



ESG Factbook

UltraTech Cement Limited

FY 2025-26



Contents

Environment_____	04
Social_____	20
Governance_____	41
Third-party Review Statement _____	58

About UltraTech

UltraTech Cement Limited, the cement flagship company of the Aditya Birla Group. The company is the largest cement company in the world by sales volume and capacity (excluding China). With a consolidated grey cement capacity of 205.5 MTPA (including overseas capacity) as of 17th April 2026. UltraTech is also one of the largest manufacturers of white cement in India with a capacity of 3.5 MTPA. With recorded net revenue of Rs 88,512 crore in financial year 2025-2026, the Company's business operations span the UAE, Bahrain, Sri Lanka and India through integrated units, white cement unit, wall care putty units, grinding units, Bulk terminals and jetties.

Company's grey cement products include Ordinary Portland Cement, Portland Pozzolana Cement, Portland Blast Furnace Slag cement and Composite Cement. With 300+ Ready Mix Concrete (RMC) plants across the country, UltraTech is the largest manufacturer of concrete in India. UltraTech is the ultimate 360-degree building materials destination, providing an array of products ranging from grey cement to white cement, from building material to building solutions and assortment of ready-mix concrete catering to various needs and applications of new age construction. Being a part of the Aditya Birla Group, the Company is committed to Group's vision to become a leading Indian conglomerate for sustainable business practices across its global operations. The Company is continuously striving to improve its performance in the areas of carbon emissions, energy productivity and efficiency, water management, waste management, biodiversity, safety, resource conservation etc.

A founding member of the Global Cement and Concrete Association (GCCA), UltraTech is aligned to the GCCA Climate Ambition 2050 and the Net Zero Concrete Roadmap. The company has adopted tools such as the Science Based Targets Initiative (SBTi) and Internal Carbon Price to drive decarbonization and has set ambitious goals through EP100 and RE100. We are also committed to No Net Loss of Biodiversity and Taskforce for Climate related Financial Disclosure (TCFD), as part of its efforts to accelerate the adoption of low carbon technologies hand processes throughout its value chain to effectively reduce its carbon and overall environmental footprint.

ENVIRONMENT

Environment Management System

We have developed robust practices and systems to create positive environmental impacts through our Environment Management System (ISO 14001) and initiatives taken to conserve the environment.

Our Environment policy focuses on engaging with internal as well as external stakeholders, and it is applicable to all of our operations, offices, products and services, suppliers, partners, subsidiaries with full operational control, and directly owned distribution and logistics channels. The policy is endorsed by our Board of Directors, Our commitment includes:

- Consult relevant external stakeholders in development of Environment policy and engage with them to implement programs for creating positive environmental impacts.
- Providing awareness and training for sound environmental practices and the environmental impacts of our actions.
- Set objectives and targets to reduce environmental impacts and develop action plans
- Monitor current environmental performance and strive for continuous improvement by utilizing opportunities to reduce environmental impacts.

We have established clear accountability, roles, and responsibilities to implement environmental policy through a defined system of hierarchy from Top management (Chief Manufacturing Officer) to the Unit level team as referred in our Environment Policy.

We have carried out various internal and external audits for Environment Management System. Currently, 100% of UltraTech's production sites have received ISO 14001 (Environmental Management System) certification. Our EnMS enables us to monitor return on environmental investments. Details of our environmental spending and savings across our operations, for the reporting year FY 2025-26 for UltraTech (Standalone) are summarized below:

Capital investment (INR)	713.9 crore
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Our Efforts for RE Implementation has led us to significant cost saving as follows in FY 26:

Savings, cost avoidance, income etc. (INR)	392 Crore
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Energy Management & Decarbonization

UltraTech is committed to improving energy efficiency and reducing its environmental footprint. Our various facilities have also been identified as obligated entities under the Government of India's Carbon Credit Trading Scheme (CCTS), 2023, which establishes a national carbon market for GHG emission reductions through tradable carbon credits, encouraging continuous improvements in carbon and energy performance. Furthermore, Cement manufacturing has been one of the energy-intensive sectors and our various units have been covered as Designated Consumers under the **Perform, Achieve, Trade (PAT)** cycles, and targets have been assigned on specific energy consumption under PAT cycles.

Our targets are notified on [BEE - PAT NOTIFICATION](#)

Evaluation of programs

We have set up a robust system of Energy audits in order to identify opportunities for improving energy efficiency in our operations. Furthermore, we have set up a comprehensive evaluation mechanism to review the progress against targets, which includes internal verification quarterly & annually, and external verification every three years. Energy saving initiatives identified during energy audits and their progress are monitored quarterly and annually. We have deployed effective strategies to achieve our energy reduction targets under the PAT scheme & we have also achieved our EP100 target much before the committed timelines (2035) to double energy productivity from the baseline year 2010.

Research & development for energy efficiency

We are fostering innovation & investments in various research and development activities in our operations and we have made significant achievements in utilizing waste heat recoveries, Computational Fluid Dynamics (CFD) based modelling targeted technological investments to enhance energy efficiency in our operations.

In the FY 2025-26, we successfully attained 414 MW of capacity through Waste Heat Recovery Systems and expanded our renewable energy portfolio to 1.39 GW.

We have taken various measures to enhance efficiency in our operations by upgrading our equipment by investing in Research and Development & taking various project interventions to reduce our energy consumption in our operations. Computational Fluid Dynamics (CFD) based modelling is one of the key Research and Development measures that enable us to optimize the power consumption of our various equipment, like Induced draft fans, also lowers the preheater exit gas temperature, optimizing thermal and electrical energy usage in our operations.

We have organized various capacity-building sessions for our employees to promote sustainable usage of energy by promoting energy efficiency techniques, which enable us to reduce our specific energy consumption.

Energy consumption (MWh)

Indicators	FY 2025-26
Total Non-Renewable Energy Consumption	10,42,21,458.38
Total Renewable Energy Consumption	36,56,289.04
Total Energy Consumption	10,78,77,747.41

Response to Climate Change

Mitigation and adaptation remain core pillars of our strategy as a response to climate change. We have conducted a comprehensive evaluation of our activities, value chain, and products to develop a mitigation strategy for risks associated with Climate change and to identify opportunities emerging from climate change. We have established a robust governance structure consisting of Board-level committee, Executive-level and Unit-level teams, which ensures the

resilience of our organization to manage climate-related opportunities and risks, and monitors the performance of our organization as per set targets.

In recent years, we have conducted on-site climate risk assessments for our facilities, and we will plan climate change assessments and develop adaptation plans for any upcoming facilities.

Furthermore, we are engaging with our value chain partners to ensure sustainable sourcing and align them with the sustainability framework. This also includes supplier capacity building and conducting assessments at sites.

Net Zero Transition

Our net-zero roadmap reflects our long-term ambition to achieve carbon-neutral concrete by 2050. Aligned with the Paris Agreement's goal of limiting global warming to 1.5°C and guided by the GCCA Concrete Future Roadmap, we are advancing a comprehensive decarbonization strategy. Key levers include reducing clinker intensity, increasing the use of low-carbon binders, enhancing energy and process efficiency, expanding the use of alternative fuels, and investing in innovative technologies such as carbon capture to support deep emissions reductions across our operations and value chain.

We have identified the Scope 1,2 & 3 Decarbonization levers and aligned actions to achieve our targets, we commit to reduce our Scope 1 emissions by 27% and Scope 2 emissions by 69% per tonne of cementitious material by FY2032 from FY2017 baseline as per our SBTi commitments. Currently we are in the advanced stages of re-validating our SBTi targets for Scope 1, Scope 2 & Scope 3 (category- 1 purchased clinker) to align with a 1.5°C trajectory, reinforcing the commitment to accelerated decarbonisation and net-zero ambitions.

Engagement with Stakeholders to Support the Achievement of the Transition Plan

UltraTech recognizes that achieving its climate transition objectives requires active collaboration across its value chain and broader stakeholder ecosystem. We regularly engage with key stakeholder groups to gather insights, address challenges, identify opportunities, and support the effective implementation of our transition plan.

Value Chain Engagement

We actively engage with suppliers, logistics partners, technology providers, fuel and raw material vendors, and customers to advance decarbonization across the value chain. These engagements focus on increasing the use of alternative fuels and raw materials, improving energy efficiency, reducing transportation emissions, promoting low-carbon products, and enhancing circular economy initiatives. Continuous dialogue with customers also helps us understand evolving market expectations and accelerate the adoption of lower-carbon cement and concrete solutions.

These initiatives include our logistic decarbonization, Sustainable procurement & continuously assessing our suppliers, Low-carbon raw material sourcing etc.

Industry Peers, Associations and Collaborative Initiative

We participate in industry forums, sectoral associations, and collaborative sustainability initiatives to exchange best practices, contribute to the development of industry standards, and collectively address common decarbonization challenges. Through these engagements, we gain insights into emerging technologies, policy developments, carbon management solutions, and pathways for achieving net-zero ambitions across the cement sector.

Government, Public Sector and Civil Society Engagement

We engage with government authorities, regulatory bodies, research institutions, and civil society organizations to support the transition towards a low-carbon economy. These interactions help us understand regulatory developments, contribute industry perspectives to policy discussions, support the deployment of sustainable technologies, and strengthen community awareness of climate-related issues. Such engagement enables us to align our transition strategy with broader national and global climate objectives while fostering inclusive and sustainable growth.

Through these stakeholder engagement mechanisms, UltraTech continuously refines its climate transition actions, strengthens implementation capabilities, and enhances transparency and accountability in pursuing its decarbonization commitments. We are engaging with The Company is actively progressing on carbon capture technologies through participation in the Department of Science and Technology (DST), Government of India, under the Special Call on Climate, Energy and Sustainable Technology (CEST). With IIT Madras and BITS Pilani as knowledge partners, we are focused on developing indigenous CCU based technology for decarbonisation of the Indian cement industry.

Towards Just Climate Transition

UltraTech recognizes that the transition to a low-carbon economy should be undertaken in a manner that is fair, inclusive, and socially responsible, while creating shared value for workers, communities, suppliers, and other stakeholders. The Company's approach to sustainability and decarbonization is guided by Just Transition principles, which seek to identify, understand, and address potential social impacts while enhancing positive outcomes associated with the transition.

Through its materiality assessment, stakeholder engagement processes, employee interactions, community consultations, supplier engagement, investor dialogues, and discussions with industry associations and government bodies, UltraTech strives to understand the perspectives, concerns, and expectations of stakeholders who may be affected by its business activities, including decarbonization initiatives. Insights gathered through these engagement processes help inform sustainability priorities, workforce development efforts, community investment programmes, risk management practices, and broader business planning processes.

As UltraTech advances its decarbonization roadmap through increased adoption of renewable energy, alternative fuels and raw materials (AFR), energy efficiency initiatives, electrification, and low-carbon products and technologies, the Company seeks to align its actions with Just Transition principles by supporting workforce readiness, community resilience, and inclusive growth. In doing so, UltraTech aims to minimize potential adverse impacts and maximize the social and economic benefits associated with the transition to a low-carbon economy. The Company strives to support these objectives through employee training, upskilling and reskilling initiatives, occupational health and safety programmes, local employment generation, supplier development, community engagement, social investment initiatives, and grievance redressal mechanisms.

UltraTech continues to strengthen its approach to understanding and managing the social and economic implications of decarbonization and aspires to further enhance its monitoring, measurement, and disclosure practices over time. The Company's approach is intended to support equitable outcomes for workers, communities, and other stakeholders while advancing its climate ambitions.

To monitor progress towards these objectives, UltraTech tracks and discloses a range of quantitative indicators related to workforce development, health and safety, employment generation, circular economy performance, and decarbonization outcomes, including:

- **Thermal substitution rate (TSR)** : Measures the positive impact of increasing alternative fuel usage, reducing dependence on virgin fossil fuels and managing diversion of Waste from landfills.
- **Plastic Negativity**: Reflects the Company's contribution to diverting plastic waste from landfills and the environment through co-processing and circular economy initiatives.
- **Low-Carbon Cement Production (Clinker-to-Cement Ratio)**: Tracks progress in producing lower-carbon cement by reducing clinker intensity and associated emissions.
- **Job Creation**: Monitors direct and indirect employment opportunities generated across rural, semi-urban, and urban areas, supporting inclusive economic development.
- **Average Training Hours**: Assesses the reach and effectiveness of capacity-building initiatives for employees and workers, supporting workforce readiness for the low-carbon transition.
- **Safety Training Hours**: Measures efforts to enhance occupational health and safety awareness and build a strong safety culture across operations.
- **Green Energy Share**: Tracks the proportion of renewable and low-carbon energy in the Company's energy mix, helping avoid and reduce greenhouse gas emissions.

These indicators enable the Company to monitor the social, economic, and environmental outcomes of its transition journey and support transparent reporting on Just Transition progress.

Waste Management

Our operations are designed to generate minimum waste at source, and we are embracing principles of circularity across all streams of our operations. We have conducted various waste audits to identify opportunities for developing action plans to reduce waste and plan sustainable disposal, and utilize waste as a resource wherever possible.

