

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (BRSR)

SECTION A General disclosures

SECTION B Management and process disclosures

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
- Principle 2** Businesses should provide goods and services in a manner that is sustainable and safe
- Principle 3** Businesses should respect and promote the well-being of all employees, including those in their value chains
- Principle 4** Businesses should respect the interests of and be responsive to all its stakeholders
- Principle 5** Businesses should respect and promote human rights
- Principle 6** Businesses should respect and make efforts to protect and restore the environment
- Principle 7** Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
- Principle 8** Businesses should promote inclusive growth and equitable development
- Principle 9** Businesses should engage with and provide value to their consumers in a responsible manner

Section A: General Disclosures

I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the Company	L74899DL1986PLC023443
2.	Name of the Company	APL Apollo Tubes Limited
3.	Year of Incorporation	1986
4.	Registered office address	37, Hargobind Enclave, Vikas Marg, Delhi 110092
5.	Corporate office address	SG Centre, 37C, Block A, Sector 132, Noida, Uttar Pradesh - 201304
6.	E-mail	comsec@aplapollo.com

7.	Telephone	011-44457164
8.	Website	https://aplapollo.com/
9.	Financial year for which reporting is being done	FY2023-24
10.	Name of the Stock Exchange(s) where shares are listed	NSE & BSE
11.	Paid-up Capital	₹55,50,49,128
12.	Name and contact details (telephone, email address) of the person for BRSR Reporting	Deepak C S Company Secretary deepakcs@aplapollo.com 0120-6918000
13.	Reporting boundary	Consolidated basis
14.	Name of assurance provider	Sustainability Actions (P) Ltd.
15.	Type of assurance obtained	Reasonable assurance on BRSR Core disclosures

II. Products/Services

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

S. No.	Description of Main WActivity	Description of Business Activity	% Of Turnover of the entity
1.	Steel Tube Manufacturer	Manufacturing & selling of structural steel tubes	100%

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

S. No.	Product/Services	NIC Code	% Of total turnover contributed
1.	MS Tubes	27152	66%
2.	GI Tubes	27152	5%
3.	GP Tubes	27152	3%
4.	Pre-painted Alu Zinc Sheets	27152	7%
5.	Pre-painted Galvanized Sheets	27152	19%

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	10	29	39
2.	International	1	0	1

19. Markets served by the entity

a. Number of locations

S. No.	Number of Locations served	Number
1.	National (Number of states)	All States
2.	International (Number of countries)	30

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

6%

c. A brief on types of customers

APL Apollo is proud of its unmatched customer base, backed by a vast network of over 800 distributors. With a reach extending to 200,000 retailers and fabricators, we are recognized as the preferred choice for structural tube solutions in India. Operating in over 2,000 towns and cities, with 11 strategically located production facilities, we ensure quick response times and on-time delivery. Additionally, with 29 sales offices across India and serving 30 countries globally, our extensive reach establishes APL Apollo as the foremost provider, offering customers unparalleled convenience and reliability.

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No.	Particulars	Total	Male		Female	
		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1.	Permanent (D)	1,175	1,152	98%	23	2%
2.	Other than permanent (E)	0	0	0	0	0
3.	Total employees (D+E)	1,175	1,152	98%	23	2%
Workers						
4.	Permanent (F)	1,620	1,615	99.7%	5	0.3%
5.	Other than permanent (G)	2,276	2,260	99.3%	16	0.7%
6.	Total workers (F+G)	3,896	3,875	99.5%	21	0.5%

b. Differently abled Employees and workers:

S. No.	Particulars	Total	Male		Female	
		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
Differently abled Employees						
1.	Permanent (D)	0	0	0	0	0
2.	Other than permanent (E)	0	0	0	0	0
3.	Total Differently abled employees (D+E)	0	0	0	0	0
Differently abled Workers						
4.	Permanent (F)	0	0	0	0	0
5.	Other than permanent (G)	0	0	0	0	0
6.	Total Differently abled workers (F+G)	0	0	0	0	0

21. Participation/Inclusion/Representation of women

	Total	No. and percentage of Females	
	No. (A)	No. (B)	% (B/A)
Board of Directors	11	2	18%
Key Management Personnel	2	0	0%

22. Turnover rate for permanent employees and workers

Category	FY 2024			FY 2023			FY 2022		
	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)
Permanent employees	20.57%	8.7%	20.34%	10.71%	0%	10.52%	4.4%	0%	4.4%
Permanent workers	13.13%	20%	13.15%	8.28%	NA	8.28%	4.5%	NA	4.5%

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

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

S. No.	Name of the holding / subsidiary / associate companies / joint ventures	Is it a holding/ Subsidiary/ Associate/ Joint Venture	% Of shares held by listed entity	Does the entity participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Apollo Metalex Private Limited	Subsidiary	100	yes
2	APL Apollo Building Products Private Limited	Subsidiary	100	yes
3	Blue Ocean Projects Private Limited	Subsidiary	100	yes
4	APL Apollo Mart Limited	Subsidiary	100	yes
5	APL Apollo Tubes Company LLC	Subsidiary	100	Not Applicable

VI. CSR details

24. I. Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes

II. If yes, Turnover – ₹13,859 Crore

III. Net worth – ₹2,890 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 (NGBRC):

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)	FY 2024			FY 2023		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	APL Apollo has a Whistleblower policy in place which lays down the procedure in accordance with which all the grievances are addressed. Link to our policy: https://aplapollo.com/wp-content/uploads/2020/06/Whistle-blower-Policy-25012022.pdf	0	0	0	0	0	0
Investors (Other than Shareholders)		0	0	0	0	0	0
Shareholders		0	0	0	0	0	0
Employees and workers		0	0	0	0	0	0
Customers		45	0	All were resolved	54	0	All were resolved
Value Chain Partners		0	0	0	0	0	0
Other (please specify)		0	0	0	0	0	0

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

Material concerns refer to those that directly or indirectly affect a company's operations, footprint, and its economic, environmental, and social value. APL Apollo recognizes that sustainable development involves not only addressing material challenges related to corporate governance, operations, and strategy, but also identifying and prioritizing its most important challenges based on stakeholder concerns. To understand stakeholders' perspectives, we first identified the relevant ESG topics for our industry by evaluating various standards and frameworks. Secondly, we conducted thorough stakeholder engagements using questionnaires and collected responses from various stakeholder groups. The issues identified are highly relevant to our success and are addressed in our stakeholder communications, internal strategic priorities, and corporate responsibility approach. During the reporting period, the list of significant topics underwent revalidation through internal stakeholder consultations. The insights gathered from these consultations were then assessed based on whether the material topic presents a risk or opportunity for the company, along with its associated financial implications.

S. no	Material issue identified	Is it 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	Energy Management	Opportunity	By optimizing energy usage and investing in renewable energy sources, APL can reduce operational costs and improve efficiency. Implementing energy-efficient technologies and processes not only reduces carbon footprint but also aligns with evolving consumer preferences for sustainable products. Additionally, it can enhance APL Apollo’s brand image and attract environmentally conscious investors and customers. By the year 2025, APL Apollo aims to ensure that all its plants have access to renewable energy. Currently, 72% of the plants already have this access.	-	Positive
2	Water & Effluent Management	Risk	Inadequate water management practices could result in increased operational costs, regulatory fines for non-compliance with water quality standards, and reputational damage due to environmental impacts such as pollution or water resource depletion. Additionally, improper effluent management poses risks of contaminating local water sources, leading to legal liabilities and community backlash.	Optimize water use, treat effluents, and implement water recycling/reuse systems. APL Apollo has taken a target to equip all its plant with Zero Liquid Discharge (ZLD) facilities by 2025. So far, 45% of the plants are equipped with ZLD.	Negative

