

To, प्रबंधक/The Manager बीएसई लिमिटेड/BSE Limited, फीरोज जीजीभोय टावर्स/ Phiroj Jeejeebhoy Towers, दलाल स्ट्रीट/Dalal Street, मुम्बई/MUMBAI- 400 001 स्क्रिप कोड/Scrip Code: 532234	To, प्रबंधक/The Manager अनुसूचन विभाग/Listing Department नेशनल स्टॉक एक्सचेंज ऑफ इंडिया लि., National Stock Exchange of India Ltd., एक्सचेंज प्लाजा, बांद्रा-कुर्ला कम्प्लेक्स, Exchange Plaza, Bandra-Kurla Complex, बांद्रा ईस्ट/Bandra East, मुम्बई/ MUMBAI-400 051 प्रतीक/Symbol: NATIONALUM
--	---

**विषय/ वित्तीय वर्ष 2024-25 के लिए व्यावसायिक उत्तरदायित्व और स्थिरता रिपोर्ट।**

**Sub: Business Responsibility and Sustainability Report for the financial year 2024-25.**

महोदय/Dear Sir,

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, enclosed please find the Business Responsibility and Sustainability Report for the financial year 2024-25. The said report also forms part of the Annual Report for the financial year 2024-25, submitted to the Stock Exchanges vide our letter dated 02.09.2025.

This is for your information and record/ आपकी जानकारी और अभिलेख हेतु।

Thanking you/ धन्यवाद

भवदीय/Yours faithfully,  
कृते नेशनल एल्यूमिनियम कंपनी लिमिटेड  
For National Aluminium Co. Ltd.  
Bharat  
Kumar Sahu  
(बी. के. साहू)/(B. K. Sahu)  
कंपनी सचिव और अनुपालन अधिकारी /  
Company Secretary & Compliance Officer  
ACS: 9953

Digitally signed by  
Bharat Kumar Sahu  
Date: 2025.09.02  
18:08:19 +05'30'

Encl.: As above

नेशनल एल्यूमिनियम कम्पनी लिमिटेड  
(भारत सरकार का उद्यम)  
निगम कार्यालय  
नालको भवन, नयापल्ली, भुवनेश्वर - 751 013 भारत

National Aluminium Company Limited  
(A Government of India Enterprise)  
REGD. & CORPORATE OFFICE  
Nalco Bhawan, Nayapalli, Bhubaneswar-751013, India

CIN # L27203OR1981GOI000920

Tel.:0674-2301988-999, Ext.:2265, 2266, 2267, 2585, 2587, E-mail:company\_secretary@nalcoindia.co.in,Website:www.nalcoindia.com

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT FOR 2024-25

### SECTION A: GENERAL DISCLOSURES

#### I. Details of the listed entity

- 1 Corporate Identity Number (CIN) of the Listed Entity: L27203OR1981GOI000920
- 2 Name of the Listed Entity: National Aluminium Company Limited
- 3 Year of incorporation: 07<sup>th</sup> January 1981
- 4 Registered office address: NALCO BHAWAN,  
Plot No. P/1, Nayapalli,  
Bhubaneswar -751013, Odisha, India
- 5 Corporate address: NALCO BHAWAN,  
Plot No. P/1, Nayapalli,  
Bhubaneswar -751013, Odisha, India
- 6 E-mail: [company\\_secretary@nalcoindia.co.in](mailto:company_secretary@nalcoindia.co.in)
- 7 Telephone: (0674) 2301988-2301999
- 8 Website: <https://www.nalcoindia.com>
- 9 Financial year for which reporting is being done: 2024-25
- 10 Name of the Stock Exchange(s) where shares are listed:
  1. National Stock Exchange of India Ltd  
(Scrip Code: NATIONALUM)
  2. BSE Limited  
(Scrip Code: 532234)
- 11 Paid-up Capital: ₹ 918.32 crores
- 12 Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:
 

Name: Shri Pankaj Kumar Sharma  
Director (Production)  
Telephone: 0674-2300660  
email id: [dirprod@nalcoindia.co.in](mailto:dirprod@nalcoindia.co.in)  
Standalone
- 13 Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together):
- 14 Name of assurance provider: TUV SUD South Asia Pvt Ltd
- 15 Type of assurance obtained: Reasonable Assurance on BRSR CORE

#### II. Products/services:

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Mining & Quarrying	Other Mining & Quarrying Activities	33.57 %
2	Manufacturing	Metal and metal products	66.27 %

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

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Aluminium products	24202	66.27 %
2	Alumina products	20119	33.57 %

### III. Operations:

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

Location	Number of plants	Number of offices	Total
National***	5*	6**	11
International	0	0	0

\* Plant sites- Bauxite Mines- Damanjodi, Alumina Refinery-Damanjodi, Aluminium Smelter- Angul, Captive power Plant- Angul. Utkal D&E Coal Mines- Angul.

\*\*Offices: Corporate Offices – Bhubaneswar, Regional Offices- New Delhi, Mumbai, Chennai, Kolkata, Port offices at Visakhapatnam.

\*\*\* There are Wind Power Units at locations: Gandikotta (AP), Luderva at Jaisalmer, Devikot at Jaisalmer, Sangli (Maharashtra)

#### 19. Markets served by the entity:

##### a. Number of locations:

Locations	Number
National (No. of States)	24
International (No. of Countries)	9

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

33%

##### c. A brief on types of customers:

Alumina and aluminium products are sold to domestic customers through Memorandum of Understanding (MoUs) and participation in tenders, while international sales are conducted via e-tendering process.

### IV. Employees:

#### 20. Details as at the end of Financial Year:

##### a. Employees and workers (including differently abled):

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES*						
1.	Permanent (D)	1,781	1,683	94.5 %	98	5.5%
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total employees (D+E)	1,781	1,683	94.5 %	98	5.5 %
WORKERS						
4.	Permanent (F)**	3,022	2,800	92.65%	222	7.35%
5.	Other than Permanent (G)***	15,125	14,254	94.24%	871	5.76%
6.	Total workers (F+G)	18,147	17,054	93.98 %	1,093	6.02%

Note: \*All Executives

\*\* All Non-Executive Employees

\*\*\* Hired through contractors

##### b. Differently abled Employees and workers:

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	37	34	91.89%	3	8.11%
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total differently abled employees (D+E)	37	34	91.89%	3	8.11%

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	56	49	87.5%	7	12.5%
5.	Other than Permanent (G)	0	0	0	0	0
6.	Total differently abled workers (F+G)	56	49	87.5%	7	12.5%

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

	Total (A)	No. and percentage of Females	
		No.(B)	%(B/A)
Board of Directors*	8	0	0
Key Management Personnel	1	0	0

Note: \* Matter was taken up with the Administrative Ministry for early appointment of requisite no. of Independent Directors including Woman Director for compliance with the provisions of the Companies Act, 2013 and SEBI (LODR) Regulations, 2015

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

	FY 2024-25			FY 2023-24			FY 2022-23		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	4.78%	4.21%	4.74%	8.01%	6.78%	7.94%	9.27%	5.88%	9.09%
Permanent Workers	10.18%	7.54%	9.99%	8.99%	4.26%	8.67%	7.89%	5.35%	7.73%

**V. Holding, Subsidiary and Associate Companies (Including Joint Ventures):****23. (a) Name of holding / subsidiary / associate companies / joint ventures:**

S. No	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Utkarsha Aluminium Dhatu Nigam Limited	Associate	50	No
2.	Khanij Bidesh India Limited	Associate	40	No
3.	Angul Aluminium Park Private Limited	Associate	49	No
4.	GACL-NALCO Alkalies & Chemicals Private Limited	Associate	40	No

**VI. CSR Details:****24. (i). Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes**

(ii). Turnover (in ₹ Cr): 16,662.21

(iii). Net worth (in ₹ Cr): 18,045.76

**VII. Transparency and Disclosure Compliances:****25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:**

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)	FY 2024 - 25			FY 2023 - 24		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	No	0	0	-	0	0	-
Investors (other than shareholders)	NA	0	0	-	0	0	-

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)	FY 2024 - 25			FY 2023 - 24		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Shareholders*	Yes <a href="https://nalcoindia.com/investor-services/contact-us/">https://nalcoindia.com/investor-services/contact-us/</a>	840	2	The two complaints were received at the end of the financial year and are therefore reflected as pending.	1,336	0	-
Employees and workers	Yes On-line Grievance Portal introduced wef 19.03.25 in NALCO intranet individual login	0	0	-	0	0	-
Customers	Yes Customers complaints received through mail	0	NA	-	2	0	-
Value Chain Partners	Yes <a href="https://samadhaan.msme.gov.in">https://samadhaan.msme.gov.in</a> <a href="https://champions.gov.in">https://champions.gov.in</a>	4	0	-	3	0	-

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
Environment					
1	Waste Management	R	Materiality Analysis, Government Regulations, Environmental Concerns	Pl. refer response to Principle 6 Essential Indicator 10	Negative
2	Water & Effluent Management	R	Materiality Analysis, Government Regulations, Environmental Concerns	Pl. refer response to Principle 6 Essential Indicator 5	Negative
3	Emissions	R	Materiality Analysis, Government Regulations, Environmental Concerns	ESPs for Boiler stacks of CPP & Refinery to control particulates emission; FTPs for Smelter Potlines to control fluoride emissions; Fugitive Fluoride monitoring systems in Smelter potlines	Negative
4	Energy Management	R	Materiality Analysis, Government Regulations, Environmental Concerns	Implemented energy-saving measures and achieved ISO-50001 certification for our Alumina Refinery, Captive Power Plant, and Aluminium Smelter; Regular energy audits identify opportunities for savings which are assessed and implemented; A comprehensive list of energy conservation initiatives is included in the Company's Annual Report	Positive
5	Resource Use	R&O	Materiality Analysis, Government Regulations, Environmental Concerns	Optimization of raw material consumption through diligent monitoring and control; Specific consumption norms set by the board-level Technology committee;	Positive

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6	Renewable & Clean Energy	R&O	Materiality Analysis, Government Regulations, Environmental Concerns	Pl. refer response to Principle 6 Essential Indicator 8	Positive
7	Bio-diversity & greenbelt	R	Materiality Analysis, Government Regulations, Environmental Concerns	Plantation of saplings in and around production units; Opening of mining faces is carried out as per approved Mining Plan; Wildlife Conservation Plan and Biodiversity Management Plan are in place; Restoration of mined sites as per the Mines closure plan, using indigenous species; Prevention of groundwater & surface water contamination;	Positive
<b>Social</b>					
8	Employee Wellbeing	R&O	Materiality Analysis, Societal Concerns	Competitive compensation is complemented by a comprehensive suite of benefits, including healthcare, travel concessions, housing assistance, subsidized utilities, various allowances, parental leave, pension plans, educational incentives, loans, social security, and scholarships for dependent children. Defined benefit schemes are also in place for provident fund, pension, settling-in support, long-service awards, gratuity, benevolent fund, post-retirement medical care, and other entitlements.  At plant locations, entire townships with modern amenities, such as schools, hospitals, shopping centres, clubs, parks, gyms, stadiums have been developed.	Positive
9	Training & development	R&O	Materiality Analysis, Societal Concerns	Employee development is supported through classroom instruction, on-the-job training, coaching, and mentoring. Dedicated training centres at the Corporate Office, S&P, and M&R complexes facilitate this process. Training needs are systematically identified, and customized programs are delivered by internal faculty or external experts.	Positive
10	Occupational Health & safety	R	Materiality Analysis, Societal Concerns & Government Regulations	Pl. refer response to Principle 3 Essential Indicator 10,12,14 & 15	Negative
11	Diversity, Equal Opportunity	R&O	Materiality Analysis, Societal Concerns	Employees have equal access to service conditions, advancement opportunities, and other matters; HR manual outlines a standardised set of rules that apply equally to all employees, regardless of gender, caste, religion, race, or other factors; Transparent and equitable hiring process, providing all qualified candidates equal opportunities for success;  Adherence to equal opportunity principles in all aspects of employee recruitment, placement, promotion, transfer, pay, training, and benefits	No implication
12	Community Engagement & Development	R&O	Materiality Analysis, Societal Concerns	Pl. refer response to Principle 8 Essential Indicator 3 & Leadership Indicator 6	Negative

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
<b>Governance</b>					
13	Business Ethics & Anti-Corruption	R	Materiality Analysis, Governance Concerns	Pl. refer response to Principle 1 Essential Indicator 4	Negative
14	Risk Management	R	Materiality Analysis, Governance Concerns	A robust risk management framework has been established to identify, assess, and mitigate potential business threats. This process is overseen by a dedicated Board-level committee to ensure strategic alignment. Regular risk assessments are conducted, with identified risks systematically documented and escalated when required.	Negative
15	R&D innovation & technology	R&O	Materiality Analysis, Governance Concerns	Committed to R&D, innovation, and technological advancement, the company operates a fully equipped Research & Technology Centre in Bhubaneswar, supported by dedicated R&D units at Angul and Damanjodi. A detailed list of R&D and technology absorption initiatives is provided in the Annual Report.	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.

S. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>										
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
	(b) Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	(c) Web Link of the Policies, if available	<a href="https://www.nalcoindia.com/company/policies-docs/">https://www.nalcoindia.com/company/policies-docs/</a> and specifically <a href="https://www.nalcoindia.com/wp-content/uploads/2021/08/Sustainable-Development-Policy-19-01-25.pdf">https://www.nalcoindia.com/wp-content/uploads/2021/08/Sustainable-Development-Policy-19-01-25.pdf</a>								
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)	No	No	Yes	No	Yes	Yes	No	No	No
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.	-	ISO 9001 ISO 14001 ISO 45001 ISO 50001	SA 8000 ISO 45001	-	SA 8000	ISO 14001 ISO 50001	-	-	ISO 9001 ISO 27001
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	Quantitative Annual targets are set at both the departmental and unit levels to track performance in key areas such as quality, environment, occupational health and safety (OH&S), and energy within the Integrated Management System (ISO9001, ISO14001 & ISO14001) and Energy Management System (ISO50001). These targets are reviewed every year to ensure continued alignment and progress. Also, targets are notified for NALCO as part of the Bureau of Energy Efficiency (BEE)'s Perform, Achieve and Trade (PAT) scheme as well as upcoming Greenhouse Gas Emission Intensity Target Rule, 2025 under the framework of the Carbon Credit Trading Scheme (CCTS) 2023.								



S. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9																																																
6.	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Performance against the targets set in the Integrated Management System and energy management systems are reviewed for achievements annually and also, at defined intervals in between, by the departments & units.  NALCO achieved the notified targets set in PAT Cycle I & PAT Cycle II of Bureau of Energy Efficiency (BEE)'s Perform, Achieve and Trade (PAT) scheme. Next targets for NALCO were notified under PAT cycle VII for which Measurement & Verification audits is due in 2025-26.																																																								
Governance, leadership, and oversight																																																										
7.	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)	NALCO, a Schedule 'A' Navratna CPSE under the Ministry of Mines, Government of India, is deeply committed to sustainability across Environment, Social, and Governance (ESG) dimensions. Recognising sustainability as central to our mission, we strive to create lasting impact within our industry and communities.  Our Community initiatives encompass education, livelihoods, environmental excellence, and community development.  We continue to drive resilient, long-term business growth through responsible practices. For us, sustainability is a strategic imperative that guides our environmental stewardship, social responsibility, and pursuit of operational excellence.  NALCO has set up Wind Power units and is pursuing a growth plan for rooftop solar power generation to help mitigate the impacts of climate change.  The Company places significant emphasis of Corporate Governance and has established a bulwark of policies, procedures etc to support the same.																																																								
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Name: Shri Pankaj Kumar Sharma DIN: 10041341 Designation: Director (Production) Contact No.: 0674-2300660 Email Id: <a href="mailto:dirprod@nalcoindia.co.in">dirprod@nalcoindia.co.in</a>																																																								
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.	<div>YES, the Company had Board level Sub-Committee i.e. CSR and Sustainability Development Committee responsible for decision making on sustainability related issues and its composition was as under:</div> <table><tr><th>Name</th><th>DIN</th><th>Nature of Directorship</th><th>Designation</th></tr><tr><td>Shri S. R. Patel</td><td>09545270</td><td>Part-time Non-official (Independent) Director</td><td>Chairman</td></tr><tr><td>Shri P. K. Sharma</td><td>10041341</td><td>Director (Production)</td><td>Member</td></tr><tr><td>Shri Jagdish Arora</td><td>10347268</td><td>Director (P&amp;T) and Director (HR)-Addl. charge</td><td>Member</td></tr><tr><td>Ms. (Dr.) Shatorupa</td><td>09396503</td><td>Part-time Non-official (Independent) Director</td><td>Member</td></tr><tr><td>Adv. D. Upadhyay</td><td>09397101</td><td>Part-time Non-official (Independent) Director</td><td>Member</td></tr></table> <div>However, after completion of tenure of Adv. D. Upadhyay and Ms. (Dr.) Shatorupa, Independent Directors on 09.11.2024, the Committee was reconstituted on 27.12.2024 consisting of the following members:</div> <table><tr><th>Name</th><th>DIN</th><th>Nature of Directorship</th><th>Designation</th></tr><tr><td>Shri S. R. Patel</td><td>09545270</td><td>Part-time Non-official (Independent) Director</td><td>Chairman</td></tr><tr><td>Shri Vivek Kumar Bajpai</td><td>10717439</td><td>Part-time Official Director</td><td>Member</td></tr><tr><td>Shri Ramesh Chandra Joshi</td><td>08765394</td><td>Director (Finance)</td><td>Member</td></tr><tr><td>Shri P. K. Sharma</td><td>10041341</td><td>Director (Production)</td><td>Member</td></tr><tr><td>Shri Jagdish Arora</td><td>10347268</td><td>Director (P&amp;T) &amp; Director (HR)-Addl. Charge</td><td>Member</td></tr></table>									Name	DIN	Nature of Directorship	Designation	Shri S. R. Patel	09545270	Part-time Non-official (Independent) Director	Chairman	Shri P. K. Sharma	10041341	Director (Production)	Member	Shri Jagdish Arora	10347268	Director (P&T) and Director (HR)-Addl. charge	Member	Ms. (Dr.) Shatorupa	09396503	Part-time Non-official (Independent) Director	Member	Adv. D. Upadhyay	09397101	Part-time Non-official (Independent) Director	Member	Name	DIN	Nature of Directorship	Designation	Shri S. R. Patel	09545270	Part-time Non-official (Independent) Director	Chairman	Shri Vivek Kumar Bajpai	10717439	Part-time Official Director	Member	Shri Ramesh Chandra Joshi	08765394	Director (Finance)	Member	Shri P. K. Sharma	10041341	Director (Production)	Member	Shri Jagdish Arora	10347268	Director (P&T) & Director (HR)-Addl. Charge	Member
Name	DIN	Nature of Directorship	Designation																																																							
Shri S. R. Patel	09545270	Part-time Non-official (Independent) Director	Chairman																																																							
Shri P. K. Sharma	10041341	Director (Production)	Member																																																							
Shri Jagdish Arora	10347268	Director (P&T) and Director (HR)-Addl. charge	Member																																																							
Ms. (Dr.) Shatorupa	09396503	Part-time Non-official (Independent) Director	Member																																																							
Adv. D. Upadhyay	09397101	Part-time Non-official (Independent) Director	Member																																																							
Name	DIN	Nature of Directorship	Designation																																																							
Shri S. R. Patel	09545270	Part-time Non-official (Independent) Director	Chairman																																																							
Shri Vivek Kumar Bajpai	10717439	Part-time Official Director	Member																																																							
Shri Ramesh Chandra Joshi	08765394	Director (Finance)	Member																																																							
Shri P. K. Sharma	10041341	Director (Production)	Member																																																							
Shri Jagdish Arora	10347268	Director (P&T) & Director (HR)-Addl. Charge	Member																																																							



**10. Details of Review of NGRBCs by the Company:**

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Yes									Annually								
Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances	Yes									Annually								

11.	Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency	P1	P2	P3	P4	P5	P6	P7	P8	P9
		No								

**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
a.	The entity does not consider the Principles material to its business (Yes/No)	NA								
b.	The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
c.	The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
d.	It is planned to be done in the next financial year (Yes/No)									
e.	Any other reason (please specify)									

**SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE****PRINCIPLE 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.****Essential Indicators:****1. Percentage coverage by training and awareness programmes on any of the principles during the financial year:**

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	-	-	-
Key Managerial Personnel	1	Principle 1 – 3 days residential training programme on “Effectiveness of Compliance, Governance & Performance Management focusing Regulatory Framework including DPE Guideline”	100%
Employee	214	Principles-1,3,5,6,9	100%
Workers	Permanent Workers- 217 Non-permanent (Contractor's) Workers-971	Permanent Workers- Principles- 3,5,6 Non-permanent (Contractor's) Workers- Safety awareness	64.9 %

**2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and as disclosed on the entity's website):**

Monetary					
	NGRBC principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (INR)	Brief of the Case	Has an appeal been preferred? (Yes/ No)
Penalty/ Fine	Principle 1	1. BSE Limited 2. National Stock Exchange of India Ltd	1. Rs.6,63,160/- (including GST @ 18%) by BSE 2. Rs.6,63,160/- (including GST @ 18%) by NSE	Non-compliances with the provisions of Regulation 17(1), 18(1), 19/19(1)/19(2) and 20/20(2)/20(2A) of SEBI (LODR) Regulations, 2015	Yes. Since appointment of Independent Directors is beyond the control of the Company, request has been made to both the Stock Exchanges for waiver of fines imposed on the company.
Settlement	Nil	NA	NA	NA	NA
Compounding fee	Nil	NA	NA	NA	NA
Non- Monetary					
	NGRBC principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/ No)	
Imprisonment	Nil	NA	NA	NA	
Punishment	Nil	NA	NA	NA	

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
Nil	NA

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

No. The company does not have a specific anti-corruption or anti-bribery policy. However, it is continuously making efforts to improve its systems and procedures to ensure transparency and compliance with existing rules and regulations. These efforts are aimed at creating a working atmosphere and conducting transactions with other entities that are relatively free from corruption. The company has formulated its Code of Business Conduct and Ethics for Board Members and Senior Management, Whistleblower Policy, Fraud Prevention policy, integrity Pact and Vigilance Manual. These initiatives focus on maintaining ethics and preventing bribery and corruption. The company's Code of Business Ethics governs the manner in which it carries out its activities and interacts with stakeholders.

