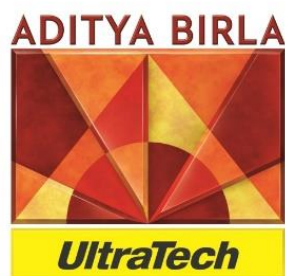




ESG Factbook

UltraTech Cement Limited

FY 2024-25



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About UltraTech

UltraTech Cement Limited, the cement flagship company of the Aditya Birla Group, is India's largest and world's third largest cement producer, excluding China. With a consolidated capacity of 188.88 million tonnes per annum (MTPA) of grey cement production, it also produces white cement and ready-mix concrete. With recorded net revenue of Rs 75,955.13 crore in financial year 2024-2025, the Company's business operations span 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. Additionally, the Company is founding member of Global Cement and Concrete Association (GCCA) and has aligned with the Roadmap for Net Zero Concrete by 2050. We are also committed to No Net Loss of Biodiversity, RE100, EP100, Carbon Pricing Leadership Coalition, Science Based Targets initiative (SBTi) and Taskforce for Climate related Financial Disclosure (TCFD) as part of its efforts to accelerate the adoption of low carbon technologies and 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, with its implementation overseen by the Board-level Risk Management and Sustainability (RMS) Committee. Our commitment includes:

- Consulting internal and external stakeholders and 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.

Pl. refer [Corporate Environment policy](#) for further details.

We have carried out various internal and external audits for Environment Management System. Currently, 99% 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 2024-25 for UltraTech (Standalone) are summarized below:

Capital investment (INR)	5,06,07,05,681.50
Savings, cost avoidance, income etc. (INR)	2,74,00,00,000.00

Energy Management & Decarbonization

At UltraTech, we are committed to continuously improving our performance on enhancing energy efficiency & implementing strategies to reduce our impact on the environment. 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 2024–25, we successfully attained 351 MW of capacity through Waste Heat Recovery Systems and expanded our renewable energy portfolio to 1.02 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 2024-25
Total Non-Renewable Energy Consumption	9,65,55,375.21
Total Renewable Energy Consumption	26,57,854.60
Total Energy Consumption	9,92,13,229.81

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.

Our detailed TCFD report includes all these aspects related to Governance, Strategy, Risk management, Metrics, and Targets associated with climate change.

[UltraTech-TCFD-report.pdf](#)

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.

Internal Carbon Pricing Strategy:

UltraTech has proactively integrated an internal carbon price of USD 10 per ton of CO₂ (Shadow price) into its business strategy and company is in process of reviewing the ICP considering the CCTS (carbon credit trading scheme) as per recent national regulations. This approach allows us to assess the environmental impact of projects and capital expenditures, incentivize consideration of climate-related issues in risk assessment & decision making, enabling more sustainable and environmentally friendly decision-making. By assigning a monetary value to each ton of CO₂ emissions, we quantify the environmental cost of our business activities. This internal pricing mechanism serves as a valuable tool for transitioning towards a low-carbon economy, Influence strategy and financial planning by conducting cost-benefit analysis, driving energy efficiency, leveraging low-carbon investments & opportunities, reducing emissions in our operations, and ensuring preparedness for current and future carbon pricing regulations to manage climate change risks. This remains an important tool to achieve our climate related targets and net zero emission goals.

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 targets and 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 innovation and investments in infrastructures that promote circularity and also efficient resource usage, which leads to continuous waste reduction in our processes. Through

our consistent efforts and targeted actions, we achieved a waste intensity of 0.021 **tonnes/ tonne of cementitious materials** with 8.7 % reduction from FY 2023-24.

We have adopted zero-waste-to-landfill practices in our operations, by reusing & recycling more than 99% of waste generated, and 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 at sites, we have undergone risk assessments related to water availability and water quality with future projections across our operations, supply chain, and product-use phase. 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 have actively focused on providing awareness to employees through various capacity-building sessions, aiming to reduce water consumption and enhance water positivity.

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. This year, we increased the share of harvested rainwater in total water consumption in water stress areas by 14% from last year.

Water consumption in water-stressed areas

Indicators	FY 2024-25	FY 2023-24
Total water consumption (kL)	46,99,413	33,81,111
Water consumption from rainwater (kL)	28,36,919	15,61,556
Share of rainwater in total water consumption (%)	60.37%	46.18%

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
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.
GWP	Global Warming Potential (GWP) is a measure of how much heat a greenhouse gas traps in the atmosphere over a specific time period, usually 100 years, compared to carbon dioxide.

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

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).

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 2024-25 are as follows:

Revenue through Blended Cements (in INR)	5,30,16,68,07,40,000
Avoided emissions through low-carbon products (Own operations)	2,10,57,134 tCO ₂
Avoided emissions through low-carbon products (third-party)	1,11,26,80,389.52 tCO ₂

In ready-mix concrete

Natural raw materials (In tonnes)	98,20,915.89
Alternative material (In tonnes)	5,23,162.00
% alternative raw materials contained in concrete (excluding natural raw materials e.g., gypsum, pozzolan)	5.06%

Biodiversity Impact Assessment

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 5 x 5 km grids. We have assessed 15 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	25	25,27,84,230
2	Sites assessed	24	24,80,48,930
3	Site's proximity to Critical areas/eco-sensitive zone	5	8,75,53,420
4	Sites with Biodiversity management plans	23	23,11,06,930

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.