S. no	Material issue identified	Is it 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	Emissions Management	Risk & Opportunity	<p><i>Risk</i></p> <p>Failure to control emissions can lead to regulatory fines and penalties, causing financial losses and reputational damage. Additionally increased stakeholder scrutiny, from customers, investors, and regulatory bodies, heightens the risk, potentially resulting in legal action against non-compliant companies.</p> <p><i>Opportunity</i></p> <p>By implementing emission reduction measures and adopting cleaner technologies, APL can enhance its environmental performance and reputation as a sustainable industry leader, this will in turn increase its access to both domestic and international markets.</p>	<p>Monitor emissions and comply with emission standards.</p> <p>Additionally, APL Apollo has adopted a net-zero emissions target for 2050, aligning with the Science Based Targets Initiative.</p>	Positive and Negative
4	Waste Management	Risk	<p>Improper disposal of waste materials can lead to soil and water contamination, causing harm to ecosystems and local communities. Moreover, inefficient waste management may result in increased operational costs due to disposal fees and potential legal liabilities.</p>	<p>Reduce, reuse, and recycle waste; implement proper disposal methods.</p> <p>At APL Apollo, majority of the waste are sold as scrap and the remainder is repurposed within the business operations. Additionally, any hazardous waste produced within the plant's vicinity is disposed via authorized vendors.</p>	Negative
5	Environmental Compliance	Risk	<p>Non-compliance with environmental regulations can result in substantial financial penalties, legal liabilities, and reputational damage.</p>	<p>Stay updated with regulations, conduct regular compliance audits, and invest in training and awareness programs.</p>	Negative

S. no	Material issue identified	Is it 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)
6	Health & Safety	Risk	<ol style="list-style-type: none"> 1. Workplace Accidents and Injuries: Inadequate health and safety measures can result in workplace accidents, injuries, and fatalities, leading to increased insurance costs, compensation claims, and loss of productivity. 2. Reputational Damage: Poor health and safety practices can damage the company's reputation, leading to loss of customer trust, stakeholder confidence, and increase the company's inability to attract and retain talent. 	<ol style="list-style-type: none"> 1. Risk Assessment: Identify hazards, assess risks, and implement controls to mitigate them. 2. Training and Awareness: Provide health and safety training to employees and raise awareness of potential risks. 	Negative
7	Human Rights and Diversity & Equal Opportunity	Risk	<ol style="list-style-type: none"> 1. Legal and Regulatory Compliance: Failure to uphold human rights, diversity, and equal opportunity principles can result in legal action, fines, and reputational damage. 2. Reputation Damage: Violations of human rights or lack of diversity and equal opportunity can lead to negative publicity, harming the company's reputation and brand image. 3. Employee Relations: Discrimination or lack of diversity and equal opportunity can lead to employee dissatisfaction, low morale, and higher turnover rates. 	<ol style="list-style-type: none"> 1. Develop and implement policies that promote human rights, diversity, and equal opportunity in the workplace. 2. Raise awareness about the importance of human rights and their impact on the organization. 3. Implement diversity recruitment strategies to attract a diverse pool of candidates. 4. Implement monitoring mechanisms to track progress on human rights, diversity, and equal opportunity goals. Additionally, by becoming a UNGC signatory, APL Apollo has strengthened its commitment to upholding human rights. 	Negative

S. no	Material issue identified	Is it 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	Labour Relation	Risk	<ol style="list-style-type: none"> 1. Work Stoppage: Labour disputes, strikes, or other forms of industrial action can disrupt operations, leading to financial losses and damage to reputation. 2. Legal and Regulatory Compliance: Failure to comply with labour laws and regulations can result in fines, penalties, and legal action. Adverse labour relations can result in legal costs associated with resolving disputes. 3. Employee Turnover: Poor labour relations can contribute to higher turnover rates, leading to recruitment and training costs and loss of institutional knowledge. Poor relations with employees can lead to decreased motivation, absenteeism, and reduced productivity. 	<ol style="list-style-type: none"> 1. Establish clear communication channels between management and employees to address grievances promptly. 2. Implement fair and transparent policies for performance evaluation, promotion, and compensation. 3. Provide regular training to management and employees on labor laws, company policies, and conflict resolution. 4. Encourage employee engagement and participation in decision-making processes. 5. Periodically, benchmark employee benefits and salary to ensure that benefits provided to employees are in line with industry standards. 	Negative
9	Training & Education	Risk	Insufficient talent possessing the necessary skills, along with high attrition rates and limited development of human capital, can lead to business disruptions, a negative impact on reputation, and may impede the Company's ability to achieve its business objectives.	<ol style="list-style-type: none"> 1. Develop a comprehensive training program to ensure employees acquire and maintain necessary skills. 2. Regularly assess training needs and adjust programs accordingly. 3. Provide opportunities for further education and skills development. 4. Implement knowledge-sharing platforms and mentorship programs to transfer skills and knowledge within the organization. 5. Monitor and evaluate the effectiveness of training programs regularly. 	Negative

S. no	Material issue identified	Is it 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	Corporate Social Responsibility	Opportunity	Most of APL Apollo's key sites are situated near the wider community. Maintaining a mutually beneficial, transparent, and trusting relationship with the community is essential for APL Apollo to retain its social license to operate. Deep engagement fosters goodwill, supports public consent, and brings long-term benefits such as community support, loyalty, a potential employee and capital source, and increased awareness of the company's products or services.		Positive
11	Corporate Governance	Opportunity	<ol style="list-style-type: none"> 1. Strong corporate governance practices can enhance the reputation of the company, increasing trust among investors, customers, and other stakeholders. 2. Good governance helps identify and mitigate risks, such as compliance issues, corruption, and ethical lapses. By managing these risks effectively, a steel company can protect its operations and finances. 3. Good governance will attract more investors since investors often prefer companies with transparent and accountable governance structures. 		Positive
12	Market presence	Opportunity	<ol style="list-style-type: none"> 1. A strong market presence can enhance brand recognition for APL Apollo, making its products more easily identifiable and preferred by customers. 2. A strong presence in existing markets can provide a platform for expanding into new markets, both domestically and internationally. 3. A strong market presence can drive revenue growth through increased sales and market share. 		Positive

Section B: Management and process disclosures

This section is aimed at helping businesses demonstrate the structures, policies, and processes put in place towards adopting the NGRBC principles and core elements. These are briefly as under:

P1	Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent, and accountable
P2	Businesses should provide goods and services in a manner that is sustainable and safe
P3	Businesses should respect and promote the well-being of all employees, including those in their value chains
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P7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
P8	Businesses should promote inclusive growth and equitable development
P9	Businesses should engage with and provide value to their consumers in a responsible manner

Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and Management Processes										
1. (a)	Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1. (b)	Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1. (c)	Web Link of the Policies, if available	https://aplapollo.com/downloads								
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, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	The majority of our policies adhere to globally recognized standards such as, SA8000, ISO 9001 (Quality Management System), ISO 14001 (Environmental Management System), and ISO 45001 (Occupational Health & Safety Management System). Additionally, several of our plants are certified in ISO standards, including ISO 9001, ISO 14001, and ISO 45001.								
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	<ul style="list-style-type: none"> • Net Zero by 2050 (aligned to SBTi). • Reduce Scope 1&2 emissions per metric ton of steel produced by 25% by 2030, against a 2023 base-year. • All units to be ZLD facilities by 2025. • Rainwater harvesting to be installed at all units by 2025. 								
6	Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.	<ul style="list-style-type: none"> • APL Apollo has initiated a Purchasing Power Agreement with BluPine Energy to establish a solar power plant in Chattisgarh, aimed at offsetting 87,000 tonnes of CO2 emissions each year. This marks a substantial stride towards fulfilling our Net Zero commitment. • 5 out of 11 Plants are equipped with ZLD facilities and others are in advanced stage. • All our plants are equipped with the necessary rainwater harvesting facility 								

