

# Responsible Steel™ Certified Site



Presented to

IRQS/233701444

## TATA STEEL LIMITED, Meramandali

### SITE NAME AND ADDRESS

Tata Steel Limited, Meramandali  
P.O. Kusupanga, Narendrapur – 759121, Meramandali,  
Dist. Dhenkanal, Odisha, India

### CLIENT NAME AND ADDRESS

Tata Steel Limited, Meramandali  
P.O. Kusupanga, Narendrapur – 759121, Meramandali,  
Dist. Dhenkanal, Odisha, India

Version of the ResponsibleSteel Standard and Assurance Manual that the site was audited against

ResponsibleSteel Standard Version 1.1  
ResponsibleSteel-Assurance-Manual- Version 1-0

### ISSUE DATE

December 19, 2023

### EXPIRY DATE

December 18, 2026

### NEXT SCHEDULED AUDIT

June 1, 2025

### CERTIFIED SINCE

December 19, 2023

### CERTIFICATION SCOPE

Certification scope: Production of Direct Reduced Iron, Coke, Sinter, Hot Metal, Semi-finished Products, Slabs, Hot Rolled Strip, Cold Rolled Strip, Coated Coils & Sheets, Production of Pig Iron, By-Products, Internal Transport of Raw Materials, Intermediary and End Products.

Audit Scope: As per the Area of Influence of Tata Steel Meramandali

### CERTIFICATION BODY

Indian Register Quality Systems (IRQS)



Indian Register Quality Systems



### AUTHORISED CERTIFICATION BODY SIGNATURE

Shashi Nath Mishra  
Vice President

Any facilities and associated activities that are directly related to steel making or processing, that are on-site or near the site and that have not been included in the certification scope or audit scope

Angul Energy Limited as per Tolling Agreement with Tata Steel Meramandali

ResponsibleSteel™, 755 Hunter Street,  
Newcastle West NSW 2303, Australia

Validity of this certificate is subject to continued conformity with the applicable ResponsibleSteel Standard and can be verified at [www.responsiblesteel.org](http://www.responsiblesteel.org)

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# Responsible Steel™ Certified Site



Annex

IRQS/233701444

## TATA STEEL LIMITED, Meramandali

### SITES AND FACILITIES COVERED BY THE CERTIFICATE

Raw Material Handling, Iron Making-, Coke Plants, Sinter and Base Blending Plants, Direct Reduced Iron Plant, Blast Furnaces, Steel Making- Lime plant, BOF (Basic Oxygen Furnace), CONARC, Hot Rolling- Hot Strip Mill, Cold Rolling Mill along with Captive Power generation from Waste Heat, Coal, and Gas.

### SUPPORT FUNCTIONS THAT CONTRIBUTED TO THE AUDIT

TATA STEEL LIMITED  
P.O. Bistupur  
Jamshedpur – 831001  
Jharkhand,  
India

ResponsibleSteel™, 755 Hunter Street,  
Newcastle West NSW 2303, Australia

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# PUBLIC SUMMARY AUDIT REPORT

This is a concise public summary of the audit report for Tata Steel Meramandali. The full version of the audit report is in the possession of the member company and the audited sites.

## Audit overview

<b>Member Name</b>	Tata Steel Limited
<b>Audited entity name</b>	Tata Steel Meramandali
<b>Number of sites</b> <b>Names &amp; location</b>	1 P.O. Kusupanga, Narendrapur – 759121, Meramandali, Dist. Dhenkanal, Odisha, India
<b>Certification scope</b>	Production of Direct Reduced Iron, Coke, Sinter, Hot Metal, Semi-finished Products, Slabs, Hot Rolled Strip, Cold Rolled Strip, Coated Coils & Sheets, Production of Pig Iron, By-Products, Internal Transport of Raw Materials, Intermediary and End Products.  On Site Facilities- Raw Material Handling, Iron Making-, Coke Plants, Sinter and Base Blending Plants, Direct Reduced Iron Plant, Blast Furnaces, Steel Making- Lime plant, BOF (Basic Oxygen Furnace), Hot Rolling- Hot Strip Mill, Cold Rolling Mill along with Captive Power generation from Waste Heat, Coal, and Gas.
<b>Standard version audited against</b>	<a href="#">ResponsibleSteel Standard V1-1</a>
<b>Audit type and outcome</b>	Initial Certification
<b>Certification body</b>	Indian Register Quality Systems (IRQS) (A Division of IRCLASS Systems & Solutions Pvt Ltd.) 52 A, Adi Shankaracharya Marg, New Wing, 2nd Floor, Opp. Powai Lake, Powai, Mumbai - 400 072, INDIA
<b>Audit Dates</b>	Onsite Stage-1 audit : – 22 & 23 February 2023 Onsite Stage-2 Audit: 17-July-2023 to 22-July-2023
<b>Number of auditors and audit days</b>	Onsite Stage-1 audit :Total Mandays 12 (6 auditors x 2 days = 12 Mandays) Onsite Stage-2 Audit: Total Mandays 42. (7 auditors x 6 days = 42 mandays)

<b>Lead auditor declaration</b>	<p>The findings in this report are based on an objective evaluation of evidence, derived from documents, first-hand observations at the sites and interviews with site staff, workers and stakeholders, as conducted during stage 1 and stage 2 audit activities. The audit team members were deemed to have no conflicts of interest with the sites. The audit team members were professional, ethical, objective and truthful in their conduct of audit activities. The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.</p> <p>It should be noted that audits are snapshots that rely on sampling. Sampling of interview partners, of documentation and records, of observed operations and activities. The auditors can therefore not exclude the possibility that there are non-conformities in addition to the ones identified during the audit activities.</p>
<b>Next audit type and date</b>	Surveillance, Proposed Date, June-2025

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# Introduction

## About ResponsibleSteel

Our mission is to be a driving force in the socially and environmentally responsible production of net-zero steel, globally.

We are a not-for-profit multi-stakeholder organisation founded to bring together business, civil society and downstream users of steel, to provide a global standard and certification initiative for steel. We have built a consensus on what sustainability looks like for steel – including the impacts of mining, steel production, the scrap metal supply chain, greenhouse gas emissions, water use, workers' rights, communities and biodiversity. We are the first global scheme for responsibly sourced and produced steel.

Our Members include steel makers, mining companies, automotive and construction companies as well as civil society organisations focused on labour rights, biodiversity, climate change and many other important issues.

## Overview of the certification process

To become a 'Certified Site', the process below must be followed:



Sites can apply to be assessed against the ResponsibleSteel Standard on a voluntary basis. Conformity with the Standard is verified by independent certification bodies and auditors. They study documentation provided by the site, review relevant media and scientific publications on the site, visit the site to see operations first-hand, and interview site management, process owners, shopfloor workers and external stakeholders such as authorities, community and civil society representatives. The assessment is summarised in an audit report that is reviewed by an independent Assurance Panel. Only if that Panel is satisfied with the quality of the audit and the resulting report, can a site with a positive certification recommendation be certified. A ResponsibleSteel certificate is valid for three years and certified sites have to pass a surveillance audit after 18 months and subsequent re-certification audits to remain certified. The rules and processes for ensuring compliance with the Standard are laid out in the [Assurance Manual](#) and have been developed in line with the Assurance Code of Good Practice set by the ISEAL Alliance.

It should be noted that engagement of external stakeholders is not required for the additional responsible sourcing and GHG requirements. A site visit is only necessary for the additional requirements if the site's GHG data has not been independently verified before the ResponsibleSteel audit or if the site and their certification body agree that a site visit would be useful.

ResponsibleSteel provides an Issues Resolution System that any stakeholder may use to log a complaint about any aspect of the ResponsibleSteel programme. The [Issues Resolution System](#) can be accessed via the ResponsibleSteel website.