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

	FY 2024-25	FY 2023-24
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	1

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

	FY 2024-25		FY 2023-24	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA

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

NA

8. Number of days of accounts payables ((Accounts payable \*365) / Cost of goods/services procured):

	FY 2024-25	FY 2023-24
Number of days of account payables	40	59

**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:

Parameter	Metrics	FY 2024-25	FY 2023-24
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	0.48%	0.25%
	b. Number of trading houses where purchases are made from	56	35
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	71.26%	81.7 %
Concentration of Sales*	a. Sales to dealers/ distributors as % of total sales	NA*	NA
	b. Number of dealers / distributors to whom sales are made	NA*	NA
	c. Sales to top 10 dealers/distributors as % of total sales to dealers / distributors	NA*	NA
Shares of RPTs in*	a. Purchases (Purchases with related parties/ total purchases)	10.62%	6.56%
	b. Sales (Sales to related parties/ total sales)	NA	Nil
	c. Loans & advances (Loans & advances given to related parties / total loans and advances)	0.12%	0.13%
	d. Investments (Investments in related parties / total investments made)	49%	67%

\*Note: Not Applicable. As NALCO sells all its product to customers directly and does not operate through dealers, distributors or any other intermediaries.

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

Yes. The Board Members are governed by the clauses on 'conflict of interest' elucidated in the 'code of business conduct and ethics for board members and senior management'. The directors are advised to abstain from any deliberation during discussion on proposal where they are interested. Generally, a declaration about Directorship/ interest in other entities is taken from all Directors at the time of their induction to the Board to ascertain their interest in other entities.

**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:**

	Current Financial Year	Previous Financial Year	Details of improvements in environmental and social impacts
R & D	5.51%	11.77%	<ul style="list-style-type: none"> <li>Leakage detection system in ash slurry line (Water Conservation / Pollution Control)</li> <li>Coal Spontaneous Combustion early detection system (Energy Savings)</li> <li>Downstream processing of High Silica bearing bauxite liquor for recovery of silica with possible product-based utilization (Process efficiency / Energy saving)</li> <li>Production of Ferro-Titanium alloy from Bauxite residue by recovery and matrix change of the metal values (Recycling)</li> <li>Kinetic Study of Digestion Desilication (Process efficiency / Energy saving)</li> <li>Detailed energy audit of the cast house furnace to increase furnace efficiency (Energy saving)</li> <li>Kinetic study on precipitation of Bayer process at NALCO refinery (Process efficiency / Energy saving)</li> <li>Development of activated alumina and treatment of fluoride contaminated water &amp; waste water (Recycle / Water Conservation)</li> <li>Characterization of different scales and studies on their utilization (Process efficiency / Energy saving)</li> <li>Setting up of Pilot Demonstration plant for Recovery of Alumina from Fly Ash (Recycling / Reuse/ Pollution Control)</li> </ul>
Capex	4.11%	6.11%	<ul style="list-style-type: none"> <li>Promotion of renewable energy</li> <li>Monitoring discharge outside plant boundary and water quality</li> <li>Use of pond ash</li> <li>Monitoring and control of CO generation at boiler outlet</li> <li>Water conservation / arrest of water leakage</li> <li>Arrest of dust</li> <li>Emission control</li> <li>Energy saving</li> <li>Reuse</li> <li>Effluent control</li> <li>Water conservation &amp; recycling</li> </ul>

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

Yes, NALCO adopts a structured and responsible approach to sustainable sourcing. The company sources bauxite only from its own mines, which operate under stringent environmental and safety standards. These practices have consistently earned 5-star ratings from the Indian Bureau of Mines. To minimize environmental impact, bauxite is transported to the refinery via a fully enclosed single-haul cable belt conveyor system. This not only helps control dust emissions but also eliminates the need for truck transportation, thereby reducing associated environmental impacts.

For the procurement of other materials, NALCO integrates environmental, social and ethical considerations into its supplier selection and procurement processes. The company's Purchase Manual includes provisions that promote transparency and ethical conduct and it enforces an Integrity Pact to ensure fairness in public procurement. Additionally, all suppliers are expected to adhere to NALCO's Environmental and Social Accountability Policies, reinforcing the company's commitment to sustainability throughout its supply chain.

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

100%

## 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)	Procedure established for plastics used for packaging of Aluminium products as per EPR action plan submitted to CPCB along with the application form.
b	E-waste	Not Applicable
c	Hazardous waste	Not Applicable
d	Other waste	Not Applicable

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

Yes, Extended Producer Responsibility (EPR) applies to NALCO, to the extent of plastics used for packaging of Aluminium Products. Our approach focuses on efficient and effective packaging waste management while raising awareness about responsible disposal practices. As part of our efforts, we are engaging with authorised Waste agencies for recycling on a geographically neutral, pan-India basis to ensure sustainable disposal in line with EPR guidelines prescribed by the Central Pollution Control Board (CPCB) from time to time. We remain optimistic that these initiatives will significantly contribute to our environmental stewardship and long-term sustainability goals.

## 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 :

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.
20119	Calcined Alumina	33 %	gate-to-gate	Yes	No
24202	Aluminium Wire rod	13 %	gate-to-gate	Yes	No

## 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 2024-25	FY 2023-2024
Aluminium Scrap recycled as % of hot metal produced	2.08 %	1.80%
Caustic Soda recycled from red mud as % of total consumption	13.15 %	12.85%

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

#### Essential Indicators:

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

Category	% OF EMPLOYEES COVERED BY										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
PERMANENT EMPLOYEES											
Male	1,683	1,683	100%	1,683	100%	NA	NA	1,683	100%	1,683	100%
Female	98	98	100%	98	100%	98	100%	NA	NA	98	100%
Total	1,781	1,781	100%	1,781	100%	98	5.5%	1,683	94.5%	1,781	100%
OTHER THAN PERMANENT EMPLOYEES											
Male	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Female	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Total	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

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

Category	% OF WORKERS COVERED BY										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
PERMANENT WORKERS											
Male	2,800	2,800	100%	2,800	100%	NA	NA	2,800	100%	2,800	100%
Female	222	222	100%	222	100%	222	100%	NA	NA	222	100%
Total	3,022	3,022	100%	3,022	100%	222	7.35%	2,800	92.65%	3,022	100%
OTHER THAN PERMANENT WORKERS											
Male	14,254	14,254	100%	14,254	100%	NA	NA	14,254	100%	14,254	100%
Female	871	871	100%	871	100%	871	100%	NA	NA	871	100%
Total	15,125	15,125	100%	15,125	100%	871	5.76%	14,254	94.24%	15,125	100%

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

	FY 2024-25	FY 2023-24
Cost incurred on well-being measures as a % of total revenue of the company	10%	15%

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

Benefits	FY 2024-25			FY 2023-24		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Yes	100%	100%	Y
Gratuity	100%	16.65 %	Yes	100%	28%	Y
ESI	NA	83.35 %	Yes	NA	72%	Y
Others – Retrenchment Benefits etc	NA	83.35 %	NA	NA	72%	NA

NOTE 1: Gratuity is applicable for permanent workers only

NOTE 2 : ESI and Retrenchment Benefits are applicable to Non-permanent Workers only.

**3. Accessibility of workplaces:**

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

Yes, to the extent of wheelchair ramps and accessible restrooms.

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

Yes. The Company has an Equal Opportunity Policy for Persons with Disabilities. The corresponding web-link is [https://nalcoindia.com/wp-content/uploads/2019/01/8-13-Equal-Opportunity-Policy-for-Persons-with-Disabilities\\_with-digital-signature.pdf](https://nalcoindia.com/wp-content/uploads/2019/01/8-13-Equal-Opportunity-Policy-for-Persons-with-Disabilities_with-digital-signature.pdf)

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

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

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

	Yes/ No (If yes, then give details of the mechanism in brief)
Permanent Workers*	<ul style="list-style-type: none"> <li>To enhance transparency and improve employee welfare, an Online Grievance Portal was launched on 19.03.2025. This platform has been developed to ensure the prompt and effective redressal of day-to-day grievances raised by NALCO employees.</li> <li>The portal provides a structured, workflow-based system for grievance submission, escalation, tracking, and resolution. It ensures a seamless and timely mechanism for addressing employee concerns while maintaining transparency and accountability at each stage of the grievance handling process.</li> <li>Importantly, the Online Grievance Portal is fully aligned with the Approved Grievance Procedure applicable to both Executives and Non-Executives, ensuring uniformity, fairness, and adherence to organizational policies.</li> <li>Furthermore, all units, including the corporate office, have a policy in place to prevent, prohibit, and address sexual harassment of women in the workplace, in accordance with the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition &amp; Redressal) Act, 2013. Internal Complaints Committees have been established at the production units and corporate office of the company to address complaints related to sexual harassment.</li> </ul> <p>For non-permanent workers grievances of such workers are generally received and managed by the EIC (Contract Engineer-in-charge) or Plant HRD through intervention with their immediate employer, i.e., the contractor.</p>
Other than Permanent Workers**	
Permanent Employees***	
Other than Permanent Employees****	

Note:

\*All Non-Executive

\*\*Workers hired through Contractors

\*\*\*All Executives

\*\*\*\*There are no other-than-permanent employees(executives)

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

Category	FY 2024-25			FY 2023-24		
	Total employees / workers in respective category (A)	No. of employees /workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees (Executives)	1,781	1,781	100%	1,586	1,586	100%
Male	1,683	1,683	100%	1,495	1,495	100%
Female	98	98	100%	91	91	100%
Total Permanent Workers (Non-Executives)	3,022	3,022	100%	3,272	3,272	100%
Male	2,800	2,800	100%	3,042	3,042	100%
Female	222	222	100%	230	230	100%

## 8. Details of training given to employees and workers:

Category	FY 2024-25					FY 2023-24				
	Total (A)	On health and safety measures		On skill upgradation		Total (D)	On health and safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
EMPLOYEES										
Male	1,683	898	53.35%	1,136	67.49%	1,495	581	39%	1,495	100%
Female	98	93	94.9%	73	74.49%	91	88	97%	91	100%
Total	1,781	991	55.64%	1,209	67.88%	1,586	669	42%	1,586	100%
WORKERS (Permanent Workers)										
Male	2,800	1,052	37.57%	311	11.11%	3,042	455	15%	908	30%
Female	222	155	69.82%	53	23.87%	230	111	48%	71	31%
Total	3,022	1,207	39.94%	364	12.05%	3,272	566	17%	979	30%

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
EMPLOYEES						
Male	1,683	1,683	100%	1,495	1,495	100%
Female	98	98	100%	91	91	100%
Total	1,781	1,781	100%	1,586	1,586	100%
WORKERS (Permanent Workers)						
Male	2,800	2,800	100%	3,042	3,042	100%
Female	222	222	100%	230	230	100%
Total	3,022	3,022	100%	3,272	3,272	100%

## 10. Health and safety management system:

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

Yes, Occupational health and safety management systems ISO 45001:2018 is implemented at Aluminium Smelter, Captive Power plant, Alumina Refinery, Bauxite Mines and Port facilities at Visakhapatnam.

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

The company follows a structured approach to identify both routine and non-routine work-related hazards and assess associated risks through the following mechanisms:

- Hazard Identification and Risk Assessment (HIRA)
- Safety inspections and observations
- Near-miss reporting
- Accident investigations
- Worker interactions during toolbox talks
- Plant-level safety committee meetings
- External safety and fire audits

These processes support proactive risk management and drive continuous improvement in workplace safety.

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

Yes.

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

Yes.



