



No. GMDC/CS/ BSE/NSE/898/2025

Dt. 31.08.2025

To, National Stock Exchange of India, Exchange Plaza, Bandra Curla Complex Bandra (East) , Mumbai – 400 051 Code : GMDCLTD	To, Bombay Stock Exchange Ltd. 25th Floor, P.J. Towers Dalal Street Fort, Mumbai-400 001 Code : 532181
---	---

Sub.: Submission of Business Responsibility & Sustainability Report 2022-23 of the Company pursuant to Regulation 34 of SEBI (LODR) Regulations, 2015.

Dear Sir,

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Business Responsibility & Sustainability Report (BRSR) which forms the part of Company's Annual Report for the FY 2024-25. The BRSR report is also filed in XBRL mode. In case of difference in XBRL and PDF version, the PDF version should be referred.

The Annual Report for FY 2024-25 together with Notice of 62nd AGM and Business Responsibility & Sustainability Report is available on the website of the company : www.gmdcltd.com

You are kindly requested, to take note of the same.

Thanking You,

Yours Faithfully,
For Gujarat Mineral Development Corporation Limited

(Joel Evans)
Company Secretary
Encl : As above

Gujarat Mineral Development Corporation Limited

(A Government of Gujarat Enterprise)

CIN : L14100GJ1963SGC001206

"Khanij Bhavan", 132 Ft. Ring Road, Near University Ground,

Vastrapur, Ahmedabad-52

Phone : 27913200/3501

Email: cs.co@gmdcltd.com Website: www.gmdcltd.com



ANNEXURE V

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity : L14100GJ1963SGC001206
2. Name of the Listed Entity : Gujarat Mineral Development Corporation Limited
3. Year of incorporation : 1963
4. Registered office address : Khanij Bhavan, 132 Feet Ring Road, Near University Ground, Vastrapur, Ahmedabad – 380052, Gujarat, India
5. Corporate address : Khanij Bhavan, 132 Feet Ring Road, Near University Ground, Vastrapur, Ahmedabad – 380052, Gujarat, India
6. E-mail : cs.co@gmdcltd.com
7. Telephone : +91-79-27913200
8. Website : www.gmdcltd.com
9. Financial year for which reporting is being done : 1st April 2024 to 31st March 2025
10. Name of the Stock Exchange(s) where shares are listed : 1. BSE Limited
2. National Stock Exchange of India Limited
11. Paid-up Capital : ₹ 63.60 Crore
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report : Mr. Joel Evans, Company Secretary
Telephone: +91-79-27913200
Email: cs.co@gmdcltd.com
13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e., only for the entity) or on a consolidated basis (i.e., for the entity and all the entities which form a part of its consolidated financial statements, taken together) : Standalone
14. Name of assessment or assurance provider : Not Applicable
15. Type of assessment or assurance obtained : Not Applicable

II. Products/Services

16	Details of business activities (accounting for 90% of the turnover):	S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the Entity
		1	Mining and Quarrying	Mining of Lignite & Bauxite	94.40
		2	Power	Electric Power Generation	5.60

17	Products/Services sold by the entity (accounting for 90% of the entity's turnover):	S. No.	Product/Service	NIC Code	% of Total Turnover contributed
		1	Lignite	05201	90.67
		2	Electric Power (Renewable)	35106	4.39
		3	Electric Power (Thermal)	35102	1.23
		4	Bauxite	07292	3.67

III. Operations

18	Number of locations where plants and/or operations/offices of the entity are situated:	Location	Number of plants	Number of Offices	Total
		National	22*	2	24
		International	0	0	0

* This excludes 9 mining projects which are under commencement.

Markets Served by the entity:			
19	a. Number of Locations	Location	Number
		National (No. of States)	2
		International (No. of Countries)	0
	b. What is the contribution of exports as a percentage of the total turnover of the entity?	Nil	
c. A brief on types of customers	At GMDC, we serve a diverse spectrum of customers across industrial manufacturing, energy, government infrastructure, MSMEs, and emerging sectors. Our key minerals—lignite, bauxite, fluorspar, and clay which are critical inputs for industries such as textiles, cement, ceramics, bricks, chemicals, and power generation. We ensure a reliable fuel supply and promote inclusive industrial growth by offering Udyam-linked pricing benefits to micro and small enterprises.		

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):						
S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1	Permanent (D)	632	587	93	45	7
2	Other than Permanent (E)	387	330	85	57	15
3	Total Employees (D+E)	1,019	917	90	102	10
Workers						
4	Permanent (F)	133	122	92	11	8
5	Other than Permanent (G)	633	585	92	48	8
6	Total Workers (F+G)	766	707	92	59	8
b. Differently abled employees and workers:						
S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Differently abled employees						
1	Permanent (D)	12	10	83	2	17
2	Other than Permanent (E)	0	0	0	0	0
3	Total differently abled employees (D+E)	12	10	83	2	17
Differently abled workers						
4	Permanent (F)	0	0	0	0	0
5	Other than Permanent (G)	0	0	0	0	0
6	Total differently abled workers (F+G)	0	0	0	0	0

Note: From the current reporting year, the 'Other than Permanent' category has been reclassified to include third-party employees and workers, which were not accounted for in FY 2023-24

21. Participation/Inclusion/Representation of women:

	Total (A)	No. and Percentage of females	
		No. (B)	% (B/A)
Board of Directors	8	3	38
Key Management Personnel	3	1	33

22. Turnover rate for permanent employees and workers:

	FY 2024-25			FY 2023-24			FY 2022-23		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	6.6%	12.2%	7.1%	21.7%	14.3%	21.2%	16.8%	5.3%	16.0%
Permanent Workers	18.9%	32.0%	20.1%	24.4%	41.2%	26.3%	21.0%	29.2%	22.1%

V. Holding, Subsidiary and Associate Companies (including joint ventures)

23. (a) Names of holding/ subsidiary / associate companies / joint ventures:

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding / Subsidiary / Associate / Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Gujarat Foundation for Entrepreneurial Excellence	Joint Venture	50	No
2.	Naini Coal Company Ltd.	Joint Venture	50	No
3.	Gujarat Jaypee Cement and Infrastructure Ltd.	Associate	26	No
4.	Gujarat Credo Mineral Industries Ltd.	Associate	26	No
5.	Aikya Chemicals Private Ltd.	Associate	26	No
6.	Swarnim Gujarat Fluorspar Private Ltd.	Joint Venture	1.1	No

VI. CSR Details

24.