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.

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). The progress made in the reporting year, FY 2024-25, is summarized below:

Supplier KPIs

KPIs for Supplier Screening	Total number of Tier-1 suppliers	16309
	Total number of significant suppliers in Tier-1	135
	% of total spend on significant suppliers in Tier-1	42%
	Total number of significant suppliers in non-tier-1 suppliers	-
	Total number of significant suppliers (Tier-1 and non-Tier-1)	135
KPIs for Supplier Assessment and/or Development		
Coverage and progress of the company's supplier assessment program	Total number of suppliers assessed via desk assessments/ on-site assessments	155
	% of unique significant suppliers assessed	100%
	Number of suppliers assessed with substantial actual/potential negative impacts	42
	% of suppliers with substantial actual/potential negative impacts with agreed corrective action/improvement plan	100%
	Number of suppliers with substantial actual/potential negative impacts that were terminated	0
Coverage and progress of suppliers with corrective action plans	Total number of suppliers supported in corrective action plan implementation	42
	% of suppliers assessed with substantial actual/potential negative impacts supported in the corrective action plan implementation	100%
Coverage and progress of suppliers in capacity-building programs	Total number of suppliers in capacity-building programs	363
	% of unique significant suppliers in capacity building programs	100%

Other Environment KPIs	FY 2024-25
Direct mercury emission (metric tonnes)*	BDL
Production of cementitious material (metric tonnes)	136257223

* 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 2024-25	FY 2023-24
Total Location based (t CO₂)	2703494.58	2303012.44
Total Market based (t CO₂)	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.

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.

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.

Furthermore, 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. Over the past FY, 62 participants engaged in structured coaching and mentorship journeys as part of their respective Leadership Journey Programs.

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. UltraTech, as on 31-Mar-25, has 28 ABG Certified Coaches and 17 employees voluntarily opted for coaching support from ABG Coaches.

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.

Impact

In FY'25, manufacturing advanced women's inclusion across representation, development, and cultural visibility.

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.

Emerge - Development Journey Program for Department Heads

EMERGE is a 12-month structured capability-building program aimed at preparing Department Heads in manufacturing units for future leadership roles such as Function Head, Project Head, or

Grinding Unit Head. Aligned with UltraTech's rapid growth and organizational integration goals, the program focuses on enhancing technical, functional, behavioural, and leadership competencies. Based on the 70:20:10 learning model, EMERGE is divided into two levels—**Business Skills** and **People Skills**—and includes masterclasses, mentoring, and on-the-job learning. Department Heads, who serve as a vital link between Unit Leadership and frontline teams, are empowered to drive productivity, innovation, and cost optimization while fostering cultural assimilation. 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. The Emerge Development Journey has evolved over the last 5 years, several participants being placed in higher / larger roles & this has led to financial cost saving of 1.2 crore.

Besides the tangible benefits of the program, other aspects catered by the program served are:

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

% FTEs participating in the program: 20%

BusinessEDGE Pro

BusinessEDGE Pro is a structured capability-building program designed to enhance commercial acumen among Functional Heads (Technical) and newly appointed Unit Heads. The initiative is strategically aligned with the organization's goal of empowering leadership with a macro-business perspective and driving operational excellence.

Program Objective

To equip Functional Heads and Unit Heads with a comprehensive understanding of business dynamics, financial levers, and stakeholder management, enabling them to make informed decisions and drive strategic performance.

Key Learning Pillars

- **Macro Perspective Building:** Business fundamentals, including financial ratios, working capital, capex planning, inventory management, and sector-specific insights (e.g., mining, logistics, power, procurement, stakeholder management).
- **Structured Learning Framework:** Masterclasses, assessments, mentoring, and on-the-job learning through cross-functional exposure and agenda-driven interactions.
- **Governance & Review Mechanism:** Strategic reviews via Cluster Connects and CMO interactions to ensure alignment and continuous improvement.

Business Benefits

Business EDGE Pro enhances leaders' commercial acumen, enabling smarter financial decisions and strategic alignment with organizational goals. It fosters cross-functional collaboration and builds a pipeline of capable, business-savvy leaders. The program drives operational efficiency in areas like inventory and capex, while strengthening stakeholder engagement. Through structured learning and governance, it empowers leaders to navigate complex business environments and contribute meaningfully to performance and growth. This has led us to achieve a reduction in variable cost and net savings of 21.58 crores.

% of FTEs covered in this program from target base: 80%

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.

29 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.