## 11. Details of safety related incidents:

Safety Incident/Number	Category	FY 2024-2025	FY 2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	Smelter – 0.449	Refinery- 0.159 Smelter- 0.071
Total recordable work-related injuries	Employees	0	0
	Workers	Smelter – 6	Refinery- 3, Smelter- 1
No. of fatalities	Employees	0	0
	Workers	Smelter – 2	3
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	Smelter – 4	1

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

NALCO has implemented the ISO 45001:2018 Occupational Health and Safety Management System to ensure a safe and healthy workplace. Key initiatives include:

- **Safety Governance:** Regular safety committee meetings, internal and external audits and continuous hazard identification and risk assessment.
- **Training & Awareness:** Safety training, coaching, and mentoring across Smelter, CPP, Refinery Bauxite Mines and Port toolbox talks and observance of National Safety Week, Chemical Disaster Prevention Day, and Road Safety Month.
- **Digital Tools:** Use of the NALCO Surakhsha mobile app for reporting unsafe acts, near misses, fire hazards, and first-aid cases.
- **Performance Monitoring:** Monthly safety performance reviews and departmental rankings (Smelter). Accident Prevention Plan is developed for each dept based on the principle of Anticipation, Compliance and Participation.
- **Infrastructure Safety:** CCTV surveillance, road markings cat's eye reflectors, eye-testing camps and traffic management systems (Smelter, CPP).
- **Work at Height Safety:** Audits, vertigo testing and implementation of corrective actions (Smelter). Fixing of permanent lifeline systems along with proper fall protection measures on all roofs & Conveyor Roof to eliminate fall from height.
- **Visual Aids & Signage:** Audio-visual SOPs and safety boards for better awareness (Smelter).
- Use of fire-retardant apron, leg guards and safety goggles etc. during hot operation (Smelter)
- **Innovative Models:** Implementation of "AAINAA" – Advance Action in Industries to Abate Accidents (Smelter).
- **Information Sharing:** Regular safety updates and surprise safety walks (Smelter).
- **Awareness Infrastructure:** Safety kiosks at main gates (Smelter, CPP).
- **Emergency Preparedness:** Mock drills across Smelter, CPP, Refinery and Bauxite Mines.
- **Mine Safety:** HEMM stability testing, one-way haul roads, 94% blast-free mining (Bauxite Mines) and haul road maintenance with berms and dividers (Utkal D Coal Mines).
- **Environmental Monitoring:** Regular assessment of dust, noise and illumination levels across workplaces.

These initiatives reflect NALCO's unwavering commitment to health, safety and continuous improvement in operational risk management.

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working conditions	0	NA	NA	0	0	NA
Health and safety	0	NA	NA	0	0	NA

## 14. Assessments for the year:

Particulars	% Of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	45 %
Working Conditions	45 %

Note: Bauxite Mines, Alumina refinery, CPP, Smelter is covered in both ISO45001 and SA8000 audits. Corporate Office is covered in SA8000 audits whereas Port Facilities covered in ISO45001 audits.

**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.****Bauxite Mines:**

- Pit Safety Committee has been made consisting of representatives from workers and management under the Chairmanship of the Mine Manager and Safety Officer as the Secretary. Monthly Pit Safety Committee Meeting is conducted to deal with all Health and Safety Related issues and MoM is shared to DGMS.
- Advanced Technology Implementation in the form of satellite-based Fleet management System for location tracking and to eliminate manual instruction for Mining operation and trip counting.

**Coal Mines:**

- Incorporated the work permit system in electrical works to ensure that all safety measures have been ensured before starting the work.
- Use of Mobile Phones by workmen were stopped in their working hours at the workplace.

**Smelter:**

- Structural Integrity study of all Silos, High-Rising Structures including Belt Conveyor Galleries of Carbon Area.
- A new traffic signal system has been installed to ensure the safe and precise placement of the loco engine and wagons. This system enhances visibility and provides clear signalling to operators, reducing the risk of misalignment and improving overall safety during unloading operations.
- Heat resistant full body protection suit for hot metal handling have been procured & distributed to all the dept.
- Hand rail provided in all the Anode Transfer vehicles to avoid slip/trip incident.
- Barricading of empty section- To prevent unauthorized access and ensure worker safety, portable hard barricades have been strategically installed around empty sections within the worksite at Bake Oven.
- To facilitate safe movement over empty pits, four dedicated platforms with wheel mounts have been designed and deployed at key locations within the worksite.
- Fixing of anchoring structure for use of full body harness in Bake Oven – To mitigate the risk of falls during maintenance activities, portable anchoring structures have been installed at strategic locations within the worksite.
- Packing of anode while wall demolition- During the dismantling process, anodes are strategically packed into the pit to create a stable and secure platform for workers to comfortably stand on while demolishing the adjacent wall.
- Indication of hooter & Blinking light has been provided to know the stoppage of downstream conveyor to increase alertness of work man at cross conveyer.
- Provision of Fixed type Water Sprinkling for continuous cooling of hot piled up ingots.
- In 1<sup>st</sup> phase, Installation of permanent lifelines over rooftop is completed. These lifelines will enhance safety for workers performing tasks at heights.
- To demonstrate a continued commitment to safety, the Smelter leadership has launched a program of “Surprise Safety Walks” on the shop floor. These unannounced weekly inspections involve directly engaging employees and workers to gain valuable insights into workplace safety practices. Inspired by this initiative, other department heads have adopted similar programs, further solidifying the company’s focus on a safe work environment.

**CPP:**

- After a near miss occurred in the OBPH pump house during valve operation- Sharp edge support of the pipeline both MS line & HRH line rounded up by cutting & grinding. While moving below the pipe line if at any point helmet will touch, then round surface will touch the helmet. It helps the working person for ease & safe work. As a corrective action, a metal stool was installed and placed near the valve at the bottom floor. This improvement allows workers to stand securely while operating the valve, ensuring they are not positioned on potentially unstable or elevated surfaces. The stool provides a safe, stable platform that minimizes the risk of falls and allows for proper posture and leverage during valve operations.
- Extension of platform for maintenance work near Unit-10 HP Bypass system done with hand railing & grill along with proper support made at BD, BPE valve floor so that space for work increased. Ladder was repositioned with angle so that it will be easier to climb to the platform. It helps the working person for ease & safe work. It enhances the safety aspect of working person. It will help to avoid such type of incident & it will enhance the safety aspect of working person.

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

Yes, for Employees, in the event of death of a Permanent Employee following benefits are extended to the nominee/family members of the deceased:

- Nalco Employees Family Financial Assistance Rehabilitation Scheme (NEFFARS)
- Funeral Expenses, Death Gratuity, PF, Benevolent Fund, Group Insurance
- Group personal life Insurance
- Group Insurance Scheme for HBA

In the event of the death of a Permanent Worker, the nominee/family members receive the following benefits:

- Nalco Employees Family Financial Assistance Rehabilitation Scheme (NEFFARS)
- Funeral expenses, death gratuity, PF, benevolent fund, group insurance
- Group personal life insurance
- Group insurance scheme for HBA

In the event of the death of a non-permanent worker hired through contractors while on duty, the nominee/family members receive the following benefits:

- One-time lump-sum financial assistance
- Benefits under the ESIC Act, 1948
- Benefits under the EPF & Misc Act, 1942

## 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.

The entity has identified its key stakeholder groups as Government, Shareholders, Customers, Employees, Communities, and Value Chain Partners (including Suppliers, Contractors, and Transporters). Stakeholder identification is guided by the nature and scope of engagement, considering the following attributes:

- **Dependency:** Those directly or indirectly reliant on our operations, products, or services, or on whom we rely to function effectively.
- **Responsibility:** Individuals or groups to whom we hold legal, commercial, operational, or ethical obligations.
- **Attention:** Stakeholders requiring immediate focus due to financial, social, environmental, or broader economic concerns.
- **Influence:** Those capable of affecting our strategic or operational decisions, or vice versa.
- **Diverse Perspectives:** Stakeholders offering varied insights that can lead to deeper understanding and innovative actions.

Based on these criteria, the entity has reaffirmed Government, Shareholders, Customers, Employees, Communities and Value Chain Partners as the major stakeholder groups. Key methods for identifying stakeholders within these groups—excluding employees—are outlined below.

Stakeholders	Identification Process
Shareholders	<ul style="list-style-type: none"> <li>• Annual General Meetings</li> <li>• Complaints &amp; grievances</li> </ul>
Government/Regulatory Bodies	<ul style="list-style-type: none"> <li>• Meetings with different Central and State Government Bodies</li> <li>• Notifications, Circulars, Submissions of various returns &amp; compliances</li> </ul>
Communities	<ul style="list-style-type: none"> <li>• RPDAC meetings</li> <li>• Informal meetings and interactions</li> </ul>
Customers	<ul style="list-style-type: none"> <li>• Tenders and Enquiries</li> <li>• Customer meets</li> <li>• Feedback, satisfaction surveys and grievance resolution</li> </ul>
Suppliers, Contractors, Transporters	<ul style="list-style-type: none"> <li>• Tenders &amp; contracts</li> <li>• Vendor and supplier meets</li> </ul>

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others	Frequency of engagement (Annually/Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Investors/ Shareholders	No	E mails, Letters, Website, Newspaper, Annual General meetings	Regular & need based	Company Performance, Dividends, Complaints & grievances

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others	Frequency of engagement (Annually/Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Communities	Yes	Request letters- Emails, Community Meetings	Need based	Community needs on infrastructure, employment, education, health, sanitation
Government Authorities/ Regulatory Bodies	No	Meetings, Emails, Letters	Regular & need based	Infrastructure development, Company Performance, Labour issues, Corporate Social Responsibilities, Compliance of various rules, acts, regulation, and laws
Customer	No	Website, emails, Letters, Meetings, conference, Surveys	Regular & need based	Commercial matters, Policy issues, market conditions, complaints & grievances
Employee	No	Discussion forums with Associations and Unions, Emails, Letters, Surveys,	Regular	benefits and remunerations, Performance rating and recognition, Career growth, Training and skill development, Safe and healthy working condition, welfare measures
Value Chain Partners (Suppliers, Vendors, Contractors)	Partly	Website, Mobile Apps, Email, Letters, vendor Meet	Regular & need based	Special privilege to MSE units, Transparency & anticorruption practices, Simplified procedure & timely payment, Terms & conditions of purchase, Speedy liquidation of disputes & redressal of grievances

## PRINCIPLE 5: Businesses should respect and promote human rights.

### Essential Indicators:

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees /Workers covered (D)	% (D/C)
<b>EMPLOYEES</b>						
Permanent	1,781	75	4.2%	1,586	43	3%
Other than permanent	0	0	0	0	NA	-
<b>Total Employees</b>	<b>1,781</b>	<b>75</b>	<b>4.2%</b>	<b>1,586</b>	<b>43</b>	<b>3%</b>
<b>WORKERS</b>						
Permanent	3,022	31	1.03%	3,272	33	1%
Other than permanent	15,125	0	0	12,648	0	0
<b>Total Workers</b>	<b>18,147</b>	<b>31</b>	<b>0.17%</b>	<b>15,920</b>	<b>33</b>	<b>1%</b>

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

Category	FY 2024-25					FY 2023-24				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
EMPLOYEES										
Permanent	1,781	NA	-	1,781	100%	1,586	NA	-	1,586	100%
Male	1,683	NA	-	1,683	100%	1,485	NA	-	1,485	100%
Female	98	NA	-	98	100%	91	NA	-	91	100%
Other than Permanent	-	-	-	-	-	-	-	-	-	-
Male	0	-	-	0	-	-	-	-	-	-
Female	0	-	-	0	-	-	-	-	-	-

Category	FY 2024-25					FY 2023-24				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
WORKERS										
Permanent (Non-Executives)	3,022	NA	-	3,022	100%	3,272	NA	-	3,272	100%
Male	2,800	NA	-	2,800	100%	3,042	NA	-	3,042	100%
Female	222	NA	-	222	100%	230	NA	-	230	100%
Other than Permanent	15,125	NA	-	15,125	100%	12,648	NA	-	12,648	100%
Male	14,254	NA	-	14,254	100%	11,843	NA	-	11,843	100%
Female	871	NA	-	871	100%	805	NA	-	805	100%

### 3. Details of remuneration/salary/wages:

#### a. Median remuneration / wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (in ₹)	Number	Median remuneration/ salary/ wages of respective category (in ₹)
Board of Directors (BoD)*	6*	97,83,333	0	-
Key Managerial Personnel	1 **	82,50,000	0	-
Employees other than BoD and KMP	1,683	43,97,267	98	43,91,836
Workers	2,800	32,96,321	222	32,82,882

\*Note: Only functional directors are included; No wages, only sitting fees is provided to the independent directors.