(i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)	Yes
(ii) Turnover (in ₹)	2,850.84 crore
(iii) Net worth (in ₹)	6,373.43 crore

VII. Transparency and Disclosures Compliances

25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2024-25			FY 2023-24		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	0	0	NA	0	0	NA
Investors (other than shareholders)	Yes	0	0	NA	0	0	NA
Shareholders	Yes www.gmdcltd.com/disclosure-under-regulation-46-sebi-lodr/	3	0	NA	0	0	NA
Employees and workers	Yes	19	1*	Pending case is related to COD & promotions.	0	0	NA
Customers	Yes www.gmdcltd.com/customer_care/complaint/	114	0	Grievances were on quality related aspects.	0	0	NA
Value Chain Partners	Yes	0	0	NA	0	0	NA
Others	NA	NA	NA	NA	NA	NA	NA

* As of the end of FY 2024-25, two grievances were pending resolution, of which one was addressed and resolved in May 2025.

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Air Emissions and Noise Pollution	Risk	GMDC's open-cast mining operations generate substantial dust and noise from drilling, blasting, and transport, impacting worker health and surrounding communities. Non-compliance with air quality norms may result in legal penalties and reputational risks.	We have adopted real-time air and noise monitoring systems, expanded green belt coverage, maintaining haul roads, and deployed advanced dust suppression and noise control measures in high-risk areas. We conduct regular environmental audits and ambient air quality monitoring to proactively mitigate regulatory risks.	Negative
2.	Biodiversity and Land Restoration	Risk	Open-cast mining leads to significant ecological disturbances, including deforestation, habitat fragmentation, and loss of local flora and fauna. Regulatory bodies are increasingly tightening environmental clearance norms, especially concerning biodiversity-sensitive areas. Failure to meet these expectations can result in project delays, penalties, suspension of mining rights, and reputational damage.	GMDC integrates biodiversity considerations into mine planning, implements progressive mine closure plans, and undertakes large-scale reclamation and afforestation.	Negative
3.	Climate Change and Decarbonisation	Risk	Mining is energy intensive and a key source of Scope 1 and 2 emissions. With growing regulatory pressure and investor expectations around decarbonisation, GMDC faces significant transition risks if emissions are not addressed proactively.	To navigate evolving regulations and mitigate related risks, GMDC engages domain experts and technical consultants for compliance, identify potential issues, ensure compliance, and address environmental, safety, community, and reputational concerns.	Negative
4.	Energy and GHG Emission Management	Risk	Rising energy prices and emerging carbon pricing mechanisms pose cost and regulatory risks, As GMDC's dependence on diesel-based machinery and grid electricity affects both its GHG footprint and operational efficiency.	Energy consumption forms a significant part of GMDC's operational costs. To enhance efficiency and sustainability, the company is implementing energy-saving measures, collaborating with contractors to adopt high-efficiency equipment, exploring on-site renewable energy solutions where feasible.	Negative

S. No.	Material Issue Identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5.	Labour Management and Human Rights	Risk	Inadequate labour practices and failure to uphold human rights can lead to legal non-compliance, regulatory penalties, reputational damage, and workforce dissatisfaction. Poor labour conditions, wage disputes, or safety incidents can disrupt operations and undermine stakeholder trust. Increasing expectations from regulators, investors, and the public demand greater accountability in labour and human rights performance.	GMDC follows a structured, compliance-oriented approach to labour and human rights management. All contracts are issued through a transparent online tendering system that mandates compliance with labour laws, wage norms, working conditions, and safety standards. Regular contractor audits, workforce sensitisation, safety training, and an accessible grievance redressal mechanism—including channels for reporting human rights concerns—ensure effective implementation.	Negative
6.	Occupational Health, Safety and Wellbeing	Risk	Mining poses inherent health and safety risks including exposure to dust, noise, and hazardous environments. Accidents or unsafe working conditions may result in regulatory penalties, operational disruptions, and reputational loss.	Ensuring a safe and secure work environment is a core priority, guided by the principle of Zero Harm. The company conducts routine risk assessments to proactively identify workplace hazards and implements targeted mitigation measures to address them effectively. Regular safety training programs are organized for employees and contract workers to strengthen awareness, build a strong safety culture, and ensure their health and well-being across all operational sites.	Negative
7.	Business Ethics & Corporate Governance	Opportunity	For GMDC, as a Government of Gujarat enterprise, robust business ethics and corporate governance is expected to uphold the highest standards of ethics and governance. This is not just a responsibility but a key enabler of public trust, regulatory compliance, and long-term value creation. Being subject to regular audits, legislative oversight, and public scrutiny, GMDC's commitment to transparency, accountability, and ethical conduct not only ensures regulatory compliance but also enhances its reputation as a responsible and reliable PSU. This reinforces investor confidence, enables smoother regulatory clearances, and supports long-term sustainable growth.	-	Positive

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
8.	Data Privacy and Cyber Security	Opportunity	For GMDC, data privacy and cyber security go beyond just compliance—they are essential to building trust in today’s digital world. As a public sector enterprise, GMDC handles sensitive operational and stakeholder information. By strengthening its cyber security systems, raising employee awareness, and staying ahead of emerging risks, the company not only protects its data but also reassures communities, partners, and regulators that it operates responsibly and transparently. This proactive approach supports safer, smarter, and more resilient growth.	-	Positive
9.	Land Acquisition	Risk	Land acquisition poses operational, financial, and reputational risks due to regulatory complexities, potential community resistance, and cost escalations. Delays in approvals, disputes over compensation, and challenges in stakeholder engagement can hinder project timelines and increase liabilities. It also carries implications related to human rights, environmental impact, and social equity. Mismanagement may lead to legal challenges, reputational damage, and loss of investor confidence, making it a material risk for GMDC’s mining and infrastructure operations.	GMDC mitigates land acquisition risks through early community engagement, transparent compensation, and thorough legal due diligence. In line with the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013, it ensures fair market value and structured R&R support. The company has its own SOP for land compensation, supported by an internal committee that oversees implementation, ensures compliance, and addresses concerns. Clear timelines, documentation protocols, and defined stakeholder responsibilities help maintain transparency and accountability. This approach is further strengthened through regulatory adherence, accessible grievance redressal mechanisms, coordination with authorities, and the use of GIS tools to enable timely, inclusive, and conflict-free acquisitions.	Negative

Note: The materiality assessment was carried out in current financial year through a structured stakeholder engagement process and internal review, resulting in an updated list of material issues.