More information on ResponsibleSteel can be found on <https://www.responsiblesteel.org/>.

## Site information

<b>Country and town</b>	India, Meramandali
<b>Activities and products</b>	<p>Activities-</p> <p>Steel Works: Raw Material Handling, Iron Making-, Coke Plants, Sinter and Base Blending Plants, Direct Reduced Iron Plant, Blast Furnaces, Steel Making- Lime plant, BOF (Basic Oxygen Furnace), Hot Rolling- Hot Strip Mill, Cold Rolling Mill along with Captive Power generation from waste heat, coal and gas.</p> <p>Products-</p> <ol style="list-style-type: none"> <li>1.HRPO: Hot rolled pickled and oiled. (Coils/Sheets)</li> <li>2.HRDSPO: Hot rolled dry skin pass pickled and oiled. (Coils/Sheets)</li> <li>3.CRFH: CR full hard.</li> <li>4.GP: Galvanized Products. (Coils/Plain Sheets/Corrugated sheets)</li> <li>5.GL: Galvalume Products. (Coils/Plain Sheets/Corrugated sheets)</li> <li>6.CCL: Colour Coated Products. <ol style="list-style-type: none"> <li>6a. PPGI: Pre painted Galvanized (coils/Profile sheets)</li> <li>6b. PPGL: Pre painted Galvalume (coils/Profile sheets)</li> </ol> </li> <li>7.CRCA: Cold rolled closed annealed. (Coils/Sheets)</li> <li>8.HR Side Slit: HR Slit coils</li> <li>9. HR Slabs</li> </ol>
<b>Year site opened</b>	2018
<b>Major extensions and / or refurbishments and year(s) when these occurred</b>	No major extension and refurbishment.
<b>Annual production</b>	5.6 MT/Annum
<b>Number of employees and contractors</b>	<p>Total – 29700 (As on 1 February 2023)</p> <p>Tata Steel Employee –3582 (Male), 104(Female), total = 3686</p> <p>Contractor – 25556 (Male) , 458 (Female), total=26014</p>
<b>Carbon reduction target</b>	<p>Tata Steel has plans in place to reduce GHG emissions and has publicly announced to reach carbon net neutrality by the year 2045.</p> <p><a href="https://www.tatasteel.com/media/18370/tata-steel-ir-2022-23.pdf">https://www.tatasteel.com/media/18370/tata-steel-ir-2022-23.pdf</a></p> <p>(Reference pages of audit report is 4,17,27,33,41,43,66)</p> <p>Tata Steel has an GHG reduction target on an intensity basis as per the below details:</p> <p>FY 25 – 2 tCO<sub>2</sub>/tcs</p> <p>FY 30 – 1.8 tCO<sub>2</sub>/tcs</p>

	Carbon Neutral by 2045
<b>Further environmental and social information</b>	<p>Integrated Report and Annual Accounts (Financial Year 22-23), 116th year:  <a href="https://www.tatasteel.com/media/18370/tata-steel-ir-2022-23.pdf">https://www.tatasteel.com/media/18370/tata-steel-ir-2022-23.pdf</a></p> <p>Business Responsibility and Sustainability Report (Financial Year 22-23):  <a href="https://www.tatasteel.com/media/18368/tata-steel-brsr.pdf">https://www.tatasteel.com/media/18368/tata-steel-brsr.pdf</a></p>

## Stakeholder engagement

Stakeholder engagement is an integral part of a ResponsibleSteel audit and ensures a rich and balanced collection of information and evidence. The auditors followed the methodology outlined in the [Guidance on Stakeholder Engagement](#) provided by ResponsibleSteel as well as the [Introduction to ResponsibleSteel for stakeholders](#).

### Analysis on Stakeholders' Interview/interaction

#### External Stakeholders-General Information

TATA Steel, Meramandali (TSM) has determined the stakeholders that include communities i.e. Women Self Help groups, Cluster level federations, Gram Panchayat Level Federation, children, School management committees, adolescent groups, marginal farmers, tribal groups, Govt. Bodies, civil society etc.

Tata Steel Foundation the CSR wing of Tata Steel undertakes development interventions for the community in consultation with the community.

There are different forums through which TATA Steel, Meramandali (TSM) engages with stakeholders i.e. through village level meetings, meetings and trainings for women groups, adolescent groups, school management committee, farmer groups etc. Most of the stakeholders are from Marginalised community which includes small and marginal farmers, land less and tribal and other back ward class community. The meeting is done as per SOP maintained for regular interaction vide TSM/QMS/CS-TSM/CS/SOP/01. The SOP provides detailed procedure to engage & communicate with the external stakeholders, capture their interests/concerns and address them. Some of the examples from the SOP and actual meeting MoM as evidenced is below:

Category	Designation/office of stakeholder	Mode of communication	Frequency of meeting	Mode of capturing concern	Process owner

Women self-help group (SHG)	Members of SHG	Formal/informal discussions, verbal/written communications	Monthly	Minutes of Meeting,	Unit Head TSF (Tata Steel Foundation)
Marginal farmer group	Members of farmer group	Formal/informal discussions, verbal/written communications	Bi-Monthly	Minutes of Meeting,	Unit Head TSF (Tata Steel Foundation)

The site also engages with different external stakeholders on regular basis, e.g. vendor and distributor meets. Events are being organised every year for community connect on important environment topics like Environment meet, Environment camps, Quiz, Greenathon Tree plantation, Poster Competition for children, Exhibition, Inter school Elocution Competitions, Swachata Abhiyan, Drive against Polythene Bags.

Tata Steel in its Code of Conduct has outlined in core principle, point 7, which states that it will treat all its stakeholders fairly and without discrimination. This principle is followed in all the engagement process across the organisation.

TATA Steel shares CSR interventions through local media, annual reports, and programmes like "GRUHLAXMI" etc.

Stakeholder's issues and concerns are discussed, scrutinised and appropriate action is taken and communicated through formal / informal means. All inputs received through formal /informal modes are recorded, tracked, and implemented accordingly.

### **Methodology for conduct of interviews of External Stakeholders**

The list of stakeholders identified by the site was in line with Stage 1 audit and the media analysis. We have considered key stakeholders in the-area-of influence as per the RS Guidance document on stakeholder engagement. The sample selected for the external stakeholders included those who do not hold a business or contractual relationship with the site. These included local communities and their formal and informal representatives, indigenous peoples, national or local government authorities, politicians, marginalised groups (Self Help Group of Rehabilitation & Resettlement (R &R) Colony), civil society organisations (ASPIRE, Green Essence Foundation), academics (Gopabandhu High School), media persons, and workers. The labour contractors were covered, as they have contractual relationship with the site. In line with the RS guidelines, both, TSM and contractor, workers were interviewed. The interviews with the external stakeholders were arranged by the site. The list of workers for the interview was provided to the audit team for their respective audit locations. The audit team randomly selected few persons from the list provided and interviewed them based on their availability.

All the identified external stakeholders were informed regarding the audit commencing on 17th of July 2023 via e-mails and telephone. The e- mail content included the information regarding the audit of the site, key elements of the RS Standard, role of CB and a formal invitation to participate in the audit process by either giving inputs via e-mail or attending and interview. The following external stakeholders were sent e-mail communication on 17th June 2023, requesting them to submit their issues/concerns with the site, if any, OR participate in the interviews:

Petroleum Explosives Safety Organization, Govt. Of India – Deputy Chief Controller of Explosives  
Member of Legislative Assembly (MLA), Dhenkanal  
Additional District Magistrate, Angul

We did not receive any inputs via e-mail.