We have taken several actions to reduce waste generation and promote resource efficiency, and we are achieving excellence through continuous monitoring of performance against benchmarks for waste reduction through circularity principles. Furthermore, we have organized various capacity-building sessions that focus on waste reduction, utilizing resources in an efficient way, and reusing waste as an input material in our cement production processes. Fly ash, rejected screening material and sewage sludge generated from these operations respectively, are a resource to us and are reused within our operations.

We are fostering circularity through innovative solutions and investments that promote efficient resource utilization and continuous waste minimization. As part of this commitment, we have partnered with HPCL through a pioneering MoU to pilot the reprocessing of used lubricating oils generated at our manufacturing units into high-quality re-refined base oil at HPCL's Green R&D Centre in Bengaluru. The initiative will also explore the development of finished lubricants from the re-refined base oil, supporting resource recovery and advancing circular economy practices within the Indian cement industry.

Through our consistent efforts and targeted actions, we achieved the waste intensity of 0.016 tonnes/ tonne of cementitious materials with 23.81 % reduction from FY 2024-25.

We have adopted a zero-waste-to-landfill approach by integrating a range of resource efficiency and waste management programs. These include the reuse of fly ash generated from our operations in cement manufacturing, recycling of metal scrap and other recyclable waste streams, and co-processing of plastic waste as an alternative resource. As a result, more than 99% of the waste generated is diverted from landfill disposal, Our Zero waste to landfill disposals are certified by an Independent third party under BRSR principle disclosures.

Water Management

We are committed to take targeted actions for enhancing water conservation in our value chains and also at the community level. We have taken various initiatives to reduce water consumption, enhance water recharge, and reduce reliance on external water sources.

To ensure water security across our operations, we regularly assess and monitor water consumption across different processes and activities at our plants. This enables us to identify areas for targeted interventions and implement measures that enhance water efficiency and reduce overall water consumption. We are continuously working to reduce freshwater withdrawal by strengthening water management infrastructure, identifying improvement opportunities through detailed water-use tracking, and maximizing the reuse and recycling of

water wherever feasible. We have implemented strong water risk management strategies that allow us to recognise and assess risk impacts, while also planning mitigation measures for related risks in our operations, value chain, and product usage phases. We have undergone risk assessments related to water availability and water quality with future projections across our operations, supply chain, and product-use phase. These assessments help us identify water-related dependencies across our operations and develop targeted action plans to address associated risks and opportunities. This supports responsible water stewardship practices and contributes to the long-term sustainability and resilience of our operations. We continuously engage with local and national-level regulatory authorities and government bodies to foresee upcoming regulatory changes, and assess and prepare for any potential risk that may arise from these regulations. The risk assessment has been conducted at the watershed, enabling us to gauge the potential impacts on not only our operations, but local communities as well. These assessments enable us to develop strategies and take targeted actions to mitigate any actual and potential negative impacts.

We undertake regular employee awareness and capacity-building programs to foster a culture of water stewardship. By enhancing knowledge of efficient water management practices, these initiatives support water conservation, reduce consumption, and contribute to our broader water positivity ambitions. We deploy various initiatives to reduce water consumption by improving infrastructure, recycling waste water, and capacity building of our employees to create minimal impact on environment.

Furthermore, We have emphasized optimizing water consumption and reducing reliance on external water sources by enhancing the utilization of harvested rainwater in our water-stressed facilities. Our efforts have resulted in significant achievements. Currently 8% of our facilities operates in water stressed region.

Water consumption in water-stressed areas

Water consumption in water stress area (In kL)	FY 26
Total Fresh Water consumption in water stressed areas	50,69,919

Product Stewardship

Product sustainability is a key focus area at UltraTech. Through extensive research and innovation, we aim to reduce our product's environmental footprint. We have conducted life cycle assessment (LCA) for 4 of our cements and published their Environmental Product Declaration (EPD). Our LCA results constitute a detailed analysis and potential for all indicators mentioned in the table below.

Please refer to - [EPD Disclosed data](#)

Life Cycle Assessment Parameters assessed

Parameter	Description
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Abiotic Depletion Potential (ADP) – Elements	Measures the depletion of non-living (abiotic) resources such as minerals and metals. It indicates the potential impact of resource extraction on the availability of these elements for future generations.
Acidification Potential (AP)	Represents the potential of emissions to cause acid rain, which can lead to harmful effects on soil, water bodies, and ecosystems.
Eutrophication Potential (EP)	Indicates the potential for nutrient enrichment in aquatic ecosystems, leading to excessive growth of algae and depletion of oxygen. This is often caused by nitrogen and phosphorus compounds.
Global Warming Potential (GWP 100 years)	Quantifies the potential contribution of greenhouse gases to global warming over a 100-year period. It is expressed relative to carbon dioxide (CO ₂), which has a GWP of 1.
Ozone Layer Depletion Potential (ODP, steady state)	Measures the potential of substances to degrade the ozone layer, which protects life on Earth from harmful ultraviolet radiation. It is expressed relative to CFC-11, a reference substance.
Photochemical Ozone Creation Potential (POCP)	Represents the potential of volatile organic compounds (VOCs) to form ground-level ozone (smog) under sunlight, which can affect human health and vegetation.
Abiotic depletion potential (ADP) - Fossil	Assesses the depletion of fossil fuels such as coal, oil, and natural gas. It reflects the impact of fossil fuel consumption on resource availability.

Further to reduce our environmental footprint, we are consistently working to promote Local sourcing from our suppliers.

We are not using any prohibited chemicals in our cement products directly and our products has also gone third party testing for several chemicals and found Below the limit of quantification.

Low embodied carbon products

We have received Green Pro certification for 70+ of our products. Our low-carbon products – blended cements - Portland Pozzolana Cement (PPC), Portland Slag Cement (PSC), and Composite Cement (CC), are produced by blending 20% - 50% supplementary cementitious materials (SCMs) with clinker. As compared to 92% clinker in Ordinary Portland Cement (OPC), blended cements have as low as 35% of clinker content, resulting in low embodied carbon in these cements. Furthermore, these product ranges aim to support reduced water consumption during the product use phase, supporting climate change mitigation and adaptation due to lower emissions, higher content of alternative cementitious materials in terms of fly ash and slag, etc. (PPC, PSC, CC), and promote water harvesting and conserving biodiversity in the larger picture. Our PSC, CC cements have specific net CO₂ emission <440 Kg CO₂/ ton of cement (scope-1 basis).

Investments in Sustainable Products, Services and Manufacturing Infrastructure

UltraTech continuously invests in research and development, advanced testing facilities, process innovation, and manufacturing infrastructure to expand its portfolio of sustainable and low-carbon building materials. Our R&D Centre focuses on reducing clinker factor, increasing the use of supplementary cementitious materials (SCMs) and industrial by-products, improving resource efficiency, enhancing product durability, and developing innovative low-carbon solutions. These investments have enabled the development and wider adoption of blended cement products, including Composite Cement (CC), which offer lower embodied carbon and reduced energy consumption compared to conventional Ordinary Portland Cement (OPC). Through collaborations with industry initiatives such as the Global Cement and Concrete Association (GCCA) and Innovandi, we continue to accelerate innovation aligned with circular economy principles and our long-term decarbonisation ambitions.

R&D Resources for Sustainable Products and Services

UltraTech's R&D efforts play a critical role in advancing sustainable product development and manufacturing practices. The R&D Centre supports the development of low-clinker products, increased utilization of supplementary cementitious materials and industrial by-products, detailed characterization of alternative fuels and raw materials, process optimization through computational fluid dynamics (CFD) modelling, and circular economy initiatives. Through advanced testing, product innovation, and process improvement, R&D contributes to reducing carbon emissions, conserving natural resources, improving operational efficiency, and enhancing product performance throughout the lifecycle.

Infrastructure Improvements for Sustainable Manufacturing

UltraTech has made significant investments in infrastructure and technology to support the sustainable production of its products. These include facilities and systems that enable greater use of alternative fuels and raw materials, improved energy efficiency, enhanced waste utilization, advanced quality control, and digital process optimisation. We also improve our process and energy efficiency using CFD modelling. Such investments support lower-carbon manufacturing, efficient resource utilization, and improved product consistency while contributing to the Company's broader sustainability and net-zero objectives.

In FY 2025-26, we invested ₹26.95 crore in R&D, reflecting our continued commitment to strengthening our sustainable product portfolio.

Capacity Building and Training on Sustainable Design and Innovation

UltraTech conducts regular training and capability-building programmes to strengthen competencies related to sustainable design, innovation, and product development. Through initiatives led by the R&D Centre, collaborations with GCCA and Innovandi, Learning & Development programmes, and the Aditya Birla Group's Gyanodaya platform, employees receive training on sustainability, decarbonisation, resource efficiency, digital technologies, circular

economy practices, and future-ready manufacturing solutions. These programmes enhance the capabilities of R&D, technical, engineering, and operational teams, enabling them to design, develop, and implement sustainable products and processes across the value chain

Not only we produce blended cements at our units, but we also encourage our direct key customers (B2B) to blend the OPC sourced from us with SCMs at their project sites, within statutory norms, enabling them to reduce the carbon footprint of their buildings.

The highlights of our product stewardship initiatives for FY 2025-26 are as follows:

Revenue through Blended Cements (in INR)	610732800000
Avoided emissions through low-carbon products (Own operations)	3,09,62,580.03 tCO ₂
Avoided emissions through low-carbon products (third-party)	1,35,34,39,478.19 tCO ₂

In ready-mix concrete

Natural raw materials (In tonnes)	95,81,989.42
Alternative material (In tonnes)	5,00,704.41
% alternative raw materials contained in concrete (excluding natural raw materials e.g., gypsum, pozzolan)	4.97 %

Sustainable products

UltraTech promotes sustainable products through performance-linked incentive mechanisms and clearly defined monthly targets for Sales and Technical teams. These targets focus on increasing the sales of blended cement and Green Pro-certified products, while dedicated service-related objectives encourage customer engagement and technical support. This approach aligns business growth with sustainability objectives and incentivises sales employees to promote revenues from low-carbon construction materials and solutions.

Biodiversity Impact Assessment

We are committed to achieve our no net loss target by 2050, with a broader vision we are aspiring for creating net positive impacts on biodiversity. We further strive for no net deforestation in our operations and encourage suppliers, partners, and other stakeholders to adopt similar practices within their value chains.

Process

Biodiversity Impact Assessment at Integrated units is carried out by application of impact assessment matrices prescribed by Aditya Birla Group Technical standards and Guidance Note. The impact assessment process consists of two steps:

1. Identification of Impacts

The impacts on biodiversity attributes are identified and evaluated considering the types and magnitude of industrial operation. The ABG Sustainability Framework, Guidance Note Biodiversity Impact and Risk Assessment, defines 28 impacts in 9 broad categories as mentioned below:

1. Impacts on Forest and Other Land Resources
2. Impact on Water Resources
3. Impacts on Ground Water – Pollution
4. Impacts of new structures due to industrial operations, i.e., waste dump
5. Impacts of Dust and Noise Pollution
6. Effects of Vehicular Movements on Faunal Groups
7. Impacts on Threatened and Unique Biodiversity
8. Impacts of the Labor Force
9. Impacts on Wildlife Corridor

2. Categorization of impacts using the impact matrix

After the impact identification with description, the evaluation of the likelihood of the impact and the potential of mitigation is documented in a biodiversity impact matrix. The biodiversity impact matrix is a tool to measure impact based on the mixture of the likelihood of expected impacts of the possibility of mitigation. It plots the Likelihood of Impacts on the Y-axis and the Potential of Mitigation on the X-axis. Likelihood of Impacts is further broken down into three components: Almost Certain/Likely; Moderately Likely and Unlikely. Similarly, the Potential of mitigation is also broken down into four components: Irreversible; Difficult to Mitigate; Can be mitigated by interventions; and can be Reversed Naturally.

Scope of Assessment

Integrated units and surrounding areas are assessed for impact on biodiversity. We conduct biodiversity impact assessments for each operational site within a 10 km radial buffer zone around the core area (mine lease area). The study area is systematically divided into grids. We have assessed our sites using this consistent approach, ensuring thorough evaluation of ecological impacts within a 10 km radius.

As part of our comprehensive biodiversity risk assessment, we have identified potential physical risks and their impacts on supply chain disruptions, encompassing both upstream and downstream activities. Additionally, we have evaluated market risks arising from shifting consumer preferences, ensuring our strategy remains adaptive and resilient.

We have thoroughly evaluated our dependency on biodiversity and its risks and impacts on our operations and upstream and downstream activities, and accordingly developed Biodiversity management plans for our sites.

Biodiversity-related risks identified

1. Loss of forest land impacting the biodiversity value (floral and faunal) of the project area by direct loss of habitat
2. Noise and associated ground vibration impact the lower vertebrates mainly the ground-dwelling reptiles and small mammals
3. Change the normal behavior in the form of restricting the movements, feeding, resting, and breeding activities of major faunal groups of the project area.