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and Management Processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c. Web Link of the Policies, if available	Principle 1 Code of Conduct for Employees Code of Conduct for Board Members and Senior Management Code for Fair Disclosure Vigil Mechanism <hr/> Principle 2 Procurement Policy <hr/> Principle 3 Equal Opportunity Policy Occupational Health Policy <hr/> Principle 4 Equal opportunity Policy Risk Management Policy <hr/> Principle 5 Human rights Policy Vigil Mechanism <hr/> Principle 6 Environmental Policy <hr/> Principle 7 Code of Conduct for Directors & Senior Management <hr/> Principle 8 Procurement Policy CSR Policy <hr/> Principle 9 IT Governance Framework (available on the intranet) Other policies can be referred from the company website. Weblink: www.gmdcltd.com/about/corporate-policies-gmdc/								
2 Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3 Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4 Name of the national and international codes/certifications/labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) Standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	<ul style="list-style-type: none"> • ISO 9001:2015 • ISO 14001:2015 • ISO 45001:2018 • 5 Star Rating by IBM (Indian Bureau for Mines), The Ministry of Mines, Government of India for the efforts and initiatives taken for implementation of the Sustainable Development Framework (SDF) at Mevasa and 3 mines Gadhsisa Group. 								
5 Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>While GMDC has not set specific ESG goals or targets, it remains committed to responsible and sustainable mining by integrating Environmental, Social, and Governance (ESG) principles across its operations. Environmentally, the company has banned single-use plastics at 80% of its sites, including the Head Office, and is expanding the use of alternative energy sources such as coal gasification for syngas production. It is also undergoing digital transformation, including the implementation of an integrated fleet management system with fuel sensors and GPS tracking to improve efficiency and reduce idle time.</p> <p>Socially, GMDC promotes an inclusive and equitable workplace by maintaining a fixed quota for marginalised segment of the society, physically Challenged people, ensuring pay equity, and upholding human rights standards. On the governance front, the company is reinforcing its sustainability framework by developing ESG policies, expanding its focus areas, and ensuring leadership-level accountability.</p>								

6 Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met. Currently, no specific targets have been set; therefore, performance tracking against defined goals is not available. However, we are in the process of establishing KPIs against which we will be able to monitor and track progress.

Governance, Leadership and Oversight

7 Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)

Dear Stakeholders,

At Gujarat Mineral Development Corporation Limited (GMDC), we remain determined in our commitment to responsible mining and sustainable growth. As a state-owned enterprise, we recognise our strategic role in advancing India’s economic development and environmental priorities. Our strategic diversification into critical minerals and rare earth elements aligns with the national agenda of ‘Atmanirbhar Bharat. and positions GMDC as a key contributor to country’s green transition.

Environmental sustainability is central to our strategy. In FY 2024–25, we improved efficiency of our renewable energy assets and launched initiatives such as mine water recycling, digital fuel tracking, slope stabilisation using overburden, and adoption of energy-efficient technologies. Water conservation efforts, including rainwater harvesting and closed-loop systems, are also being scaled up.

To enable cleaner industrial processes, we are progressing on coal gasification projects to produce syngas, methanol, and fertilizers, while also transitioning to electric and hybrid mining fleets. Biodiversity preservation, integrated waste management, and circular use of overburden in construction and land reclamation continue across sites.

Our CSR programmes impact more than 3.5 lakh people annually, focusing on health, education, and women empowerment. Internally, we are enhancing workforce diversity and safety through inclusion initiatives and the “Safe Mines, Safe Workers” campaign.

Through our 'Smart Mining' initiative and robust ESG governance aligned with BRSR and NGRBC, GMDC is evolving into a responsible, technology-driven, and future-ready enterprise.

Roopwant Singh, IAS
 Managing Director
 Gujarat Mineral Development Corporation Limited

8 Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies). Shri Roopwant Singh, IAS
 Managing Director
 Gujarat Mineral Development Corporation Limited

9 Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details. Shri Roopwant Singh, IAS
 Managing Director
 Gujarat Mineral Development Corporation Limited

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee									Frequency (Annually / Half Yearly / Quarterly / Any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Yes, a Board-level and management team actively oversee the performance of these policies and regularly evaluates the progress of initiatives against defined goals.									Need Basis								
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Yes, Board level management ensures adherence to all statutory requirements relevant to its operations. Any identified instances of non-compliance are addressed promptly through corrective action, and follow-up audits to prevent recurrence, in line with public sector accountability frameworks and internal risk governance protocol.									Quarterly								

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency

P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9

Yes, the organisation is subject to regular audits conducted by the Comptroller and Auditor General (C&AG) of India, a constitutionally empowered and independent authority. These audits involve a detailed and systematic evaluation of financial statements, operational processes, and compliance with all relevant statutory and regulatory provisions. In addition to routine audits, the C&AG also conducts thematic audits focusing on governance aspects such as decision-making processes, accountability mechanisms, and institutional effectiveness. The resulting audit reports are formally tabled before the Legislative Assembly and subsequently reviewed by various legislative committees, including the Public Undertakings Committee of the State Legislature.

The organisation has a dedicated internal audit function that conducts regular pre-audit checks to independently assess compliance with internal controls, policies, and procedures. This function is supported by an internal audit committee comprising third-party auditors and chaired by an Independent Director, ensuring objectivity, transparency, and alignment with best governance practices. These internal assessments, along with external audits by the C&AG, are given due importance, and appropriate corrective actions are promptly undertaken to address any identified gaps and enhance the overall control environment.