The other stakeholders were contacted over phone by our auditor Mr. S K Panigrahi. These included village committee members, village leaders, opinion makers, Civil Society organizations, elected leaders, marginalised groups, academics. Most of the stakeholders were satisfied with the Plant activities and initiatives taken for improving their quality of life. One of the members of the village committee mentioned regarding dust nuisance from the Plant during strong winds. This was because of dumping of slag on the boundary by the erstwhile Bhushan Steel Ltd. After acquisition, TSM sought the legal approval for disposing of the slag and planted of trees in the area, which has resulted in eliminating dust pollution.

To ensure coverage of independent stakeholder's consultation, in-addition to the list identified by the site, the auditors interviewed the following stakeholders on various issues related to the impact of site's activities on the local communities:

Road Accident – Print media (newspaper correspondent), Superintendent Of Police, Sub-collector, Dhenkanal, Assistant District Collector, Dhenkanal.

Air, Water & Dust Pollution - Print media (newspaper correspondent), Superintendent-Of-Police, Sub-collector, Dhenkanal, Assistant District Collector, Dhenkanal, Assistant Director of Factories & Boilers, Residents nearby Lingra river discharge point and outfall of wastewater Kishindgha river.

Legal Compliances - Assistant Director of Factories & Boilers, Deputy Chief Controller.

Authenticity of CSR Activities and grievance of the local communities - Print media (newspaper correspondent), Superintendent Of Police, Sub-collector, Dhenkanal, Assistant District Collector, Dhenkanal.

Diseases arising from pollution (air, water & land) - Print media (newspaper correspondent), Superintendent Of Police, Sub-collector, Dhenkanal, Assistant District Collector, Dhenkanal.

Security conflict - Print media (newspaper correspondent), Superintendent Of Police.

Dust level, Traffic congestion near TSM site, basic amenities provided to drivers and cleaners at the transport park – Randomly spoke to one of the drivers of the transport park.

Accident on 13.06.2023 at Blast Furnace, Power Plant # 2 (details provided in the later part of the audit report under the section "Media Analysis") - Print media (newspaper correspondent), Superintendent-Of-Police, Sub-collector, Dhenkanal, Assistant District Collector, Dhenkanal, Assistant Director of Factories & Boilers.

Rehabilitation & Resettlement (R&R) – Six women living in the R&R colony, who also belong to the marginalised community, and now form part of the Women's' Self-Help Group (SHG) (Gruhalaxmi Bahumukhi Mahila Utpadiak Samabaya Samiti)

### **Outcome of the external stakeholders interviews**

The interviews were conducted based on the generic stakeholder interview questionnaire provided by ResponsibleSteel. The focus of the interviews was to understand the concerns faced by the external stakeholders because of the Plant activities, including degradation of air/water quality, if any. Most

respondents confirmed that the site endeavoured to conduct its business in a responsible manner by implementing various CSR activities to improve the quality of lives of the communities living around the Plant. It was noteworthy to learn from the group of 6 women of the Rehabilitation & Resettlement (R & R) colony that their quality of life had significantly improved since the acquisition of the Plant by Tata Steel management. Their husbands who had employment inside the Plant enjoyed higher salaries, by which they could now afford to send their children to private schools. They expressed satisfaction with respect to the amenities they availed like electricity, water supply, and construction and maintenance of roads. The improved condition of roads ensured that their children did not face any difficulties when going to school. They also mentioned that the safety culture of the Plant had significantly improved e.g., it was now mandatory for all to wear PPEs. In case of any grievance related to amenities or facilities they could directly approach the CSR team in their office. They were confident that their concerns were heard and addressed appropriately. Few of these women were Board of Directors of the multi-purpose cooperative set up by TSM (Gruhalaxmi Bahumukhi Mahila Utpadiak Samabaya Samiti). They expressed their satisfaction at the initiative which led to increase in their family incomes through various household industries like tailoring, dairy farming, and others. We also asked them if they had any grievance because of the Plant activities, and their response was that no such issues were faced by them. Their grievance related to the approach road to the colony was taken-up for repair by TSM under CSR.

Amongst the elected members of the local community, we interacted with local MLA. His major concern was that the site was not providing employment to the people from the local community and many of those who applied for employment with the vendors were rejected due to safety concerns, which according to him were not valid. We further investigated the matter and learnt the status of local workers and migrant workers for the few subcontractors and TSM itself, refer table below.

TSM worker	Migrant works	Local Workers
3283	1913	1370
TSSL (Contractor)	Migrant worker	Semi-skilled
3682	1778	1904
Contractor	Migrant worker	Local worker
23250	2930	20320

We also discussed with him regarding the accident at Blast Furnace Power Plant # 2 which occurred inside the plant on 13.06.2023. (Details provided in the later part of the report under the heading "Media Analysis", ) He confirmed that the emergency preparedness was well implemented, situation was completely under control, and all affected were immediately provided medical care and attention. He was very appreciative of how the management managed the crisis effectively.

The Additional District Magistrate appreciated the exceptional support provided by the Plant management during COVID times. He also appreciated the funds provided for transformation of the primary Schools. He confirmed that the Plant had a system of monthly meetings during which issues were discussed and necessary improvement actions were taken. He mentioned that the local people wanted expansion of the Awas Yojna (Housing project for the poor) to Banarpal area. The site confirmed that the project on housing was being extended as a step-by-step approach to various locations, and Banarpal was one of the areas in their plan.

We interacted with some media personnel to investigate the issue, highlighted in media, of dust level and traffic congestion due to the vehicular movement. We learnt that the issue of dust was mainly due to the widening and construction of NH 55 (National Highway 55, owned by the Government of India). To improve the situation TSM has set up a transport park where vehicles are parked and the vehicular movement has become systematic, ensuring less congestion and reduced amount of dust levels. Here at the transport park, we interacted with one of the drivers to understand the working conditions. The driver confirmed that the waiting time was around 8 to 9 hours. The site's management reviews the data on weekly basis related to vehicle-in-vehicle out (VIVO). Based on the outcome of the weekly review the site has initiated corrective actions to improve the VIVO. According, to the data provided, the VIVO has been reduced from average of 9 hours (June 2023 & July 2023) to 7 hours in August 2023. Our auditor visited the waiting area, canteen and washrooms, which were found in well maintained and hygienic conditions. The drivers do not have any resting place in the bay area, however, they can access food vending machines which are located at prominent places in-side plant. To further improve the situation, of logistics and working conditions TSM management has planned construction of 3 more transport parks viz TSM RM-VI&DTC Parking (No.-8), TSM SMS-1 PARKING(IBMD), TSM HSM Parking Area (HSM open coil yard). Each of these parking lots will be equipped with all the amenities like restrooms, toilets, and canteens.

The audit team members covered the effects of emissions from the Plant which might affect the water and air quality during their visits to the Lingra river discharge point and Kishindgha river. At the Lingra river discharge point no abnormal spillage /leakage was observed. The water quality is checked by Tata steel on daily basis and elements like ammonia, COD, BOD seen to be well within limit (Refer test report no.; EMD/23-24/0382/09/02, dated 12.09.2023, for effluent sample collected on 08.09.2023 from Drain 8 (near Lingara Nalla (drain) – COD – 28.8mg/l, BOD – 3 days at 27<sup>0</sup> C – 3.42 mg/l). At this location the auditor interacted with some passers-by who expressed overall satisfaction on the discharge water quality. There is no incidence of widespread water borne disease as found from the interaction with the passers-by living close to the Plant. During visit to Kishindgha River, outfall of wastewater disposal from the Plant to this river, at about 8 km (outfall), the local villagers were interviewed. (5 number of persons (residents) while they were on their way, passing through the pavement, just above the river outfall). All of them confirmed that there was no issue of wastewater quality into their fields. No issues related to air, water and land pollution were reported by either print media or government authorities.