Average training hours/ FTE: 23.90 hours

Average training cost /FTE: Rs 1058

Learning program for Contractual employees

We have developed specialized training programs tailored to the skill requirements of both our contractual employees and workers. Our training program encompasses digital transformation, skill enhancement, and technical competencies and these learning platforms are made accessible to contractual employees to support their professional growth.

Additionally, we conduct on-site training sessions specifically designed for our contractual workforce. These programs aim to strengthen their capabilities and enable greater value addition within our operational ecosystem.

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 provides a range of benefits to its employees and workers, aimed at enhancing their overall well-being. In addition to standard provisions, we implement unit-specific social protection programs tailored to local needs. These initiatives include access to loan facilities,

concession-based education for employees' & workers' children, regular health camps, and welfare programs for employees' and workers' that extend beyond public provisions. These efforts reflect our commitment to supporting our workforce both professionally and personally.

Performance Appraisal and Management

The performance appraisal process at UltraTech involves following stages:

- Goal Setting, for SMART (specific, measurable, Achievable, relevant, time bound goals) SMART that focusses on setting your goals and objectives which cascade from business and sustainability targets set for the year.
- Mid-Year Reflection (MYR), a pit-stop to reflect on past six months, seek feedback and plan for the next six months,
- Self-Evaluation at the end of the year, to self-reflect on the impact created and values exhibited during the year,
- Annual Review Conversation, a dedicated time for a meaningful discussion between manager and employee to discuss the impact multidimensionally, HOWs of performance and development needs, including measuring the impact created beyond the agreed goals/objectives and value reflection – analyzing individual alignment with 5 values of Aditya Birla Group (Integrity, Passion, Commitment, Seamlessness and Speed)
- Manager Evaluation, to assess performance of team member based on the impact created and 'How' part of goal achievement.

This review happens twice a year during mid-year and annual review process. There is real-time feedback exchange through *PingMe* – an online tool for feedback sharing and manager-employee conversations throughout the year.

Apart from individual performance, the pay matrix also incorporates team and business unit performance.

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.

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.

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.

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 2024-25, we achieved a 97% participation rate, reflecting the trust our employees place in us. The survey recorded a 94% Engagement score, with a 1% improvement from last FY 2023-24. 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.
- 42 locations available for face-to-face counselling

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 is up to 60 days leave which can be availed through advance leave or previously accumulated leaves.

Paternity leave: Non primary giver can avail this leave for 5 working days in maximum of two troughs.

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.

Occupational health and Safety

Our Company has implemented Occupational health and safety management system, in line with our Safety and Occupational health Policies. Currently, 99% 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.	51	0	0	3	48
2	Senior Management	Nos.	206	4	0	76	134
3	Middle Management	Nos.	1345	64	7	809	593
4	Junior Management	Nos.	12164	701	2367	8701	1797
5	Staff	Nos.	6300	621	2180	3677	1064
Total Permanent Employees		Nos.	20066	1390	4554	13266	3636
6	Workers	Nos.	6452	22	53	3771	2650
Total Permanent Workforce		Nos.	26518	1412	4607	17037	6286
Contractual Workforce							
7	Offrolls	Nos.	6725	403	4339	2459	330
8	Contract Labour	Nos.	53774	1335	16345	31699	7065
Total workforce		Nos.	90167				

Nationality wise breakup

Sr. no.	Nationality	% share in total management positions	% share in permanent workforce
1	India	99.73	99.40
2	Sri Lanka	0.17	0.36
3	Bangladesh	0.01	0.08
4	Bahrain	0.01	0.03
5	Pakistan	0.00	0.04
6	United Arab Emirates	0.03	0.03
7	Nepal	0.00	0.03
8	Philippines	0.02	0.02
9	Yemen	0.01	0.01
10	Egypt	0.01	0.01

Hiring

Sr. No.	Category	Unit	Gender		Age wise break up		
			Male	Female	<30	30-50	>50
1	Top Management	Nos.	1	0	0	1	0
2	Senior Management	Nos.	14	0	0	11	3
3	Middle Management	Nos.	66	4	1	60	9
4	Junior Management	Nos.	1697	167	967	889	8
5	Staff	Nos.	995	188	793	388	2
6	Workers	Nos.	64	1	8	42	15
Total Hiring		Nos.	3197				

Nationality wise break up of Hiring

Sr. No.	Category	Unit	Gender	
			Male	Female
1	Indian	Nos.	2827	358
2	Philippines	Nos.	1	0
3	Sri Lanka	Nos.	9	0
4	United Arab Emirates	Nos.	0	2
Total		Nos.	3197	

Turnover

Sr. No.	Category	Unit	Gender		Age wise break up		
			Male	Female	<30	30-50	>50
1	Top Management	Nos.	4	0	0	1	3
2	Senior Management	Nos.	19	0	0	5	14
3	Middle Management	Nos.	122	7	0	73	56
4	Junior Management	Nos.	1206	134	406	757	177
5	Staff	Nos.	488	57	229	192	124
6	Workers	Nos.	334	0	4	31	299
Total Turnover		Nos.	2371				