12. If answer to question (1) above is "No" i.e., not all Principles are covered by a policy, reasons to be stated:

P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9

The entity does not consider the Principles material to its business (Yes/No)

The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)

The entity does not have the financial or/human and technical resources available for the task (Yes/No)

It is planned to be done in the next financial year (Yes/No)

Any other reason

Not Applicable

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

PRINCIPLE 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable

At GMDC, we are committed to conducting business with integrity, guided by a strong governance framework that ensures ethical conduct, legal compliance, and effective risk management. Our comprehensive policies promote transparency, prevent corruption, address conflicts of interest, and support regular stakeholder communication. This approach strengthens accountability and responsibility across the organisation, helping us build trust and contribute to sustainable development.



ESSENTIAL INDICATORS

1. Percentage coverage by training and awareness programmes on any of the principles during the financial year:

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	1	Board Familiarization Programme with focus on outlook and strategic roadmap	100
Key Management Personnel	1	Business Strategy and outlook discussion Leadership & Managerial Development	100
Employees other than BoD and KMPs	40	<p>Key Technical trainings on following topics:</p> <ul style="list-style-type: none"> • Mining Tenement System • Geotechnical Engineering Aspects • Surpac and Datamine Mine Planning Software • MINEX – Advanced Mine Planning Software • Drone Flying for Mining Surveillance • Mining for Non-Mining Professionals • Mining and Environmental Legislation • Land Acquisition and Rehabilitation & Resettlement (R&R) <p>Key Regulatory and Compliance training on following topics:</p> <ul style="list-style-type: none"> • Statutory Return Compliance • ISO Standards - ISO 9001:2015, ISO 14001:2015 & ISO 45001:2018 • POSH (Prevention of Sexual Harassment) Compliance • ISO/IEC 17025:2017 – Laboratory Competence Standards • New Criminal Laws in India • Arbitral Tribunal Awards and Court Judgements <p>Key Soft skill trainings on following topics:</p> <ul style="list-style-type: none"> • Motivation, Leadership & Team Building • Winning the People-Tech Synergy • Advanced Excel for Business Analytics • Stress Management • Financial Planning for a Post Retirement Life • MPDP-V (Management and Professional Development Program – Version V) <p>Key Health & Safety trainings on following topics:</p> <ul style="list-style-type: none"> • First Aid and CPR • National Road Safety Month • Electrical Protection Systems 	75
Workers	7	<ul style="list-style-type: none"> • Mines Safety • Happy Life after Retirement • Financial Planning after Retirement • First Aid CPR • National Road Safety • POSH (Prevention of Sexual Harassment) • Quality Control 	15

2. Details of fines / penalties / punishment / award / compounding fees / settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators / law enforcement agencies / judicial institutions, in the financial year, in the following format:

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/Fine*	NA	NA	NA	NA	NA
Settlement	NA	NA	NA	NA	NA
Compounding fee	NA	NA	NA	NA	NA

*Note: During the year the stock changes has issued the notice for the payment of fine, on account of noncompliance SEBI LODR regarding composition of risk management committee, Stakeholder relationship committee and Nomination & Remuneration Committee. However, the company has already filed for wavier of fine as this non compliance occurred due to procedural approvals from Government of Gujarat.

Non-Monetary				
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	NA	NA	NA	NA
Punishment	NA	NA	NA	NA

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
Not Applicable	

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

Yes, GMDC upholds a strict anti-corruption and anti-bribery stance, driven by its Code of Conduct and Code of Conduct for Board Members and Senior Management. This Code mandates integrity, transparency, and full compliance with applicable laws across all levels of governance. It outlines expectations for ethical behaviour, strictly prohibit corrupt practices, and reinforce the company's commitment to responsible and ethical business conduct. Strengthening this framework, GMDC has a robust vigil mechanism that supports anti-corruption and anti-bribery efforts by enabling employees and stakeholders to report any suspected misconduct or unethical behaviour in a confidential and secure manner. These governance practices ensure accountability and reflect GMDC's commitment to maintaining the highest ethical standards in all its dealings.

Web link: www.gmdcltd.com/about/corporate-policies-gmdc/

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

	FY 2024-25	FY 2023-24
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

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

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

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

Not Applicable

8. Number of days of accounts payables ((Accounts payable *365) / Cost of goods/services procured) in the following format:

	FY 2024-25	FY 2023-24
Number of days of accounts payables	42	59

9. Open-ness of business

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

Parameters	Metrics	FY 2024-25	FY 2023-24
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	Not Applicable	
	b. Number of trading houses where purchases are made from	GMDC does not have purchasing arrangement with trading houses. GMDC's purchase is done through GeM portal or through open tenders and RFPs.	
	c. Purchases from top 10 trading houses as % of total purchases from trading houses		
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	Not Applicable	
	b. Number of dealers / distributors to whom sales are made	GMDC directly supplies to the end users/customers and there is no intermediate dealer/distributor.	
	c. Sales to top 10 dealers/ distributors as % of total sales to dealers / distributors		
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	Nil	Nil
	b. Sales (Sales to related parties / Total Sales)	12.14%	17.6%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	Nil	Nil
	d. Investments (Investments in related parties / Total Investments made)	Nil	Nil

LEADERSHIP INDICATORS

1. Awareness programmes conducted for value chain partners on any of the principles during the financial year:

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
Yes, All contractors and value chain partners at GMDC undergo a structured induction programme at the time of engagement, covering key aspects such as environmental compliance, labour laws, occupational health and safety, and ethical business practices. In addition, regular safety trainings are conducted to ensure continuous alignment with company's site-specific safety protocols and operational standards. These initiatives serve as ongoing awareness and capacity-building efforts to familiarise partners with applicable statutory requirements and responsible business expectations.		

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

Yes, GMDC has a Code of Conduct that outlines the framework for identifying, preventing, and managing conflicts of interest, applicable to Board members and Senior Management. Any actual or potential conflict must be promptly disclosed to the Company Secretary to ensure transparency and uphold the integrity of decision-making. Complementing this, the company has a comprehensive Related Party Transaction Policy that governs all transactions involving related entities, ensuring they are conducted at arm's length and in the best interest of the organisation. Together, these mechanisms reinforce GMDC's strong governance standards and help maintain public trust as a responsible state-owned enterprise.