\*\* During FY24-25, the Company Secretary was changed.

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

	FY 2024-25	FY 2023-24
Gross wages paid to females as % of total wages	6.49%	7%

### 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)

NO

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

The grievance redressal procedure for both executives and non-executives is outlined in the HR manual available on the company intranet, under the CDA Rules section. Additionally, a company-wide policy is in place—covering all units, including the corporate office—for the prevention, prohibition, and redressal of sexual harassment of women at the workplace, in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. Internal Complaints Committees (ICCs) have been constituted at all production units and the corporate office to address such complaints.

For non-permanent workers, particularly contract workers, a formal grievance mechanism is not explicitly defined. In such instances, grievances are generally addressed by the Engineer-in-Charge (EIC) or the Plant Human Resources Department, who liaise directly with the contractor—the immediate employer—to facilitate resolution.

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual Harassment	0	0	Nil	0	0	Nil
Discrimination at workplace	0	0	Nil	0	0	Nil
Child Labour	0	0	Nil	0	0	Nil
Forced Labour/ Involuntary Labour	0	0	Nil	0	0	Nil
Wages	0	0	Nil	0	0	Nil
Other Human rights related issues	0	0	Nil	0	0	Nil

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

	FY 24-25	FY 23-24
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees / workers	0	0
Complaints on POSH upheld	0	0

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

Each case of discrimination or harassment is thoroughly evaluated to assess potential adverse impacts on the complainant. Based on the findings, appropriate corrective actions—such as reorganization or other necessary measures—are taken to address the issue effectively.

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

Yes

**10. Assessments for the year:**

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labor	45 %
Forced/involuntary labor	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	NA

*Note: Major part of the Organisation i.e. Bauxite Mines, Alumina Refinery, CPP, Smelter and Corporate Office are covered by SA8000 audits and certification*

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

NA

**PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment.****Essential Indicators:****1. Details of total energy consumption (in Giga Joules) and energy intensity:**

Parameter	FY 2024-25	FY 2023-24
<b>From renewable sources</b>		
Total electricity consumption (A)	3,44,919.25	3,21,468
Total fuel consumption (B)	0	-
Energy consumption through other sources (C)	0	-
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>344,919.25</b>	<b>3,21,468</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D)	13,57,927.62	19,78,074
Total fuel consumption (E)	10,42,90,189.34	10,70,98,793
Energy consumption through other sources (F)	0	-
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>10,56,48,116.96</b>	<b>10,90,76,867</b>
<b>Total energy consumed (A+B+C+D+E+F)</b>	<b>10,59,93,036.21</b>	<b>10,93,98,335</b>

Parameter	FY 2024-25	FY 2023-24
Energy intensity per rupee of turnover (Total energy consumed/turnover in rupees)	0.00064	0.00084
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)* (GJ/Million USD) (Total energy consumed / Revenue from operations adjusted for PPP)	12,996.10#	0.01915
Energy intensity in terms of physical output [Total Energy consumed / Alumina Hydrate production (20,75,500 MT)] (GJ/MT)	51.07	51.51
Energy intensity (optional) – the relevant metric may be selected by the entity	-	55.06

Note: \*For the purpose of calculation of revenue adjusted Purchasing Power Parity (PPP), conversion factor for FY 24-25 has been taken as @20.43 /USD as per the data available at (<https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND>).

# Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)\* (Total energy consumed / Revenue from operations adjusted for PPP in Rs.). As part of data improvement process optimisation, we have revised, the intensity calculation for FY 2024-25.

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

Yes, reasonable assurance has been carried out by TUV SUD South Asia Pvt Ltd.

During FY 2024-25, MEA (Mandatory Energy Audit) as per BEE notification has been carried out by accredited energy auditors m/s East Coast Sustainable at Bauxite Mines, Alumina Refinery, CPP and Smelter.

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

Yes, for earlier PAT cycles I & II. For current PAT cycle, assessment is due in FY 2025-26.

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

Parameter	FY 2024-25	FY 2023-24
<b>Water withdrawal by source (in kiloliters)</b>		
(i) Surface water	4,80,87,770	4,92,50,007
(ii) Groundwater	3,20,889	5,81,979
(iii) Third party water	3,335	3,335
(iv) Seawater / desalinated water	-	0
(v) Others	3,42,604	0
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	4,87,54,598	4,98,35,321
<b>Total volume of water consumption (in kilolitres)</b>	4,86,32,939	4,97,67,850
Water intensity per rupee of turnover (Total water consumption / turnover.)	0.0003	0.00038
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)* (Total water consumption / Revenue from operations adjusted for PPP) (KL/Million USD)	5963.02#	0.00871
Water intensity in terms of physical output [Total Water consumption / Alumina Hydrate production (20,75,500 MT)] (kl/MT)	23.43	23.43

Note: For the purpose of calculation of revenue adjusted Purchasing Power Parity (PPP), conversion factor for FY 24-25 has been taken as @20.43 /USD as per the data available at (<https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND>).

#Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP in Rs.). As part of data improvement process optimisation, we have revised, the intensity calculation for FY 2024-25.

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

Yes, reasonable assurance has been carried out by TUV SUD South Asia Pvt Ltd



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

Parameter	FY 2024-25	FY 2023-24
<b>Water discharge by destination and level of treatment (in kiloliters)</b>		
(i) To Surface water		
- No treatment	0	0
- With treatment – please specify level of treatment <i>Coal mine pit water is transferred to settling pond for treatment by addition of lime and alum. Clear water from the settling pond is partially discharged to nearby water bodies only during monsoon with prior intimation to SPCB.</i>	1,06,658.85	52,471
(ii) To Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) To Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third parties (Municipal Sewers)		
- No treatment (water discharged from Corporate Office, Bhubaneswar to municipal drain system of BMC. )	15,000	15,000
- With treatment – please specify level of treatment	0	0
(v) Others		
- No treatment	0	0
- With treatment – please specify level of treatment	0	
<b>Total water discharged (in kiloliters)</b>	<b>1,21,658.85</b>	<b>67,471</b>

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency:  
No

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

Yes,

At the NALCO, several wastewater conservation measures have been implemented to achieve:

**Zero Liquid Discharge:** The management and disposal of treated effluents generated during plant operations are governed by the specific operating consent orders issued by the State Pollution Control Boards, which our plants and units strictly follow:

**Smelter Plant:** At the Smelter Plant, surface runoff from the Potline and Carbon areas, along with shop floor wastewater, is systematically directed into three engineered holding basins with capacities of 100,000 m<sup>3</sup>, 51,000 m<sup>3</sup>, and 38,000 m<sup>3</sup>. This collected water undergoes advanced treatment through Ion-Exchange and Emrion Nano De-fluoridation (DF) systems to ensure removal of contaminants, particularly fluoride.

The facility maintains a robust closed-loop water management system. Treated water from Ion-Exchange and Nano DF plants, combined with runoff from key operational zones—such as the Zero Discharge Sump, Spent Pot Lining (SPL) Storage Area, Captive Landfill Area—as well as subsoil water from Potlines, effluent from the Hazardous Waste Incinerator, and treated sewage from the Plant STP, is efficiently recycled and reused within plant operations, reinforcing the commitment to zero liquid discharge and sustainable water stewardship.

**Captive Power Plant:** At the Captive Power Plant, a stringent zero liquid discharge (ZLD) protocol is maintained. Decanted water from the Ash Pond undergoes chemical treatment and is efficiently recycled for ash slurry preparation, minimizing freshwater dependency.

**Alumina Refinery:** The Alumina Refinery demonstrates robust circular water practices by recycling wastewater from the Red Mud Pond, Holding Pond, Ash Pond, and treated sewage from the STP. This reclaimed water is reused across multiple processes, including the Bayer process and site horticulture, enhancing resource efficiency.

**Bauxite Mines:** 100% of the treated wastewater—originating from the canteen's biological treatment system and vehicle wash water treatment plant—is reused for dust suppression, ensuring complete water reutilization and zero discharge status.

**Utkal D&E Coal Mines:** It has a Zero Liquid Discharge regime throughout the year. During the monsoon season, excess treated water is released into a nearby nallah strictly in accordance with the conditions specified in the Consent to Operate (CTO) issued by the Odisha State Pollution Control Board (OSPCB), with prior intimation to the authority.

## 6. Please provide details of air emissions (other than GHG emissions) by the entity:

Parameter	Please specify unit	FY 2024-25	FY 2023-24
<b>NO<sub>x</sub></b>			
• Smelter FTP/FTC stacks avg.	mg/Nm <sup>3</sup>	49.59	37.76
• CPP Boiler Stacks avg.		297.13	290.16
• Refinery Boiler Stacks avg.		260.045	276.00
• Refinery Calciner Stack		326.82	420.00
<b>SO<sub>x</sub></b>			
• Smelter FTP/FTC stacks avg.	mg/Nm <sup>3</sup>	93.99	76.8
• CPP Boiler Stacks avg.		520.32	499.41
• Refinery Boiler Stacks avg.		343.41	478.00
• Refinery Calciner Stack		319.25	282.00
<b>Particulate matter (PM-2.5)</b>			
• Smelter FTP/FTC stacks avg.	mg/Nm <sup>3</sup>	28.05	32.28
• CPP Boiler Stacks avg.		77.8	70.3
• Refinery Boiler Stacks avg.		84.48	84.09
• Refinery Calciner Stack		24.99	24.12
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	µg/Nm <sup>3</sup>	< 0.2	< 0.2
Hazardous air pollutants (HAP)	-	-	-
Others – please specify (Total Fluoride emission from Smelter Potlines & Bake Ovens)	mg/Nm <sup>3</sup>	0.468	0.388

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency:  
NO

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

Parameter	Unit	FY 2024-25	FY 2023-24
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	MtCO <sub>2</sub> e	1,06,41,135.54	1,10,40,113
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	MtCO <sub>2</sub> e	2,74,225.94	4,52,210
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions /turnover in Cr.)	tCO <sub>2</sub> e/Rs. crore	0.000065	0.000088
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP) (Metric tons of CO <sub>2</sub> equivalent/USD Million)		1,338.36#	0.002012
Total Scope 1 and Scope 2 emission intensity in terms of physical output [Total Scope 1 & 2 / Alumina Hydrate production (20,75,500 MT)] (MtCO <sub>2</sub> e/MT)	-	5.251173	5.410698
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional) – the relevant metric may be selected by the entity	-	-	19.14

\*Note: For the purpose of calculation of revenue adjusted Purchasing Power Parity (PPP), conversion factor for FY 24-25 has been taken as @20.43 /USD as per the data available at (<https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND>)

# Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity\* (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP in Rs.) As part of data improvement process optimisation, we have revised, the intensity calculation for FY 2024-25

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

Yes, reasonable assurance has been carried out by TUV SUD South Asia Pvt Ltd

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

The Entity focuses on reducing its greenhouse gas (GHG) emissions through two main strategies:

- Generating renewable energy and
- Improving energy efficiency through process enhancements, equipment modernization, and R&D initiatives.