These identified biodiversity risks and impacts are well integrated under Enterprise risk management as a part of overall climate and sustainability risks, as we have taken targets to achieve no net loss by 2050, failure to achieve this may create reputational, regulatory and business continuity risks.

Mitigation Actions

Our assessed sites have implemented comprehensive Biodiversity Management Plans (BMPs) for mitigation of identified risks and impacts. UltraTech has undertaken several initiatives to minimize our impact on biodiversity. Here are examples of these initiatives across different categories of the mitigation hierarchy:

Avoidance: Avoidance remains a fundamental pillar of our Biodiversity Management Plan, fully aligned with our Biodiversity Policy. Our primary focus is to proactively prevent any adverse impacts on biodiversity through responsible operational practices, we have taken several initiatives Such as to:

- Avoid operational activities in proximity to World Heritage areas and IUCN Category I-IV protected areas
- Avoid operating in critical habitats and ecologically sensitive areas
- Avoid the introduction of any new potentially invasive, non-native species and seek to eradicate these within our operational sites (Refer to: Biodiversity Policy)
- Preserving ecosystems: Ensuring that existing ecosystems are protected from disturbance and raising awareness around.
- Maintaining noise levels below 85 dBA: Mitigating the impact of noise pollution on wildlife.

Minimization: We strive to create minimise adverse impacts and enhance positive impacts on Biodiversity wherever possible, we have taken proactive steps which includes:

- Developing green belts to restore mined areas and to reduce impacts and promote biodiversity.
- Establishing nurseries to meet sapling requirements.
- Creating check dams to counter erosion and prevent soil erosion and habitat degradation.
- Constructing rainwater harvesting structures to improve water availability.

- Developing butterfly gardens to attract butterflies: Enhancing local biodiversity and supporting pollinators.

Restoration/Rehabilitation: Our mitigation efforts strongly focus on Restoration and rehabilitation principles. We have undertaken several initiatives which includes:

- Storing and conserving water in mined-out pits and restoring water resources.
- Establishing bird nests and additional green spaces to enhance habitats for birds and other wildlife.
- Initiating apiculture (beekeeping) within plant and colony areas for habitat enhancement.

Transformation: Our biodiversity mitigation efforts, focuses on addressing the root causes of nature loss by reimagining our operations, value chain, and products to generate positive environmental outcomes. We are committed to:

- Capacity building and empowering our employees and establishing effective mechanisms for biodiversity stewardship.
- Transforming landscapes through targeted ecological interventions that restore and cherish biodiversity.
- Promoting soil and wildlife conservation through active participation of local communities and stakeholders.
- Demonstrating product and environmental stewardship by innovating sustainable solutions such as *UltraTech Enviroplus* and *ZeroCAL*, which reflect our commitment to nature-positive business models.

These initiatives reflect our strategic shift from minimizing harm to actively regenerating and enhancing biodiversity across our operations.

We have undertaken a transformative biodiversity mitigation initiative in collaboration with local stakeholders, community in the drought-prone Chitakheda region of Neemuch, Madhya Pradesh. The area, once severely impacted by ecological degradation, agricultural failure, deforestation, and wildlife loss, has seen a remarkable revival through our integrated watershed management approach. Our interventions—particularly soil conservation through terracing and bunding—have led to forest regeneration, the return of wildlife, and improved agricultural productivity. These efforts have restored ecological balance and built long-term resilience in a previously threatened landscape. Today, Chitakheda stands as a model of ecological revival, reflecting our commitment to sustainable development and environmental stewardship.

Key Highlights for UltraTech Integrated units

S.no.	Indicators	No.	Operational area (in m ²)
1	Total sites	35	39,55,81,520.23
2	Sites assessed	24	32,60,16,070.00

3	Site's proximity to Critical areas/eco-sensitive zone	5	8,78,96,700.00
4	Site's proximity to Critical areas/eco-sensitive zone with biodiversity plans	5	8,78,96,700.00
5	Sites with Biodiversity management plans (Overall)	24	32,60,16,070.00

Sustainable Supply Chain

UltraTech has implemented a sustainable supply chain program to screen and assess its suppliers on ESG criteria. We have developed an extensive framework for assessing ESG parameters of the associated suppliers, with Board-level and Executive-level oversight for its implementation. The framework is in alignment with SMETA's 4-pillar and GCCA's guidelines on sustainable supply chain.

Guided by a robust ESG framework, we ensure our suppliers share our commitment to sustainability, enabling responsible sourcing and strengthening the resilience and integrity of our supply chain. Oversight of the implementation of sustainable supply chain programme is monitored at both board level and by internal review committee headed by Chief Procurement Officer.

Our sustainable supply chain framework integrates responsible sourcing, risk mitigation, and supplier development aligned with strong ESG principles.

We embed sustainability into every stage of supplier engagement, UltraTech integrates sustainability into procurement through strategic sourcing, vendor assessments, and digitisation, ensuring cost efficiency, environmental stewardship, We also have integrated supplier ESG assessments into our decision-making and procurement processes. Suppliers scoring below our minimum threshold must undergo training and frequent reviews; continued non-compliance may lead to ending the business relationship. Those exceeding our benchmarks receive additional weightage in contracts, reinforcing our ESG focused procurement approach.

We continuously review our purchasing practices to ensure the delivery of high-quality products while meeting ESG requirements, thereby fostering a sustainable supply chain ecosystem. We actively support our value chain partners through regular training programs, desk-based and on-site assessments, and by guiding them with industry ESG benchmarks, along with case studies and corrective action plans to help them align with our Sustainability frameworks.

All new suppliers are evaluated on ESG parameters before onboarding, ensuring alignment with our sustainability standards from the outset.

We conduct both desk-based and on-site assessments of our suppliers through second-party evaluations. Furthermore, to ensure transparency and accountability, our assessment processes and supply chain indicators for programs are independently verified by a third party.

We have identified screening KPIs on the basis of commodity-specific, sector-specific and geography-specific risks. The framework is largely tailored around pillars of governance (policies

and disclosures), environment (emissions, waste, and resource efficiency), and social (health & safety and CSR expenditure).

Supplier KPIs

1.1	Total number of unique suppliers	18713
1.2	Number of unique significant suppliers	134
1.3	Number of unique significant suppliers supported with development measures (as a subset of 1.2)	134
1.4	Number of unique significant suppliers assessed via desk assessments/on-site assessments (as a subset of 1.2)	134
1.5	Number of unique significant suppliers assessed with substantial actual/potential negative impacts (as a subset of 1.4)	33
1.6	Number of unique significant suppliers with substantial actual/potential negative impacts with agreed corrective action/improvement plan (as a subset of 1.5)	33
1.7	Number of unique significant suppliers with substantial actual/potential negative impacts that were terminated (as a subset of 1.5)	0

Other Environmental KPIs

Environment KPIs	FY 2025-26
Direct mercury emission (metric tonnes)*	BDL
Production of cementitious material (metric tonnes)	153909535

*We have carried out periodic inspection at our facilities as per USEPA-29 testing protocol. At all places Mercury emissions are found Below Detection Limit (BDL).

Scope 2 emissions

Indicators	FY 2025-26	FY 2024-25	FY 2023-24
Total Location based (t CO₂)	3442575.80	2703494.58	2303012.44
Total Market based (t CO₂)	2047787.71	1884213.56	1884386.57

SOCIAL

Human Rights

Our commitment

We are committed to respecting human rights and have zero tolerance for rights abuses of any kind. We implement policies and processes with a systematic, do-no-harm approach, and ensure respect and dignity for all our stakeholders.

We have established our Human Rights Policy in accordance with international standards, including the United Nations Global Compact (UNGC) and the International Labour Organization (ILO). No employee is discriminated against based on their ethnicity, gender, age, political orientation, religious belief, or physical disability. We believe in cultivating a culture which promotes Zero discrimination & harassment based on ethnicity, gender, age, political orientation, religious belief, or physical disability, and provide equal opportunity to all of our valuable stakeholders for enabling an inclusive environment.

Please refer [Human Rights Policy](#).

Human Rights Management

We have developed a comprehensive and holistic approach towards the management of Human rights issues and create positive impacts on our stakeholders. This approach is based on the following pillars

- **Risk identification:** Identification of human rights risks & minimising the human rights abuse, whether it be at the Company level or the supplier/contractor side.
- **Identify vulnerable group:** Identification of vulnerable groups & setup committees to resolve human rights issues on vulnerable groups.
- **Risk prevention, mitigation, and remediation:** Develop processes to mitigate human rights risks, which comprises setting up a robust Governance structure for reporting and remediation as per procedures laid out, and also to provide training and capacity building of all value chain members for spreading awareness regarding respecting human rights.
- **Monitoring and review:** Continuous review and progress on human rights issues. Also, a quarterly Company-level review is conducted by a central team.

Based on these pillars, we have developed a holistic approach for establishing Human rights due diligence processes, which includes:

- Risk identification in our own operations
- Risk identification in our own value chain or other activities related to our business
- Risk identification in new business relations, be it some new venture, merger or acquisition
- A systematic periodic review of the risk mapping of potential issues observed

The human rights issues listed as part of our due diligence process are exhaustive, ranging from forced labour, human trafficking, child labour to freedom of association, right to collective

bargaining, equal remuneration, discrimination, to name a few. The groups covered as part of our assessment are our own employees, women, children, indigenous people, migrant workers, third-party contracted workers, and local communities.

In-house tool

We have a strong commitment towards upholding dignity and human rights and developing a conducive environment to nurture an inclusive workspace for all. We have developed a comprehensive in-house tool for conducting human rights due diligence, which contains a list of potential Human rights issues as per the business context. This enables us to identify the probability of occurrence & possible impacts on stakeholders due to any human rights violations, and also to identify the potential risk and opportunities emerging from activities in our operations and value chain. The identified potential risks are then prioritised through assessing severity and likelihood of occurrence. Action plans are developed to mitigate any associated potential risks; this process is continuously reviewed to develop risk management plans.

Reporting Mechanisms

UltraTech has multiple mechanisms available for reporting issues.

1. Xpedite: This is a portal to raise grievances. Employees can access it and raise grievance. The portal has an escalation matrix to ensure timely resolutions of grievances.
2. Integrity Matters Portal: A portal managed by an external third party which can be used for reporting any violations on ABG Values and POSH. This portal offers the highest level of confidentiality. The portal also enables a complainant to raise an issue anonymously. This portal can be used by employees, non-employees, and whistleblowers. Complaints can be shared via email, reported on the portal, or sent via post.
3. Each unit is also equipped with a dedicated Grievance Redressal Committee (GRC).

Mitigation and remediation

On the basis of our HRDD results and findings, we have developed robust mitigation & remediation strategies to reduce potential human rights risk in our operation, which includes company as well as supplier/contractor level issues. Responsibilities are assigned to respective functions and teams to take corrective actions for identifying issues and impacts on vulnerable groups. In addition to that we have developed an agile review mechanism that reviews the progress and action taken every quarter at site and organizational levels. In alignment with our Anti-Discrimination and Harassment Policy, we have implemented effective mechanisms for reporting, grievance redressal, and taking disciplinary actions.

We have established Grievance redressal committee at plant level which addresses grievances raised by employees and worker including human rights as well.

Furthermore, to reinforce our commitment to a respectful and harassment free workplace, we have set up POSH (Prevention of Sexual Harassment) Committees across all sites. We follow

a Zero Tolerance approach in handling POSH complaints, with strict corrective actions including formal warnings and terminations where necessary.

For the health and safety of our workforce, we have a dedicated Safety Department that conducts regular audits, identifies root causes of incidents, and implements corrective actions to maintain a safe working environment.

We are regularly conducting desk-based and onsite assessments with our value chain Partners, which includes Human rights aspects under our Supply chain assessment programs. Suppliers are categorised into high, medium low risk categories based on their performance, and score based on that, we are providing handholding support for corrective actions at their end.

These measures reflect our dedication to upholding human rights in a responsible, transparent, and proactive manner.

Diversity and Inclusion

At UltraTech, we recognize the invaluable contributions of our stakeholders—including our workforce, local communities, and our customers—in shaping the organization’s journey and success. We are committed to fostering inclusive growth by creating equal employment opportunities and actively integrating diverse sections of society into our workforce. These efforts have positively impacted social development and reflect our dedication to responsible and sustainable business practices.

Diversity, Inclusion, and Cultural Education

Our workforce is composed of individuals from diverse nationalities, regions, and genders. At UltraTech, we are committed to fostering an inclusive environment that respects and values different cultural backgrounds and perspectives. We uphold the principle of inclusion by actively promoting diversity across all levels of the organization.

To support this commitment, we have introduced various policies and cultural education programs aimed at increasing awareness, understanding, and mutual respect among employees. These initiatives are particularly important in our multicultural work environment and help strengthen collaboration, communication, and cohesion across teams. Whether operating within a single region or across international borders, cultural education plays a vital role in building a respectful and unified workplace culture. These further include celebration of different festivals from diverse cultures and ensuring personal conduct to cherish and respect different cultures.

