



ENVIRONMENTAL POLICY

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ENVIRONMENTAL POLICY

A) Introduction

Usha Martin Limited (hereinafter referred to as “UML” or “Company”) is committed to conducting its business in an environmentally responsible and sustainable manner. We recognize our operations have an impact on the environment, and we are dedicated to minimizing this impact through proactive environmental management, innovation, and continuous improvement. Guided by international frameworks such as ISO 14001:2015 (Environmental Management Systems) and the United Nations Sustainable Development Goals (UNSDGs), we integrate environmental responsibility into our strategic objectives and operational practices.

This Environmental Policy outlines our commitment to environmental stewardship, compliance with international standards, and alignment with global sustainability frameworks. It serves as a foundation for our efforts to protect the environment, reduce our environmental footprint, and contribute to a sustainable future for generations to come.

B) Scope

This policy applies to all UML operations in India, including manufacturing units, supply chain activities, distribution, product lifecycle processes, and all employees, contractors, and stakeholders directly or indirectly engaged in UML’s value chain.

C) Commitment Framework

Usha Martin Limited (UML) is committed to minimizing its environmental footprint while prioritizing customer health and safety. We address key environmental issues such as energy consumption and GHG emissions, water management, resource conservation, hazardous materials management, product end-of-life, biodiversity, air pollution and environmental awareness and advocacy. Our efforts focus on optimizing energy efficiency, transitioning to renewable energy, conserving water bodies, promoting resource efficiency, ensuring the safe handling of hazardous materials, advancing waste recycling practices, reducing air pollution, protecting and restoring biodiversity, to drive sustainable development.

- Reducing Environmental Impacts:
 - Implement a Risk-Based Thinking (RBT) approach to proactively identify, assess, and mitigate environmental risks.
 - Minimize the environmental impact of our operations and supply chain.
 - Implement energy efficiency measures and renewable energy sourcing to reduce GHG emissions.
 - Ensure safe handling, storage, and disposal of hazardous chemicals in compliance with Hazardous and other Wastes (Management & Transboundary Movement) Rules, 2016
 - Implement measures to prevent soil and water contamination from chemicals and wastes arising from operations and supply chain.
 - Promote water conservation through efficient usage, recycling, and protection of natural water resources near operational sites.
 - Implement air pollution control measures, including reducing particulate matter (PM), NO_x, and SO_x emissions through advanced filtration and emission control technologies.
 - Engage our workforce, suppliers and community to create an eco- friendly society and to build awareness on the subject

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- Incorporate circular economy principles to conserve resources, reduce waste, and manage product end-of-life responsibly.
- Expanding Policy Coverage:
 - Embed sustainability principles into product design, packaging, and supply chain management.
- Ensuring Compliance:
 - Adhere to applicable legal requirements and other compliance obligations, including voluntary sustainability commitments and industry best practices.
 - Require all key business partners, contractors/suppliers to comply with UML's environmental standards.
- Fostering Collaboration:
 - Collaborate with suppliers, customers, employees, industry organizations, advocacy groups, and academia to address environmental challenges.
 - Engage with all stakeholders to identify and address environmental issues.
- Prioritizing Actions and Setting Goals:
 - Conduct materiality assessments biennially to identify key environmental topics and set measurable goals.
 - Establish clear, time-bound environmental targets and track progress.
- Evaluating and Improving Performance:
 - Integrate the Plan-Do-Check-Act (PDCA) cycle into the Environmental Management System (EMS) to drive continuous improvement in environmental performance.
 - Use internal/external audits, periodic reviews, and stakeholder feedback to refine objectives and processes.
 - Report environmental performance annually through sustainability disclosures.
- Employee Awareness & Training
 - Establish an environmental training and awareness program for employees, contractors, and supply chain partners.
 - Promote a culture of environmental responsibility through participation in sustainability initiatives and cross-functional collaborations.
 - Ensure employees are aware of their roles, responsibilities, and contributions to UML's environmental objectives.

D) Governance Mechanism

The Environmental Policy will be communicated through multiple channels, including the UML's website, intranet, sustainability reports, and training sessions and workshops for employees and supply chain partners. Other specific stakeholder engagement communication channels will also be utilized.

This policy forms part of the Sustainability Framework and is mandatory for implementation across all UML businesses. The sustainability council is accountable for establishing and implementing the policy and responsible for its adherence to all applicable standards.

- Roles and responsibilities
 - The Sustainability council oversees the policy implementation and progress reviews across all business units to achieve sustainable development.

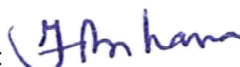
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- A dedicated ESG team leads the implementation of the Environmental Management System (EMS), monitors performance and also ensures alignment between business strategy and environmental objectives.
- ☞ All employees and contractors/suppliers are responsible to adhere with this policy.

- Periodic Review and Continuous Improvement
 - Annual Policy Reviews: Integrate the Plan-Do-Check-Act (PDCA) cycle into the Environmental Management System (EMS) to drive continuous improvement in environmental performance. The policy will be reviewed and updated annually by the Sustainability Council based on internal/external assessments, stakeholder feedback, and evolving regulations.
 - Performance Monitoring: Environmental KPIs will be tracked, monitored and progress will be reported through UML's sustainability disclosures.
 - Stakeholder Engagement: Regular feedback from stakeholders will be incorporated into the review process to enhance the policy's effectiveness.

This policy is complemented by other related policies – Climate Stewardship Policy, Water Stewardship Policy, Biodiversity Policy and OHS Policy.

Signature: 
Designation : Whole-time Director
Date : 10th April 2025