Nationality wise Turnover breakup

Sr. No.	Category	Unit	Gender	
			Male	Female
1	India	Nos.	2152	196
2	Sri Lanka	Nos.	17	1
3	United Arab Emirates	Nos.	1	1
4	Sudan	Nos.	1	0
5	Bahrain	Nos.	1	0
6	Bangladesh	Nos.	1	0
Total		Nos.	2371	

Trainings

Sr. No.	Description	Unit	Gender		
			Male	Female	Total
1	Top Management	Total training Hours	1092.93	0.00	1092.93
		Average training Hours	21	0	21
2	Senior Management	Total training Hours	8301.97	99.66	8401.63
		Average training Hours	40	24.91	40
3	Middle Management	Total training Hours	43696.55	2268.16	45964.71
		Average training Hours	32	35	33
4	Junior Management	Total training Hours	264486.20	16707.23	281193.43
		Average training Hours	22	24	22
5	Staff	Total training Hours	102389.31	14535.41	116924.72
		Average training Hours	16	23	17
6	Workers	Total training Hours	212877.00	1600.00	214477.00
		Average training Hours	33	73	33

Age wise breakup

Sr. No.	Age wise breakup of training (Permanent employees)	
	Age group	Training hours
1	<30	98247
2	30-50	289626
3	>50	65705

Nationality-wise breakup

Nationality-wise breakup of training for permanent employees		
Sr. No.	Nationality	Training hours
1	India	452079.4
2	Sri Lanka	589.5
3	Bangladesh	287.6
4	United Arab Emirates	226.3
5	Pakistan	158.6
6	Bahrain	84.5
7	Philippines	83.5
8	Egypt	39.1
9	Nepal	26.9
10	Yemen	2
	Total Training hours	453577.4

Gender pay gaps

Sr. No.	Indicators	(%)
1	Mean gender pay gap	21.3%
2	Median gender pay gap	20.9%
3	Mean bonus gap	26.1%
4	Median bonus gap	13.5%

for UTCL - Management India, excludes Kesoram & India cements.

Other KPIs

Description	FY 2024-25
Employee Turnover Rate	
Total (%)	9.78
Voluntary (%)	8
Employee Engagement Rate	
Employee Engagement Rate (% employees with top level of satisfaction)	94
Employees who responded to the survey (%)	97
Training and Development	
Average hours per FTE of training and development	23.90
Average amount spent per FTE on training and development	1,058 INR
Mean employee compensation (In INR)	12.16 lakhs
New Hiring	
Total number of new hires	3197
% of open positions filled by internal candidates	53
UltraTech Cement Middle East Investments Limited – UAE and Bahrain	424
UltraTech Cement Lanka (Pvt.) Limited – Sri Lanka	99

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 Governance & 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.

At Board level, the Risk Management and Sustainability Committee provides guidance and oversight to all ESG issues.

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 Technical & Sustainability Officer (CTSO), in collaboration with key functional heads, leads the implementation of these initiatives at the organizational level. The CTSO is directly responsible for all 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, social impact, and diversity programs, near-term and long-term target definition, definition and approval of the training and awareness campaigns of employees and supply chain stakeholders. CTSO reports to the Business Head cum Chief Manufacturing Officer (CMO) & MD (Director on Board) on monthly/ and on need basis.

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. Furthermore, the performance-linked pay matrix of our Chief Technical and Sustainability Officer (CTSO) constitutes more than 40% weightage towards sustainability targets. Similarly, other executives have relevant sustainability targets assigned in their pay structure.

Corporate Governance

Shareholders are key stakeholders whose role is critical in various decision-making processes, as outlined under the Companies Act. Certain matters—such as changes to the company's objectives or amendments to the Articles of Association—require shareholder approval through a special resolution. These approvals may be obtained either at general meetings or via postal ballot. The Notice convening the Annual General Meeting includes resolutions related to the adoption of a new Memorandum of Association and the alteration of the Articles of Association, ensuring compliance with statutory requirements and alignment with the company's evolving strategic direction.

Overall attendance of Directors at the Board Meetings was >85%

The Board serves as the highest governance authority within the organization, with Directors playing pivotal roles in both strategic oversight and corporate management. These responsibilities are accompanied by liabilities, as defined under the Companies Act, 2013.

All directors, except Executive and Independent Directors, are liable to retire by rotation and, if eligible, may offer themselves for reappointment. Executive Directors are appointed for a fixed

tenure and are not subject to rotational retirement. Independent Directors can serve a maximum of two terms of five years each, in accordance with the Companies Act and Listing Regulations. As per statutory requirements, at least two-thirds of the total number of directors must be those whose term is determined by retirement through rotation and appointed by the company in a general meeting. At every Annual General Meeting, one-third of such rotational directors retire from office. This structure ensures a balanced and transparent board composition, while Executive and Independent Directors continue to serve fixed terms aligned with governance norms.