Employee Development

Employees are the key assets to our Company. It hosts multiple programs and provides several learning and growth opportunities to its employees and workers.

We offer a diverse range of training programs aimed at enhancing the capabilities of our workforce. These include leadership development, technical skill enhancement, coaching and

mentorship, occupational health and safety (OHS) training, behavioural development, and training in digital tools.

Furthermore, we have expanded our training portfolio to include modules focused on upskilling for emerging industry trends, such as digital transformation and sustainability. Special emphasis is placed on climate change awareness and preparedness, ensuring our employees are equipped to contribute effectively in a rapidly evolving industrial and environmental landscape.

The key employee development programs are summarized below:

Coaching and Mentorship program

At UltraTech, coaching and mentorship have been integral to a guided learning approach provided under accelerated leadership programs like Emerge and StepAhead. These interventions support participants in navigating role transitions, challenges, and implementing Action Learning Projects over the course of the program.

The ABG ‘Coaching for Cultural Transformation’ initiative is primarily designed to enhance Coaching as a Culture to drive people transformations at various levels within the Group; as well as influence every people Manager within the organization to become effective, transformational Coaches. As of 31 March 2026, we have 38 ABG certified coaches with 6 employees voluntarily availing coaching support.

Coaching is being leveraged to shift managerial culture – from telling and instructing to asking and listening, fostering self-awareness, empathy, conflict resolution, and stronger talent engagement. These efforts contribute to improved productivity, retention, and leadership effectiveness across the organization.

Learning through Employee Resource Groups teams and network

HERizon, UltraTech’s first Employee Resource Group (ERG) for women in manufacturing, was launched in FY’25 as a strategic pillar under the Diversity & Inclusion charter. It is more than a symbolic initiative; it is a business enabler designed to support UltraTech’s ambition of being a 200+ MnT agile and inclusive organization. The ERG is anchored in creating a resilient, diverse pool in critical operations while building a culture of equity, psychological safety, and accountability across units. With a decentralized structure led by plant-level ERG Leads and central guidance from the BCOE, HERizon fosters grassroots ownership of visible change. Key goals include accelerating women’s representation, breaking stereotypes, and enabling an ecosystem to thrive across career and life stages.

Critical Shifts and Business Relevance

HERizon has catalysed a shift from a **protective to a performance-driven lens**, enabling women to be seen as contributors rather than exceptions. Male colleagues now recognise inclusion as a “**business conversation**,” and plant heads are using the ERG to co-create agendas with women employees. Visible change is not limited to infrastructure it now encompasses hiring, leadership

conversations, skill-building, and daily shopfloor interactions. HERizon is shaping the fabric of UltraTech's future workforce of being agile, inclusive, and capable of sustaining growth in high-performance environments.

StepAhead – Career Acceleration Journey Program for Territory Sale Heads (TSH)

StepAhead is a 15-month structured capability-building program aimed at preparing Territory Sales Heads (TSH) in S&M vertical for future leadership roles such as Regional Heads- Marketing. Aligned with UltraTech's rapid growth and organizational integration goals, the program focuses on enhancing functional, behavioral, and leadership competencies. Based on the 70:20:10 learning model, StepAhead is divided into two levels—**Business Skills** and **People Skills**—and includes masterclasses, mentoring, and on-the-job learning. This initiative ensures a future-ready leadership pipeline to sustain UltraTech's business expansion and operational excellence.

Impact: The major advantage of the program has been internal talent pipeline versus cost of external hire. StepAhead has evolved over the last 5 years, several participants being placed in higher / larger roles. In FY26, 30 employees were promoted to higher roles through internal talent mobility and succession planning initiatives, resulting in estimated hiring cost savings of ₹25.5 lakh through reduced external recruitment requirements.

Besides the tangible benefits of the program (in terms of internal bench strength), other aspects catered by the program served are:

- Retention of HIPOs (High Potentials)
- Building aspiration in the TSH through visibility of the career development program

Junior to Mid-level leadership development

As part of the organization's Fit to Grow learning pillar, multiple structured Leadership Development Programs were implemented during FY 2025–26 to build a strong pipeline of future leaders across Sales & Marketing and Manufacturing functions. These programs are designed to enable career acceleration, role transitions, and leadership readiness through structured, blended learning interventions.

ELEVATE: This is a career advancement journey launched in FY 2025–26 to prepare identified Customer Relationship Managers (CRM) & equivalent role holders for readiness into Territory Sales Head (TSH) & equivalent roles. The program focuses on building leadership capability and commercial acumen required for next-level responsibilities.

Key capability areas covered:

Leadership mindset, customer-centric thinking, consultative selling, channel understanding, and overall business ecosystem management.

Employees covered:

- **41** participants from the Sales & Marketing vertical
- High-potential CRM & equivalent role holders

STRIDE: This is a Fit to Grow career advancement program aimed at grooming selected **Territory Manager – Technical Customer Solution (TCS) & equivalent role holders** for transition into **Regional Head – Technical & equivalent leadership roles**.

Key capability areas covered:

Leadership mindset, customer-centric thinking, market awareness, consultative selling, stakeholder management, and business ecosystem understanding.

Employees covered:

- **26 participants** from the Sales & Marketing vertical
- Identified high-potential TM-TCS & equivalent role holders

Program Effectiveness

- 6 out of 41 participants promoted to next level from Elevate program
- 7 out of 26 participants promoted to next level from Stride program

Learning program for Contractual employees

UltraTech has developed a Trade Specific Competency Framework covering critical manufacturing trades to strengthen workforce capability, improve operational effectiveness, and establish structured career pathways for both on-roll and contract workmen. The framework currently covers 6,647 workmen across Fitter, Electrician & Instrumentation, HEMM Operator, and Welder trades.

Objective

Develop a trade-wise competency framework aligned to business requirements and operational excellence.

A total of 1,969 workmen have completed the training Programme.

Moving towards Just Industrial Transition

Digital Transition Programs

Our training and development programs are designed to prepare our workforce for emerging industry demands, including digitalization, Industry 4.0, and the understanding and application of Generative AI. These modules ensure that employees are equipped to deliver value in a rapidly evolving industrial landscape.

These courses enable employees to effectively leverage digital advancements, resulting in enhanced efficiency and productivity. They play a vital role in supporting the organization's broader goal of digital transformation.

In alignment with our commitment to a just transition, we ensure that the shift toward sustainable and technologically advanced operations is inclusive and equitable. Our approach prioritizes reskilling and upskilling, enabling employees to adapt to new roles and responsibilities while minimizing disruption to livelihoods. This ensures that no one is left behind as we move toward a more sustainable and innovative future.

Transition Program for Retiring Employees

Enabling Description a New Life Post Retirement (ENLPR)

This learning event is designed to support participants in preparing for significant life and career transitions post-retirement. Key outcomes include:

- **Personal and Family Readiness:** Enhance awareness for both participants and their spouses regarding potential future changes, and assist in developing a structured transition plan.
- **Career and Life Planning:** Facilitate the exploration, discussion, and development of ideas for the next phase of one's career or personal interests, culminating in a practical realization plan.
- **Holistic Guidance:** Provide insights and address queries related to health, nutrition, financial planning, and legal matters to support informed and confident decision-making.

7 employees have been covered in this program.

Workforce-Driven Sustainability and Climate Action

Sustainability is deeply integrated into our operational practices, with our workforce playing a pivotal role in achieving targets related to energy efficiency, water conservation, waste reduction, and upholding ethical standards in business conduct.

We regularly conduct training sessions to raise awareness about climate change, emphasizing the urgency of action and strategies to mitigate its adverse impacts. These initiatives are closely aligned with our climate action plan, which includes proactive measures to safeguard facilities and personnel against risks associated with extreme weather events such as heatwaves and flooding. Our objective is to ensure minimal disruption and protect the well-being of our workforce under such conditions.

In addition to that, we have done capacity building programs for our workforce focussing on enhancing energy efficiency, reducing water consumption, waste minimization etc for creating greater positive impact on the environment.

Respecting Diverse Cultures at UltraTech

At UltraTech, we take pride in having a workforce that represents diverse sections of society. We are deeply committed to fostering a workplace culture rooted in respect, inclusion, and zero tolerance for discrimination or harassment. To support this, we have introduced various policies and cultural education programs aimed at increasing awareness, understanding, and mutual respect among employees. These initiatives are particularly important in our multicultural work

environment and help strengthen collaboration, communication, and cohesion across teams. These efforts aim to build a unified, inclusive environment where diversity is celebrated and aligned with our shared goal of organizational growth.

Expanding social protection for the Workforce

UltraTech offers a comprehensive range of benefits to employees and workers to support their overall well-being. Beyond statutory benefits, the Company implements unit-specific social protection initiatives tailored to local needs and workforce requirements. These include access to loan facilities, concessional education support for employees' and workers' children, regular health camps, and various welfare programs that extend beyond public social protection provisions. Through these initiatives, UltraTech remains committed to promoting the professional, financial, and personal well-being of its workforce.

Employee Well-being and Safety

We have multiple employee support and well-being programs, aiming to enhance both physical and mental well-being of employees.

Establishing work life balance.

We have pro strong commitment to ensure healthy and balanced work environment by aligning working conditions with employee needs. Our various policies like Anti-harassment and anti-discrimination policy, Human rights policy, code of conduct focuses on ensure all legal and regulatory compliances. Our commitments include

- Avoid excessive working hours & Setting maximum working hours as per Factories act 1948 provisions.
- Pay workers for annual leave as per Factories act 1948 provisions.
- Equal remunerations to men and women as Equal remuneration act,1976.

We also ensure that our suppliers, contractors, and partners adhere to the regulatory provisions of the Factories Act, 1948, for setting work hour limits, wages, better conditions of work and maintaining consistent standards across our operations.

We offer flexible working hours and work from home options to our employees as per business requirements, supporting work-life balance. Our sites are equipped with breastfeeding facilities within their respective Occupational Health Centres (OHCs) to support nursing mothers.

In compliance with the Factories Act, 1948, we have set clear limits on maximum working hours to prevent excessive or prolonged work periods. Our Time Office and software systems are used to monitor employee attendance, including check-in and check-out times, ensuring accurate tracking of working hours and effective management of overtime.

This further ensure our commitments included under to compensate employees in a fair and transparent manner and also to ensure all legal and regulatory compliances and uphold responsible pay practices including living wages where applicable.

Overtime hours are calculated based on recorded attendance data, and employees are duly compensated for any additional work beyond regular hours. We also ensure that our suppliers, contractors, and partners adhere to the regulatory provisions of the Factories Act, 1948, for setting work hour limits and maintaining consistent standards across our operations. We are also compliant by the legal provision for setting minimum notice period for lay off (if any).

Furthermore, Our Leave Policy empowers employees to take time off for health, personal needs, and relaxation, enabling them to manage life's priorities effectively. We ensure well-being of our employees by encouraging them to utilise their Paid leave entitlements.

We conduct regular meetings with unions and workers' representatives to discuss working conditions and address any grievances. In addition to that Our teams conduct regular audits, reviews regarding safety & working conditions. We also encourage our employees and workers to raise their concerns fostering a transparent and supportive environment that promotes continuous improvement in working conditions.

Compensation and Benefits

Our organization conducts annual compensation reviews to ensure fairness, competitiveness, and recognition of employee contributions. These reviews are aligned with statutory requirements, market benchmarks, and individual performance, ensuring transparency and ethical conduct throughout the remuneration process.

We ensure Equal pay and remuneration for all our employees as per our commitments included in Anti-harassment and anti-discrimination policy, Human rights policy and Code of conduct.

[Anti-harassment and anti-discrimination policy](#)

[Human rights policy](#)

We are regularly monitoring pay gaps and transparently disclosing ratio of salaries for women to men and also mean, median gender pay gaps. We review our wage data on regular basis and based on that we devise our strategies and actions.

We strictly adhere to the minimum wage regulations established by the relevant government authorities. All work orders and contractual agreements are structured to guarantee that workers receive compensation equal to or exceeding the prescribed minimum wages.

This provision ensures our adequate remuneration on and above living estimates and market benchmarks.

We annually disclose details of minimum wages paid to employees and workers under BRSR disclosure Principle 5. This year 100% of our employees and workers received compensation equal to or exceeding the minimum wages.

Employee Engagement

We conducted the ABG Vibes survey, a third party-led initiative, to understand and strengthen employee engagement. This survey constitutes various questionnaires which help us to map Job satisfaction, Job purpose and motivation, happiness at work, stress levels at work, Approachability of leaders, development opportunities in current role, Empowerment in job role, aspiring carrier in organization etc.

This survey not only helps us gauge employee sentiment across the organization but also enables us to identify areas that require improvement. By understanding what our employees value and where they see opportunities for enhancement, we can strategically align our actions to foster a more conducive and empowering work environment. In FY 2025-26, we achieved a 97% participation rate, reflecting the trust our employees place in us. The survey recorded a 95% Engagement score, with a 1% improvement from last FY 2024-25. These results highlight our continued commitment to creating a positive, engaging workplace where every employee feels heard, valued, and motivated to grow.