Link: www.gmdcltd.com/about/corporate-policies-gmdc/

PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe

At GMDC, safety and sustainability are central to our operations. We recognise that the future of our business depends on responsible mining and clean power generation that protect both land and communities. We design mine pits and dumps with stability and care, invest in efficiency enhancing technologies to reduce environmental impact, and ensure all waste is disposed of safely and in full compliance with regulations. In our power services, including solar and wind energy, we focus on harnessing clean, renewable resources to drive a sustainable future.



ESSENTIAL INDICATORS

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

	FY 2024-25	FY 2023-24	Details of improvement in environmental and social impacts
R&D	100%	100%	Funds were allocated towards research and development initiatives focused on advancing sustainable technologies. This includes supporting scientific studies on Lignite/coal gasification, exploring emission-free trucking solutions, and undertaking specialized training initiatives in partnership with institutions such as IITs with the objective of promoting innovation in cleaner energy alternatives and sustainable industrial practices.
CAPEX	70.33%	4%	As part of a comprehensive sustainability and efficiency initiative, Napier grass was cultivated contributing significantly to soil conservation, enhancing green cover, and providing a renewable source of biomass for energy generation. In parallel, fly ash generated from the bottom of the boiler at the thermal power plant was repurposed into bricks, promoting eco-friendly construction practices and reducing industrial waste. To further improve operational performance, the plant and equipment at ATPS underwent refitting as part of a strategic turnaround.

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

Yes, GMDC has a procurement policy in place that outlines defined procedures for sustainable sourcing through its centralized digital procurement portal, GEM, which manages e-tendering, RFPs, and bidding for mining-related goods and services. This platform ensures transparency, regulatory and legal compliance, fair competition, and traceable documentation across all procurement activities.

In line with its commitment to responsible business conduct, GMDC has integrated ESG (Environmental, Social, and Governance) criteria into its vendor evaluation framework. This includes assessing environmental compliance, occupational health and safety, fair labour practices, and ethical governance. As part of the due diligence process, vendor background checks are conducted prior to onboarding. Vendors found to be non-compliant with statutory obligations or involved in unethical conduct are liable for disqualification or blacklisting in accordance with the procurement policy.

GMDC also emphasizes local sourcing to minimize logistics-related emissions and support economic development in its operating regions. The procurement process extends beyond materials to include services, consultancy, and infrastructure support, ensuring that sustainability principles are upheld across all categories.

These measures reflect GMDC’s commitment to building a robust, transparent, and accountable supply chain ecosystem, fully aligned with its procurement policy.

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

100%

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

Given the nature of our business operations—which include lignite and bauxite mining as well as power generation—the products generated are consumed during use and cannot be reclaimed or returned at the end of their life cycle. Therefore, this disclosure is not applicable to GMDC.

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

No, Extended Producer Responsibility (EPR) is not applicable to Gujarat Mineral Development Corporation Limited.

LEADERSHIP INDICATORS

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

NIC Code	Name of Product/Service	% of total Turnover Contributed	Boundary for which the Life cycle perspective/assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) if yes, provide the web-link.
----------	-------------------------	---------------------------------	--	---	--

Life cycle Assessment has not been conducted.

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

Name of Product/Service	Description of Risk/Concern	Action Taken
-------------------------	-----------------------------	--------------

Not Applicable

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

Indicate input material	Recycled or re-used input material to total material	
	FY 2024-25	FY 2023-24

Not Applicable

Not Applicable

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format:

	FY 2024-25			FY 2023-24		
	Reused	Recycled	Safely Disposed	Reused	Recycled	Safely Disposed

Plastics (including packaging)

E-waste

Hazardous waste

Other waste

Not Applicable

Not Applicable

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
---------------------------	---

Not Applicable

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

GMDC is committed to promoting the well-being, safety, and dignity of all employees, including contract workers and value chain partners. The company ensures compliance with labour laws, provides a safe and healthy, and non-discriminatory work environment, and promotes equal opportunities. Regular safety trainings, skill development, and welfare initiatives are conducted across sites. GMDC also extends benefits such as health insurance, retirement provisions, and other benefits to eligible employees. Efforts are being made to strengthen the well-being of contract workers and vendors by promoting fair labour practices and awareness on human rights. Through these initiatives, GMDC strives to create a respectful, inclusive, and supportive work culture that aligns with the broader goals of social responsibility and sustainable development.



ESSENTIAL INDICATORS

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

Category	% of employees covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent employees											
Male	587	587	100	587	100	-	-	587	100	0	0
Female	45	45	100	45	100	45	100	-	-	0	0
Total	632	632	100	632	100	45	100	587	100	0	0
Other than Permanent employees											
Male	330	148	45	330	100	-	-	0	0	0	0
Female	57	29	51	57	100	57	100	-	-	0	0
Total	387	177	46	387	100	57	100	0	0	0	0

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

Category	% of workers covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent workers											
Male	122	122	100	122	100	-	-	122	100	0	0
Female	11	11	100	11	100	11	100	-	-	0	0
Total	133	133	100	133	100	11	100	122	100	0	0
Other than Permanent workers											
Male	585	48	8	585	100	-	-	0	0	0	0
Female	48	7	15	48	100	48	100	-	-	0	0
Total	633	55	9	633	100	48	100	0	0	0	0

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format.

	FY 2024-25	FY 2023-24
Cost incurred on well-being measures as a % of total revenue of the company*	0.31%	0.20%

* The cost incurred pertains only to GMDC employees. Workers engaged through third-party contracts are not included in this disclosure.

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

Benefits	FY 2024-25			FY 2023-24		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100	100	Yes	100	100	Yes
Gratuity	100	100	Yes	100	100	Yes
ESI	NA	NA	NA	NA	NA	NA
Others (Leave Encashment Benefit)	100	100	NA	100	100	NA

3. Accessibility of workplaces

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

Yes, All administrative offices and operational premises of GMDC are equipped with necessary accessibility features for persons with disabilities, in accordance with the provisions of the Rights of Persons with Disabilities Act, 2016. These include access ramps, designated restrooms, and appropriate signage to ensure barrier-free movement within the premises. Accessibility requirements are also integrated into the planning and design of new infrastructure to ensure continued compliance and inclusive access for all employees and workers.