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9																																																												
Governance, Leadership, and Oversight																																																																					
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets, and achievements (listed entity has flexibility regarding the placement of this disclosure)	<p>ESG has emerged as an undeniable catalyst for organizational value enhancement, serving as a key indicator of productivity and resilience. By integrating ESG considerations into our governance and decision-making processes, we aim to enhance our ability to identify emerging opportunities and mitigate risks effectively. APL Apollo's commitment to excellence has not only led to greater financial efficiency but also positioned us to achieve crucial ESG objectives, thereby contributing significantly to value creation for all stakeholders involved.</p> <p>This year, APL Apollo proudly became a signatory of the United Nations Global Compact (UNGC), underscoring our commitment to responsible business practices and sustainability. This signifies a significant step forward for the company, aligning us with global standards for corporate responsibility and emphasizing our dedication to ethical operations, environmental stewardship, and social progress. Additionally, APL Apollo has taken a target to become Net Zero by 2050 in alignment with the Science Based Target Initiatives.</p>																																																																				
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.	<p>APL Apollo has formalized its approach to ESG governance, aligning with our vision and mission. This reflects the commitments we made last year to all stakeholders, including employees, suppliers, and customers, ensuring high-quality materials. Our focus on honesty and transparency is evident in clearly defined targets, progress tracking, and efforts for ongoing improvement. The ESG Charter serves as a policy document, outlining our sustainability goals, progress reporting, and short-, medium-, and long-term objectives. We've established a robust ESG governance structure to adhere to the ESG Charter, overseen by three main levels: the Board (Risk Management Committee), Corporate Management (ESG Council), and Site Management (Site Council).</p>																																																																				
10. Details of Review of NGRBCs by the Company	<p>a. Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee</p> <table border="1"> <thead> <tr> <th></th> <th>P1</th> <th>P2</th> <th>P3</th> <th>P4</th> <th>P5</th> <th>P6</th> <th>P7</th> <th>P8</th> <th>P9</th> </tr> </thead> <tbody> <tr> <td>1. Performance against above policies and follow up action</td> <td colspan="9">Yes, the review is conducted by the Committee of the Board</td> </tr> <tr> <td>2. Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances</td> <td colspan="9">Yes, the review is conducted by the Committee of the Board</td> </tr> </tbody> </table> <p>b. Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)</p> <table border="1"> <thead> <tr> <th></th> <th>P1</th> <th>P2</th> <th>P3</th> <th>P4</th> <th>P5</th> <th>P6</th> <th>P7</th> <th>P8</th> <th>P9</th> </tr> </thead> <tbody> <tr> <td>1. Performance against above policies and follow up action</td> <td colspan="9">Annually</td> </tr> <tr> <td>2. Compliance with statutory requirements of relevance to the principles, and the rectification of any non-compliances</td> <td colspan="9">Annually</td> </tr> </tbody> </table>										P1	P2	P3	P4	P5	P6	P7	P8	P9	1. Performance against above policies and follow up action	Yes, the review is conducted by the Committee of the Board									2. Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Yes, the review is conducted by the Committee of the Board										P1	P2	P3	P4	P5	P6	P7	P8	P9	1. Performance against above policies and follow up action	Annually									2. Compliance with statutory requirements of relevance to the principles, and the rectification of any non-compliances	Annually								
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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.	<table border="1"> <thead> <tr> <th></th> <th>P1</th> <th>P2</th> <th>P3</th> <th>P4</th> <th>P5</th> <th>P6</th> <th>P7</th> <th>P8</th> <th>P9</th> </tr> </thead> <tbody> <tr> <td></td> <td colspan="9">No external evaluation was conducted; however, the processes and compliances undergo scrutiny by internal auditors and regulators where applicable. Policies are periodically reviewed and updated by department heads and business leaders, with approval from management and/or the board.</td> </tr> </tbody> </table>										P1	P2	P3	P4	P5	P6	P7	P8	P9		No external evaluation was conducted; however, the processes and compliances undergo scrutiny by internal auditors and regulators where applicable. Policies are periodically reviewed and updated by department heads and business leaders, with approval from management and/or the board.																																																
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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
1. The entity does not consider the principles material to its business (Yes/No)									
2. The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
3. The entity does not have the financial or/human and technical resources available for the task (Yes/No)						Not Applicable			
4. It is planned to be done in the next financial year (Yes/No)									
5. Any other reason (please specify)									

Section C: Principle-wise performance disclosure

This section is intended to assist demonstrating their ability to integrate the principles and core elements into essential processes and decisions. The information needed is divided into ‘Essential’ and ‘Leadership’ categories. While the essential indicators must be given by every institution required to file this report, the leadership indicators may be voluntarily disclosed by entities that desire to be leaders to advance in their drive to be more socially, ecologically, and ethically responsible.

Principle 1: Business 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

S. No.	Segment	Total number of training & awareness programmes held	Topics / principles covered under the training	% Of persons in respective category covered by the awareness programmes
1	Board of Directors	1	All 9 principles have been covered	100%
2	Key Managerial Personnel	1	All 9 principles have been covered	100%
3	Employees other than BOD and KMPs	1	Code of Conduct	96%
4	Workers	663	Occupational Health & Safety Awareness	92%

2. Details of fines / penalties / punishment / award / compounding fees / settlement amount paid in proceedings (by the entity or by its directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions in FY 2024

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ Judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/ No)
Penalty/Fine	1	State Tax Officer, Intelligence, Hosur, Tamil Nadu under Section 74 of the CGST Act, 2017	₹1087227973 (Cumulative)	Non-Payment/reversal of GST on certain items for various years (FY2017- FY2023) as per the GST department.	Yes
Settlement	-	-	-	-	-
Compounding fee	-	-	-	-	-

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

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
Non-Payment/reversal of GST on certain items as per the GST department	The Hon'ble High Court of Madras vide various orders passed on different dates fully or partially set aside the demand orders and remanded back the same to the respective authority.

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

The company is committed to upholding principles of transparency, accountability, and good governance. In addition to the Business Responsibility Policy, the company has implemented a 'Corporate Ethics and Code of Conduct,' which includes directives on Anti-Bribery and Anti-Corruption. The company also has an effective Vigil Mechanism and Whistle Blower Policy in place. This Code of Conduct applies to both directors and employees of the company. Furthermore, the company encourages its suppliers, contractors, NGOs, and others to adhere to similar ethical practices in a fair manner.

5. No of Directors/KMPs/Employees against whom disciplinary action was taken by any law enforcement agency for the charges of bribery / corruption.

Segment	FY 2024	FY 2023
1 Directors	0	0
2 Key Managerial Personnel	0	0
3 Employee	0	0
4 Workers	0	0

6. Details of complaints with regard to conflict of interest

Segment	FY 2024		FY 2023	
	Number	Remarks	Number	Remarks
1	0	0	0	0
2	0	0	0	0

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.

None

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

	FY 24	FY23
Number of days of accounts payables	40	36

9. Open-ness of business

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

Parameter	Metrics	FY 24 (Current Financial Year)	FY 23 (Previous Financial Year)
Concentration of Purchases	a) Purchases from trading houses as % of total purchases	0	0
	b) Number of trading houses where purchases are made from	0	0
	c) Purchases from top 10 trading houses as % of total purchases from trading houses	0	0
Concentration of Sales	a) Sales to dealers / distributors as % of total sales	~90%	~90%
	b) Number of dealers / distributors to whom sales are made	800+	800+
	c) Sales of top 10 dealers / distributors as % of total sales to dealers / distributors	35%	34%
Share of RPTs in	a) Purchases (Purchases with related parties / Total Purchases)	15%	13%
	b) Sales (Sales to related parties / Total Sales)	4%	3%
	c) Loans & advances (Loans & advances given to related parties / Total loans & advances)	100%	100%
	d) Investments in related parties / Total Investments made)	29%	52%

LEADERSHIP INDICATORS

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

Total number of awareness programmes held	Topics / principles covered under the training	% of value chain partners covered (by value of business done with such partners) under the awareness programmes
1	GHG Emission, Supply code of conduct, Human rights	52%

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

The company has established a Code of Conduct for Directors and Senior Management. This code mandates that individuals act in the best interests of the company. It also requires them to ensure that any external business dealings or personal associations do not create conflicts of interest with the company's operations. A conflict of interest occurs when a director or Senior Management member's personal interest, directly or indirectly, through relatives or associates, conflicts or appears to conflict with the company's interests. In such situations, the Director concerned is required to immediately report the same.

For additional information please refer to our Code of Conduct for Board and Senior Management: <https://aplapollo.com/wp-content/uploads/2020/06/Code-of-conduct-for-Members-of-the-Board-and-Senior-Management.pdf>

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.

S. No.	Segment	FY 2024	FY 2023	Details of improvements in environmental and social impacts
1	R&D	(100%) ₹5 Crore	(100%) ₹5 Crore	The Company is working towards energy efficiency, waste management and process optimization.
2	Capex	24%	19%	Investments in renewable energy, zero liquid discharge, rainwater harvesting and improvement of health and safety initiatives.

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

In its vendor onboarding process, the company ensures all vendors are aware of its sustainability standards. Additionally, APL Apollo procures raw materials from MSMEs and local sources.

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

94% of APL Apollo's suppliers (by spend) adhere to SA8000 and ISO 45001 standards.

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) (b) E-waste (c) Hazardous waste and (d) other waste.

	FY24		
	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	At APL Apollo, our commitment to environmental sustainability runs deep. We guarantee that all our process scraps are recyclable, contributing to waste reduction and the promotion of a circular economy. We've partnered with reputable third-party vendors to manage and dispose hazardous waste and E-waste generated from our compounds responsibly. Additionally, treated wastewater is utilized for landscaping purposes within our facilities.		
E-Waste			
Hazardous Waste			
Other Waste			

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.