Wellness programs

UltraTech values the proverb 'Health is Wealth' and makes it part of its employee care. Various measures spanning from mental health to physical well-being is taken for the benefit of employees.

Mental Health:

"Life Unlimited" is an Employee Assistance Program (EAP) for employees in India.

It provides counselling support to address and resolve issues that are important for employee and their family. This is free and confidential service available, via, Email and Telephone. A face-to-face interaction can also be sought in case of need. Services include:

- 100 Counsellors in India
- Toll free number to reach out the counsellors
- 24X7 counselling facility
- 24 hours response time to counselling query
- Special requests like regional language requirements, gender, location specifications are taken care.
- If an employee feels that he or she needs to speak with a counselor urgently, then the urgent cases are taken care of within 4 hours.

Stress:

We understand that environmental conditions and other non-controllable things in life can lead to stress in our people. We have launched various initiatives to de-stress our people. We have conducted self-awareness survey for the people to make them aware of the level of stress they are in. This step serves as diagnostic system. Post this step, we conduct various sessions which

involves Yoga and interventions at regular intervals to minimize stress and keep our people live stress free and 'happy on the go'.

Sports & Health Initiatives:

Various activities as sports for the employees and their family members are conducted on regular basis both at various units and Head office. Gym is also present at locations to help employees maintain their fitness post work. At various units, in company clubs, gym is available for family members as well. Playground made specifically for various sports as Cricket, Football etc. is present at various units, which is available for employees and their family members. UltraTech aspires to do a holistic development of its employees and their family members as together they make a happy and healthy community.

Family Benefits:

Maternity Leave: Every woman is entitled to 26 weeks maternity leave (leave with pay) and additional maternity leave option which can be availed through advance leave or previously accumulated leaves.

Paternity leave: Non primary giver can avail this leave for five working days.

Child adoption benefits: Any person who have adopted a child is eligible for following benefits,

- 1) Child adoption leave
- 2) Additional maternity leave
- 3) Child Care leave
- 4) Phase back program
- 5) Healthy pregnancy program
- 6) Transition Guidance

Childcare leave: Eligible women can avail 5 days Child Care leave per year to take care of the child during his / her illness. It can be availed till the child turns 2 years old.

Further our Privilege leave provisions help our employees to plan family care based on the individual's requirements. The company also offers a Part-Time, Part-Pay option for eligible employees, subject to business requirements. UltraTech facilitates access to childcare services through contractual arrangements with daycare centres, ensuring childcare support is available to employees.

Occupational health and Safety

Our Company has implemented Occupational health and safety management system, in line with our Safety and Occupational health Policies. Currently, 100% of UltraTech's operational sites are ISO 45001 certified.

Our commitments towards Occupational Health and safety include:

- Coverage of provisions to all employees, workers, contractors, staff and suppliers
- Compliances with applicable statutory regulations, national and international standards
- Participation of employees, business associates, workers for managing OHS at workplace
- Strive for continual improvement in OHS management system
- Develop and implement safety objectives and targets and accordingly prioritize and integrate with action plans

Our policies

- [Occupational Health Policy](#)
- [Safety Policy](#)

OHS programs

Risk and Hazard Assessment

We have detailed incident investigation procedures in place. The Company has established a comprehensive standard on Hazard Identification and Risk Assessment (“HIRA”). All Units form a cross-functional team of trained employees and experienced workers that identifies each activity-wise (both routine and non-routine) hazards, assesses associated risks considering exposure, severity and probability and formulates control measures based on the significance of the risks.

Prioritization and integration of action plans

As soon as an incident is reported, the site safety team identifies the level of threat associated with incident as per our internal guidelines. For high-risk category, the site head appoints an investigation team to collect facts and determine underlying causes. Based on the investigation insights, corrective and preventive actions are identified along with systems to be strengthened, which are communicated and implemented across operations by Corporate Safety Team.

For prevention of recurrence of similar incidents, lessons learnt through those are circulated across all Units through Red Corner Notice (RCN) and Black Corner Notice (BCN) followed by periodic review of progress on compliance of recommended corrective and preventive actions.

Procedures to investigate work related Injuries

We follow a structured process as per our Internal standards for investigating of work-related injuries and incidents. It begins with forming a trained investigation team, including relevant personnel and a leader from outside the incident department. The team collects facts through site preservation, interviews, and document reviews. Using tools like Why-Why analysis / **Root Cause Failure Analysis** (RCFA), they identify root causes and contributory factors. Based on findings, corrective and preventive actions are developed, ensuring they are SMART and aligned with risk control hierarchies. A detailed investigation report is then prepared and shared with key stakeholders and uploaded to the incident management system. Findings are communicated through safety meetings and briefings to promote awareness. Finally, the implementation of

corrective actions is reviewed and closed. This process ensures accountability, continuous improvement, and alignment with the goal of “Zero Harm.” All incidents, regardless of severity, are investigated to prevent recurrence and strengthen safety systems.

Evaluating of Progress against targets

As far as governance & evaluation is concerned, OH&S board chaired by Managing Director reviews overall effectiveness of safety management system once in every two months. In addition, eight different subcommittees headed by Manufacturing Cluster Heads and Corporate Function Heads at board-level and six subcommittees at unit-level headed by Unit Heads have been functioning to strengthen various important elements of safety and reviewing effectiveness and monitor safety performances against our set targets on periodic basis.

Internal and External Audits

We have effective mechanisms for internal and external audits. Our team regularly conducts audit at site for assessing safety issues, further we are conducting second party audits by trained employees from other plants, & also from independent third party to evaluate degree of compliance with critical safety standards.

Emergency preparedness Plan

In pursuit of Emergency Preparedness, each Unit has its on-site emergency preparedness plan duly approved by concerned regulatory authority. All types of potential emergencies and their response plans are part of the approved document. The roles and responsibilities of the nodal members such as incident controller and rescue members are clearly articulated and communicated. All employees and contract workers are trained in their roles in case of any emergency. Units conduct mock drills to evaluate the response of people, equipment, and tools against all the possible emergency situations which are periodically covered in mock drills.

Ensuring Health and Safety at value chain

Health and safety remain an integral criterion for procurement and purchases as it is part of our supplier code of conduct, supplier screening during onboarding and ongoing assessment process. Our Supplier assessments comprehensively cover safety aspects during onsite and desk-based assessments or new as well as existing supplier. We assess our suppliers based on the various indicators like procedures for assessing work-related Risks & hazards, Emergency plans, fire safety and electrical safety parameters etc. Currently, all new suppliers are assessed on ESG criteria for onboarding and 100% assessment of critical suppliers is completed.

Social data indicators

Workforce breakup

Sr. No.	Category	Unit	Gender		Age wise break up		
			Male	Female	<30	30-50	>50
Permanent workforce							
1	Top Management	Nos.	62	0	0	6	56
2	Senior Management	Nos.	264	9	1	115	157
3	Middle Management	Nos.	1531	77	5	987	616
4	Junior Management	Nos.	12673	726	2466	9153	1780
5	Staff	Nos.	6269	683	2256	3649	1047
Total Permanent Employees		Nos.	20799	1495	4728	13910	3656
6	Workers	Nos.	6083	22	50	3443	2612
Total Permanent Workforce		Nos.	26882	1517	4778	17353	6268
Contractual Workforce							
7	Offrolls	Nos.	7904	423	5365	2644	318
8	Contract Labour	Nos.	57403	1361	15307	35570	7887
Total workforce		Nos.	95490				

Nationality wise breakup

Sr. no.	Nationality	% share in total management positions	% share in permanent workforce
1	India	99.50	99.22
2	Sri Lanka	0.17	0.34
3	United Arab Emirates	0.16	0.18
4	Pakistan	0.06	0.07
5	Philippines	0.03	0.03
6	Egypt	0.03	0.02
7	Yemen	0.02	0.01
8	Jordan	0.01	0.01
9	Bangladesh	0.01	0.07
10	Bahrain	0.01	0.03

11	Nepal	0.00	0.03
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Hiring

Sr. No.	Category	Unit	Gender		Age wise break up		
			Male	Female	<30	30-50	>50
1	Top Management	Nos.	5	0	0	2	3
2	Senior Management	Nos.	15	0	0	8	7
3	Middle Management	Nos.	111	2	0	104	9
4	Junior Management	Nos.	1554	135	836	846	7
5	Staff	Nos.	830	128	680	278	0
6	Workers	Nos.	23	0	6	17	0
Total Hiring		Nos.	2803				

Nationality wise break up of Hiring

Sr. No.	Category	Unit	Gender	
			Male	Female
1	Indian	Nos.	2529	253
2	Philippines	Nos.	1	0
3	Sri Lanka	Nos.	8	3
4	United Arab Emirates	Nos.	0	9
Total		Nos.	2803	

Turnover

Sr. No.	Category	Unit	Gender		Age wise break up		
			Male	Female	<30	30-50	>50
1	Top Management	Nos.	3	0	0	1	2
2	Senior Management	Nos.	26	0	0	4	22
3	Middle Management	Nos.	126	5	1	61	69
4	Junior Management	Nos.	1270	139	472	751	186
5	Staff	Nos.	734	76	341	316	153
6	Workers	Nos.	347	0	1	22	324
Total Turnover		Nos.	2726				

Nationality wise Turnover breakup

Sr. No.	Category	Unit	Gender	
			Male	Female
1	India	Nos.	2487	210
2	Sri Lanka	Nos.	15	2
3	United Arab Emirates	Nos.	1	6
4	Egypt	Nos.	2	0
5	Philippines	Nos.	0	1
6	Bahrain	Nos.	1	0
7	Jordan	Nos.	0	1
Total		Nos.	2726	

Trainings

Sr. No.	Description	Unit	Gender		
			Male	Female	Total
1	Top Management	Total training Hours	2218	0	2218
		Average training Hours	36	0	36
2	Senior Management	Total training Hours	12286	298	12583
		Average training Hours	47	33	46
3	Middle Management	Total training Hours	62402	4284	66687
		Average training Hours	41	56	41
4	Junior Management	Total training Hours	439334	30457	469791
		Average training Hours	35	42	35
5	Staff	Total training Hours	128965	22358	151322
		Average training Hours	21	33	22
6	Workers	Total training Hours	247366	421	247787
		Average training Hours	41	19	41

Age wise breakup

Sr. No.	Age wise breakup of training (Permanent employees)	
	Age group	Training hours
1	<30	140142
2	30-50	446058
3	>50	116402

Nationality-wise breakup of Trainings for Permanent employees

Sr. No.	Nationality	Training hours
1	India	949607.21
2	Sri Lanka	315.44
3	United Arab Emirates	255.15
4	Pakistan	67.8
5	Bangladesh	77.3
6	Philippines	25.94
7	Bahrain	19.34
8	Nepal	14.53
9	Egypt	4.91
10	Jordan	0.25
11	Yemen	0.22
	Total Training hours	950388

Gender pay gaps

Sr. No.	Indicators	(%)
1	Mean gender pay gap	15%
2	Median gender pay gap	17%
3	Mean bonus gap	12%
4	Median bonus gap	7%

for Management India employees

Other KPIs

Description	FY 2025-26
Employee Turnover Rate	
Total (%)	10.9
Voluntary (%)	8.6
Employee Engagement Rate	
Employee Engagement Rate (% employees with top level of satisfaction)	95
Employees who responded to the survey (%)	97
Training and Development	
Average hours per FTE of training and development	33.5
Average amount spent per FTE on training and development	4840

Mean employee compensation (In INR)	13.05 lakhs
New Hiring	
Total number of new hires	2803
% of open positions filled by internal candidates	57
Ratio of basic salary female to male	
Top Management	0.00
Senior Management	1.40
Middle Management	1.02
Junior Management	0.88
Human rights management	
Sites (own operations) assessed in last 3 years	100%
Sites with identified risk (% of total sites)	0
Sites with mitigation plans (% of total sites)	100%
Contractors assessed in last 3 years (% of total sites)	100%
Contractors with identified risk (% of total sites)	0
Contractors with mitigation plans (% of total sites)	100%
Jurisdiction wise permanent workforce	
UAE	498
Bahrain	45
Sri Lanka	95
Nepal	3
India	27758
Type of training*	
Behavioral Competency	349602.75
Functional Competency	208249.63
Others (online courses, sessions etc)	105622.61
Total	663475

*for permanent employees except ICL.

Stakeholder Engagement

The Aditya Birla Group technical guidance as well as the UTCL Stakeholder Engagement Policy inform operating procedures across all our locations for applicable projects. The policy is endorsed by our Board of Directors, with its implementation overseen by Board-level Corporate Social Responsibility (CSR) Committee.