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

Yes, GMDC has implemented an Equal Opportunity Policy in accordance with the Rights of Persons with Disabilities Act, 2016. The policy ensures that persons with disabilities are provided fair and equal access to employment opportunities, aligned with the reservation norms prescribed by the Government of Gujarat. Accessibility considerations are embedded in recruitment and workplace infrastructure. To support implementation, the Company Secretary functions as the Nodal Grievance Redressal Officer, while the Deputy General Manager (HR) serves as the Liaison Officer for matters related to the employment of persons with disabilities.

Weblink: www.gmdcltd.com/hr/employee-circular/

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

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

* No female employees availed maternity leave during the year.

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes, GMDC has a formal grievance redressal mechanism supported by institutional frameworks such as the Right to Information (RTI) Act, a dedicated HR Sub-Committee, and inclusive provisions for addressing concerns of Persons with Disabilities (PWDs). These components ensure that grievances are handled transparently, fairly, and in a manner accessible to all.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	Employees and workers can raise grievances through site-level HR teams, designated grievance boxes, or direct communication with supervisors. Grievance Redressal Committees are operational at both the corporate and project levels to ensure timely and impartial resolution of issues. Additionally, a POSH Committee is constituted in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 to specifically address workplace harassment complaints. All grievance procedures are aligned with applicable legal requirements and organisational policies, ensuring fairness, accountability, and inclusivity across the organisation.

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

Category	FY 2024-25			FY 2023-24		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	632	547	87	701	491	70
Male	587	507	86	648	457	71
Female	45	40	89	53	34	64
Total Permanent Workers	133	129	97	136	136	100
Male	122	118	97	122	122	100
Female	11	11	100	14	14	100

8. Details of training given to employees and workers:

Category	FY 2024-25					FY 2023-24				
	Total (A)	On Health and Safety measures		On skill upgradation		Total (D)	On Health and Safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	917	588	64	875	95	648	285	44	508	78
Female	102	44	43	100	98	53	18	34	38	72
Total	1,019	632	62	975	96	701	303	43	546	78
Workers										
Male	707	403	57	430	61	122	67	60	57	47
Female	59	32	54	32	54	14	3	21	2	14
Total	766	435	57	462	60	136	70	52	59	43

Note: From the current reporting year, the 'Other than Permanent' category has been reclassified to include third-party employees and workers, which were not accounted for in FY 2023-24

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	917	917	100	648	648	100
Female	102	102	100	53	53	100
Total	1,019	1,019	100	701	701	100
Workers						
Male	707	707	100	122	122	100
Female	59	59	100	14	14	100
Total	766	766	100	136	136	100

Note: From the current reporting year, the 'Other than Permanent' category has been reclassified to include third-party employees and workers, which were not accounted for in FY 2023-24

10. Health and safety management system:

a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/No). If yes, the coverage such system?	Yes, GMDC has implemented an Occupational Health and Safety (OHS) Management System across its mining and administrative operations. The system covers both employees and contract workers and includes hazard identification, training, audits, and emergency preparedness. GMDC's practices are aligned with statutory requirements under the Mines Act, 1952, Mines Rules, 1955, and Mines Vocational Training Rules, 1966, ensuring regulatory compliance and worker safety. Site-level safety committees are in place to monitor and review health and safety performance regularly.
b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?	GMDC identifies work-related hazards and assesses risks through structured processes, including Hazard Identification and Risk Assessment, regular site inspections, job safety analyses (JSA), and risk assessments for both routine and non-routine activities. High-risk tasks follow pre-task safety briefings and a permit-to-work system. Supervisors and safety officers conduct ongoing monitoring, supported by periodic safety audits and internal reviews to identify emerging risks. GMDC has developed a comprehensive Safety Manual that outlines these procedures and serves as a reference for all operational sites. All practices are aligned with applicable mining safety regulations.
c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/No)	Yes, GMDC has established processes that allow workers to report work-related hazards and withdraw from tasks they consider unsafe, without any adverse consequences. Workers may raise such concerns with designated safety personnel, supervisors, or during safety committee meetings. The system includes provisions for stop-work authority in case of perceived imminent risk. All reported concerns are formally recorded, investigated, and addressed as per the company's occupational health and safety protocols.
d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)	Yes, the company offers continuous access to non-occupational medical and healthcare services for all employees and contractors.

11. Details of safety related incidents, in the following format:

Safety Incident/Number	Category	FY 2024-25	FY 2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees Workers	Nil 0.21	Nil Nil
Total recordable work-related injuries	Employees Workers	Nil 2	Nil Nil
No. of fatalities	Employees Workers	Nil 1	Nil Nil
High consequence work-related injury or ill-health (excluding fatalities)	Employees Workers	Nil Nil	Nil Nil

12. Describe the measures taken by the entity to ensure a safe and healthy work place.

Yes, GMDC has implemented a comprehensive Occupational Health & Safety (OHS) Management System, anchored within its Quality Environment Health Safety (QEHS) framework. The system operates across all its mining sites and administrative offices, covering both employees and contract personnel.

Key measures include:

- Regular risk assessments and hazard identification through site inspections, Job Safety Analyses (JSAs), and Safety Management Plans in accordance with regulation.
- Robust safety infrastructure, including issuance of PPE, slope-stability radars for landslide monitoring, and clearly defined Safe Operating Procedures.
- Deployment of trained safety officers, supported by frequent safety training and mock drills to ensure preparedness.
- Emergency and evacuation plan at all operational locations, along with first-aid stations, ambulances, and periodic health check-ups as per Mines Rules 1955.
- Compliance with key statutory frameworks such as Mines Act, 1952; Mines Rules, 1955; and Vocational Training Rules, 1966; alongside ISO 45001 certification under the iQEHS system.
- Continuous monitoring and review via site-level safety committees, along with internal and external audits under QEHS protocols.

