured and inclusive mechanism has been established to ensure the timely receipt, documentation, and redressal of community grievances. Central to this approach are the 10 LIF Outreach Centers, which serve as critical community engagement hubs across 21 villages. These centers operate under the guiding principle of “Connecting Communities, Empowering Lives”, ensuring that community voices are heard, respected, and acted upon.

Each Outreach Center is staffed with trained Outreach Workers (ORWs) who play a multifaceted role in community development. In addition to their responsibilities—such as disseminating information on government schemes, raising awareness on social issues, facilitating emergency medical services (including ambulance coordination), conducting baseline surveys, and promoting sustainable practices like kitchen gardens—these ORWs are also pivotal in grievance management.

The grievance redressal mechanism functions as follows:

Access Points: Community members can approach any of the 10 Outreach Centers to submit grievances in person or through the ORWs during field visits.

Documentation: A dedicated Grievance Register is maintained at each center to record complaints, concerns, and follow-up actions.

Follow-up and Resolution: ORWs liaise with relevant government departments, local authorities, or service providers to facilitate timely resolution of issues raised.

Feedback Loop: Complainants are regularly updated on the status of their grievances, ensuring transparency and trust in the system.

This grassroots, community-integrated approach not only resolves individual concerns but also contributes to strengthening the overall social fabric by fostering accountability and empowerment at the local level.

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

	FY 2025 (Current Financial Year)	FY 2024 (Previous Financial Year)
Directly sourced from MSMEs/ small producers	2.94	2.94
Directly from within India	99.99	-
Sourced directly from within the district and neighbouring districts	39.04	23.18

Note: The percentage calculations were based on the quantity of input materials sourced.

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 (Current Financial Year)	FY 2024 (Previous Financial Year)
Rural	85.41	87.38
Semi-urban	-	0.33
Urban	-	4.46
Metropolitan	14.59	7.83

(Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)

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.

Consumer complaints and feedback on quality and logistics are received via email/ phone by the marketing team and shared internally with respective departments for necessary actions, complaints are resolved, and response is provided to the customers on a timely basis.

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

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

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

	FY 2025 (Current Financial Year)			FY 2024 (Previous Financial Year)		
	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	No complaints have been received	0	0	No complaints have been received
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	0	0		0	0	

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

	Number	Reasons for recall
Voluntary recalls	0	NA
Forced recalls	0	NA

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

Yes. The Company has in place policy such as Privacy Policy, to ensure sufficient safeguards are in place to prevent any data leakage.

Web-link - <https://lloyds.in/investors/investor-policies/>

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

No penalties/regulatory action has been levied or taken on the above-mentioned parameters.

7. Provide the following information relating to data breaches:

a. Number of instances of data breaches	0
b. Percentage of data breaches involving personally identifiable information of customers	0
c. Impact, if any, of the data breaches	0