We interacted with Opinion Leader from Khaliberena village. He was asked if there were any complaints related to degradation of air/water quality from the villagers, and he confirmed that there were no such complaints.

The outcome of the external stakeholder revealed that the focus of the CSR activities was education, health, livelihood, rural and urban infrastructure development, aimed towards improving the quality of lives of the communities. There were no issues expressed regarding degradation of air/water quality as a result of the Plant activities.

### **Methodology for Internal Stakeholders Interview**

The sample of 202 persons interviewed included both, male and female employees of TSM as well as contract workmen. Both, individual and group, interviews were conducted. The interview

questionnaire was developed internally by IRQS, covering ILO conventions on safety and labour rights. The interviewee was explained the purpose of the interview and were assured that all information gathered would be done without any attribution. The process of interview ensured the following:

- If an individual preferred to be interviewed privately without the presence of other workers, the audit team considered their request.
- Workers and their representatives were interviewed in a confidential setting without any supervision or management personnel present.
- The audit team provided workers with the contact information of the audit team and were informed that the contact information may be used to provide input to the audit in a confidential manner.
- Language of communication used is Hindi / Odia / English

The focus of the interview was to gather information on:

- Safety culture and engagement of workers in safety related matters.
- Respect for the rights of workers and support towards their well-being. – the questionnaire was developed based on ILO conventions on health, safety, and labour rights, covering all the elements of rights of workers including, child and juvenile labour, forced or compulsory labour, non-discrimination, association and collective bargaining, disciplinary practices, hearing and addressing worker concerns, communication of terms of employment, remuneration, working time and worker well-being.

### **Outcome of the Internal Stakeholders Interview**

Based on the interviews conducted we were able to gather the following positive aspects relevant to safety culture of the organization and labour rights of the workmen:

- TATA Steel provides utmost importance to safety and health of workers – all workmen confirmed that the safety culture in the organization had improved significantly since the takeover of the Plant by Tata Steel Management. It was mandatory to wear PPEs at work; workmen were issued PPEs when required; safety trainings were provided on regular basis; all safety related matters were discussed during toolbox talks and mass meetings; in case of accidents or indisposition of any person first aid is provided and, if required treatment is provided at the Occupational Health Centre within the Plant. The workmen confirmed that they were aware of the hazards in their workplaces and the emergency preparedness. All workmen had to undergo the annual medical examination.
- No discrimination with regards to Pay Scale, promotions, canteen facility, workload, etc. – most workmen were satisfied with their salaries. In fact, some of them appreciated their pay under the current management. The subcontractor's workers were not aware of their leave entitlement and mentioned that they were not receiving their pay slips. We audited this criterion through the sites CLM (Contract Labour Management) portal found that the leave records and salary details were in line with the Standard requirements. The awareness with respect to this aspect needed to be improved. Few subcontractors' workmen mentioned that they had to pay for their medical expenses and skill assessments. This aspect was not completely demonstrated by the site; accordingly, one minor non-conformity was raised.
- Infrastructure - rest rooms, bus facility from gate to plant, canteen, drinking water facilities available. One of the workmen interviewed confirmed that the numbers of toilet facilities had significantly increased. We could see several toilet facilities, separate for each gender, and drinking water facilities

in the plant premises during our site visit. Since take-over of the Plant by TSM management total 65 numbers of toilet facilities have been installed. Another 115 are planned in FY 24, out of which 36 have been installed and operational and 79 are under progress – verified review records dated 15.07.2023. However, the hygiene of the toilet facilities was not well maintained. Hence, one minor non-conformity has been raised.

.Transport Park – The driver confirmed that the waiting time was around 8 to 9 hours. The site's management reviews the data on weekly basis related to vehicle-in-vehicle out (VIVO). Based on the outcome of the weekly review the site has initiated corrective actions to improve the VIVO. According to the data provided, the VIVO has been reduced from average of 9 hours (June 2023 & July 2023) to 7 hours in August 2023. Our auditor visited the waiting area, canteen and washrooms, which were found in well maintained and hygienic conditions. The drivers do not have any resting place in the bay area, however, they can access food vending machines which are located at prominent places in-side plant. To further improve the situation, of logistics and working conditions TSM management has planned construction of 3 more transport parks viz TSM RM-VI&DTC Parking (No.-8), TSM SMS-1 PARKING(IBMD), TSM HSM Parking Area (HSM open coil yard). Each of these parking lots will be equipped with all the amenities like restrooms, toilets, and canteens.

- Ethics policy, TATA code of conduct being known to all the workmen – Deployment of all the policies were found to be effective. The workers felt that a very strong culture of ethics prevailed within the organization. They were aware of the company's ethics policy and knew contact details of their ethics counsellor. They could directly report any issues to their ethics counsellor, if required. Management people were easily accessible – in-case of any issues / grievances they could directly report to their HODs / supervisors. They felt the work environment was conducive to openness and honesty, as they did not fear any type of punishment or retaliation.

- There is no restriction on collective bargaining and workers could raise any issues related to aspects of discrimination. The employees who may be affected by discrimination have the right to seek redressal of grievance against the discrimination. A system for handling grievances is described in Codified Rules applicable to TSM employees. For contract employees it is as per Standing Orders. In case of such cases, the concerned person may access the SPEAK-UP mechanism which is available through toll free number, e-mail, website and mail box. This grievance mechanism is administered by 3<sup>rd</sup> party – KPMG, to ensure anonymity of the person.

The outcome of the internal stakeholder revealed that the site provided a safe and healthy work environment, free of any sort of discrimination, achieved through deployment of culture of ethics and safety. Transport Park – The driver at the transport park mentioned that the waiting time previously used to be very high (we presume it was before the construction of the transport park). Now the situation had improved to a great extent with respect to the waiting time. The transport park is well equipped with restrooms, canteens, waiting area and washrooms, all of which were found to be maintained in good condition. To further improve the situation, of logistics and working conditions TSM management has planned construction of 3 more transport parks viz TSM RM-VI&DTC Parking (No.-8), TSM SMS-1 PARKING(IBMD), TSM HSM Parking Area (HSM open coil yard). Each of these parking lots will be equipped with all the amenities like restrooms, toilets, and canteens. The progress of construction is

reviewed every week by senior management – verified review records for the 3<sup>rd</sup> week of September 2023.

.Maternity & Paternity Benefits – This element was covered during the interview of workers, including contractor female employees. However, we found that prior to acquisition there were negligible number of female employees. The TSM management has taken up target for ensuring at least 30% women workers in the workplace. Contractor's female workers get maternity benefit under the Employee State Insurance Act (ESI Act) since employees are covered by ESIC (Employees State Insurance Corporation) policies. TSM's female workers get Maternity Benefit of 26 weeks are provided to female Officers and Non-Officers. We have verified two numbers of female contractor employees and found meeting the requirements. —

### **Stage-1 Readiness Review:**

According to IRQS audit protocol Stage-1 readiness was carried out on-site on 22<sup>nd</sup> & 23<sup>rd</sup> February 2023. Stage-1 was carried out with following objectives.

- Review the site's self-assessment and supporting evidence
- Review audit reports of relevant other certifications of the site for the purpose of recognition
- Review the media articles provided by the site and conduct an additional media analysis
- Asses the site's complexity and exposure to risk
- Review and determine the site's certification scope and the audit scope
- Identify areas of concern and determine the site's readiness for stage 2
- Put together the audit team
- Plan the audit, potentially including a revised estimate of audit time
- Identify and inform external stakeholders of the site audit

There were 57 Areas of Concerns (AOCs). The site submitted action taken report on the AOCs raised, these were reviewed considered as input for preparation of Stage-2 Audit Plan. As part of the stage-2 audit the AOCs were verified to check the effectiveness of actions taken.