Through these measures, GMDC embeds safety and health into everyday operations, promoting a reliable and compliant work environment

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	14	0	-	Nil	Nil	Nil
Health & Safety	3	0	-	Nil	Nil	Nil

14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100%
Working Conditions	100%

Note: All of our operational mines are regularly assessed in line with ISO requirements as well as DGMS.

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

GMDC follows a structured incident investigation process aligned with its QEHS Policy and mining safety regulations. Site-level safety teams conduct preliminary investigations and root cause analysis, followed by the implementation of corrective and preventive actions. For major incidents, cross-functional teams conduct in-depth reviews, and findings are discussed at corporate safety committee meetings.

Learnings are shared during inter-site safety meetings to strengthen preventive measures. Regular internal audits are conducted biannually, while external audits are carried out by third-party agencies. Observations are addressed through formal CAPA processes to ensure continuous improvement and compliance.

LEADERSHIP INDICATORS

1. Does the entity extend any life insurance or any compensatory package in the event of death of

(A) Employees (Yes/No): Yes

(B) Workers (Yes/No): Yes

2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

To ensure the proper deduction and deposition of statutory dues by its value chain partners, GMDC has implemented the following measures:

a) Partner Selection and Due Diligence:

A structured due diligence process is followed during the selection and onboarding of value chain partners. This includes evaluating their compliance history, financial stability, and adherence to applicable legal and statutory obligations, especially those related to taxation and regulatory remittances.

b) Contractual Safeguards:

All contracts clearly define the partner’s responsibility to comply with relevant statutory requirements, including the timely deduction and remittance of dues. These obligations are legally binding, with stipulated consequences for non-compliance.

c) Audits and Monitoring:

GMDC conducts regular audits and monitoring exercises to verify partner compliance. This includes reviewing financial records, tax filings, and related documentation. Ongoing engagement is maintained to support compliance and address any concerns proactively.

d) Transparency and Reporting:

Robust systems are in place to track statutory deductions and remittances across the value chain. Partners are required to submit periodic compliance reports and supporting evidence, which are reviewed to ensure accuracy and adherence to regulatory requirements.

3. Provide the number of employees / workers having suffered high consequence work-related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25	FY 2023-24	FY 2024-25	FY 2023-24
Employees	Nil	Nil	Nil	Nil
Workers	1	Nil	Nil	Nil

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/No)

Yes, GMDC provides transition assistance programs for employees at the time of retirement. As part of this, the company organises a dedicated training session titled “Life After Retirement”, which aims to help retiring employees plan for financial stability, health, and overall well-being in the post-retirement phase. Additionally, all statutory retirement benefits such as Provident Fund, Gratuity, and Leave Encashment are facilitated in a timely manner. This program is part of GMDC’s broader effort to ensure a smooth and respectful transition for employees exiting the workforce.

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices Working Conditions	<p>GMDC ensures that 100% of its value chain partners are assessed for compliance with applicable health, safety, and labour regulations as part of its structured procurement process. These requirements are embedded within the Request for Proposal (RFP) documents and contractual terms, forming a mandatory part of vendor eligibility and onboarding. All vendors and contractors are required to comply with statutory obligations related to occupational health, safety, and working conditions. This assessment is an integral part of our procurement due diligence and contract management process.</p> <p>Additionally, GMDC is enhancing its supplier engagement framework by integrating formal mechanisms to evaluate value chain partners on key ESG parameters in a phased manner, reinforcing our commitment to responsible and sustainable sourcing.</p>

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

As GMDC continues to strengthen its supplier engagement practices, no significant risks have been formally identified to date through structured assessments of value chain partners’ health, safety, or working conditions. Compliance with statutory norms is currently ensured through clearly defined contractual obligations and regular site-level supervision. Non-adherence to contractual conditions may result in penalisation, as clearly stated in the agreements. Suppliers are also required to submit an affidavit affirming that they have not been blacklisted by any government or private agency. Looking ahead, GMDC is working towards establishing a more structured monitoring and evaluation framework to proactively identify and address potential risks across the value chain. In parallel, the company plans to introduce targeted training and awareness programs for suppliers to promote best practices in occupational health, safety, and responsible labour practices.

PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders

GMDC engages with a wide range of stakeholders, including employees, local communities, regulatory authorities, customers, shareholders and value chain partners through structured and transparent channels. The company recognises the importance of understanding stakeholder expectations and incorporates their feedback into its decision-making processes wherever relevant. Engagement activities are carried out through public hearings, community meetings, statutory consultations, grievance mechanisms, and regular interactions with government bodies. GMDC also supports community development initiatives around its mining locations, focusing on education, healthcare, and livelihood enhancement. These efforts reflect the company’s approach to inclusive growth and responsiveness to stakeholder needs.



ESSENTIAL INDICATORS

1. Describe the processes for identifying key stakeholder groups of the entity:

GMDC identifies its key stakeholder groups based on the nature and extent of their impact on, and influence by, the company's operations. The process involves internal assessments by cross-functional teams, considering statutory requirements, business priorities, and community relevance. Key stakeholder groups include employees, local communities, regulatory authorities, suppliers, contractors, customers, investors, and civil society organisations. Stakeholder identification is guided by the company's operational footprint, legal obligations under mining and environmental regulations, and social license to operate. The process is further shaped by relevant corporate legislative requirements to ensure transparency, accountability, and responsible business conduct. Engagement priorities are reviewed periodically to ensure alignment with evolving business activities and stakeholder expectations.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly /others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	<ul style="list-style-type: none"> Email communication Training and awareness sessions Conference and Seminars Internal communication platforms (e.g., notice boards, intranet) Townhalls and employee meets One-on-one interactions with HR/management 	Ongoing	<ul style="list-style-type: none"> Communication on policy updates, performance, and organisational changes Health, safety, and skill development sessions Welfare schemes, wellbeing and internal grievance mechanisms Employee feedback and engagement forums
Shareholders / Investors	No	<ul style="list-style-type: none"> Annual General Meetings (AGM) Stock Exchange filings and disclosures Investor presentations and earnings calls Conferences and Roadshow Emails and investor query responses One-on-one investor interactions 	Ongoing/ Quarterly / Annually/ Need basis	<ul style="list-style-type: none"> Financial results and performance updates Business strategy and growth outlook ESG initiatives and disclosure Corporate governance and statutory compliance
Customers	No	<ul style="list-style-type: none"> Emails and SMS notifications Website and product updates In-person customer visits or meetings Grievance redressal through customer support channels 	Ongoing	<ul style="list-style-type: none"> Product quality and logistics coordination Addressing grievances and service-related queries Timely updates on availability and dispatch schedules Feedback collection through direct interactions
Communities and NGOs	Yes	<ul style="list-style-type: none"> Community meetings and CSR outreach events Public hearings (as per statutory requirements) Notice boards in villages and project areas Informal interactions with local leaders and beneficiaries Email and phone communication via CSR team Grievance redressal through various channels 	Ongoing	<ul style="list-style-type: none"> CSR activities aligned with local needs (education, health, livelihood) Addressing environmental and community grievances Partnership opportunities for social programs
Suppliers	No	<ul style="list-style-type: none"> RFPs and tender documents via GMDC procurement portal Emails and SMS for updates and clarifications Pre-bid and vendor meetings Performance review discussions Training sessions and vendor capacity-building workshops 	Need basis/ Tender-Linked/ Periodic	<ul style="list-style-type: none"> Clarification of contractual terms Safety and compliance briefings Training programs (as needed) Payment schedules, procurement transparency Vendor capability enhancement initiatives