APL Apollo does not have EPR liability.

LEADERSHIP INDICATORS

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

NIC Code	Name of Product/ Service	% Of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
27152	MS Tubes	66%	The LCA study boundary spans from Cradle to Grave, encompassing raw material extraction, transportation, environmental impact across processing stages, product use, and end-of-life considerations.	Yes	Yes, APL Apollo has publicly reported that it has conducted LCA for its products in its ESG Report 2022-23. Refer to the link below: https://aplapollo.com/images/others/ESG_Annual_Report_22-12-2023.pdf
27152	GI Tubes	5%		Yes	
27152	GP Tubes	3%		Yes	
27152	Pre-painted Alu Zinc Sheets	7%		Yes	
27152	Pre-painted Galvanized Sheets	19%		Yes	

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.

Name of Product/Service	Description of the risk / concern	Action Taken
Our products are of a great circularity nature due to its high recyclability, durability, and longevity. As per the Life Cycle Assessment, none of our products exhibited any kind of social or environmental risks.	Not Applicable	Not Applicable

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2024	FY 2023
Processing of solid waste like steel tube end-cuts, and mild steel craps	3%	3%

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:

	FY 2024			FY 2023		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	NA	NA	NA	NA	NA	NA
E-waste	NA	NA	NA	NA	NA	NA
Hazardous waste	NA	NA	NA	NA	NA	NA
Other Waste	NA	NA	NA	NA	NA	NA

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

Indicate product category

Reclaimed products and their packaging materials as % of total products sold in respective category

At APL Apollo, we are deeply committed to environmental sustainability. As part of our eco-friendly approach, we ensure that 100% of our process scraps are recyclable, reducing waste and promoting a circular economy. Moreover, we have established partnerships with trusted third-party vendors to responsibly manage and dispose of any non-steel materials generated from our facilities. By actively minimizing plastic usage and embracing recycling practices, we strive to create a greener and more sustainable future for generations to come.

100%

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

ESSENTIAL INDICATORS

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

Category	Total (A)	% Of employees covered by									
		Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Employees											
Male	1,152	1,152	100%	-	-	NA	-	-	-	NA	-
Female	23	23	100%	-	-	23	100%	-	-	No Cases	-
Total	1,175	1,175	100%	-	-	23	1.96%	-	-	-	-
Other than Permanent Employees											
Male	-	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Total	-	-	-	-	-	-	-	-	-	-	-

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

Category	Total (A)	% Of workers covered by									
		Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Workers											
Male	1,615	1,615	100%	-	-	NA	-	-	-	NA	-
Female	5	5	100%	-	-	5	100%	-	-	No Cases	-
Total	1,620	1,620	100%	-	-	5	0.31	-	-	-	-
Other than permanent workers											
Male	2,260	2,260	100%	-	-	NA	-	-	-	NA	-
Female	16	16	100%	-	-	16	100%	-	-	No Cases	-
Total	2,276	2,276	100%	-	-	16	0.70	-	-	-	-

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

	FY 24	FY23
Cost incurred on well-being measures as a % of total revenue of the company	0.011%	0.010%

2. Details of retirement benefits for Current and Previous FY

Benefits	FY 2024			FY 2023		
	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%	100%	100%	100%	Y
2 Gratuity	100% as per the gratuity	100% as per the gratuity	We maintain gratuity trust with Kotak Mahindra	100% as per the gratuity eligibility	100% as per the gratuity eligibility	Y
3 ESI	100% as per ESI limit	100% as per ESI limit	Employee State Insurance Corporation	100% as per ESI limit	100% as per ESI limit	Y
4 Others	-	-	-	-	-	Not Applicable

3. Accessibility of workplaces - Are the premises / offices of the entity accessible to differently abled employees, 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.

All our facilities and premises are properly equipped with the necessary amenities to make them accessible for differently abled persons.

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.

The company actively promotes diversity and equal opportunity in all aspects of its business operations, ensuring that employees and workers are not discriminated against based on factors such as caste, gender, religion, or cultural background during recruitment and throughout their employment.

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

Gender	Permanent Employees		Permanent Workers	
	Return to work Rate (%)	Retention Rate (%)	Return to work Rate (%)	Retention Rate (%)
Male	None of the permanent employees and workers have claimed parental leave in FY24.			
Female				
Total				

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

		Yes/No (If yes, then give details of the mechanism in brief)
1	Permanent workers	At APL Apollo, we prioritize the creation of a safe and inclusive workplace for our employees. To ensure transparency and address any concerns, we have implemented a robust vigil mechanism. Our Anti-Sexual Harassment Policy is actively enforced to handle and resolve any grievances in this regard. Additionally, we have a Whistleblower policy in place, outlining the procedure for employees and workers to raise complaints, including the contact details of the Vigilance Officer. We are committed to fostering a culture of respect and providing a confidential platform for employees to voice their concerns, thereby maintaining a harassment-free workplace.
2	Other than Permanent Workers	
3	Permanent Employees	
4	Other than Permanent Employees	

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

Category	FY 2024			FY 2023		
	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	NA	NA	NA	NA	NA	NA
Male	NA	NA	NA	NA	NA	NA
Female	NA	NA	NA	NA	NA	NA
Total Permanent Workers	NA	NA	NA	NA	NA	NA
Male	NA	NA	NA	NA	NA	NA
Female	NA	NA	NA	NA	NA	NA

8. Details of training given to employees and workers

Category	FY 2024					FY 2023				
	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	1,152	-	-	1,152	100%	1176	-	-	1,176	100%
Female	23	-	-	23	100%	22	-	-	22	100%
Total	1,175	-	-	1,175	100%	1198	-	-	1,198	100%
Workers										
Male	1,615	1,615	100%	-	-	3,119	3,119	100%	-	-
Female	5	5	100%	-	-	-	-	-	-	-
Total	1,620	1,620	100%	-	-	3,119	3,119	100%	-	-

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

Category	FY 2024			FY 2023		
	Total (A)	No (B)	% (B/A)	Total (C)	No (D)	% (D/C)
Employees						
Male	1152	890	77.26%	1,176	1,176	100%
Female	23	16	69.57%	22	22	100%
Total	1175	906	77.11%	1,198	1,198	100%
Workers						
Male	1615	1,348	83.47%	3,119	3,119	100%
Female	5	5	100%	-	-	-
Total	1620	1,353	83.52%	3,119	3,119	100%

Note: Employees & workers who joined post 30th September 2023 have not been considered for career development review

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?

At APL Apollo, the well-being and safety of our employees is one of our top priorities. We have established an Occupational Health & Safety policy that complies with ISO 45001 standards, ensuring a strong occupational health and safety management system. This policy includes detailed practices and guidelines designed to promote a secure working environment. We spare no effort in implementing all necessary measures to protect the health and safety of our employees, as we strongly believe that their well-being is of utmost importance. Three out of eleven manufacturing facilities (27%) are certified with ISO 45001 for Occupational Health and Safety.

For more information, kindly refer to our Occupational Health & Safety Policy:

https://aplapollo.com/images/others/OHS_Policy_Draft_APL_Apollo.pdf

The link to our ISO certifications: <https://aplapollo.com/esgs>

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

We hold regular meetings to identify, assess, and effectively mitigate safety and hazard-related issues. These meetings provide a forum for open communication, empowering our team to address potential risks and maintain a safe working environment. Through active participation in these discussions, we demonstrate our dedication to fostering a culture of safety and continually enhancing our workplace conditions.

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

Yes, at APL Apollo, we have a clearly established procedure that enables our employees to report any work-related hazards they come across and to take appropriate steps to remove themselves from such risks. Our Occupational Health & safety policy offers detailed information on this procedure, ensuring that every employee has the necessary knowledge and resources to prioritize their own safety and that of their colleagues. We are dedicated to promoting a culture of proactive hazard reporting and risk reduction, with the well-being of our employees being our top priority in all our operations.

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

We offer access to medical and healthcare facilities for non-work-related issues, ensuring comprehensive healthcare support. We have dedicated ambulances available at our manufacturing locations and have suitable arrangements with local hospitals and clinics. Moreover, we provide health insurance and accident coverage to our employees and workers, ensuring their welfare. Through these initiatives, we showcase our dedication to their overall health and welfare, nurturing a supportive and holistic workplace environment.