### **STAGE-2 AUDIT**

The Stage-2 audit was scheduled from 17<sup>th</sup> to 18<sup>th</sup> July-2023. As part of preparation of stage-2 audit, we conducted following activities.

1. Reaching out to stakeholders
2. Media Analysis
3. To ensure announcement of stage-2 audit amongst the local communities and stakeholders 'of TATA Steel Limited, Meramandali; banners were displayed at designated locations in and around the plant.
4. These banners were in local Odiya language.

These activities were conducted 4-weeks prior to stage-2 audit.

As part of stage-1 audit IRQS received list of external stakeholders and media coverage captions. The methodology used to reach out External stakeholders was Email, wherever available, where only phones

numbers were available Mr. Saroj Kumar Panigrahi (Audit Team Member familiar with local language) contacted them over phone-call to seek inputs to the stage-2 audit. Thus, reaching out to stakeholders, IRQS ensured that communication and attitude is culturally appropriate and takes account of stakeholders' technological capabilities.

IRQS efforts to engage with stakeholders based on following,

- a) The scale, scope of activities, complexity and risk exposure of the site
- b) The level and nature of any past, current, and anticipated conflicts with stakeholders.

Key Inputs received one from ResponsibleSteel and other media captions was related to accident which occurred on 13/June/2023.

**Media Analysis: Media analysis of the TSM revealed following 2 main points.**

- 1) Accident occurred in TSM on 13/06/23.
- 2) Inbound & outbound Truck movement of TSM on the national highway leading to traffic jams and dust (This is national highway owned by Central Government of India, and currently under expansion. National highway-55 (NH-55))

**1) Report on incident dtd. 13/6/23, which lead to a fatality (Serial Number #1 above);** Reference to Criterion 3.3.2 (F) of RS.

**WHAT HAPPENED:**

After the Annual shutdown, boiler was lit up on 12th June 2023 and on the same day, during synchronization of boiler to the header it was noticed that the isolation valve of 250 TPH located near CSDH (Common Steam Distribution Header) was not opening. The valve didn't open through multiple remote commands from the control desk. It got stuck in the closed position. The decision was taken to shut down the 250 TPH Gas fired boiler.

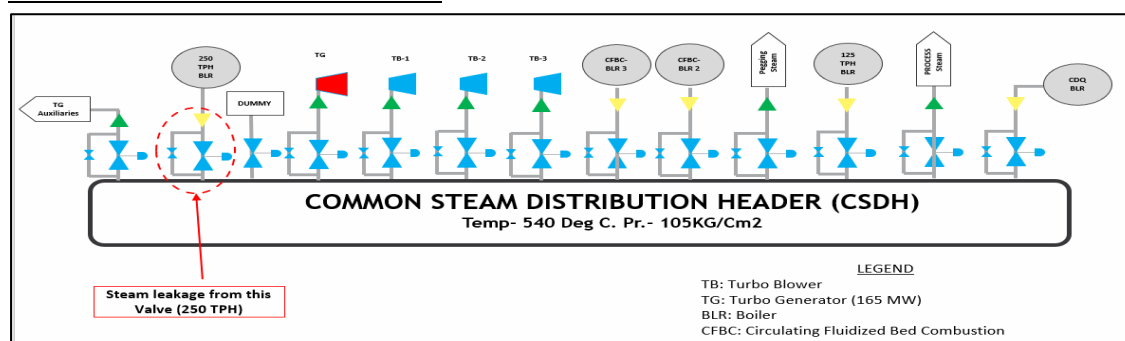
Subsequently on the next day (i.e., 13th June) 250 TPH boiler was shut down with its Main steam Stop Valve (MSSV) located at the vicinity of this boiler in isolated condition. The mechanical team decided to remove the motorized actuator of the valve for further inspection. After removal of this actuator, the maintenance team tried to rotate the spindle manually. While doing this activity, at around 01:00 PM, the spindle of the valve came out from its position. A gush of steam came out from the opening created due to the broken spindle causing burn injuries to 18 employees - TSM-07, TSTSL (Tata Steel Technical Services Limited) -06, Contractor-05 (Includes two highly skilled experts).

**IMMEDIATE ACTIONS TAKEN:**

- All actions are taken in line with "on site emergency plan of TSM, which was approved by Director of Factories & Boilers, Bhubaneswar. Odisha. Letter no. IV (IH) 3- 149/11/3143 dated 19.10.2022

- All the 18 injured persons were immediately rescued from the site and were sent to the Occupational Health Centre of TSM. After referral from doctor all were shifted to Ashwini Hospital, Cuttack, Odisha.
- Emergency safety protocol was activated, all maintenance activity were stopped, and the incident site was cordoned off.
- Immediate information as given to all senior officials of TSM - Chief Power house, Chief safety, Vice president office, Fire control room, Power plant control room, Security office, Occupational Health Centre, VP – Safety & Sustainability TATA STEEL, Local administrative authorities – Assistant Director Factories & Boilers – Dhenkanal zone, Dy. Director Factories & Boilers, Angul, Superintendent of police Dhenkanal
- Official press released by TATA Steel on 13/06/2023.
- Preliminary Investigation Report was logged into the ENSAFE intranet portal of TSM. A cross functional and cross locational team was formed for detailed investigation.
- On 15 June 2023, one person got discharged from Ashwini Hospital, Cuttack.
- Later, on 16 June 2023, the injured person along with 3 other injured persons were shifted by air ambulance to National Burns Center, Airoli, Navi Mumbai, after stabilization. 10 persons were shifted to Tata Main Hospital, Jamshedpur and 3 persons remained in Ashwini Hospital, Cuttack
- One workmen's condition continued to deteriorate due to severe extensive deep burns, sepsis, acute respiratory distress syndrome (ARDS) and multi organ failure. He suffered a cardiac arrest, from which he could not revive and succumbed to his injuries at 10:30 AM on 17 June 2023.

#### **INCIDENT SITE SCHEMATIC VIEW :**



#### **Key findings during preliminary investigation**

- The team was engaged in opening the valve to connect the 250 TPH to the common steam header since the valve didn't open by remote command. The team was trying to open the valve manually.
- Working on the valve connected to pressurised steam line is identified as high risk job.

- Manual rotating of valve is not recognised as a potential activity which broke the valve as the valve spindle broke before the manual rotation. The team observed that the spindle was rotating at its place (and not moving up) when valve opening command was given through electrical actuator which suggest that the spindle got free from the valve head.
- Since the team was not dismantling the valve the only protection was the valve seal. Competent person were deployed for the job.
- People from mechanical team were there as they were executing the job. People from electrical team were present because they dismantled the electrical actuator, but they remained there after finishing their job. People from operation were present to see the progress of the job. As the job was critical and of complex nature few other people were curious to see the job hence they all were present at the site.
- Total 18 persons were present, As per requirement it was supposed to be about 14 to 15 persons presence during the job covering from Instrumentation, mechanical, electrical departments & experts. It was observed 3 persons were additionally present during the job due to criticality & complexity of job.