Our stakeholder engagement policy focuses on to:

- Engage with stakeholders (including local communities) to understand stakeholder needs, involve them in managing risks for effective redressal of grievances if any.
- Identify the CSR projects in consultation with the community in a participatory manner
- Assessing the nature of impacts on stakeholders to identify affected community and local stakeholders, accordingly identify Vulnerable groups and prioritise actions for planning redressal.
- Establishing clear accountability by assigning adequate resources and responsibilities for effective stakeholder engagement;
- Resolving stakeholder grievances in a timely and culturally appropriate manner;

Furthermore, our supplier code of conduct also emphasizes and focuses on community engagement and local communities to foster their social and economic development.

Program highlights.

Conducting Local Stakeholder and Community Impact Assessments: To ensure transparency and accountability, we conduct social satisfaction audits and impact assessments to evaluate the effectiveness of our CSR initiatives. These assessments, carried out by independent agencies in compliance with regulatory norms, offer valuable insights into community perceptions and project outcomes. The findings guide continuous improvement and ensure our efforts align with stakeholder expectations and broader social development goals.

Ensuring Clear Communication Channels for Local Stakeholders: We have established robust communication channels to engage with stakeholders. At the unit level, the CSR Cell serves as the first point of contact for local stakeholders—whether for grievances or requests for new projects. The CSR Cell is supported by the Functional Head (HR) and the Unit Head through:

- Regular review of projects
- Direct interaction with key stakeholders during periodical CSR meetings
- Field visits to operational areas

Conducting Regular Surveys and Reviews: Our CSR processes emphasize active community participation. We begin with Participatory Rural Appraisal (PRA), which builds the capacity of communities to effectively communicate with the company. PRA empowers local stakeholders to identify, prioritize, and articulate their basic needs, ensuring that CSR initiatives are responsive and inclusive.

Proactive Local Stakeholder Engagement: We conduct regular surveys, studies, and impact assessments to capture the voices of local stakeholders. Based on the feedback received, mid-course corrections are initiated when necessary.

Identification of Emerging concerns: At each UltraTech unit, periodical meetings are held with local stakeholders to identify emerging concerns. These meetings address issues related to both CSR and core operations.

We also provide multiple channels for stakeholders to share feedback or report grievances, including:

- Direct reporting via the company's website
- A 24x7 phone helpline
- Dedicated email channels : Local CSR helpline numbers are prominently advertised within communities, and feedback can be submitted in regional languages.

GOVERNANCE

ESG Strategy

We have a comprehensive ESG governance strategy to effectively manage and oversee ESG-related risks and opportunities across our value chain, operations, products, and services.

We have a Board level committee which provide guidance and oversight to ESG issues. We have Corporate Social Responsibility committee which provides oversight on community development program to create greater positive impact on society which strengthens our ESG aspects beyond the boundaries of organization.

At the executive level, the Managing Director (MD) and Chief Manufacturing Officer (CMO) provide strategic guidance and oversight for ESG initiatives across the organization. The Chief Sustainability Officer (CSO), in collaboration with key functional heads, leads the implementation of these initiatives at the organizational level. The CSO is responsible for decisions related to ESG related risk and opportunities, climate transition plans, climate adaptation plans, low carbon product portfolio definition, just transition strategy, evaluating the effectiveness of sustainability and climate action, over all ESG impacts, near-term and long-term target definition, definition and approval of the ESG training and awareness campaigns of employees and supply chain stakeholders. CSO reports to the Business Head cum Chief Manufacturing Officer (CMO).

To ensure effective implementation of our targets, all of our Environmental and sustainability targets, which include but not limited to emission reduction, energy reduction, circularity, process efficiency, safety, and risk-management, are linked to executive pay.

Corporate Governance

Good corporate governance forms the cornerstone of the Company's business philosophy and operations. Our governance framework is anchored in the principles of transparency, accountability, integrity and fairness in all stakeholder interactions. The Board provides strategic leadership and effective oversight of the Company's affairs, supported by its Committees, which oversee critical areas including financial reporting, business performance, risk management, executive remuneration and stakeholder engagement. Shareholders approvals wherever necessary, including for making any change to the Company's Articles and Memorandum of Association are taken in line with various statutory and regulatory requirements. This governance architecture promotes responsible decision-making, sustainable growth and long-term value creation.

Board Effectiveness

The Board's effectiveness is central to the Company's corporate governance framework and its ability to create sustainable value for stakeholders. The Board collectively brings together a diverse mix of skills, expertise, industry experience and perspectives, enabling informed deliberations and balanced decision-making. Through a structured governance framework, the Board reviews the Company's strategic priorities, operational and financial performance, risk

profile, sustainability initiatives and key stakeholder matters, ensuring that management actions remain aligned with the Company's long-term objectives.

Directors of the Company recognise and discharge their fiduciary duties with integrity, independence and diligence. They exercise objective judgement, avoid conflicts of interest, and act in line with the duties and liabilities imposed under various statutes, in the interests of the Company and its stakeholders.

The Board's effectiveness is further strengthened through a clearly defined division of responsibilities, access to timely and comprehensive information, and constructive engagement during Board and Committee meetings. Periodic evaluations of the Board, its Committees and individual Directors support continuous improvement in governance practices, effectiveness and overall Board performance.

Board of Directors - Appointment and Composition

The Company follows a robust and transparent process for the appointment of its Directors, aimed at ensuring an optimal balance of skills, experience, independence and diversity on the Board. Directors are appointed in accordance with applicable statutory and regulatory requirements, taking into consideration their professional expertise, integrity, leadership capabilities and ability to contribute effectively to the Company's strategic direction and governance.

The Board's composition is designed to promote independent judgement and effective oversight. It comprises Executive, Non-Executive and Independent Directors, bringing together a broad range of competencies and perspectives. The process for appointment and re-appointment of Directors is guided by the recommendations of the Nomination and Remuneration Committee, which assesses the qualifications, experience and suitability of candidates in line with the Company's Board diversity and succession planning objectives.

The Company's Board is constituted in accordance with applicable governance requirements. Executive Directors are appointed for fixed terms and are not liable to retire by rotation, while Independent Directors may serve up to two consecutive terms of five years each. At least two-thirds of the Board comprises directors whose office is subject to retirement by rotation, and one-third of such directors retire at each Annual General Meeting, with eligible directors being entitled to seek reappointment.

Key metrics:

The overall board attendance during FY 2025-26 was >90%;

50% of Board comprises of Independent Directors.

CEO's Variable Compensation

Executive annual incentive payouts are linked to the achievement of relevant financial and operational metrics, which are reviewed annually and aligned with the Company's strategic priorities and focus areas.

Management Ownership Requirements

The Company promotes alignment between executive interests and long-term shareholder value through its equity-linked incentive programmes. Stock options, restricted stock units and performance stock units, are granted to eligible executives and leadership team members to encourage long-term performance, talent retention, participation and ownership.

Sr. no.	Company's CEO and other executive directors hold company shares	All elements of remuneration package i.e. salary, benefits, pensions etc. (Amount in Rs.)	No. of Shares held as on 31 st March, 2026
1	Mr. Kailash Chandra Jhanwar, Managing Director	23,75,01,115	22,819
2	Mr. Vivek Agrawal, Whole – time director and Chief Marketing Officer	11,74,49,367	16,655

Risk Management

Enterprise Risk Management Framework

The Company has established a comprehensive Enterprise Risk Management Framework ("ERMF"/" framework") to identify, assess, analyze, and mitigate risks while fostering a proactive risk culture that supports long-term operational resilience. This framework is integrated into governance processes, with periodic reviews and escalation of high-risk issues to appropriate oversight bodies.

Framework Objectives

The framework aims at establishing a structured and consistent approach for identifying, assessing, and managing risks across the organisation, promoting clear accountability for risk management across all levels of the organisation and strengthening the overall governance structure through well-defined oversight and assurance mechanisms, ensuring that risk considerations are embedded into strategic and operational decision making at every level of the organisation, defining a uniform approach for assessing and analysing risks in a structured and transparent manner, ensuring that all functions apply consistent criteria and judgement, fostering a strong culture of risk awareness and initiatives.

Governance and Oversight

We have Board level committees which provide guidance and oversight for Risk management. Furthermore, the Audit committee and the Risk Management committee evaluate the internal financial controls and risk management systems in the company, while, at the executive level, the leadership team, risk officer & senior management evaluate the current risk landscape. The Company engages independent experts to further enhance the risk framework. Based on risk prioritization and mitigation plans, functional and departmental heads implement corrective actions and provide feedback to shape future strategies.

Risks identification and assessment

The Company's ERMF is designed to embed risk considerations into strategic planning and business decision-making. It facilitates the systematic identification, assessment and monitoring of risks aligned to the Company's key strategic priorities, including growth, operational excellence, customer focus, sustainability and value creation. The framework oversees 14 key enterprise risks covering operational, strategic, financial, technological, environmental and regulatory dimensions.

Risks monitoring and mitigation

Risks are prioritised using impact risk matrix, enabling the development of appropriate mitigation plans. In response to evolving economic and geopolitical conditions, we engaged external experts to reassess key exposures and strengthen mitigation strategies. This process included leadership consultations, risk surveys and workshops with senior management to identify priority risks and define response measures.

We periodically review our risk landscape to ensure alignment with changing business conditions. This includes reassessing existing risks, identifying emerging threats and evaluating the effectiveness of current mitigation measures.

Risk culture and awareness

Our Risk Management framework is designed and updated in collaboration and with inputs from our senior leadership team, CXOs and employees across various functions and departments to foster a culture of proactive risk identification, training, workshops and user awareness in the risk management process.

Based on our enterprise risk assessment process, the following key risks have been identified:

1. Raw Material Availability, Supply Vulnerability & Cost Volatility
2. Health, Safety & Community Well-being across Operations
3. Skilled Manpower Availability & Contractor Ecosystem Constraints
4. Geopolitical Tensions Affecting Operational Continuity
5. Succession Health
6. Land Acquisition, Resettlement & Community Acceptance
7. Evolving Construction Technologies & Shifts in Public Spending Patterns
8. ESG & Sustainability Transition

9. Climate Change Exposure to Operations & ESG Commitments
10. Water Scarcity Exposure in Project & Operating Sites
11. Enterprise wide Digital and Responsible AI Adoption, Organisational Capability, Execution and Change Readiness
12. Cybersecurity Vulnerabilities, Gen-AI Data Exposure
13. Spurious Products, Product Quality & IP Protection
14. Evolving Regulatory & Statutory Compliance Obligations

Some of the key risks could involve the following aspects:

1. Raw Material Availability, Supply Vulnerability & Cost Volatility:

The Company remains dependent on the uninterrupted availability of key raw materials and fuels essential for manufacturing operations. Supply disruptions, quality constraints, cost inflation or regulatory constraints can adversely affect production continuity, operating margins and overall financial performance, making this a significant business risk.

2. Health, Safety & Community Well-being across Operations:

Any fatal incidence could have impact on Company's reputation, legal and regulatory exposure, production loss and thus financial loss.

3. Geopolitical Tensions Affecting Operational Continuity:

Geopolitical developments, supply-chain disruptions and inflationary pressures can impact the availability and cost of critical inputs, logistics and freight services. Such disruptions may affect operational efficiency, customer service levels, profitability and market competitiveness.

4. Water Scarcity Exposure in Project & Operating Sites:

Water is a critical resource for various operational and project activities. Increasing water stress, climatic change, resource scarcity and evolving regulatory requirements may disrupt operations, affect product quality, increase compliance obligations.

5. Enterprise wide Digital and Responsible AI Adoption, Organizational Capability, Execution and Change Readiness:

The successful deployment of digital and AI initiatives is critical to achieving the Company's strategic and operational objectives. Challenges related to capability building, change management, technology adoption and execution may delay value realization and impact long-term competitiveness.

6. Cybersecurity Vulnerabilities, Gen-AI Data Exposure:

The Company's increasing reliance on digital technologies and interconnected systems heightens its exposure to cyber threats and data-security risks. A significant cybersecurity incident could disrupt operations, compromise sensitive information, impact stakeholder trust and result in financial and regulatory consequences.

Emerging Risks

The Company continuously scans its internal and external environment to identify emerging risks and opportunities that may impact its business and strategic priorities. A cross-functional approach brings together insights from various functions to assess evolving trends, industry developments, regulatory changes and stakeholder expectations. This collective and ongoing assessment supports informed strategic planning, strengthens enterprise resilience and enables the Company to remain agile in an increasingly dynamic business environment.

Information Security

Our cybersecurity preparedness is built on a multi-layered strategy aligned with UltraTech's Cybersecurity and Data Privacy Policy. We adopt a multi-faceted approach, integrating industry best practices and advanced technologies to strengthen our defences against evolving cyber threats. This ensures a resilient and secure digital environment across all operations. We are committed to

- Implement adequate security policies, processes, and controls to protect confidentiality, maintain integrity, and ensure availability of all information assets
- Continuously strive to improve and strengthen our Information Security systems.
- Monitoring cybersecurity threats and provide necessary measures such as Policy, Procedure, and appropriate solutions.
- Design, Develop and Implement highly secure and highly available IT System to respond cybersecurity threats.
- Establish clear-cut reporting channels for any form of violation of the cyber-security
- Establish clear-cut reporting channels & individual responsibilities across the entire workforce for reporting any form of violation of the cyber-security and data privacy incidents.
- Engage with third parties including suppliers for establishing robust information security requirements at their end.
- Protect our stakeholders, critical information and assets from threats for our employees and other concerned parties.