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

Safety Incident/Number		Category	FY 2024	FY 2023
1	Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.7	1.1
		Workers	9.3	3.1
2	Total recordable work-related injuries	Employees	15	5
		Workers	64	12
3	No. of fatalities	Employees	0	0
		Workers	0	0
4	High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	2
		Workers	5	4

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

A safety committee, consisting of a safety officer and four members from different departments, conducts regular safety and health inspections at all APL Apollo group facility.

Internal Safety Committee is responsible for the following activities:

- Conduct daily safety rounds.
- Document any unsafe conditions observed during the rounds.
- Provide regular in-house safety training and awareness programs for all employees.
- Plan and conduct mock drills at regular intervals.
- Regularly inspect and monitor all firefighting equipment.
- Hold weekly meetings with the unit head to review the safety standards of the unit.

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

	FY 2024			FY 2023		
	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	Nil	Nil	Nil	Nil
Health & Safety	Nil	Nil	Nil	Nil	Nil	Nil

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	27% of our manufacturing facilities are certified with ISO 45001
Working Conditions	

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.

APL Apollo ensures safety across all its plants through a comprehensive array of measures. This includes prominent safety display boards within the plants, the presence of HIRA sheets outlining division-specific safety protocols, and the implementation of action plans in each division to mitigate near-miss hazards. Additionally, before and after safety Kaizen work is conducted, assembly points and fire extinguishers are visibly marked, and safety education and training programs are regularly conducted. The audit teams ensure ongoing evaluation and improvement of safety standards, complemented by daily toolbox talks and audio-visual presentations on safety guidelines. Barricades are strategically placed near heavy machinery, and the mandatory use of personal protective equipment is enforced. New employees undergo thorough safety inductions, while continuous

monitoring is facilitated through CCTV surveillance and supervision by security personnel. Furthermore, all movable machinery is equipped with sensors to halt operations in the event of human proximity. Recognition and reward systems incentivize adherence to safety protocols. Internal infrastructure enhancements such as speed breakers further contribute to accident prevention, and strict compliance requirements for third-party contractors ensure insurance and ESIC standards are met for any work conducted within the 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) (B) Workers (Y/N)?

Employees: Yes

Workers: No

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

The agreements with our value chain partners include clauses that ensure statutory dues are regularly deducted and deposited. We closely monitor adherence to these clauses.

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

	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 2024	FY 2023	FY 2024	FY 2023
Employees	NIL	2	NIL	NIL
Workers	7	4	NIL	NIL

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)

The company consistently invests in developing its human capital, focusing on enhancing current skills, competencies, and providing diverse experiences to employees. This approach not only boosts workforce employability but also facilitates a seamless transition to new opportunities if desired.

Regarding the gratuity scheme, it entails a lump sum payment to vested employees upon retirement, death, or termination of employment. The payment is equivalent to 15 days' salary for each completed year of service or part thereof exceeding 6 months. Vesting occurs after completing 5 years of service.

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	Tata Steel and JSW account for 94% of our upstream value chain. All of Tata Steel's manufacturing sites are certified with ISO 45001, while 54% of JSW's facilities have obtained this certification.
Working Conditions	Tata Steel is certified with SA 8000 and JSW is partially certified with SA 8000

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.

APL Apollo has implemented various measures to mitigate major risks and concerns identified in evaluations of health and safety practices and working conditions among its value chain partners. The company actively engages with suppliers to enhance their sustainability practices by providing them with improvement opportunities, particularly focusing on those categorized as 'Basic' and 'Improving' in the Responsible Supply Chain Policy assessment. These efforts involve outlining specific follow-up actions to drive positive change.

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.

Key stakeholders are identified based on their influence and impact on the company's operations. The company conducted a materiality assessment, gathering opinions from both external and internal stakeholders through online and offline surveys.

In the initial stage of this process, internal stakeholders were classified as employees, while external stakeholders were categorized as investors and shareholders, suppliers/partners, and customers/dealers. Additionally, the company selected community groups to receive resources in the form of CSR projects, aiming to promote community welfare.

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

Stakeholder group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, A/Wvertisement, 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
Shareholders & Investors	No	Investor calls, analyst meets and general meetings	Quarterly/Annually/ As or when required	<ol style="list-style-type: none"> 1. Transparent and effective communication of business performance 2. Addressing investor queries and concerns 3. Sound corporate governance mechanisms 4. Providing insights into the Company's corporate strategy and business environment
Employees	No	Employee engagement initiatives, continuous interaction with management, appraisals, grievance redressal mechanism	Regularly (weekly/ monthly)	<ol style="list-style-type: none"> 1. Personal development and growth 2. Health and safety 3. Grievance resolution 4. Competitive remuneration
Suppliers/ Partners	No	Regular meetings with key suppliers by senior management, supplier visits, suppliers' meet, supplier tour of manufacturing facilities	Quarterly/Half yearly	<ol style="list-style-type: none"> 1. Infrastructure support 2. Interactive engagement 3. Inclusion of local and MSME vendors
Customers/ Dealer	No	Regional meets, visits to dealers, need-based visits, Customer meets, Customer visits by the marketing team and senior management	Quarterly	<ol style="list-style-type: none"> 1. Grievance redressal 2. Product quality 3. post-sales support
Community	Yes	Need-based assessment surveys, community visits by company management, periodic cultural meets	As per regulatory requirements and as per needs	<ol style="list-style-type: none"> 1. Public hearings 2. Meetings with community leaders

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.

APL Apollo's Stakeholder Engagement policy is covered under its Business Responsibility Policy. The company emphasizes the importance of an effective stakeholder engagement system in achieving long-term sustainability goals and overall company success.

The board has delegated the responsibility of gathering valuable inputs from key internal and external stakeholders. In the financial year 2022, the company conducted a comprehensive materiality assessment and stakeholder engagement process to gain a deeper understanding of critical environmental, social, and governance (ESG) concerns relevant to its operations.

As part of this process, the company interacted with key internal and external stakeholders to comprehend their challenges and incorporate their perspectives into materiality assessments, which helped prioritize ESG concerns. Insights from stakeholder engagement were analyzed to develop the materiality matrix and finalize the list of ESG priority areas and take targets against them.

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

The company consistently engages with its key stakeholders in a regular and proactive manner, enabling it to effectively execute its ESG strategies and maintain transparency regarding the outcomes. In line with current needs and stakeholder interactions, the company conducts periodic assessments to update and revise its policies.

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

The company actively supports and responds to underprivileged, vulnerable, and marginalized groups in society. As part of its CSR efforts, it addresses the needs of the poor and disadvantaged directly or through local NGOs. In FY 24, the company invested 13 Crore INR in initiatives aimed at uplifting people.

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 2024			FY 2023		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
Employees						
Permanent	1,175	1,175	100%	1,198	1,198	100%
Other than permanent	0	0	NA	0	0	0
Total employees	1,175	1,175	100%	1,198	1,198	100%
Workers						
Permanent	1,620	1,620	100%	1,389	1,389	100%
Other than permanent	2,276	2,276	100%	1,730	1,730	100%
Total workers	3,896	3,896	100%	3,119	3,119	100%

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

Category	FY 2024					FY 2023				
	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										
Male	1,152	9	1%	1,143	99%	1,176	0	0	1,176	100%
Female	23	-	-	23	100%	22	0	0	22	100%
Other than permanent										
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Workers										
Permanent										
Male	1,615	167	10%	1448	90%	1,389	-	-	1,389	100%
Female	5	2	40%	3	60%	0	0	0	0	0
Other than permanent										
Male	2,260	180	8%	2080	92%	1,730	-	-	1,730	100%
Female	16	4	25%	12	75%	0	0	0	0	0

3. Details of remuneration/salary/wages

a) Median remuneration / wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	5	₹3,00,00,000	-	-
Key Managerial Personnel	4	₹36,50,000	-	-
Employees other than BoD and KMP	1,110	₹5,06,352	20	₹5,45,010
Workers	3,802	₹2,95,116	21	₹2,34,552

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

	FY24	FY23
Gross wages paid to females as % of total wages	1.7%	1.0%

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)

APL Apollo has appointed a dedicated Vigilance Officer and an Internal Complaints Committee responsible for addressing and managing all matters related to human rights. This officer ensures that grievances are promptly, impartially, and confidentially addressed. APL Apollo prioritizes the creation of a safe and inclusive work environment where the rights of every employee are respected, and any concerns are resolved promptly and effectively.