Risk Management

We have implemented a comprehensive risk management approach to identify, assess, analyse, and mitigate risks while fostering a proactive risk culture that supports long-term operational resilience. A board-level Risk Management Committee oversees the overall process, while at the executive level, the CFO & other key leaders evaluate the current risk landscape. Based on risk prioritization and mitigation plans, functional and departmental heads implement corrective actions and provide feedback to shape future strategies. Training sessions are conducted for the Board of Directors—including executive, independent, and non-executive members—CXOs, functional heads, and employees to embed a proactive risk mindset. Our risk management framework is reviewed annually and as needed to stay aligned with evolving challenges.

We have also adopted a structured risk tolerance framework to ensure risks are managed in line with strategic objectives and stakeholder expectations. This includes defining clear risk thresholds, integrating them into governance processes, conducting periodic reviews, and escalating high-risk issues to appropriate governance bodies. This enables us to balance risk and opportunity effectively, fostering resilience and sustainable growth across our operations and value chain.

On annual and defined basis, we conduct internal and external audits from independent third party for risk identification, assessment, prioritization & mitigation to continuously improve our business practices, compliance & procedures.

Risk identified	Likelihood	Impact	Risk appetite	Mitigation plan
IT, Cybersecurity	Low	high	Medium	To strengthen cybersecurity and mitigate risks, we deploy appropriate defences. Regular phishing simulations help raise user awareness, while continuous vulnerability scanning and remediation protect IT and OT systems. Fast incident detection and automated response minimize damage. A comprehensive data security plan ensures

				sensitive data is classified and controlled. We must secure SaaS usage through due diligence and risk assessments. Assessing IT infrastructure supports future growth, and adopting a cloud-first approach enhances scalability. Enhancing IT skills enables effective tech integration, while prioritizing infrastructure investments ensures optimal use of resources within budget constraints.
Climate and Sustainability	Medium	Medium	Medium	To address environmental and regulatory challenges, we have proposed a range of strategic measures. These include exploring advanced technologies for pollution control beyond compliance and adopting automation and digitalisation to manage emissions at the source. Continuous optimisation of raw and fuel mixes will help reduce pollution loads. We will proactively monitor domestic and global regulatory landscapes, including CCTS, BRSR, and CBAM. Technological upgrades such as replacing ESPs with Bag Houses and evaluating SNCR systems are also planned. Additionally, we aim to build partnerships for developing high-TSR clean biofuel plants, including green hydrogen, to support sustainable and compliant operations.

Emerging Risks

Research by World economic Forum has released global risk report, highlighting the need for various corporations and governments to take note of the risks in short and long term. UltraTech being an agile company, responds to the risk report by identifying the top emerging risks and adopt an enterprise-wide approach to analyze and create optimal risk mitigation plans.

Top 2 identified emerging risks:

Name of risk	Category	Description with respect to company business	Impact on company business	Mitigation measures
AI Governance & Management	Technological	The role of Generative AI (Gen AI) in producing false or misleading content at scale. A lack of clear accountability can obscure responsibility for AI-driven decisions, leading to legal, ethical, and reputational consequences. Inadequate regulation and oversight may allow unsafe or unethical AI systems to be deployed unchecked. Over-reliance on AI without human oversight can lead to errors and decisions lacking empathy or context. Ignoring ethical and societal impacts may enable harmful uses such as surveillance or manipulation, threatening democratic values. A lack of transparency in AI models can reduce trust and hinder accountability. Finally, talent and skill gaps in AI governance increase the risk of misuse and operational inefficiencies.	In long term, there is a possibility of financial losses when AI projects fail or are misaligned with business goals. Unethical or biased AI decisions can damage reputations and erode stakeholder trust. With evolving data protection and AI regulations—such as the Digital Personal Data Protection Act—non-compliance may lead to legal penalties and increased scrutiny. Additionally, rapid AI adoption can disrupt the workforce, rendering existing skills obsolete and creating talent gaps. Finally, companies that fail to scale AI effectively may fall behind competitors, losing market relevance and innovation momentum. We conducted an internal estimate based on the assessments and given controls; such incidents can interrupt business & operations up to two weeks.	To mitigate AI misuse risks, we are adopting a proactive approach. This includes securing sensitive data through automated classification and controlled transmission. We are carefully assessing third-party SaaS platforms and embrace a cloud-first strategy where feasible. Evaluating our IT infrastructure helps us prepare for future growth, while investing in skill development ensures our teams can manage emerging technologies effectively. By prioritizing infrastructure investments based on business impact. These actions enable us to deploy AI responsibly, reduce vulnerabilities, and build a secure, ethical, and future-ready digital environment.
Natural resource shortage	Environment	UltraTech with its production capacity of 188.87 MTPA, it requires a lot of natural raw material. In FY 25, it used 138.48 million tonnes of natural raw material. With the increase in the production capacity of our company and cumulative increase in production across	<ul style="list-style-type: none"> • Shortage of virgin material for production • High cost of procurement • Unavailability/limited availability of quality raw material 	UltraTech has taken a goal to increasingly use the waste from other industries as fuel or raw material. We are also working towards utilizing the MSW by partnering with various Municipal corporations to source