[Cyber-security-and-data-privacy-policy.pdf](#)

Governance

We have established an effective governance framework to manage cybersecurity risks. At the board level, our Risk Management and Sustainability Committee provides strategic oversight and ensures accountability at the highest level.

At the executive level, our Cybersecurity Steering Committee, comprising senior leaders—including the Chief Digital Information Officer (CDIO) and Chief Information Security Officer

(CISO)—plays a critical role in guiding and overseeing the implementation of our cybersecurity strategy.

Cybersecurity Management

We ensure comprehensive cybersecurity readiness through a range of proactive measures, including:

- Regular employee awareness training to foster a security-conscious culture, It begins with induction training for new employees. All employees are required to complete an e-learning programme on Information Security.
- Every employee signs the 'Information Security Code of Conduct', which outlines security guidelines and potential disciplinary actions for breaches.
- Routine vulnerability assessments of IT assets to identify and mitigate risks,
- Robust business continuity planning to safeguard critical applications and ensure operational resilience,
- Periodic internal and external audits in alignment with ISO/IEC 27001:2022 standards to maintain compliance and strengthen controls,
- Established protocols and reporting channels enable prompt detection and escalation of suspicious cybersecurity activities. Employees are expected to remain vigilant and report anomalies to the Information Security Team via designated means, including a dedicated email channel.

Leveraging AI Responsibly for Sustainable Growth

As a progressive and future-ready organization, we recognize the transformative potential of Artificial Intelligence (AI) and other emerging technologies in enhancing productivity, quality, innovation, operational excellence, and data-driven decision-making across our business. We are committed to leveraging AI responsibly, ethically, and securely while ensuring compliance with applicable laws, regulatory requirements, and internal governance frameworks related to data privacy, information security, and technology use.

Our approach to Responsible AI is guided by the principles of transparency, accountability, fairness, security, and human oversight. We strive to ensure that AI technologies are developed, deployed, and used in a manner that creates sustainable value while safeguarding the interests of employees, customers, business partners, and other stakeholders.

We proactively commit towards:

- Respecting data privacy during the development and use of AI models by adhering to applicable legal requirements, ensuring ethical use of data, and preventing any unauthorized access or misuse.

- Establishing appropriate, controls, cybersecurity safeguards to protect business sensitive information during development and use of AI.
- Ethical and responsible use of artificial intelligence and strictly prohibiting its use for any purposeful manipulative behavior.
- Promoting fairness and non-discrimination by identifying, preventing, and mitigating potential data bias during the development and use of AI models.
- Establishing a comprehensive AI governance framework (keeping human in the loop) with a structured oversight mechanism to support responsible usage, guide critical decision-making, and ensure accountable implementation of AI solutions.
- Ensuring transparency in AI systems by clearly communicating their purpose, use, capabilities, and limitations in line with the needs and expectations of relevant stakeholders.
- Defining clear boundaries for the use of artificial intelligence by establishing explicit guidelines outlining acceptable and prohibited uses of AI technologies.
- Minimising the ecological and environmental footprint of by adopting resource-efficient practices to encourage environmentally responsible operations.
- Establishing enterprise-wide accountability by clearly defining and assigning roles and responsibilities for AI development, awareness, outcome monitoring, and security governance, thereby ensuring the coordinated, responsible, and compliant deployment of AI solutions.

As our adoption of AI technologies continues to evolve, we will strive to regularly review and strengthen our governance practices to align with emerging regulations, industry best practices, technological advancements, and stakeholder expectations. This commitment reflects our ambition to harness the benefits of AI while maintaining trust, protecting human rights, and creating long-term sustainable value.

Advancing Responsible AI Across the Organization

Our approach to embracing Artificial Intelligence (AI) is guided by robust procedures and governance mechanisms that enable responsible, secure, and ethical deployment of AI technologies across the organization.

We have established stringent access control mechanisms to govern AI usage. All AI-related projects require appropriate approvals from the Chief Information Security Officer (CISO), AI Centre of Excellence (CoE) and the AI Cloud Team. Human oversight is embedded within critical AI-enabled processes, ensuring that significant decisions remain subject to appropriate review, validation, and accountability by designated personnel. Access is restricted to AI Centre of Excellence (CoE)-approved models and tools, ensuring that sensitive information is protected and unauthorized AI applications are not used within the organization. Furthermore, access to AI solutions is governed through role-based and conditional access controls. To enhance

transparency and accountability, AI-enabled solutions are clearly labelled to help users distinguish between human-generated and AI-generated content. This transparency fosters trust, informed decision-making, and responsible use of AI systems.

We are committed to continuously evaluating and improving our AI models and applications. We have established mechanisms by providing detailed guidelines and these are being implemented across AI models and projects to ensure comprehensive monitoring and improvement. We monitor model performance, latency, prompts and tools etc which ensures the AI system remains reliable and relevant over time.

We strive to ensure higher ethical standards and fairness throughout the use and development of AI technologies. We are developing various procedures, regular assessment, supported by defined protocols and controlled access management to ensure fairness in our AI models. This helps us to identify and mitigate potential biases in AI models and outputs and promoting equitable and reliable AI-driven outcomes.

Our AI development approach is also aligned with sustainability considerations. We prioritize efficient computing practices through a "Right-Sized Model" approach, optimizing energy and resource consumption while promoting shared infrastructure wherever feasible. This helps reduce the ecological footprint associated with AI deployment and supports our broader sustainability objectives.

To strengthen accountability, we have established clear IT Service Management (ITSM) channels that are communicated across the organization. Defined ownership structures and escalation mechanisms help ensure that AI-related issues, incidents, and concerns are addressed promptly and responsibly. Users, including third parties, may also raise grievances through the Company's whistleblower mechanism or other reporting channels available within the domains where AI solutions are implemented.

In addition, we conduct dedicated training programs and awareness modules for employees on the ethical, safe, and responsible use of AI technologies. These initiatives aim to build organizational capability, encourage responsible adoption, and foster a culture of accountability and trust in AI-enabled solutions. This structured approach enables us to leverage the benefits of AI while maintaining strong standards of security, transparency, fairness, sustainability, and governance.

AI-Enabled Sustainability in Cement Manufacturing

Our AI solutions have delivered measurable and quantifiable outcomes across business operations, including improvements in Thermal Substitution Rate (TSR), reduced dependence on natural fuel resources, enhanced operational efficiency, and significant cost savings. By leveraging advanced analytics, automation, and optimization technologies, we are able to improve productivity while supporting our sustainability objectives in a responsible manner. The case study below highlights one such initiative, demonstrating how AI-driven interventions have

generated tangible environmental and business benefits, contributing to sustainable value creation across the organization.

Case study

Kiln operation in cement manufacturing is a highly dynamic and energy-intensive process, where stability directly influences clinker quality, fuel efficiency, and overall plant productivity. At the plant, traditional kiln management relied heavily on operator experience, manual fuel control, and limited real-time visibility. This often resulted in process instability, inconsistent AFR (Alternative Fuels and Raw Materials) usage, and suboptimal thermal efficiency.

To address these challenges, a comprehensive AI-integrated digital transformation initiative was implemented in kiln operations. The solution combined multiple advanced technologies, including kiln thermal imaging, advanced process controls, and an AI-enabled AFR analysis systems which monitor material size, composition, and foreign material presence in real time.

Integration with mobile applications and automated alert systems ensured that operators and management had instant access to key performance indicators, enabling faster decision-making and proactive intervention. This ecosystem of interconnected tools transformed kiln control from a reactive, experience-based approach into a data-driven and automated process.

Quantifiable Outcome: The initiative delivered measurable improvements across efficiency, cost, and sustainability. AFR consumption increased and kiln operations became more stable with extended run hours. Additional benefits included improved WHRS power generation and extended refractory life. Overall, the project established a scalable and intelligent kiln management framework, aligning operational excellence with sustainability goals while laying the foundation for future AI-driven advancements in cement manufacturing.

Double Materiality Assessment

We engaged with various internal and external stakeholders to assess how our activities impact environment, society and stakeholders at large (inside out) and how these material issues are impacting our business (outside in). We conduct this assessment every 3 years and these results helps us to identify key priority areas for business and as well as stakeholders (internal and external) to create greater positive impact. This assessment was conducted in last year FY 2023-24 which is assured by third party.

Refer assurance statement in [UltraTech-ESG-Factbook-FY-2023-24.pdf](#)

Material issues for Enterprise value creation

Health and safety

Business case

At UltraTech, ensuring the health and safety of our workforce, communities, and stakeholders is a core operational priority. We are committed to maintaining robust safety measures and fostering a zero-harm culture across all our facilities. Given the inherent risks associated with our operations—such as mining, raw material movement, and processing—health and safety have been identified as a **material issue** in our materiality assessment. We are putting our continuous efforts to proactively manage risks, implement best practices, and uphold the highest standards of occupational health and safety.

Business Impact: Risk

Business strategy

Our policies & commitments: Health policy, Safety policy.

UltraTech Cement embeds a “Zero Harm” philosophy into its operations, supported by ISO 45001-certified systems and a strong governance structure. The company implements HIRA across units, conducts second- and third-party safety audits, and leverages digital tools like *mySetu*, an online Permit to Work system, and *Chetna*, an AI assistant for safety data analysis. Virtual Reality based training enhances preparedness for high-risk tasks. Safety is integrated into all business decisions, with Power BI dashboards providing actionable insights. These initiatives ensure transparency, accountability, and continuous improvement in creating a safe, resilient, and compliant work environment.

Target: Zero fatalities on annual basis

Circularity

Business case: Circularity remains crucial lever towards achieving net zero goals and also it supports resource efficiency, waste reduction, and environmental sustainability. By integrating circular practices into its operations, UltraTech minimizes raw material dependency, enhances energy efficiency, and contributes to a low-carbon economy—aligning with its broader sustainability goals and commitment to responsible growth.

Business Impact: cost, revenue & opportunity.

Business strategy

Our policies & commitments: Sustainability Policy, Environment policy.

As part of our broader sustainability strategy, we integrate circular economy principles to reduce environmental impact, conserve resources, and support long-term business resilience. We

operate on a Zero Waste to Landfill (ZWL) model, reusing, recycling, or co-processing over 99% of our waste. In FY 2025–26, we have utilised 49.83 million tonnes of recycled and alternative raw materials in cement production —such as fly ash, slag, and gypsum—reducing our reliance on natural resources. In FY 2025-26, we co-processed 0.6 lakh tonnes of industrial waste, 4.40 lakh tonnes of agro-waste, and 20.70 lakh tonnes of municipal solid waste as alternative fuels in Kiln and TPP.

Our Targets

- Net zero by 2050

Business Ethics and Corporate Governance

Business case

At UltraTech, strong business ethics and corporate governance are essential for delivering long-term stakeholder value. We are guided by a comprehensive Code of Conduct that promotes ethical behavior, transparency, and accountability across all levels. Strong governance practices are essential not just for compliance, but for enabling responsible decision-making and fostering a culture of integrity. These principles help us to strengthen stakeholders' trust, mitigate risks, and ensure sustainable growth in a dynamic business environment.

Business Impact: Risk, Revenue.

Business strategy

Our policies & commitments: Code of conduct, Anti-Bribery, Anti-Corruption, and Whistleblower Protection.

We uphold ethics and integrity as core pillars of our business strategy, ensuring transparency and accountability across all operations. Our Code of Conduct, supported by anti-bribery, anti-corruption, anti-money laundering, and whistleblower protection policies, guides ethical behavior at every level. A third-party-managed grievance redressal channel ensures impartiality. All employees undergo Code of Conduct training, and compliance is linked to performance appraisals. We strictly prohibit anti-trust and anti-competitive practices. With 100% director coverage in human rights and governance training, and zero conflict of interest cases reported, we foster a culture of trust, integrity, and sustainable growth.

Target: 100% regulatory compliances on annual basis.

Customer Satisfaction and Grievance Management

At UltraTech, customers remain at the centre of our business strategy and value creation approach. We are committed to understand evolving customer needs, delivering best in class products and services, and fostering long-term relationships built on trust, transparency, and responsiveness. Through continuous engagement and feedback-driven improvement, we strive to enhance customer satisfaction and strengthen brand loyalty.

To enable seamless engagement, we have established multiple customer interaction channels. Customers can seek support and provide feedback through our dedicated toll-free helpline (1800 210 3311). Customers can also reach us through our customer care email (ultratech.care@adityabirla.com). Additionally, customers can submit enquiries and feedback through website-based query forms available on our website, providing a convenient and accessible digital platform for engagement.

Furthermore, we leverage advanced AI technologies through **UltraBuddy**, our Generative AI-powered chatbot, enabling users to conveniently register service requests, submit enquiries, and provide feedback through an intuitive digital interface.