**Post incident action taken:**

- Hazard Identification & Risk assessment document of Mechanical maintenance department of BFPP has been revised document no. DSP/M/BFPP/MM(C)/RCR/01, dated 17.06.2023.
- The SOP has been revised for safe and controlled stoppage of entire BFPP-2 along with all connected 04 nos. of boilers (Regd. No, OD-353, OR-1447, OD-80 and OD-277) to ensure complete depressurization of CSDH (Common Steam Distribution, Header) . SOP no. IMS/M/BFPP2/OPERATION/SOP/21, Rev. 02, date 07.07.2023
- The BFPP -2 plant was shut down for a certain period post-accident from 13.06.2023 to 07.07.2023 till the repaired order received from Assistant Director Factories & Boilers, Dhenkanal zone. Letter no. 530 dated 07.07.2023.
- The access control mechanism has been installed to enter to the common steam header area at BFPP 2 plant
- Old defective valve was carefully cut and withdrawn from its position and new valve fitted with TIG (Tungsten Inert Gas) root followed by EAW (Electric Arc Welding)
- During the process of replacement of valve Pre heat & Post weld treatment followed along with NDT test (DP, Radiography and UT test).
- All the stage inspection such as material with test certificate and weld fit-up being offered for inspection and acceptance to Asst. Director of Factories & Boilers, Dhenkanal Zone. Odisha

- To ensure safety, consent was taken from OEM (M/s KSB valves) for the suitability of valve for the design steam pressure and temperature.
- To ensure the quality of work welding procedure and schedule were made discussed with officials of Director of Factories & Boilers, Bhubaneswar, Odisha along with welding expert from Tata Steel, Jamshedpur. Entire welding work, pre heat & post heat treatment were carried out under the supervision of TATA Steel, Jamshedpur-TSJ's welding expert.
- The broken part of the spindle is under the custody of Controller of Boiler Board (CBB).for investigation.
- To ensure the emergency preparedness as advised by Dy. Director Factories & Boilers Angul, one onsite mock drill was conducted at LD gas holder plant on dated 28.06.2023 in presence of district Assistant Director Factories & Boilers, Dhenkanal, District fire officer, representative from Superintendent of police, representatives from mutual aid partner from nearby companies M/s JSPL, Angul, M/s Nova Ltd, M/s GMR. The mock drill was conducted successfully without any deviation.
- The preliminary investigation report was shared with every concerned functions in safety meeting for information & necessary action at their end. However the final report shall be prepared as valve spindle failure report is awaited from Central Boiler Board, Govt. of India.

#### **START UP OF BFPP PLANT # 2 & WAY FORWARD**

- SOP has been prepared for "Operation of header steam line incoming outgoing isolation valves (with single pressure relief valve)" for the safe & controlled startup of BFPP-2 along with all connected 04 nos. of boilers (Regd. No, OD-353, OR-1447, OD-80 and OD-277) to ensure proper charging of CSDH. SOP no IMS/M/BFPP2/OPERATION/SOP/89, Rev.0, Date. 28.06.2023
- BFPP- 2 safely started and normalized after getting approval for lifting of prohibition order for operation of CSDH.
- Current status of the BFPP plant#2 being communicated to Dy. Director of Factory & Boilers Bhubaneswar & Asst. Director Factories & Boilers, Dhenkanal on continues basis.
- As advised by the Director of Factory & Boilers Bhubaneswar, the order has been given to M/s Thermax and M/s Avant-Garde Engineers, for feasibility study of installation of addition valve in steam piping between CSDH & 250 TPH GFB main steam stop valve. Report from Avant-Garde Engineers received and expected from Thermax by end of July 2023.
- Final investigation report is awaited from CBB (Controller Of Boiler Board), based on their investigation and metallurgical analysis of the broken piece of the valve further corrective actions can be initiated.

#### **EMPLOYEE TREATMENT STATUS AS ON 18<sup>th</sup> JULY 2023**

Total	:	18 employees exposed to the steam leakage (TSM-07 TSTSL-06, CONTRACTR-05)
Fatal	:	01 employee on 17.06.2023
Discharged from hospital	:	14 employees.
Under treatment in hospital are stable: 03 employees.		

& normal, regular dressing on going

### **COMPENSATION DETAILS EXTENDED TO THE FAMILY (DESEASED EMPLOYEE)**

#### **Family status of deceased employee:**

The Deceased workman is survived by his wife, 3-year-old daughter, mother, and father. All assistance, as per company norms, is being extended to the family as detailed below

<b>Particulars</b>	<b>Amount (INR) Indian Currency</b>
Employees Compensation Amount (As per EC Act)	14,95,500
Funeral Expenses	20,000
Amount towards Contributory Family Benefit Scheme (CFBS)	3,35,000
Provident Fund Contribution (EE & ER share)- Appx.	2,19,192
EDLI Amount (Maximum) – Employee deposit linked insurance scheme	7,00,000
Gratuity amount	1,03,275
Full & Final amount	16,639
<b>Total amount</b>	<b>28,89,606</b>
<b>Family Support Scheme (FSS)</b>	
Six Month Salary to be paid to the Nominee	
Employment / Pension / Pension cum Employment (Pension to the nominee upto the age of 60 years -last drawn Basic salary with 10% yearly increment).	
Medical facility to the family as per the Mediclaim Policy of the company.	
Education expenses for two child (Tuition and Hostel Fee) maximum two lakh per family per year upto Graduation.	
Relocation and shifting maximum one month last drawn Basic Salary.	

### **2) The media analysis on Traffic jams and dust level on national Highway NH-55 (Serial Number # 2 of media analysis):**

Truck movement on the national highway leading to traffic jams, dust (This is national highway owned by Central Government of India, and currently under expansion. National highway-55 (NH-55). Some of these trucks are plying for TSM. Management of TSM has taken two-fold actions to control traffic caused because of inbound and outbound truck movement related to TSM.

Following things verified during the interaction with the logistics department and their Subcontractor.

- Safety Road Marshals are deployed by TSM, in front of the entrance gate, especially at the peak hours to regulate the traffic.
- TSM has inaugurated the 'Transport Park: in the month of Nov-2022, to regulate the movement of the inbound & outbound trucks to the TSM Plant. Transport Park is built opposite to the TSM, where all inbound trucks are diverted. Each truck registering at the entry gate receives the token number. After safety checks and verification of documents at

the gate, truck is allocated the specific bay as per the token number. In this transport park, drivers can park their trucks and take rest in the rest rooms. Canteen Facility is also made available for them. Once the logistics departments give signal to transport park for the placement of the truck, as per the tonnage and token number First-In-First-out (FIFO) is followed. Thus, facility ensures that single truck enters the plant at a time. This resolved multiple issues such as dust, traffic jams and parking of HCV (trucks) along the national highway.

## Summary of Audit Findings

<b>Conform</b>	Conformity, the requirement is fulfilled.
<b>Opportunity for Improvement (OFI)</b>	The respective requirement or criterion has been implemented, but effectiveness or robustness might be increased, or it is a situation that could lead to a future non-conformity if not addressed.
<b>Minor non-conformity (NC)</b>	Isolated, unusual or non-systemic lapse. Or a lapse with limited temporal and organisational impacts. A non-conformity that does not result in a fundamental failure to achieve the objective of the relevant requirement or related criterion. Sites can become certified with minor non-conformities, but they must have addressed them by the time of their next audit.
<b>Major non-conformity (NC)</b>	A non-conformity that, either alone or in combination with further non-conformities, results in or is likely to result in a fundamental failure to achieve the objective of the relevant requirement or related criterion. For example, non-conformities that continue over a long period of time, are systemic, affect a wide range of the site's production or of the site's facilities. Sites with major non-conformities cannot be certified.
<b>Exclusion</b>	The requirement is either <b>not applicable</b> : excluded from the audit since it is not applicable to the sites; or <b>not rated</b> : the requirement is very closely linked to another requirement where a non-conformity (NC) or opportunity for improvement (OFI) has already been raised. Sometimes, when requirements are linked to one and the same subject-matter, it is appropriate to count NCs or OFIs only once to avoid repetition.