		the globe, there is huge pressure to meet the raw material required. Given the finite nature of the natural material and associated environmental & societal impact associated with the extraction and processing of the same, it is one of the major long-term risks considered by UltraTech.	<p>due to over exploitation</p> <ul style="list-style-type: none"> Forced change in Technology /equipment to meet changing requirement with available synthetic material/low grade raw material 	<p>and finally incinerate them in our kilns.</p> <p>This year we have used 21.73% recycled input material of the total input material in cement production. We have also co-processed 2.09 million tonnes of waste in our kilns and thermal power plant. We have a current thermal substitution rate of 5.7% which means we have used waste material to substitute coal in our thermal requirements.</p>
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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
- 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.

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 2024–25, we utilized 44.15 million tonnes of recycled and alternative raw materials in cement production —such as fly ash, slag, and gypsum—reducing our reliance on natural resources. We co-processed 0.08 lakhs tonnes of industrial waste, 6.75 lakhs tonnes of agro-waste, and 14.12 lakhs tonnes of municipal solid waste as alternative fuel sources. Our use of recycled polypropylene (rPP) in packaging reduced virgin plastic consumption by 43%. These efforts are backed by ₹459.2 crores in Capex and Opex, reinforcing our commitment to circularity and sustainable growth.

Our Targets

- Net zero by 2050
- Alternative fuel usage: 10% by FY 2030
- Recycled material usage: 25% by FY 2030

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

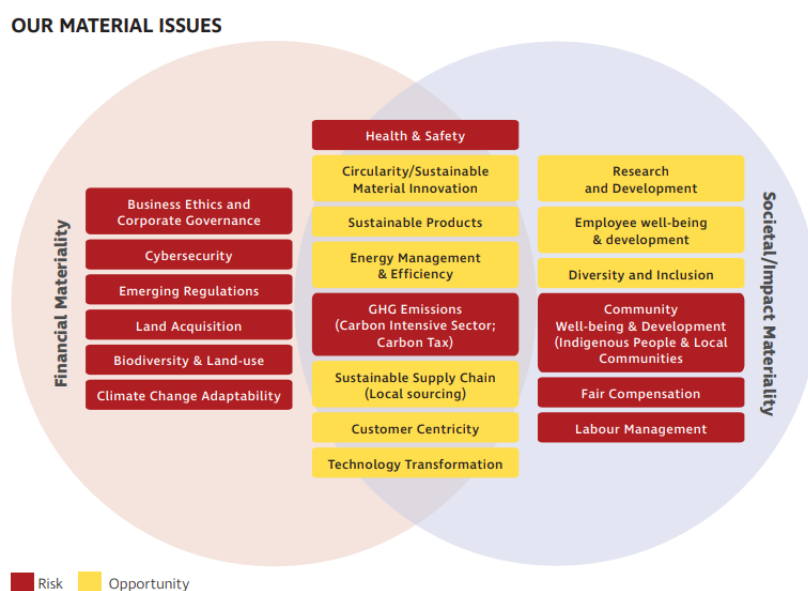
Our policies & commitments: Code of conduct, Anti-Bribery, Anti-Corruption, and Whistleblower Protection.

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.

Material Issues for External Stakeholders/Environment

We engaged with various internal and external stakeholders through a rigorous double materiality assessment involving a wide-range of external and internal stakeholders, we have been able to identify the topics of material, impacting both our business and our external stakeholders/environment or society at large.



Summarized below are the key material topics with impact on external stakeholders/environment:

Circular economy

This year, having partnered with various companies and Municipal Corporations, we have utilized 6.75 lakhs tonnes of agro-waste and 14.12 lakhs lakhs tonnes of MSW as alternative fuels in our kiln operations and captive power plants. This operation not only saves the amount of GHGs from getting emitted in the atmosphere but also impacts other environmental factors. Land use and biodiversity of the adjoining areas are some of the impacts mitigated by the diverting wastes from landfill.

Environmental impact:

- As per EPA (<https://www.epa.gov/report-environment/wastes>) Municipal solid waste landfills are the third-largest source of human-related methane emissions in the U.S., accounting for 15.5 percent of these emissions in 2021. Methane is one of several non-CO₂ gases that contribute to global climate change. Methane gas is released as wastes decompose, and emissions are a function of the total amount and makeup of the wastes

as well as management facility location, design, and practices. Gas emissions can be affected by recycling and changing product use. For example, increased recycling of municipal solid waste reduces the amount of waste sent to landfills while also conserving natural resources (e.g., timber, water, and minerals) and preventing pollution by reducing the need to collect new raw materials.

- With DEFRA GHG conversion factors 2023, we have estimated that 1.1 million tonnes of CO₂e is prevented from getting emitted in the atmosphere.

This year we have achieved 5.7% thermal substitution rate through use of Alternative fuels.