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

As per the Human Rights Policy, all grievances are addressed following the mechanism outlined in the Whistleblower Policy. The Chairman of the Audit Committee forwards Protected Disclosures to the Vigilance Officer for necessary action. The Vigilance Officer conducts investigations, involving other officers, committees, or external agencies if needed, and submits a report to the Audit Committee within 60 days, with the option to request an extension. The Audit Committee may seek further information, involve additional officers or agencies, and treat the investigation as a neutral fact-finding process.

If wrongdoing is found, the Audit Committee recommends disciplinary action to the Board. Disciplinary actions adhere to the Company's personnel conduct and disciplinary policies. The Audit Committee reports all Protected Disclosures and investigation results quarterly to the Board. Confidentiality is maintained throughout the process, and complainants are protected from unfair treatment and retaliation.

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

	FY 2024			FY 2023		
	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	NIL	NIL	NA	NIL	NIL	NA
Discrimination at workplace	NIL	NIL	NA	NIL	NIL	NA
Child Labour	NIL	NIL	NA	NIL	NIL	NA
Forced Labour/ Involuntary Labour	NIL	NIL	NA	NIL	NIL	NA
Wages	NIL	NIL	NA	NIL	NIL	NA
Other human rights related issues	NIL	NIL	NA	NIL	NIL	NA

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

	FY24	FY23
Total complaints reported under Sexual Harassment on Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	NIL	NIL
Complaints on POSH as a % of female employees / workers	NIL	NIL
Complaints on POSH upheld	Not Applicable	Not Applicable

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

APL Apollo's Whistleblower policy and Prevention of Sexual Harassment policy outlines guidelines, processes, procedures, and forums for reporting, hearing, and resolving complaints related to sexual harassment and discrimination. These complaints are reviewed by the Vigilance Officer designated by the Company's management.

Our policies ensures that no unfair treatment is given to a complainant for reporting a disclosure under this policy. Adequate safeguards are provided against unfair employment practices, such as retaliation, threats, intimidation, or obstruction of the complainant's duties/functions. Any violation of these safeguards can be reported to the Chairman of the Audit Committee, who may initiate an investigation and take suitable disciplinary action.

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

Yes, human rights are a fundamental component of the company's business agreements and contracts. The company is dedicated to safeguarding and promoting the human rights of its workforce, communities, and all individuals directly or indirectly impacted by its business activities.

10. Assessments for the year

Section	% Of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Sexual Harassment	APL Apollo is committed to health and safety, demonstrated by its recent UNGC membership and its dedication to providing a safe workplace. The company also upholds a human rights policy that ensures zero tolerance for discrimination, child labor, forced labor, and sexual harassment.
Discrimination at workplace	
Child Labour	
Forced Labour/ Involuntary Labour	
Wages	

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

APL Apollo rigorously examines its business operations to pinpoint any risks concerning human rights. Our company's human rights policy guarantees that none of our activities involve forced or child labor, and we maintain a strict stance against all forms of sexual harassment and discrimination.

LEADERSHIP INDICATORS

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

APL Apollo upholds the principle of Human Rights in all its business ventures. In FY24, there have been no significant complaints or grievances related to human rights issues.

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

APL Apollo has strict measures in place to ensure Human Rights are not violated in its operations however, the company is gearing up to conduct a thorough Human Rights due diligence in the following financial years.

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

Yes, all the premises and facilities of APL Apollo are equipped with necessary amenities to ensure accessibility for differently abled visitors.

4. Details on assessment of value chain partners:

	% Of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	Tata Steel and JSW account for 94% of our upstream value chain.
Discrimination at workplace	Tata Steel is certified with SA 8000 and is committed to conduct human rights due diligence in FY 24 in accordance with OECD guidelines. Meanwhile, JSW is partially certified with SA 8000.
Child Labour	
Forced Labour/Involuntary Labour	
Wages	

5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.

Not Applicable

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

ESSENTIAL INDICATORS

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

Parameter	FY24	FY23
From renewable sources		
Total electricity consumption (A) (GJ)	206,748	178,626
Total fuel consumption (B) (GJ)	-	-
Energy consumption through other sources (c) (GJ)	-	-
Total energy consumed from renewable sources (A+B+C) (GJ)	206,748	178,626
From non-renewable sources		
Total electricity consumption (D) (GJ)	525,319	301,368
Total fuel consumption (E) (GJ)	662,510	445,173
Energy consumption through other sources (F) (GJ)	181,323	-
Total energy consumed from non-renewable sources (D+E+F) (GJ)	1,369,152	746,541
Total energy consumed (A+B+C+D+E+F) (GJ)	1,575,900	925,167
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations) (GJ/INR Crore)	87	57.2
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP) GJ/USD Million	194.8	126.9
Energy intensity in terms of physical Output (GJ/ Mn MT)	0.6	0.4
Energy intensity (optional) – the relevant metric may be selected by the entity		

We commissioned our new Raipur plant in FY2023 and have gradually increased production at the plant. In FY25, we are in the process of identifying strategies to increase the share of renewable energy in the plant. Apart from this plant, share of renewable energy consumed by all our other plants is 41%

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, Our Energy consumption data has been assured by a third party. Name of assurance provided- Sustainability Actions Private Limited.

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

Not Applicable

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

Parameter	FY24	FY23
Water withdrawal by source (in kiloliters)		
(i) Surface water	89,807	0
(ii) Groundwater	419,315	458,919
(iii) Third party water	46,946	130,942
(iv) Seawater / desalinated water		
(v) Others		
Total volume of water withdrawal (In kiloliters) (i + ii + iii + iv + v)	556,068	589,861
Total volume of water consumption (In kiloliters)	556,068	589,861
Water intensity per rupee of turnover (Total water consumption / Revenue from operations) (KL/INR Crore)	30.7	36.48
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP) KL/USD Million	68.7	80.9
Water intensity in terms of physical Output (KL/ Mn MT)	0.2	0.3
Water intensity (optional) – the relevant metric may be selected by the entity		

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, Our water consumption data has been assured by a third party. Name of assurance provided- Sustainability Actions Private Limited.

4. Provide the following details related to water discharge:

Parameter	FY24	FY23
Water discharge by destination and level of treatment (in kiloliters)		
(i) To Surface water		
- No treatment	0	0
- With treatment – please specify level of treatment	0	31,033
(ii) To Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	85,035	14,967
(iii) To Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third parties		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(v) Others		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
Total water discharged (in kiloliters)	85,035	46,000

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, Our water consumption data has been assured by a third party. Name of assurance provided- Sustainability Actions Private Limited.

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

Yes, four out of eleven plants currently have zero liquid discharge facilities, and the remaining plants are in an advanced stage of implementation. Our objective is to have Zero Liquid Discharge facilities operational in all our plants by 2025.

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

Parameter	Please specify unit	FY 2024	FY 2023
NOx	µg/m ³	43	3.9
Sox	µg/m ³	39	2.6
Particulate matter (PM)	µg/m ³	45.9	-
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Others- please specify	-	-	-

Note: Unit of measurement for FY23 air emissions was Metric Tonne (MT)

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

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

Parameter	Please specify units	FY 2024	FY 2023
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	52,852	29,260
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	101,830	59,436
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tons of CO ₂ equivalent/INR Crore	8.5	5.5
Total Scope 1 and Scope 2 emission intensity per rupee turnover adjusted for Purchasing Power Parity (PPP) (Total scope 1 and scope 2 GHG emissions / revenue from operations adjusted for PPP)	Metric Tonne CO ₂ /USD Million	19	12.2
Total Scope 1 and Scope 2 emission intensity in terms of physical output	Metric Tonnes CO ₂ / Mn MT	0.06	0.04
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-

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, Our Scope 1 and Scope 2 Emissions data has been assured by a third party. Name of assurance provided- Sustainability Actions Private Limited.

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

72% of APL Apollo's plant have access to renewable energy. In FY24, the total energy consumption from renewable sources was 206,748 GJ which is a 16% increase from renewable energy consumption in FY23. Additionally, APL Apollo has signed a Power Purchase Agreement with BluPine Energy for a 61.65-megawatt solar plant in Chattisgarh. This project is estimated to generate about 94.5 million units of electricity annually, which will offset more than 87,000 tonne of CO₂ emissions each year.