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
<b>Principle 1. Corporate Leadership</b>					
Criterion 1.1: Corporate Values and Commitments (6)	5	1	0	0	0

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 1.2: Leadership and Accountability (5)	5	0	0	0	0
<b>Principle 2. Social, Environmental and Governance Management Systems</b>					
Criterion 2.1: Management System (6)	6	0	0	0	0
Criterion 2.2: Responsible Sourcing (6)	6	0	0	0	0
Criterion 2.3: Legal compliance and signatory obligations (6)	6	0	0	0	0
Criterion 2.4: Anti-Corruption and Transparency (8)	7	0	0	0	1
Criterion 2.5: Competence and awareness (5)	5		0	0	0
<b>Principle 3. Occupational Health and Safety</b>					
Criterion 3.1: OH&S policy (6)	6	0	0	0	0
Criterion 3.2: Health and Safety (OH&S) management system (10)	10	0	0	0	0
Criterion 3.3: Leadership and worker engagement on OH&S (10)	10	0	0	0	0
Criterion 3.4: Support and compensation for work-related injuries or illness (8)	7	0	1	0	0
Criterion 3.5: Safe and healthy workplaces (5)	3	0	2	0	0
Criterion 3.6: OH&S performance (2)	2	0	0	0	0
Criterion 3.7: Emergency preparedness and response (6)	6	0	0	0	0
<b>Principle 4. Labour Rights</b>					
Criterion 4.1: Child and juvenile labour (9)	9	0	0	0	0
Criterion 4.2: Forced or compulsory labour (7)	7	0	0	0	0
Criterion 4.3: Non-discrimination (9)	6	0	3	0	0
Criterion 4.4: Association & collective bargaining (12)	11	0	0	0	1
Criterion 4.5: Disciplinary practices (5)	3	0	2	0	0
Criterion 4.6: Hearing and addressing worker concerns (5)	5	0	0	0	0
Criterion 4.7: Communication of terms of employment (5)	5	0	0	0	0
Criterion 4.8: Remuneration (11)	5	1	2	0	3
Criterion 4.9: Working time (7)	3	1	4	0	0

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 4.10: Worker well-being (2)	2	0	0	0	0
<b>Principle 5. Human Rights</b>					
Criterion 5.1: Human rights due diligence (5)	5	0	0	0	0
Criterion 5.2: Security practice (9)	8	0	0	0	1
Criterion 5.3: Conflict-affected and high-risk areas (5)	5	0	0	0	5
<b>Principle 6. Stakeholder Engagement and Communication</b>					
Criterion 6.1: Stakeholder engagement (10)	10	0	0	0	0
Criterion 6.2: Grievances and remediation of adverse impacts (12)	12	0	0	0	0
Criterion 6.3: Communicating to the public (7)	7	0	0	0	0
<b>Principle 7. Local Communities</b>					
Criterion 7.1: Commitment to local communities (8)	8	0	0	0	0
Criterion 7.2: Free, Prior & Informed Consent (3)	3	0	0	0	0
Criterion 7.3: Cultural heritage (7)	0	0	0	0	7
Criterion 7.4: Displacement and Resettlement (9)	7	0	0	0	2
<b>Principle 8. Climate Change and Greenhouse Gas Emissions</b>					
Criterion 8.1: Corporate commitment to achieve the goals of the Paris Agreement (8)	8	0	0	0	0
Criterion 8.2: Corporate Climate-Related Financial Disclosure (2)	2	0	0	0	0
Criterion 8.3: Site-level GHG emissions measurement and intensity calculation (3)	3	0	0	0	0
Criterion 8.4: Site-level GHG reduction targets and planning (11)	11	0	0	0	0
Criterion 8.5: Site-level GHG or CO2 emissions reporting and disclosure (8)	8	0	0	0	0
<b>Principle 9. Noise, Emissions, Effluents and Waste</b>					
Criterion 9.1: Noise and vibration (7)	7	0	0	0	0
Criterion 9.2: Emissions to air (8)	8	0	0	0	0
Criterion 9.3: Spills and leakage (9)	9	0	0	0	0

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 9.4: Waste, by-product and production residue management (11)	11	0	0	0	0
<b>Principle 10. Water Stewardship</b>					
Criterion 10.1 Water-related context (7)	7	0	0	0	0
Criterion 10.2 Water balance and emissions (8)	7	0	0	0	1
Criterion 10.3 Water-related adverse impact (6)	6	0	0	0	0
Criterion 10.4 Managing water issues (8)	8	0	0	0	0
<b>Principle 11. Biodiversity</b>					
Criterion 11.1: Biodiversity commitment and management (25)	10	0	1	0	14
<b>Principle 12. Decommissioning and closure</b>					
Criterion 12.1: Decommissioning and closure (13)					13
	Conform	OFI	Minor NC	Major NC	Exclusion
<b>Total (370) *</b>	<b>310</b>	<b>03</b>	<b>15</b>	<b>0</b>	<b>48</b>

\* Note that the Total in the table does not correspond to the sum of Conform, OFI, Minor NC, Major NC and Exclusion due to the way that requirements and conformity classifications are counted.

#### Exclusions

Clause	Requirement	Justification for Exclusion
2.4.2	The site implements processes to verify the legitimacy of cash transactions, and limits cash transactions to a maximum of US\$10,000 (or the approximate equivalent in local currency) or lower where required by law.	All financial transactions are made using digital payment methods (online transactions), hence processes for confirming the legitimacy of cash transactions and restrictions on cash transactions are not applicable.
2.4.5	The site reports to the public the names of political parties, politicians, public officers and other politically exposed persons (PEP) that have received financial or in-kind contributions directly or indirectly from the site, and the total monetary value they have received.	Site is not allowed to pay financial aid to any political parties, politicians, public officers and other politically exposed persons (PEP) directly or indirectly
2.4.6	The site regularly reports to the public the names of business associations, charities and think tanks that have received financial or in-kind contributions directly or indirectly from the site, citing the total monetary value they have received.	<p>The site is not allowed to contribute directly or indirectly to any business associations, charities and think tanks.</p> <p>The financial aids are given through TATA STEEL group corporate level. The records are available, but the names are not disclosed to the public.</p>

		Verified the record: Names with amount are maintained.
4.4.2	Where national law restricts workers' organisations, the site has evidence showing that it respects and does not obstruct legal alternative means for workers to associate freely	There is no National Law in India that restricts workers to organize
4.8.7	If requested by the workers' representatives, the site commits to introduce a living wage for its workers.	No such request was received from workers by the organization. Verified with workers during workers' interview. Wages are paid as per Govt. of Odisha's Minimum Wages Act
4.8.7 a	Work with the regional government, other companies and, where they exist, with trade unions to define the regional living wage, unless it has already been defined;	No such request was received from workers by the organization. Verified with workers during workers' interview. Wages are paid as per Govt. of Odisha's Minimum Wages Act.
4.8.7 b	Develop a time-bound plan to implement the living wage over time	No such request was received from workers by the organization. Verified with workers during workers' interview
5.3	Conflict-affected and high-risk areas-	There is no conflict affected and high-risk areas in the Area of influence. <a href="https://www.cahraslist.net/cahras#IND">https://www.cahraslist.net/cahras#IND</a>
7.3	Where critical cultural heritage exists in the site's area of influence.....	No critical cultural heritage site
7.4.1 b	Consider alternative operational set-ups to avoid or minimise physical and economic displacement;	No displacement has taken place since the acquisition by Tata Steel.
7.4.2	When physical displacement is unavoidable, the site develops a Resettlement and Compensation Action Plan in consultation with the affected communities.	No displacement has taken place since the acquisition by Tata Steel.
10.2.4	In the absence of applicable regulatory standards, the site adopts and makes publicly available specific water quality objectives for the site, that have been established using credible methodologies and that are in line with prevailing water quality standards	This is not applicable as regulatory standards are in place, e.g. IS10500 standard available for quality of drinking water.
11.1.2 a, b,c,d,e	The site does not initiate activities or plan associated facilities in or immediately adjacent to the following areas: site is not allocated close to: world heritage site, IUCN protected areas; Key Biodiversity Areas (KBAs). Indigenous and community-conserved areas (ICCAs) and Ramsar Sites	NO world heritage site, IUCN protected areas; Key Biodiversity Areas (KBAs) near to TSM
11.1.4 a & c	In the case of critical habitat, the site does not implement any activities or plan infrastructure, unless all of the following are demonstrated	No critical habitat
11.1.5	In the event of downgrading, downsizing or degazettement of World Heritage Sites, Ramsar sites	No world heritage site, No Ramsar Sites