Stakeholder impacted: Communities, Investors, Customers, Suppliers and contractors.

Sustainable supply chain

At UltraTech, while we aspire to become sustainable in our entire network of supply chain, we have started with tier 1 suppliers to begin with. We encourage tier 1 suppliers to do the same in their own tier 1 suppliers, thus creating a nuclear-like reaction to cover the entire gamut of the supply chain. We mainly focus on the following:

1. Assessment of critical suppliers on ESG criteria
2. Screening of new vendors on ESG criteria
3. Procurement from local suppliers

While we have partners with third parties for points 1&2, UltraTech takes special interest in increasing and/or maintaining the share of procured material from local suppliers. This has numerous social benefits, which is part of our ESG drive for the business. Snapshot of progress on procurement from local suppliers is:

Year	Procurement from local suppliers (% of total)
FY 25	75%

Social benefits as understood from the International Labour Organization document titled 'GOOD PROCUREMENT PRACTICES AND SMEs IN GLOBAL SUPPLY CHAINS: what do we know so far? A literature review has highlighted' following potential benefits has been highlighted:

- Supporting the local economy: Local procurement can create jobs, apprenticeships, and work placements, and distribute income. It can also help develop communities.
- Improving product quality: Local suppliers can provide fresher, higher-quality products that meet ethical standards.
- Reducing environmental impact: Local procurement can reduce carbon emissions by shortening the distance products need to travel. Shorter supply chains can also help reduce supply chain risks and lead times, which can be useful for urgent requests.

- Community empowerment: Local sourcing often involves engaging with small and medium-sized businesses (MSMEs) in the area. Collaborating with local suppliers empowers these businesses and strengthens the community's economic resilience.
- Cultural and social considerations: Local sourcing shows respect for the cultural values, traditions, and customs of the community. It demonstrates that the company is sensitive to local needs and preferences. This cultural alignment can improve the company's reputation and foster a stronger social license.

Thus, UltraTech continues to boost the local economy while making the entire supply chain sustainable.

External Stakeholder Impacted: Investors, Suppliers and contractors, and communities.

Contribution to trade associations and other bodies

Contributions to Trade Associations	FY 2024-25 (INR)
CMA	2,95,68,000
GCCA	2,41,53,943
GCCA INDIA PVT LTD	8,00,000
CII	3,79,500
INNOVANDI	97,18,415
Others, pl specify- FICCI	1,94,680
Total	6,48,14,538
Other Contributions	FY 2024-25 (INR)
Contributions to Local, regional or national political campaigns / organizations / candidates	Nil
Contributions for Lobbying, interest representation or similar	Nil
Charitable Contributions	Nil

Independent Assurance Statement

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

Independent Assurance Statement to UltraTech Cement Limited on select non-financial disclosures in ESG Factbook for the financial year 2024-25.

Introduction and objective of engagement

UltraTech Cement Limited (the 'Company') has developed its ESG Factbook FY 2024-25.

BDO India LLP (BDO) was engaged by the Company to provide independent assurance on select non-financial sustainability disclosures in the ESG Factbook (the 'Report') for the period 1st April 2024 to 31st March 2025.

The Company's responsibilities

The content of the Report and its presentation are the sole responsibilities of the Management of the Company. The Company's Management is also responsible for the design, implementation, and maintenance of internal controls relevant to the preparation of the Report, so that it is free from material misstatement.

BDO's responsibilities

BDO's responsibility, as agreed with the Management of the Company, is to provide assurance on the ESG Factbook as described in the 'Scope & boundary of assurance' section below. We do not accept or assume any responsibility for any other purpose or to any other person or organization. Any reliance a third party may place on the Report is entirely at its own risk.

Assurance standard

We conducted our assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), "Assurance Engagements Other than Audits or Reviews of Historical Financial Information", and ISAE 3410, "Assurance Engagements on Greenhouse Gas Statement", issued by the International Auditing and Assurance Standards Board (IAASB).

We applied the criteria of '**Limited**' Assurance for select non-financial information of the Report.

Scope & boundary of assurance

The reporting scope and boundary cover the Company's operations in India and other countries as set out in the Report.

We have assured the select non-financial indicators in the Report (as set out in Appendix 1 to this statement), pertaining to the Company's non-financial performance for the period 1st April 2024 through 31st March 2025.

Assurance methodology

Our assurance process entailed conducting procedures to gather evidence regarding the reliability of the disclosures covered in the assurance scope. Physical verification on a sample basis was carried out at the following locations, in addition to interaction with Client's team at various locations and corporate office as needed:

- Corporate Office, Mumbai;
- Pune Bulk Terminal, Pune;
- Dhar Cement Works, Madhya Pradesh;
- Kotputli Cement Works, Rajasthan;
- Jharsuguda Cement Works, Odisha;
- Cuttack Cement Works, Odisha;
- Awarpur Cement Works, Maharashtra;
- Bara Cement Works, Uttar Pradesh;
- Dankuni Cement Works, West Bengal;
- Birla White, Rajasthan;
- Rawan Cement Works, Chhattisgarh;
- Ras Al-Khaimah, UAE;
- Sri Lanka Bulk Terminal, Sri Lanka;
- Sankar Nagar Cement Works, Tamilnadu;
- Sarala Nagar Cement Works, Tamilnadu

We used our professional judgement as Assurance Provider for selection of sample of the Company's locations/facilities and non-financial information for the purpose of verifications.