In addition to digital platforms, customers can directly engage with our on-ground sales and technical teams during their site visits, meetings, and regular interactions. These engagements help us understand customer expectations, provide technical assistance, and address project-specific requirements.

Recognising the importance of inclusive engagement, we strive to make our customer support mechanisms accessible and user-friendly for all stakeholders. Through dedicated toll-free support, direct human interaction, on-site assistance, and multiple communication channels, we aim to reduce barriers to access and provide timely assistance tailored to individual needs. By fostering equitable and inclusive engagement, we seek to strengthen stakeholder trust, enhance service accessibility, and build enduring relationships.

Feedback gathered through these touchpoints is systematically analysed and shared with relevant business, operational, and technical teams. Based on the insights received, these teams take appropriate actions to address concerns and incorporate customer feedback into product development, service delivery, and process improvement initiatives. This continuous feedback loop enables us to enhance our products and services, strengthen customer satisfaction, and deliver an improved overall experience.

We are committed to ensuring timely and effective resolution of customer grievances. Upon receipt of a complaint, a unique incident number is generated and communicated to the customer to facilitate tracking and transparency. Customers may register complaints through multiple channels, including dealers, employees, the contact centre, customer care platforms, and our website. All complaints are recorded and monitored through a centralized digital

platform, while dedicated technical teams aim to resolve the majority of customer concerns within 72 hours. Our customer care team keeps on posting customer for resolution and redressal process to manage timelines. Post-resolution feedback is also collected to assess customer satisfaction and identify opportunities for further improvement.

To continuously strengthen the effectiveness of our customer management processes, we conduct periodic audits and reviews of customer complaint handling and service delivery mechanisms across regions. Findings from these assessments are used to identify improvement opportunities, implement corrective actions, and enhance overall customer experience. We regularly capture feedback through Net Promoter Score (NPS) to shape customer experiences through impactful changes. In FY 2025-26, Individual Home Builders and Influencers have shown strong advocacy with an NPS of 77.

Through our multi-channel engagement model, robust grievance management framework, and continuous improvement initiatives, we strive to build enduring customer relationships, enhance customer satisfaction, and create sustainable value for all stakeholders.

Policy advocacy

Public policy advocacy is an integral part of our external engagement strategy. We engage with national and international industry bodies, trade associations, multilateral organizations, and policy forums to contribute to the development of regulations, standards, and initiatives that foster sustainable growth and responsible business practices. Our approach to sustainability is guided by globally recognized frameworks and commitments, including the Paris Agreement, the United Nations Sustainable Development Goals (SDGs), the Science Based Targets initiative (SBTi), our Net Zero commitments, and the GCCA Net Zero Roadmap.

Through these engagements, we contribute industry insights, share practical expertise, and participate in policy dialogues that support the development of effective regulatory frameworks and industry best practices. Our participation helps advance the transition towards a resilient, resource-efficient, and low-carbon economy while supporting the sustainable development of the cement and construction materials sector.

Policy Advocacy Framework

We maintain a structured and transparent approach to public policy engagement, supported by defined processes governing lobbying activities and trade association memberships. All memberships, affiliations, and advocacy activities are reviewed and approved by senior management and executive leadership, including the Managing Director and CXOs, to ensure alignment with the Company's strategic priorities, sustainability commitments, and climate objectives.

Our governance framework establishes clear roles, responsibilities, and oversight mechanisms for policy advocacy and external engagement. Designated representatives from relevant

functions manage interactions with trade associations, industry bodies, research institutions, and think tanks based on their respective areas of expertise. This approach ensures that advocacy activities are conducted responsibly, transparently, and in a manner consistent with our corporate values, sustainability commitments, and publicly stated policy positions.

Alignment with Climate Commitments and the Paris Agreement

We are committed to supporting the goals of the Paris Agreement and integrating climate considerations into our public policy and advocacy activities. Through our engagement with industry associations, trade bodies, and policy platforms, we advocate for climate-resilient development, decarbonisation, energy transition, and the advancement of a low-carbon economy.

To ensure continued alignment, we undertake periodic reviews of our advocacy activities, trade association memberships, and external affiliations against our climate commitments and sustainability objectives. We seek to maintain associations with organizations whose climate-related positions are broadly consistent with our own ambitions and with the objectives of the Paris Agreement. Where potential misalignments are identified, we engage constructively with the relevant organization, assess the nature and significance of the divergence, and review the continued appropriateness of the affiliation.

Our governance framework incorporates a clear escalation mechanism to address material misalignments between our policy positions and those of affiliated organizations. Depending on the circumstances, actions may include proactive engagement to encourage alignment, transparent disclosure of differing positions, suspension of participation in specific activities, or termination of membership. Through this approach, we strive to ensure that our advocacy activities consistently support our sustainability strategy, climate commitments, and long-term value creation objectives.

Contribution to trade associations and other bodies

Contributions to Trade Associations	FY 2025-26 (INR)
CMA	2,25,00,000
GCCA	3,64,43,806
CII	4,17,450
INNOVANDI	1,07,86,353
Others, pl specify- FICCI	1,50,000
Total	7,02,97,609
Other Contributions	FY 2025-26 (INR)
Contributions to Local, regional or national political campaigns / organizations / candidates	Nil
Contributions for Lobbying, interest representation or similar	Nil

Charitable Contributions	Nil
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Other indicator

Indicator	Disclosure
Number of directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/corruption	Nil
Discrimination	Nil
Customer privacy data	Nil
Conflicts of interest	Nil
Harassment (POSH complaints)	20



Independent Assurance Statement to UltraTech Cement Limited on select non-financial disclosures in the ESG Factbook for the financial year 2025–26

Unique identification no.: **3153221758**

To
The Board of Directors and Management
UltraTech Cement Limited
'B' Wing, Ahura Centre, 2nd floor,
Mahakali Caves Road, Andheri (East), Mumbai-400093

Introduction and objective of the engagement

TÜV SÜD South Asia Pvt. Ltd. hereinafter referred to as "TÜV SÜD" has been engaged by UltraTech Cement Limited (the 'Company'), having its registered office at '**B' Wing, Ahura Centre, 2nd Floor, Mahakali Caves Road, Andheri East, Mumbai – 400093, Maharashtra, India**' to perform an independent assurance on selected non-financial sustainability disclosures presented in the **ESG Factbook FY 2025-26 (the "Report")** of the Company for the reporting period **01 April 2025 to 31 March 2026**.

The objective of the engagement was to provide an independent assurance conclusion on the selected non-financial sustainability disclosures identified within the defined scope and reporting boundary.

Scope and boundary of the verification

The third-party verification was conducted to obtain **limited assurance** over selected sustainability indicators (as set out in Annexure I to this assurance statement) disclosed in the ESG Factbook FY 2025–26.

The reporting scope and boundary cover the Company's operations in India and other countries as set out in the Report. The assurance engagement was limited to the selected disclosures identified within the defined scope and reporting boundary.

Other than the information specifically provided in this statement and the selected indicators identified in Annexure I, TÜV SÜD did not perform assurance procedures over any other information included in the Company's BRSR, Integrated and Sustainability Report, Annual Report, website or other corporate communications. Accordingly, TÜV SÜD does not express a conclusion on such information.

Responsibility of the Company

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

Verification methodology and procedures performed

The assurance engagement was planned and performed in accordance with the verification methodology developed by the TÜV SÜD Group, which is based upon **ISAE 3000** and **ISO 17029**. For greenhouse gas-related disclosures, relevant principles of **ISAE 3410** were also considered, where applicable.

The engagement applied a **limited level of assurance** for selected sustainability indicators disclosed in the Report.

The verification was based on a systematic and evidence-based assurance process limited to the scope stated above. The selection of assurance procedures was subject to the verifier's professional judgement. The procedures performed included, amongst others:

- Review of the reporting boundary, scope of reporting and applicable reporting criteria;
- Inquiries with personnel responsible for sustainability reporting, data collection, consolidation and internal review;
- Evaluation of the design and implementation of systems and processes for compiling, analysing and aggregating sustainability information;
- Review of the Company's data collection, collation and calculation methodologies;
- Assessment of the appropriateness of quantification methods used for the selected non-financial indicators;
- Review of consistency of data and information within the Report and between the Report and source records;
- Analytical review and inspection of selected sustainability information reported at corporate and site levels;
- Execution of audit trail for selected claims and data streams to assess accuracy in collection, transcription and aggregation;
- Assessment of internal controls relevant to sustainability data management and reporting;
- Review of supporting documentation and evidence on a sample basis; and
- Onsite and/or offsite verification at selected locations.

Physical verification on a sample basis was carried out at selected locations, in addition to interaction with the Company's corporate team and site-level personnel. The sample locations considered in the original assurance scope included:

Sl. No.	Company Name	Site Address
Onsite Review		
1	Ultratech Cement Limited	Registered office - 'B' Wing, Ahura Centre, 2nd Floor, Mahakali Caves Road, Andheri East, Mumbai – 400093, Maharashtra, India
2		Baga Cement Works - Village Baga, P.O. Kandhar Tehsil: Arki, District Solan, Himachal Pradesh - 171102, India
3		Basantnagar Cement Works - Basantnagar, Peddapalli, Telangana – 505187, India
4		Bela Cement Works - Jaypee Puram, P.O. Jaypee Puram, Rewa - 486450, Madhya Pradesh, India
5		Bhatinda Cement Works - P.O. Lehra Mohabat, Behind Guru Hargovind Thermal Plant (GHTP), Bathinda, Punjab, 151111, India
6		Dalla Cement Works - Post: Dalla, District Sonbhadra Uttar Pradesh - 231207, India
7		Kukurdih Cement Works - Sarkipar, P.O: Simradih, Tehsil & District: Baloda Bazar-Bhatapara, Chhattisgarh-493332, India
8		Manikgarh Cement Works - At Post Gadchandur, Tehsil Korpana, District Chandrapur, Maharashtra - 442908, India
9		Nagpur Cement Works - Village Ashti, Navegaon, and Tarsa Tehsil Mouda (Mouda) District Nagpur, Maharashtra – 441106 India
10		Nathdwara Cement Works - Nathdwara Cement Works Post: Aditya Nagar, Amli Road Tehsil: Pindwara District: Sirohi, Rajasthan – 307031, India
11		Navi Mumbai Bulk Terminal - Plot No 53-55 & 61-64, Sector 1 Dronagiri Industrial Area, Uran, Raigad district. Pin no.400707, India
12		Vizag RMC - Sy. No. 58/1 & 58/6, Paradesipalem, Near Madhurawada, Visakhapatnam-63, Visakhapatnam – 530048, India
13		Durgapur Cement Works - Near EPIP Plot, P.O: Muchipara Rajbandh, City: Durgapur, District: Bardhaman - West Bengal-

Conclusion

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the selected non-financial sustainability disclosures of the Company presented in the ESG Factbook FY 2025–26 have not been prepared, in all material respects, in accordance with the applicable Reporting Criteria.

Our conclusion applies only to the selected information specifically identified in this statement and does not extend to any other information presented in the Company's BRSR, Integrated and Sustainability Report, Annual Report, website or other communications.

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 sustainability reporting was not performed. Accordingly, TÜV SÜD do not express a conclusion on this information.

Financial data were drawn directly from independently audited financial accounts. TÜV SÜD did not perform any further assurance procedures on data, which were subject of the annual financial audit.

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 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

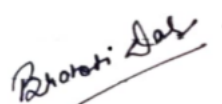
TÜV SÜD South Asia Pvt Ltd. is an independent certification and testing organization and member of the international TÜV SÜD Group, with accreditations also in the areas of social responsibility and environmental protection. The assurance team was assembled based on the knowledge, experience and qualification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

Kolkata, 27 August 2026



Mr Prosenjit Mitra

General Manager- Verification, Validation and Audit
Management System Assurance



Ms Brotoji Das

Verification Team Leader, TÜV SÜD
Management System Assurance

Annexure I

Sl. No.	Indicator reference	Indicator description
1	Energy consumption (MWh)	Total non-renewable energy consumption
		Total renewable energy consumption
		Total energy consumption
2	Water consumption in water stress areas (kL)	Total freshwater consumption in water stressed areas (except Sea-water)
3	Scope 2	Total location-based Scope 2 GHG emissions
		Total market-based Scope 2 GHG emissions
4	Mercury emission	Direct mercury emissions
5	Gender pay gap	Mean gender pay gap
		Median gender pay gap
		Mean bonus gap
		Median bonus gap
6	KPIs for supplier screening	Total number of unique suppliers
		Number of unique significant suppliers
		Number of unique significant suppliers supported with development measures (as a subset of 1.2)
		Number of unique significant suppliers assessed via desk assessments/on-site assessments (as a subset of 1.2)
		Number of unique significant suppliers assessed with substantial actual/potential negative impacts (as a subset of 1.4)
		Number of unique significant suppliers with substantial actual/potential negative impacts with agreed corrective action/improvement plan (as a subset of 1.5)
		Number of unique significant suppliers with substantial actual/potential negative impacts that were terminated (as a subset of 1.5)