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

Parameter	FY24	FY23
Total Waste generated (in metric tonnes)		
Plastic waste (A)	6,501	37,610
E-waste (B)	24	2,050
Bio-medical waste (C)		
Construction and demolition waste (D)		
Battery waste (E)	0.41	
Radioactive waste (F)		
Other Hazardous waste. Please specify, if any. (G)	7,997	8,090
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector)	99,528	55,150
Total (A+B + C + D + E + F + G + H)	114,050	102,900
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	6.3	6.4

Parameter	FY24	FY23
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) Metric Tonnes/USD Million	14.1	14.1
Waste intensity in terms of physical output (Metric Tonnes/ Mn MT)	0.04	0.05
Waste intensity (optional) – the relevant metric may be selected by the entity		
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	102,769	22,790
(ii) Re-used	3,244	24,960
(iii) Other recovery operations	2	
Total	106,015	47,750
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	7,997	
(ii) Landfilling	38	
(iii) Other disposal operations		55,150
Total	8,035	55,150

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, Our waste data has been assured by a third party. Name of assurance provided- Sustainability Actions Private Limited.

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.

Liquid non-hazardous waste produced at the Sewage Treatment Plant (STP) is repurposed to sustain green areas, while hazardous waste is carefully segregated and stored in secure, manned facilities. APL Apollo adheres strictly to the Hazardous Waste and other Waste Rules of 2016, ensuring that hazardous waste is disposed of responsibly through authorized vendors.

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, 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.
	None of APL Apollo's facilities are located near the vicinity of ecologically sensitive areas.		

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Not Applicable					

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 non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken if any
	APL Apollo has been compliant to all environmental regulations and guidelines in India hence, this question is not applicable to the company.			

LEADERSHIP INDICATORS

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

- Name of the area:** According to Central Groundwater Board APL Apollo's plants located in Hyderabad, Sikandrabad, and Bangalore are in zones where groundwater has been overexploited.
- Nature of operations:** Manufacturing & Selling of Structural Steel tubes
- Water withdrawal, consumption, and discharge in the following format:**

Parameter	FY24	FY23
Water withdrawal by source (in kiloliters)		
(i) Surface water	-	-
(ii) Groundwater	225,087	199,302
(iii) Third party water	10,527	38,187
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kiloliters)	235,614	237,489
Total volume of water consumption (In kiloliters)	235,614	237,489
Water intensity per rupee of turnover (Water consumed / turnover) (KL/INR Crore)	13	14.7
Water intensity (optional) – the relevant metric may be selected by the entity	-	-
Water discharge by destination and level of treatment (in kiloliters)		
(i) Into Surface water		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(ii) Into Groundwater		
- No treatment	-	-
- With treatment – please specify level of treatment	33,063	-
(iii) Into Seawater		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iv) Sent to third parties		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(v) Others		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
Total water discharged (in kiloliters)	33,063	-

Note: The total water withdrawal exceeds the total water discharged significantly. Out of the 5 plants located in water-stressed regions, 1 plant of APL Apollo, situated in Bangalore, have implemented zero liquid discharge facilities.

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.

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

Parameter	Unit	FY24	FY23
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	1,178,908	47,535
Total Scope 3 emissions per rupee of turnover	Metric tons of CO ₂ equivalent/INR Crore	65.06	2.9
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity		-	-

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

3. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not Applicable

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

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Direct Forming Technology (DFT)	45% of APL Apollo plants employs this cutting-edge technology for manufacturing, employing a fully computerized process. DFT represents a novel method for tube production, enabling the creation of custom hollow sections seamlessly integrated into the mill range without requiring roll modification. Refer to the link below for further details on this technology: https://aplapollo.com/products/structural-steel-tubes-apollo-dft	The benefits of the technology are as follows: <ul style="list-style-type: none"> This innovation allows for the production of any size within the mill range without the need for roll changes, leading to a significant decrease in setup time. This technology enables us to maintain uniform width throughout the tube/pipe.

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

Yes, APL Apollo has a Business Continuity Plan which is incorporated within the company's Risk Management Policy. As per the plan, the Risk Management Committee shall ensure that APL Apollo lays down a strategy to safeguard company's assets, human resources, business partners and business processes during a natural calamity. Refer to our risk management policy for further details: https://aplapollo.com/images/others/Risk_Management_Policy.pdf

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

At APL Apollo, we closely monitor the business operations of our value chain partners and ensure they abide by our work ethics and practices. So far, all our value chain partners have been compliant to law and order and there have been no adverse impact to the environment.

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

Tata Steel and JSW account for 94% of our upstream value chain. JSW and TATA Steel's plants are certified under ISO 14001. Both of our major suppliers have implemented all the necessary environmental policies companywide to ensure sustainable business practices and protection to the environment.

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: 2
- b. List the top 10 trade and industry chambers / associations (determined based on the total members of such a 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	CII (Confederation of Indian Industry)	National
2	FIEO (Federation of Indian Export Organization)	National

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

Name of Authority	Brief of the case	Corrective action taken
In Financial year 2024, APL Apollo did not display any kind of anticompetitive conduct hence, this question is not applicable to the company.		

LEADERSHIP INDICATORS

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

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
Not Applicable					

Principle 8: Businesses should promote inclusive growth and equitable development.

ESSENTIAL INDICATORS

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current FY 24

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
NIL					

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

S.No	Name of project for which R&R is ongoing	State	District	No. of project affected families (PAFs)	% Of PAFs covered by R&R	Amounts paid to PAFs in the FY (in ₹)
NIL						

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

APL Apollo Tubes Limited demonstrates a strong commitment to community engagement and welfare through its customized grievance redressal mechanisms. These mechanisms are tailored to the specific needs and nuances of each location where the company operates, ensuring they are not only effective but also sensitive to local concerns. This approach highlights APL Apollo's dedication to understanding and addressing the unique challenges and expectations of the communities in which it operates, fostering trust and sustainable relationships.

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

Category of waste	FY 2024	FY 2023
Directly sourced from MSMEs/ small producers	2%	2%
Directly from within India	97%	98%

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	FY24	FY23
Rural	37.24%	33.52%
Semi-Urban	-	-
Urban	40.45%	44.29%
Metropolitan	22.31%	22.19%

LEADERSHIP INDICATORS

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

Details of negative social impact identified	Corrective action taken
NIL	

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

S. No	State	Aspirational District	Amount Spent (in ₹)
NIL			

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

At APL Apollo, we are working towards implementing a preferential procurement policy in order to uplift marginalized suppliers.

b. From which marginalized /vulnerable groups do you procure? Not Applicable

c. What percentage of total procurement (by value) does it constitute? Not Applicable

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

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
NIL				

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

Name of authority	Brief of the Case	Corrective action taken
	NIL	

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% Of beneficiaries from vulnerable and marginalized groups
1.	Aarohi: It's a program focused on skill development for women, offering training in areas like beauty parlors, nutrition, and other tailored skills to empower them to secure their livelihoods.	280	100%
2.	Shikshana Pragati: Improved the basic infrastructure of Junior Primary school in the identified villages to make it safer for students and teachers to ensure student retention & a good learning experience for children	300	100%
3.	Karuna: In collaboration with Noida authority, APL Apollo has conducted Anti-Rabies vaccination drives for stray dogs in the locality.	11,650	100%
4.	Vidya Jyoti-I Kesda: Provision of teachers at Govt Higher Secondary School in Kesda Village to cover/complete the pending syllabus so children don't waste an academic year.	525	100%
5.	Samuday Bhawan I in Ringni and Mahila Shakti Bhawan- Kesda: A community room has been built in Ringni and Kesda village to facilitate vocational training for women and other residents. This space is available for use by both the Government and APL Apollo for training sessions. Additionally, APL Apollo has future plans to maintain an orchard around the Bhawan.	4,000	100%
6.	Ujjwal - I in Ringni & Kesda: The localities of Ringni and Kesda have struggled with crime due to inadequate street lighting, posing a significant danger, especially at night. Recognizing this issue, the village Sar Panch APL Apollo for assistance. In response, APL Apollo initiated a street lighting project, installing LED lights throughout the villages to improve safety and security.	7,175	100%
7.	Umeed: The underprivileged community has faced challenges in affording medical treatments for their terminal illnesses. In response to this distressing situation, APL Apollo has identified individuals in need of treatment and assisted them in accessing it.	5	100%

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.

Our consumer-centric approach considers consumer complaints as opportunities to enhance consumer expectations and create more value with each subsequent supply. APL Apollo's complaint management process has evolved over the years to adapt to changing consumer expectations regarding complaint acknowledgment and resolution. Any dissatisfaction expressed by consumers regarding APL Apollo's products and services is treated as a complaint and is managed through a SAP-based consumer complaint management system.