Operational wind power projects are located in Gandikota, Andhra Pradesh (50.4 MW), Luderva, Rajasthan (47.6 MW), Devikot, Rajasthan (50 MW), and Jath, Maharashtra (50.4 MW). During the year, 9,32,96,407 KWh Wind Power from own WPP Gandikota was consumed at production sites.

Additionally, various roof-top solar PV plants are in operation at different locations i.e. Corporate Office, NRTC, Corporate Township, Refinery Township, Bauxite Mines Offices and Vizag Port facilities. New installations are planned across the Units.

Several energy efficiency projects have been undertaken, targeting GHG emission reductions, such as cathode block graphitization, use of slotted anodes, installation of dampers and exhaust manifolds, chemical cleaning of Condensers, HSD consumption reduction for bauxite mines vehicles, VFD installation, and replacing lamps and motors with energy-efficient alternatives. A pilot project aimed at developing low-energy cell technology for smelter plants has achieved a significant reduction in specific DC energy consumption.

As an initiative to reduce carbon foot-print, trail co-firing of Bio-mass pellets has started in one Boiler at CPP, Angul.

Also, total 1,79,184 saplings were planted during the year, with a view to green-belt around plant sites and also, to absorb CO<sub>2</sub>.

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

Parameter	FY 2024-25	FY 2023-24
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	0.78	0
E-waste (B)	4.77	13.169
Bio-medical waste (C)	1.48	1.859
Construction and demolition waste (D)	9	12
Battery waste (E)	28.71	32.154
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G) <b>Smelter</b> - Used or Spent Oil, Wastes/ residues containing oil, Cathode residues including pot lining wastes, Tar containing wastes, Chemical sludge from Waste water treatment, Flue gas dust & other particulates, spent copper catalyst, rejected filter bags (FTP), Asbestos Waste, Coke dust, Spent Ion-exchange resin, green anode ridge waste, Green anode cooling decantation tank sludge, Carbon anode baking waste, Drain cleaning sludge, Ladle cleaning residues, Spilled waste (FTP), Incineration ash, Spent Anode, Floor sweeping waste, Shot blasting waste, Rejected AlF <sub>3</sub> bags, Aluminium dross, Rejected lining of furnace, Empty Barrels/ containers/ liners wastes, Waste Copper Cable, <b>CPP</b> - Used Oil, Transformer Oil, Spent Resin, <b>Alumina Refinery</b> - Used oil, Chemical containers, asbestos, <b>Bauxite Mines</b> - Used Oil, Oil sludge, Used Vehicle Filter, Cotton waste, Incinerator ash, <b>Coal Mines</b> - used oil, <b>Port Facilities</b> - Used oil	93,916.83	99,324.153
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) <b>Smelter</b> - Ferrous scrap, non-ferrous scrap, Induction furnace slag, Used Refractory bricks, mixed debris <b>CPP</b> - Ash, <b>Alumina Refinery</b> - Red mud, Fly Ash, lime Grit, <b>Bauxite Mines</b> - Overburden, <b>Coal Mines</b> - Overburden, <b>Port Facilities</b> - mixed met	2,03,47,919.68	1,10,62,779.91
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>2,04,41,881.25</b>	<b>1,11,62,163.25</b>
Waste intensity per rupee of turnover (Total waste generated / Turnover in Rs. Cr.)	0.00012	0.000085
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)* (Total waste generated / Revenue from operations adjusted for PPP) MT/ USD Million	8155.76#	0.00195
Waste intensity in terms of physical output [Total Waste / Alumina Hydrate production (20,75,500 MT)] (MT/MT)	9.85	5.26
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	85,015.7	87,039.82
(ii) Re-used	9,68,729.13	9,50,923
(iii) Other recovery operations	0	56,86,763
<b>Total</b>	<b>10,53,744.83</b>	<b>67,24,725.82</b>

Parameter	FY 2024-25	FY 2023-24
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	102.451	126.454
(ii) Landfilling	39.11	32.721
(iii) Other disposal operations (to authorised recyclers, ash pond, redmud pond, stored for future use etc.) *	<b>1,89,91,093.69</b>	<b>44,41,323.36</b>
<b>Total</b>	<b>1,89,91,235.25</b>	<b>44,41,482.53</b>

Note: \*For the purpose of calculation of revenue adjusted Purchasing Power Parity (PPP), conversion factor for FY 24-25 has been taken as @20.43 /USD as per the data available at (<https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND>)

#Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP). As per of data improvement process optimization, we have revised the intensity calculation for FY 2024-25.

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

Yes, reasonable assurance has been carried out by TUV SUD South Asia Pvt Ltd

**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:**

NALCO's operating units have implemented an environmental management system based on ISO 14001, focusing on waste management through identification, categorization and responsible handling. Key practices include: E-waste and Battery Waste: Disposed of at authorized centres through collection, dismantling, recycling or buy-back schemes.

**Biomedical Waste:** Treated at NALCO's facilities or in compliance with State Pollution Control Board (SPCB) orders.

**Hazardous Waste:** Managed as per OSPCB authorization, including categorization, storage, and disposal. Spent Pot lining (SPL) carbon is recycled for energy recovery, and refractory portions are stored and proposed for authorized disposal.

**Aluminium Dross:** Metallic portion recovered; remaining dross used in anode covering or disposed of by recyclers.

**Spent Anode Butts:** Fully recycled for anode production.

**Miscellaneous Hazardous Waste:** Includes carbon area waste, asbestos waste, and others disposed of at CHWTSDF.

**Used Oil:** Stored securely and auctioned or sold to authorized recyclers.

**Non-Hazardous Waste:**

**Overburden from Mines:** Reused for reclamation of mined areas.

**Red Mud:** Disposed of in red mud ponds.

**CPP Ash:** Disposed off in abandoned mine voids or used in emergency ponds; fly ash utilized for filling and brickmaking.

**Coal Mill Rejects:** Stored in a dedicated yard for disposal.

**Scrap:** Ferrous and non-ferrous scrap is recycled, reused, or sold. Rejected refractory bricks used for hard surfacing and road construction; mixed debris disposed of in low-lying areas.

**Food Waste:** Converted into compost. These measures highlight NALCO's commitment to effective waste management and environmental sustainability.

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

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
1	Panchaptmali Bauxite Mine, Damanjodi, Dist. - Koraput, Odisha	Mining of bauxite	Yes

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain. (Yes / No)	Relevant Web link
4 MTPA Coal Production from amalgamated Utkal D & E Coal Mine	EIA notification 2006 & its subsequent amendment	09.10.2024	Yes	Yes	MOEFCC website ( <a href="https://parivesh.nic.in/">https://parivesh.nic.in/</a> )

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):

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
None	NA	NA	NA

**Leadership Indicator:**

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

S. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
<b>Bauxite Mines</b>			
1.	Reuse of treated waste water from canteen and HEMM	100% reuse of treated waste water for dust suppression purpose inside the mines	2,03,708 KL of waste water reused
<b>Coal Mines</b>			
2.	Construction of settling pond for treatment of mine pit seepage water and surface runoff	Capacity 50,000 KL	Treatment of waste water is done for further reuse. This reduces the fresh water consumption
<b>Smelter</b>			
3	Recycling of Treated water of Ion-Exchange DF Plant	Used for Plantation and anode cooling at GAP-I & II of Carbon area	Resource conservation & waste water recycling
4	Recycling of Treated water of Emrion Nano DF Plant	Used as cooling water make-up	Resource conservation & waste water recycling
5	Recycling of Surface run-off from Zero Discharge Sump	Used for horticulture, gardening, vehicle washing and civil construction work	Resource conservation & waste water recycling
6	Recycling of Surface run-off by Re-routing of Drain	Treated in ETPs for plant use	Resource conservation & waste water recycling
7	Recycling of Surface run-off from SPL Storage Area	Treated in ETPs for plant use	Resource conservation & waste water recycling
8	Recycling of Surface run-off from Captive Landfill Area	Treated in ETPs for plant use	Resource conservation & waste water recycling
9	Recycling of Surface run-off near Watch Tower No.-23	Installation of ETP with recirculation system near WT-23 to utilize non-plant water for Plant use is underway	Resource conservation & waste water recycling
10	Recycling of Subsoil water of Potlines	Used as makeup water for compressor cooling and fire fighting	Resource conservation & waste water recycling
11	Recycling of effluent water of Hazardous Waste incinerator	Recycled into the scrubbing system of HW Incinerator after filtration	Resource conservation & waste water recycling
12	Recycling of Plant STP Water	Further treated at ETPs and subsequently recycled for plant use	Resource conservation & waste water recycling
13	Recycling of S&P Township STP water	Used for horticulture and gardening purpose inside Parks, Stadium, Clubs, Schools etc. at S&P Township	Resource conservation & waste water recycling
14	Recycling of CISF Colony STP water	Used for horticulture and gardening purpose inside CISF Colony	Resource conservation & waste water recycling
15	Rainwater harvesting in S&P Township	Rainwater from the roof tops of new quarters is channelized to 3 charging wells to charge the ground water	Rain water conservation & ground water recharging
<b>Captive Power Plant</b>			
16	Lean slurry project of ash disposal to abandoned allotted mine void of south Bharatpur OCP	Captive Power Plant, NALCO always carries out ash disposal in an environment friendly manner. The scheme of disposal of ash by lean slurry disposal method in abandoned mines void of Bharatpur OCP (South block) of Mahanadi Coal Fields Ltd. has been implemented. Under the scheme lean slurry is disposed in the Mines void at Bharatpur South & decanted water from mines after treatment is brought back to plant area for reuse. The project was commissioned in July, 2021 and is meant to enhance ash utilization.	Eco-friendly method of ash utilization

S. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
17	Installation of Clariflocculator	To further reduce the turbidity of ash slurry recycle water from Ash-pond & mine void another Clariflocculator of 3000 m3/hr capacity has been installed and commissioned inside plant. The recycled water after treatment is being re-used for ash slurry making & other use in plant.	100% Re-use of water for process requirements.
18	Rain water harvesting system	Rain water Harvesting and Recycling system has been commissioned with pond capacity of 50000 m3 of water equipped with 2x250 m3/hr of pumping capacity. The recycled water is used for plant usage.  Also roof-top water Roof top rain water harvesting system had been installed in CW pump house and RCPH. Water collected during monsoon is fed to CW fore-bay and fire hydrant fore-bay respectively, thereby reducing water makeup.	100% Re-use of water for plant usage
19	Trial Co firing of Biomass Pellets in Boiler	Trial feeding of 20 MT of Biomass Pellets along with coal was started on 29.03.2025 in Unit # 07 Boiler.	Trial for renewable and sustainable energy source to reduce use of fossil fuel
<b>Alumina Refinery</b>			
20	Plg/Ts/Rpd (Red Area)	Red mud filtration system	Discharge of Less water to RMP
21	Utilisation of canteen waste and biodegradable township waste	Canteen waste is treated in a digester and reused as manure. Biodegradable waste from Township is aerobically degraded and used as manure	Saving of cost in manure procurement achieved.
22	Rain water harvesting	Rain water harvesting being carried out in Admin building and Training centre	Water conservation achieved
<b>Corporate Facilities</b>			
23	Rain water harvesting system on roof top of Mahanadi Niwas Guest House in Township	Roof area of 860 sqm with 150m length of rain water collection pipe with Ground Water Recharge Unit	Annual average Rain Water collection (Harvesting/year)- 1230 Kilolitres
24	Sewage treatment plant behind HRD Centre at Township	Recycling and utilising the sewage line waste water in gardening purpose of HRD Centre garden area	Recycling capacity of 300 Kilolitres/day