We conducted a review and verification of data collection, collation, and calculation methodologies, and a general review of the logic of inclusion/ omission of relevant information/ data in the Report. Our review process included:

- Evaluation and assessment of the appropriateness of quantification methods used to arrive at the non-financial sustainability information of the ESG Factbook;
- Review of consistency of data/information within the Report as well as between the Report and source;
- Engagement through discussions with personnel at both corporate and plant/facility levels who are accountable for the data and information presented in the Report;
- Execution of an audit trail of claims and data streams, to determine the level of accuracy in collection, transcription, and aggregation;
- Review of data collection and management procedures, and related internal controls.

**Limitations and exclusions:**

There are inherent limitations in an assurance engagement, including, for example, the use of judgement and selective testing of data. Accordingly, there are possibilities that material misstatements in the Report may remain undetected.

The assurance scope excludes:

- Data and information outside the defined reporting period (1st April 2024 to 31st March 2025);
- Review of the 'economic and/or financial performance indicators' included in the Report or on which reporting is based; we have been informed by the Company that these are derived from the Company's audited financial records;
- The Company's statements and claims related to any topic other than those listed in the 'Scope & boundary of assurance';
- The Company's statements that describe qualitative/quantitative assertions, expression of opinion, belief, inference, aspiration/targets, expectation, aim or future intention.

Our observations

The disclosures of the Company, covered under the 'Scope and boundary of assurance', are fairly reliable.

Our Conclusions

Based on the procedure performed on select non-financial indicators under the scope and boundary of assurance, nothing has come to our attention that causes us not to believe that the disclosures of the Company are presented fairly, in all material respects, in accordance with the relevant reporting guidelines/standards.

Our assurance team and independence

BDO India LLP is a professional services firm providing services in Advisory, Assurance, Tax, and Business Advisory Services, to both domestic and international organizations across industry sectors. Our non-financial assurance practitioners for this engagement are drawn from a dedicated Sustainability and ESG Team in the organization. This team is comprised of multidisciplinary professionals, with expertise across the domains of sustainability, global sustainability reporting standards and principles, and related assurance standards. This team has extensive experience in conducting independent assurance of sustainability data, systems, and processes across sectors and geographies. As an assurance provider, BDO India LLP is required to comply with the independence requirements set out in the International Federation of Accountants (IFAC) Code of Ethics for Professional Accountants. Our independence policies and procedures ensure compliance with the Code.

For BDO India LLP

Indra Guha
Partner | Sustainability & ESG
Business Advisory Services

Gurugram, Haryana
10 September 2025

Appendix 1 (to be read as part of 'Scope and boundary of assurance')

The sustainability indicators/disclosures considered under the scope of limited assurance are presented below:

Sr. No.	Indicator Title	Indicator Description
1	Energy Consumption (MWh)	<ul style="list-style-type: none"> • Total Non-Renewable Energy Consumption • Total Renewable Energy Consumption • Total Energy Consumption
2	Scope 2 GHG emissions (tCO ₂)	<ul style="list-style-type: none"> • Total Location-based Scope 2 GHG Emissions • Total Market-based Scope 2 GHG Emissions
3	Mercury emissions (MT)	<ul style="list-style-type: none"> • Direct mercury emission
4	KPIs for Supplier Screening	<ul style="list-style-type: none"> • Total number of Tier-1 suppliers • Total number of significant suppliers in Tier-1 • % of total spend on significant suppliers in Tier-1 • Total number of significant suppliers in non-tier-1 suppliers • Total number of significant suppliers (Tier-1 and non-Tier-1)
5	Coverage and progress of the company's supplier assessment program	<ul style="list-style-type: none"> • Total number of suppliers assessed via desk assessments/ on-site assessments • % of unique significant suppliers assessed • Number of suppliers assessed with substantial actual/ potential negative impacts • % of suppliers with substantial actual/potential negative impacts with agreed corrective action/improvement plan • Number of suppliers with substantial actual/potential negative impacts that were terminated
6	Coverage and progress of suppliers with corrective action plans	<ul style="list-style-type: none"> • Total number of suppliers supported in corrective action plan implementation • % of suppliers assessed with substantial actual/potential negative impacts supported in the corrective action plan implementation
7	Coverage and progress of suppliers in capacity-building programs	<ul style="list-style-type: none"> • Total number of suppliers in capacity-building programs • % of unique significant suppliers in capacity building programs
8	Gender pay gaps	<ul style="list-style-type: none"> • Mean gender pay gap • Median gender pay gap • Mean bonus gap • Median bonus gap