	or protected areas of the IUCN categories I-VI, the site continues its no-go policy.	
11.1.6	Where a World Heritage site, Ramsar site or officially protected area is established in, around or adjacent to the area of activity of an existing site, the site ensures that its activities do not lead to adverse impacts on those values for which the World Heritage site, Ramsar site or protected area was designated-	There is no World Heritage site, Ramsar site or officially protected area is around or adjacent to the area of activity
11.1.7 a & c	Protected and community-conserved areas and Ramsar sites	No Protected and community-conserved areas and Ramsar sites
11.1.11	Where the site has been the subject of controversy, its activities have been verified by a competent independent party as having no adverse impact on World Heritage sites, protected and conserved areas, indigenous and community-conserved areas, Ramsar sites or Key Biodiversity Areas	There are no World Heritage Sites, protected and conserved areas, indigenous and community-conserved areas, Ramsar sites or Key Biodiversity Areas in or immediately adjacent to TSM.
12	Decommissioning and closure	There is no plan for decommissioning and closure of any sites in near future.

## Strengths

<ul style="list-style-type: none"> <li>Set-up of a steering level committee and different cross-functional teams to drive and implement ResponsibleSteel standards. (1.1.1a).</li> <li>Values, policies, and commitments deployed through plant level Business Objectives &amp; Standards (BO&amp;S) and further deployed as Key performance Indicators (KPIs) at department level (1.2.2)</li> <li>Management systems certification like ISO 9001, ISO 45001, ISO 14001 IATF 16949 complementing ResponsibleSteel (2.1).</li> <li>Key performance indicators for the personnel responsible for the site's procurement of raw materials have been specified and are aligned with the corporate owner's commitment to responsible sourcing (2.2.3)</li> <li>Compliance tracking mechanism through SAP based application -"Evolve" for applicable Environment &amp; OH&amp;S laws (3.2.2).</li> <li>TSM has robust grievance mechanisms for both internal and external stakeholders. It is available in public domain and user friendly (4.6 and 6.2).</li> <li>Consultative &amp; participative approach for CSR activities, through Tata Steel Foundation focusing on community development (7.1), to gain trust and consensus of the stakeholders.</li> <li>GHG reduction strategy and robust review of mechanism to track the progress (8.1.4 &amp; 8.1.5).</li> <li>Water stewardship to achieve water positive target by 2045 (10.2.3).</li> </ul>
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## Areas for improvement

During the audit, a few areas were identified that require the attention of the sites and 15 minor non-conformities against requirements of the ResponsibleSteel Standard were raised. The sites are required to effectively address the non-conformities before the next audit. The non-conformity findings are related to:

### **Criterion 3.4.3 b: Support and compensation for work-related injuries or illness**

A procedure not developed for providing compensation to workers if an occupational illness connected to the worker's duties manifests after a worker has retired. No documented procedure is there. Legal requirement related to compensation as per ESIC Act is met through Social Security scheme (FBS, EFBS, FSS). FBS (Family benefit scheme), EFBS (employees family support scheme) & FSS (Family support scheme)

### **Criterion 3.5.2 'a': Safe and healthy workplace**

The system of periodic checks of sanitation system exists and was verified in various departments and found in place. Wash-room Sanitation & upkeep found inadequate in Coke oven plant at MHS "T-2" (Porta Cabin) & RMHS which can be improved.

### **Criterion 3.5.2 'b': Safe and healthy workplace**

Drinking water is periodically tested and water tanks are cleaned as per the Factory Act requirements. The tests are carried out by external approved laboratories and are found complying with the requirements. It was observed that the overhead drinking water tank in coke oven plant was without cleaning date.

### **Criterion 4.3.1 b: Non-discrimination**

The requirement is for a public policy commitment to 'Provides equal pay for work of equal value'. The current public policy is related to payment in line with legal requirements. This is not the same as providing equal pay for equal work, and this is a gap in the policy. This leads to minor nonconformity.

### **Criterion 4.3.1 c: Non-discrimination**

Public policy "Equal Opportunity and Anti-Discrimination Policy" although meets the intent but **does not explicitly** state that commitment to 'related to treatment of migrant workers' (the site ensures that migrant workers are engaged on equivalent terms and conditions as non-migrant workers carrying out similar work.). This is gap and raised as a minor non-conformity.

### **Criterion 4.3.6: Non-discrimination**

During workers' interview, few workers of vendors informed that payment was made by them towards the Medical Examination & Annual Skill Assessment Test. Process of verification of re-reimbursement through CLM portal not fully demonstrated. Policy on TATA STEEL Business Associates Code of Conduct in place and terms & conditions stated in the work order

### **Criterion 4.5.1: Disciplinary Practices**

The site has a public policy that states 'all disciplinary actions are in accordance with law'..but does not explicitly state "prohibits threats or use of disciplinary practices that undermine workers' dignity" so issued as Minor NC

**Criterion 4.5.2: Disciplinary Practices**

The site has procedures (SOP number -HRM/DM/SOP/CWRC/22 Dated-1-04-2022.), but how the site has developed this procedure together with workers and their legitimate representatives to analyse the risk of undignified disciplinary practices being used or threatened to use not clearly mentioned in the procedure.

**Criterion 4.8.1 b: Remuneration**

the requirement is for a public policy that commits to paying overtime a premium. This is not in the public policy, hence raised as a non-compliance.

**Criterion 4.8.1 c: Remuneration**

the requirement is for a public policy commitment to pay workers in monetary means only and in full. This commitment is not in public policy, hence raised as a non-compliance.

**Criterion 4.9.1 a: Working time**

Tata Steel Social Accountability Policy is publicly available, but effective fatigue management is key in determining working time, shift patterns and time off for workers, these requirements are not reflected in the policy

**Criterion 4.9.1 b: Working time.**

The site has a public policy does not explicitly state "Activities requiring overtime work are accepted voluntarily by workers"

**Criterion 4.9.1 c: Working time.**

The site has a public policy does not explicitly state "All workers are provided with appropriate time off for meals and breaks, demonstrating effective processes for fatigue management"

**Criterion 4.9.1 d: Working time**

The site has a public policy does not explicitly state "All workers are provided with appropriate time off for meals and breaks, demonstrating effective processes for fatigue management"

**Criterion 11.1.7 "d": Biodiversity commitment and management**

The lemon grass project implemented to protect the farmers crop has not considered the biodiversity impact on the Asian Elephants, specifically, since the elephant corridor is 5 KMs from the Plant.

## Assurance Panel Declaration

In line with the ResponsibleSteel Assurance Manual, three members of the Assurance Panel reviewed the full audit report for Tata Steel Limited Meramandali including the auditors' findings for each individual requirement of the ResponsibleSteel Standard. Subsequently, the Assurance Panel members met online to discuss individual findings and to align their views on the audit report. We sought clarification and asked for reconsideration of conformity classifications where the auditors' conclusions were not sufficiently substantiated. Following review of the changes that were made by the auditors, we support the certification recommendation for Tata Steel Limited Meramandali

The Assurance Panel's conclusions on the final audit report are as follows:

- The audit report contains sufficient detail to support an informed certification decision
- The supporting evidence and rationales given in the audit report support the auditors' conformity classifications
- The certification recommendation based on the audit report is conclusive

This statement has been approved by the three members of the Assurance Panel who reviewed the audit report on 19 December 2023.