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

- **Bauxite Mines:** A comprehensive Disaster Management Plan (DMP) and On-site Emergency Plan (OSEP) are in place to manage emergencies, including occupational health and safety (OHS) and environmental incidents. Preparedness is maintained through regular assessments and quarterly mock drills involving all relevant stakeholders.
- **Alumina Refinery:** An On-site Emergency Response Plan outlines designated responsibilities for the factory manager and CISF fire personnel. The facility conducts regular fire and chemical emergency mock drills, supported by a clear emergency command structure.
- **Smelter Plant:** The DMP and On-site Emergency Plan address critical scenarios such as pool fires, fireballs in HFO storage tanks, and incidents in LPG storage areas. The plant is well-equipped with firefighting and rescue systems to manage such events.
- **Captive Power Plant:** Similar to other units, the Captive Power Plant operates under a structured DMP and OSEP framework.
- **Utkal D&E Coal Mines:** There is an Emergency Response Plan outlining roles & responsibilities covering inundation, dump/slope failures, explosion during blasting, drowning in the water reservoir and mine fire.
- **Overall:** All facilities maintain robust and regularly updated emergency preparedness plans. Routine drills are conducted to ensure operational readiness and to familiarize personnel with emergency procedures and roles.

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

**Essential Indicators:**

- a. **Number of affiliations with trade and industry chambers/ associations.** 18 (Nineteen)
- b. **List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.**



S. No.	Name of the trade and industry chambers / associations	Reach of trade and industry chambers/ associations (State/National)
1	Aluminium Association of India (AAI)	National
2	Confederation of Indian Industry (CII)	National
3	Standing Conference of Public Enterprise (SCOPE)	National
4	Chemicals and Allied Products Export Promotion Council (CAPEXIL)	National
5	Federation of Indian Mineral Industries (FIMI)	National
6	Federation of Indian Export Organisations (FIEO)	National
7	National Institute of Personnel Management (NIPM)	National
8	International Chamber of Commerce (ICC)	National
9	Indian Chamber of Commerce (ICC)	National
10	Indian National Committee/ World Mining Congress	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.

NA

## PRINCIPLE 8 Businesses should promote inclusive growth and equitable development.

### Essential Indicators:

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

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

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

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	Amount paid to PAFs in the FY (In INR)
1	Utkal D Coal Mines	Odisha	Angul	137*	100	6,89,62,612
2	Utkal E Coal Mines	Odisha	Angul	400*	100	24,56,14,039

\*Above figures pertain to PDFs (Project Displaced Families who are disbursed compensation)

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

Although a formal grievance redressal mechanism specific to the local community is not in place, concerns are proactively addressed through ongoing interactions, field visits, and regular dialogue with community members. The district-level RPDAC (Rehabilitation and Periphery Development Advisory Committee) meetings, conducted by district administration from time-to-time also serve to highlight concern and grievances of local communities. The Company engages closely with local communities to understand and integrate their needs, priorities, and expectations. Prior to the rollout of any project, extensive consultations are conducted to ensure alignment with community aspirations.

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

Parameter	FY 2024-25	FY 2023-24
Directly sourced from MSMEs/ small producers	47.44 %	30.64%
Directly sourced within India	94.88 %	97.69%

\* 'Total Inputs' excludes Coal, fuel oil, caustic soda, ALF3, Synthetic Flocculants, Steel, Cement, Bearings, Lubricants, grease, proprietary items, imported items.



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

Location	FY 2024-25	FY 2023-24
Rural	NA	NA
Semi-urban*	81%	84.29%
Urban	NA	NA
Metropolitan**	19%	15.71%

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

Note: \* Population Between 10000-100000- Nalconagar Angul & Damanjodi employees

\*\* Population Over 1000000- Bhubaneswar, Delhi, Kolkata, Mumbai, Chennai, Vizag employees

#### Leadership Indicators:

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 lakh)
1	Odisha	Koraput	2,549.24
2	Odisha	Malkangiri	124.70
3	Odisha	Nabarangpur	125.30
4	Andhra Pradesh	Visakhapatnam	34.62

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

Yes

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

- Micro and Small enterprises (MSEs)
- MSEs owned by SC/ST entrepreneurs
- MSEs owned by women entrepreneurs

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

47.44%

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)	Benefits shared (Yes/No)	Basis of calculating benefits 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 Activities	No of Beneficiaries	% Beneficiaries from Vulnerable & Marginalised group
1	Financial Support towards provision of Vehicles and water bodies for Elephant Camp at Kumarkhunti of Chandaka- Dampara Wildlife Sanctuary.	Indeterminate	Indeterminate
2	Financial Support to "Office of the Nimapara NAC, Puri" for (one) Animal Ambulance to treat injured/ abandoned animals at the accident spot and render emergency services to stray animals.	Indeterminate	Indeterminate

S. No.	CSR Activities	No of Beneficiaries	% Beneficiaries from Vulnerable & Marginalised group
3	Financial Support to District Administration, Angul towards organising 12 <sup>th</sup> Zila Mahostav at Angul.	Indeterminate	Indeterminate
4	Financial Support towards organising Panchpattamali Natya Mahotsav, Damanjodi	Indeterminate	Indeterminate
5	Financial Support to District Administration, Koraput towards organising 27 <sup>th</sup> State Level Tribal Festival, PARAB Koraput.	Indeterminate	Indeterminate
6	Supply of drinking water during summer at peripheral villages of S&P Complex Angul	Indeterminate	Indeterminate
7	Financial Support towards Installation of 10,000 (LPH) capacity RO drinking water plant along with water supply system inside Shree Jagannath Temple.	Indeterminate	Indeterminate
8	Provision of drinking water RO at Gandhi Park Puri maintained by NALCO under Swachh Iconic Site.	Indeterminate	Indeterminate
9	Provision of Drinking water RO at Puri	Indeterminate	Indeterminate
10	NALCO Best Matriculate Award for outstanding students from Peripheral High Schools at S&P Complex, NALCO, Angul	31 Students	Indeterminate
11	Expenditure towards imparting education to periphery students other than NALCO employee dependents in Odia Medium Schools (Saraswati Vidya Mandir) in Angul	3,170 Students	Indeterminate
12	" Nalcara Aliali Jhia" (Nalco ki Ladli): To provide financial support to girl students every year under BPL category from periphery villages of S&P Complex Angul	133 Students	100% (Girl Child)
13	Supporting residential education to poor backward & tribal children from periphery villages of M & R Complex, Damanjodi & Pottangi.	562 Students	88% SC/ ST Students.
14	Expenditure towards imparting education to periphery students other than NALCO employee dependents in Odia Medium Schools (Saraswati Vidya Mandir) in Damanjodi	1,736 Students	Indeterminate
15	" Nalcara Aliali Jhia" (Nalco ki Ladli): To provide financial support to girl students every year under BPL category from periphery villages of M & R Complex, Damanjodi.	147 Students	100% (Girl Child)
16	Operation of Medical Health Units (MHUs) at periphery villages of S&P Complex, Angul, Utkal D & E Coal Block.	Around 50,000 Patients	Indeterminate
17	Providing Primary Health Services through OPD Consultation at S&P Complex, Angul Periphery villages.	Around 18,000 Patients	Indeterminate
18	Financial support to All India Institute of Medical Sciences (AIIMS), Bhubaneswar for procurement of medical equipment.	Indeterminate	Indeterminate
19	Preventive Health care measures by supply of mosquito net at various schools located at Bhubaneswar	600 Households	Indeterminate
20	Financial Support to "Swami Vivekanand National Institute of Rehabilitation Training and Research (SVNIRTAR), Olatpur Cuttack towards procurement and installation of equipment towards improvement in providing services to the persons with disabilities	Indeterminate	100 % (PWD)
21	Operation of Medical Health Units (MHUs) at periphery villages of M&R Complex, Damanjodi & Pottangi Periphery.	Around 65,000 Patients	Indeterminate
22	Financial Assistance to Saheed Laxman Nayak Medical College and Hospital, Koraput for strengthen and enhance health delivery system.	Indeterminate	Indeterminate
23	Financial Assistance to Collectorate, Malkangiri for "Screening of Anaemia, Sickle Cell Anaemia and addressing Malnutrition & Stunting among children" under Aspirational District, Malkangiri	Indeterminate	Indeterminate
24	Financial Assistance to Collectorate, Nabarangpur for "Screen-ing of Anaemia, Sickle Cell Anaemia and addressing Malnutri-tion & Stunting among children" under Aspirational District, Nabarangpur.	Indeterminate	Indeterminate

S. No.	CSR Activities	No of Beneficiaries	% Beneficiaries from Vulnerable & Marginalised group
25	Financial Support to Shree Jagannath Temple Administration, Puri for procurement of Medical Devices and Diagnostic Analyser Machines for Sevak Kalyan Dispensary of the Temple, Puri	Indeterminate	Indeterminate
26	Providing garbage transportation vehicles to Maa Mangala Temple Trust Board, Kakatpur in Puri	Indeterminate	Indeterminate
27	Preventive Health care measures and provision of nutritious and hygienic food at Puri during the Ratha Yatra	Around 55,500 People.	Indeterminate
28	Pradhan Mantri TB Mukht Bharat Abhiyan – Request to provide Financial Support to provide Additional Nutrition support to TB Patients in Visakhapatnam District	5,500 TB Patients	Indeterminate
29	Financial Assistance for Establishment of Dialysis Centre at Sub Divisional Hospital, Bagha, West Champaran, Bihar.	Indeterminate	Indeterminate
30	Promotion of livelihood through Jackfruit Value addition in selected priority villages of NALCO, Damajodi.	Indeterminate	Indeterminate
31	Financial Support towards Construction of Pilgrim accommodation blocks in Badrinath, Uttarakhand.	Indeterminate	Indeterminate
32	Providing scholarship to 14 students under PM Internship Scheme	14 Students	Indeterminate
33	Installation of 60 nos. of street light on electric poles at village Gobara under Angul District.	Indeterminate	Indeterminate
34	Renovation of Kukudang Smanan Ghat Road at Village Kuku-dang under Angul District.	Indeterminate	Indeterminate
35	Renovation of Road beside Railway line at Village Tentoloi, Kukudang under Angul District.	Indeterminate	Indeterminate
36	Construction of Concrete road from Amanasahi to Bauti Mandir at village Kullad(Angul District)	Indeterminate	Indeterminate
37	Improvement of Road and Construction of drain from Railway line to Nandira Jora at Village Karnapur	Indeterminate	Indeterminate
38	Improvement of lighting in the street road from Nalco chhak to Balramprasad	Indeterminate	Indeterminate
39	Repair & renovation of Singhsahi bridge at village Kullad	Indeterminate	Indeterminate
40	Construction of community centre at taramanga sahi in village Matiasahi, Purunagarh	Indeterminate	Indeterminate
41	Swachta Hi Sewa campaign at Damanjodi	Indeterminate	Indeterminate
42	Swachta Hi Sewa campaign at Angul	Indeterminate	Indeterminate
43	Swachta Hi Sewa campaign at Bhubaneswar	Indeterminate	Indeterminate
44	Swachta Hi Sewa campaign at Visakhapatnam	Indeterminate	Indeterminate
45	Financial assistance to Ekal Gram Sangathan for organizing state level Khel-Kud Pratiyogita (Athletics & Sports) among students of tribal areas.	Indeterminate	Indeterminate
46	Operation of Battery-Operated Vehicles (BOVs) from Jagannath Ballav Matha to Shri Jagannath Temple and Railway Stations of Puri, Bhubaneswar & Cuttack.	Indeterminate	Indeterminate
47	Providing Security service (Ward & Watch) at Gandhi Park, Puri (Swachh Iconic Sites)	Indeterminate	Indeterminate
48	Horticulture, Development & Maintenance work at Gandhi Park, Puri (Swachh Iconic Sites)	Indeterminate	Indeterminate
49	Renovation works in Puri including "Gandhi Park", Puri (Swachh Iconic Sites)	Indeterminate	Indeterminate