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

State	As a percentage to total turnover
Environmental and social parameters relevant to the product	Environmental and social parameters relevant to the products are available on our website: https://aplapollo.com/
Safe and responsible usage	Environmental and social parameters relevant to the products are available on our website: https://aplapollo.com/
Recycling and/or safe disposal	APL Apollo produces steel products that have a long lifespan and do not require frequent recycling. However, our products are fully recyclable. Moreover, the majority of our waste consists of metal scrap, which is sold to authorized vendors who are responsible for its recycling.

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

	FY 2024			FY 2023		
	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	Not Applicable	0	0	Not Applicable
Advertising	0	0	Not Applicable	0	0	Not Applicable
Cyber-security	0	0	Not Applicable	0	0	Not Applicable
Delivery of essential services	0	0	Not Applicable	54	0	All complaints were resolved
Restrictive trade practices	0	0	Not Applicable	0	0	Not Applicable
Unfair trade practices	0	0	Not Applicable	0	0	Not Applicable
Others	45	0	All complaints were resolved	0	0	Not Applicable

Note: All complaints were related to products & services

4. Details of instances of product recalls on accounts of safety issues

	Number	Reason for recall
Voluntary recalls	Nil	Not Applicable
Forced recalls	Nil	Not Applicable

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.

APL Apollo has a companywide cyber security policy which is available on the company's intranet. Furthermore, APL Apollo is making substantial efforts to strengthen its information security measures by aligning its practices with international standards. It is on the verge of obtaining official certification with ISO 27001.

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

Not Applicable

7. Provide the following information relating to data breaches:

- a. **Number of instances of data breaches:** No breaches reported in FY24.
- b. **Percentage of data breaches involving personally identifiable information of customers:** Not Applicable
- c. **Impact, if any, of the data breaches:** Not Applicable

LEADERSHIP INDICATORS

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

Details about APL Apollo's products and services can be found on this link <https://aplapollo.com/>

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

At APL Apollo, we consistently solicit feedback and diligently address customer grievances, ensuring that every effort is made to keep our customers informed about the responsible use of our products.

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

At APL Apollo, we notify our customers of any disruptions or discontinuations through our website.

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

We follow the laws and regulations pertaining to the display of product information on the product. Furthermore, we take customer feedback seriously and make every effort to implement it into our business processes.

To,
The Board,
APL Apollo Tubes Limited
SG Centre, 37C, Block A, Sector 132,
Noida, Uttar Pradesh - 201304

Independent Assurance Statement

Scope and Approach

Sustainability Actions Private Limited ("SAPL") has been engaged by management of APL Apollo Tubes Limited ("APL" or "the Company"), to perform an independent reasonable assurance engagement of the Company's Business Responsibility and Sustainability Report (BRSR) Core Matrices (refer to annexure 1) for the FY23-24.

Reporting Criteria

The Report is prepared based on BRSR Core Framework (Annexure I of the SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/CIR2023/122 dated July 12, 2023 and "Guidance Note for Business Responsibility and Sustainability Reporting Format" by Securities and Exchange Board of India (SEBI)

Management Responsibilities

The Company's Management is responsible for identification of key aspects,, content and presentation of the Business Responsibility and Sustainability Report in accordance with the Criteria mentioned above. This responsibility includes the design, implementation and maintenance of internal control relevant to the preparation of the Business Responsibility and Sustainability Report and measurement of BRSR Core Matrices which are free from material misstatement, whether due to fraud or error.

Independence and Quality Control

We are independent from the entity in accordance with the requirements of independence and quality assurance set out in BRSR provisions and professional pronouncements and have fulfilled our additional professional obligations in accordance with these requirements.

Our assurance engagements are based on the assumption that the data and information provided by the Company to us as part of our review have been provided in good faith and free from material misstatements. We were not involved in the preparation of any statements or data included in the report except for Assurance Statement.

Our firm applies International Standard on Quality Management and accordingly maintains a comprehensive system of quality

control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our Responsibility

Our responsibility is to express a reasonable assurance conclusion on the BRSR Core Matrices, based on the procedures we have performed and the evidence we have obtained. We conducted our engagement in accordance with the International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ('ISAE 3000'), and the terms of reference for this engagement as agreed with APL. Those standards require that we plan and perform our engagement to obtain reasonable assurance about whether, in all material respects, the Subject Matter is presented in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

Basis of our Opinion

We planned and performed our work to obtain the evidence we considered necessary to provide a basis for our assurance opinion and the process did not involve engagement with external stakeholders. We carried out one-to-one discussions, onsite and remote assessments.

As part of our assurance process, a multi-disciplinary team of sustainability and assurance specialists reviewed the disclosures presented within the Report and referenced information and sampled the disclosures and were reviewed through the APL's customised sustainability information management system.

We undertook the following activities:

- Obtained an understanding of the BRSR core matrices ;
- Interviewed selected senior managers responsible for management of sustainability topics and reviewed selected evidences to support issues disclosed in

the Report. We were free to choose interviewees and interviewed those with overall responsibility to deliver APL's Sustainability objectives;

- Reviewed processes and systems for aggregating site level sustainability information, that is, reviewed sustainability disclosures for selected sites as well as the overall data aggregated and consolidated at the Corporate level from the Company's sustainability management system;
- Review of the processes for gathering and consolidating the selected performance data related to identified material topics and, for a sample, checking the data consolidation in context under the Principle of Completeness.

Based on the above understanding and the risks that the matrices may be materially misstated, determined the nature, timing and the extent of further procedures, reviewed records and performed testing including recalculation of sample data to establish an audit trail.

Opinion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the company's identified sustainability criteria as per BRSR core framework (refer to annexure 1) for the year ended 31st March 2024 are not prepared, in all material respects, in accordance with the Reporting Criteria.

Inherent Limitations

We have relied on the information, documents, records, data, and explanations provided to us by the Company for the purpose of our review. The assurance scope excludes:

- Any disclosure other than those mentioned in the scope section above

- Data and information outside the defined reporting period
- Data related to Company's financial performance, strategy and other related linkages expressed in the Report.
- The reported financial data are based on audited financial statements issued by the Company's statutory auditors which is subject to a separate audit process. We were not involved in the review of financial data from the Annual Report.
- The Company's statements that describe expression of opinion, belief, aspiration, expectation, forward looking statements provided by the Company and assertions related to Intellectual Property Rights and other competitive issues.
- Mapping of the Report with reporting frameworks other than those mentioned in Reporting Criteria above.
- While we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls.
- The procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

For and behalf of Sustainability Actions Pvt. Ltd.

(CIN – U74999HR2021PTC093811)

Saket Sinha

(Director)

Dt:- 9th May'24

Gurgaon, India

Annexure – 1

BRSR Core attributes

	BRSR Indicator	Type of Assurance
P1 E8	Number of days of accounts payable	Reasonable
P1 E9	Concentration of purchases & sales done with trading houses, dealers and related parties Loans and advances & investments with related parties	Reasonable
P3 E1c	Spending on measures towards well-being of employees and workers – cost incurred as a % of total revenue of the company	Reasonable
P3 E11	Details of safety related incidents including lost time injury frequency rate, recordable work-related injuries, no. of fatalities	Reasonable
P5 E3b	Gross wages paid to females as % of wages paid	Reasonable
P5 E7	Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, including complaints reported, complaints as a % of female employees and complaints upheld	Reasonable
P6 E1	Details of total energy consumption (in Joules or multiples)	Reasonable
P6 E1	Details of total energy intensity	Reasonable
P6 E3	Provide details of water withdrawal by source	Reasonable
P6 E3	Provide details of water consumption	Reasonable
P6 E4	Provide details of water discharged	Reasonable
P6 E6	Details of Air Emissions (Other than GHG emissions)	Reasonable
P6 E7	Provide details of greenhouse gas emissions (Scope 1)	Reasonable
P6 E7	Provide details of greenhouse gas emissions (Scope 2)	Reasonable
P6 E7	Provide details of greenhouse gas emissions (Scope 1 and Scope 2) intensity	Reasonable
P6 E9	Provide details related to waste generated by category of waste	Reasonable
P6 E9	Provide details related to waste recovered through recycling, re-using or other recovery operations	Reasonable
P6 E9	Provide details related to waste disposed by nature of disposal method	Reasonable
P8 E4	Input material sourced from following sources as % of total purchases – Directly sourced from MSMEs/ small producers and from within India	Reasonable
P8 E5	Job creation in smaller towns	Reasonable
P9 E7	Instances involving loss/breach of data of customers as a percentage of total data breaches or cyber security events	Reasonable