**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.**

Customer complaints or feedback related to payment issues, delayed deliveries, product quality or quantity, and documentation discrepancies are addressed in line with NALCO's well-established Marketing Guidelines and the documented procedures under its ISO 9001 quality management system. Upon receiving a complaint, representatives from NALCO's Regional Offices and/or qualified technical personnel from the plant may visit the customer's premises to investigate and assess the issue on-site within the prescribed defined timeframe.

In cases where the customer raises a compensation claim, a dedicated committee is constituted to verify the claim and evaluate the extent of the loss incurred. Based on its assessment, the committee recommends a suitable compensation amount, ensuring a transparent and equitable resolution process.

NALCO also incorporates the review of customer complaints into its broader continuous improvement initiatives. By systematically analysing and addressing such feedback, the company strives to enhance operational efficiency, resolve recurring issues, and improve overall customer satisfaction.

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	Not Applicable, As we provide services in a B2B market and such information on products is provided by the final end product manufacturers.
Safe and responsible usage	NA
Recycling and/or safe disposal	Not Applicable, Since we provide services in a B2B market and such information on products is provided by the final end product manufacturers.

*Note: Not Applicable as per the nature of products. NALCO products are primary Alumina and Aluminium Metal products sold to secondary processors in the value chain.*

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

	FY 2024-25		Remarks	FY 2023-24		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	Nil	Nil	-	Nil	Nil	-
Advertising	Nil	Nil	-	Nil	Nil	-
Cyber-security	Nil	Nil	-	Nil	Nil	-
Delivery of essential services	NA	NA	-	NA	NA	-
Restrictive Trade Practices	Nil	Nil	-	Nil	Nil	-
Unfair Trade Practices	Nil	Nil	-	Nil	Nil	-
Other	Nil	Nil	-	2	0	-

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

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

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

Yes, (ISO27001 framework/policy on cyber security and privacy policy are available) The web-link of the policy:

- <https://nalcoindia.com/wp-content/uploads/2019/03/IT-SECURITY-POLICY-signed.pdf>
- <https://NALCOindia.com/home/privacy-policy/>

**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:**

Nil, no such issue relating to advertising, and delivery of essential services; re-occurrence of instances of product recall. Therefore, no action taken by regulatory authorities.

**7. Provide the following information relating to data breaches:****a. Number of instances of data breaches:**

0

**b. Percentage of data breaches involving personally identifiable information of customers:**

0

**c. Impact, if any, of the data breaches:**

NA

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

Visit our website <https://nalcoindia.com/> click on “menu” button on top corner of the right side go to business and select products for product related information. For services related information go to Citizen Corner from Menu.

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

Our customers are secondary manufacturers and not to end-consumers. We provide products in a B2B market. Such information on products is provided by the final end product manufacturers.

**3. 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.**

With respect to products manufactured by NALCO, there is no Indian regulatory mandate to display any product information thereon, Hence, this requirement is not applicable.

**4. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)**

Yes, as per internal policy, customer satisfaction on different aspects of product and services offered by the company is collected through a feedback mechanism on half yearly basis based on which the Customer Satisfaction Index (CSI) score is calculated against the best supplier.

\*\*\*\*\*



### Assurance statement on third-party verification of sustainability information

Unique identification no.: 3153148829

TÜV SÜD South Asia Pvt Ltd. (hereinafter TÜV SÜD) has been engaged by, **National Aluminium Company Limited (NALCO), Nalco Bhawan, P/1, Nayapalli, Bhubaneswar, Odisha** (hereinafter "Company") for the period from 01-04-2024 to 31-03-2025.

The verification was carried out according to the steps and methods described below.

### Scope of the verification

The third-party verification was conducted to obtain independent assurance about whether the Sustainability information is prepared in reference to BRSR standard/framework (hereinafter referred as "Reporting Criteria").

#### Reporting standard/framework

The disclosures have been prepared by **National Aluminium Company Limited (NALCO)**, in reference to:

BRSR Core – Framework for assurance and ESG disclosures for value chain as per SEBI (Securities and Exchange Board of India) Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated July 12, 2023.

The following sustainability indicators' reporting are included in the scope of the assurance engagement during the reporting period Financial Year (FY) 2024-2025 as listed below

Reasonable level of assurance of 'BRSR 9 Core Attributes'

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the BRSR reporting, and accordingly, we do not express a conclusion on this information.

It was not part of our engagement to review product- or service-related information, references to external information sources, expert opinions and future-related statements in the Report.

### Responsibility of the Company

The legal representatives of the Company are responsible for the preparation of the BRSR report in accordance with the Reporting Criteria. This responsibility includes in particular the selection and use of appropriate methods for measurement, calculation, collection and compilation of information and the making of appropriate assumptions or, where appropriate, the making of appropriate estimates. Furthermore, the legal representatives are responsible for necessary internal controls to enable the preparation of a BRSR report that is free of material - intentional or unintentional - erroneous information.

### Verification methodology and procedures performed

The verification engagement has been planned and performed in accordance with the verification methodology developed by the TÜV SÜD Group which is based on ISAE 3000 assurance engagement standard and ISO 17029.



### Level of Assurance

Reasonable Level of assurance for the 9 core attributes of BRSR (Ref: Annexure I of SEBI circular)

The verification was based on a systematic and evidence-based assurance process limited as stated above. The selection of assurance procedures is subject to the auditor's own judgment.

- Inquiries of personnel who are responsible for the stakeholder engagement und materiality analysis to understand the reporting boundaries
- Evaluation of the design and implementation of the systems and processes for compiling, analysing, and aggregating sustainability information as well as for internal controls
- Inquiries of company's representatives responsible for collecting, preparing and consolidating sustainability information and performing internal controls
- Analytical procedures and inspection of sustainability information as reported at group level by all locations
- Assessment of local data collection and management procedures and control mechanisms through a sample survey at selected multiple sites as mentioned below:

Sl. No.	Company Name	Site Address
1	National Aluminum Company Limited (NALCO)	Nalco Bhawan, P/1, Nayapalli, Jaydev Vihar Odisha, 751013
2		Mines & Refinery, Damanjodi, Koraput, Odisha, 763008
3		Smelter Plant, Nalco Nagar, Angul, Odisha, 759145
4		Captive Power Plant, Nalco Nagaer, Angul, Odisha, 759145

### **Conclusion**

#### Reasonable level of Assurance- BRSR 9 Core Attributes

On the basis of the assessment procedures carried out & evidence we have collected during 07-07-2025 to 29-07-2025, the identified sustainability indicators of 9 Core Attributes (Listed in Annexure I of this statement) of BRSR for FY 2024-2025 are prepared in all material respect in accordance with the reporting requirements outlined in BRSR Core.

### **Limitations**

The assurance process was subject to the following limitations:

- The subject matter information covered by the engagement are described in the "scope of the engagement". Assurance of further information included in the BRSR reporting was not performed. Accordingly, TÜV SÜD do not express a conclusion on this information.
- The assurance scope excluded forward-looking statements, product- or service-related information, external information sources and expert opinions.

### **Use of this Statement**

The Company must reproduce the TÜV SÜD statement and possible attachments like Assurance report in full and without omissions, changes, or additions.

This statement is by the scope of the engagement solely intended to inform the Company as to the results of the mandated assessment. TÜV SÜD has not considered the interest of any other party in the selected sustainability information, this assurance report or the conclusions TÜV SÜD has reached. Therefore, nothing in the engagement or this statement provides third parties with any rights or claims whatsoever.





### Independence and competence of the verifier

TÜV SÜD South Asia Pvt Ltd. is an independent certification and testing organization and member of the international TÜV SÜD Group, with accreditations also in the areas of social responsibility and environmental protection. The assurance team was assembled based on the knowledge, experience and qualification of the auditors. TÜV SÜD South Asia Pvt Ltd. hereby declares that there is no conflict of interest with the Company.

Place, Date: Kolkata, 08-08-2025

Name: Prosenjit Mitra

General Manager- Verification, Validation and Audit  
Management System Assurance

Name: Prarthana Chand

Verification Team Leader, TÜV SÜD  
Management System Assurance

### Annexure I

S.No	Attribute	Parameter	Cross reference to BSR (P-Principles/ E- Essential Indicator)
1.	Green-house gas (GHG) footprint  Greenhouse gas emissions may be measured in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard*	Total Scope 1 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)  Total Scope 2 emissions (Break-up of the GHG (CO <sub>2</sub> e) into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)  GHG Emission Intensity (Scope 1 +2)	P6-E7
2.	Water footprint	Total water consumption  Water consumption intensity  Water Discharge by destination and levels of Treatment	P6-E3 P6-E4
3.	Energy footprint	Total energy consumed  % of energy consumed from renewable sources  Energy intensity	P6-E1



4.	Embracing circularity - details related to waste management by the entity	<p>Plastic waste (A) E-waste (B) Bio-medical waste (C) Construction and demolition waste (D) Battery waste (E) Other Hazardous waste. Please specify, if any. (G) Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector) Total waste generated ((A+B + C + D + E + F + G + H) Waste intensity Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations For each category of waste generated, total waste disposed by nature of disposal method</p>	P6-E9
5.	Enhancing Employee Wellbeing and Safety	<p>Spending on measures towards well being of employees and workers – cost incurred as a % of total revenue of the company</p> <p>Details of safety related incidents for employees and workers (including contract-workforce e.g. workers in the company's construction sites)</p>	P3-E1 P3-E11
6.	Enabling Gender Diversity in Business	<p>Gross wages paid to females as % of wages paid</p> <p>Complaints on POSH</p>	P5-E3 P5-E7
7.	Enabling Inclusive Development	<p>Input material sourced from following sources as % of total purchases – Directly sourced from MSMEs/ small producers and from within India</p> <p>Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or nonpermanent /on contract) as % of total wage cost</p>	P8-E4 P8-E5
8.	Fairness in Engaging with Customers and Suppliers	<p>Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events Number of days of accounts payable</p>	P9-E7 P1-E8
9.	Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties	P1-E9