LEADERSHIP INDICATORS

1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

GMDC has institutionalised structured processes to ensure stakeholder voices are systematically considered in shaping its Environmental, Social, and Governance (ESG) strategy and decision-making. Recognising the diverse interests and influence of stakeholders on its operations, GMDC proactively engages with key groups—including employees, local communities, investors, suppliers, regulatory authorities, and civil society organisations—through transparent and formal channels such as public consultations, community meetings, investor briefings, vendor forums, and internal communication platforms. Inputs from these engagements are compiled by relevant functional teams and shared through structured reporting mechanisms with senior leadership and the Board. These insights inform strategic planning, operational decisions, and risk mitigation efforts. The outcomes are integrated into GMDC's ESG goals, sustainability roadmap, and policy frameworks, ensuring stakeholder expectations are embedded within the company's governance systems and long-term value creation approach.

2. Whether stakeholder consultation is used to support the identification and management of environmental and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

Yes, GMDC actively uses stakeholder consultations to identify and manage environmental and social topics across its operations.

As mandated under India's Environmental Legislative Framework, public hearings are conducted as part of Environmental Clearance (EC) process for mining and industrial projects. These hearings are facilitated by the respective State Pollution Control Boards and held in the presence of the District Magistrate and Collector. These hearings provide local communities in the project-affected areas an opportunity to voice their environmental and social concerns directly to the company. The concerns raised are recorded formally. GMDC responds to the concerns raised by taking appropriate action and submits detailed reports to the relevant regulatory authorities at regular intervals.

To ensure continuous stakeholder engagement beyond the EC process, GMDC has deployed dedicated CSR teams across all project sites. These teams work closely with village representatives and community members to identify local issues and co-develop solutions through participatory dialogue.

Key initiatives undertaken include:

- **Infrastructure Development:**

GMDC has constructed check dams in water-scarce villages, significantly improving local water availability for both domestic and agricultural use. These structures have helped recharge groundwater levels and support small-scale farming. Additionally, solar-powered streetlights have been installed in underserved rural areas, enhancing safety, improving night-time mobility, and reducing dependence on unreliable grid electricity. Such as the construction of check dams and installation of solar-powered streetlights in rural and underserved areas.

- **Education Support:**

To promote inclusive education, GMDC has distributed educational materials such as books and stationery to students in government schools. Special focus is given to supporting girl students through scholarships, helping reduce dropout rates and encouraging higher secondary education. Sports activities are also supported to foster physical development, team spirit, and holistic growth among schoolchildren.

- **Health and Hygiene:**

GMDC operates mobile medical vans that provide basic healthcare services in remote villages lacking access to primary health centres. These vans conduct door-to-door health check-ups, distribute free medicines, and raise awareness on sanitation, nutrition, and preventive care. Thousands of villagers benefit from these services annually, leading to early diagnosis and better health outcomes.

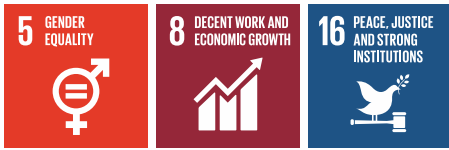
These initiatives collectively enhance the quality of life in GMDC's operational areas while strengthening the company's social license to operate. They reflect GMDC's commitment to inclusive growth, responsible mining, and long-term community development.

3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.

GMDC, as an enterprise of the Government of Gujarat, qualifies as a 'State' under Article 12 of the Constitution of India. In line with this status, the company aligns its operations and outreach programs with the constitutional vision of promoting equity, inclusion, and social development. GMDC's Corporate Social Responsibility (CSR) Policy places focused attention on addressing the needs of vulnerable and marginalised groups, including Scheduled Castes (SC), Scheduled Tribes (ST), women, and economically weaker sections. These initiatives aim not only to enhance the quality of life for disadvantaged populations but also to contribute to the broader socio-economic development of communities in areas where GMDC operates. The company undertakes programmes in education, healthcare, skill development, infrastructure, and environmental sustainability, ensuring its CSR efforts are both inclusive and responsive to local needs.

PRINCIPLE 5: Businesses should respect and promote human rights

At GMDC, upholding human rights is a core principle and non-negotiable commitment. We strictly comply with all government laws and regulations while working to foster a more inclusive and equitable society. We believe true progress comes from fairness, diversity, and inclusion. With this in mind, we prioritize serving MSME business holders and ensure that respect for human rights is embedded throughout our entire value chain. Our goal is to create an environment where everyone has the opportunity to succeed with dignity and respect.

**ESSENTIAL INDICATORS****1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:**

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	%(D/C)
Employees						
Permanent	632	250	40	701	29	4
Other than permanent	387	86	22	636	4	1
Total Employees	1,019	336	33	1,337	33	3
Workers						
Permanent	133	10	8	136	24	18
Other than permanent	633	67	11	62	18	29
Total Workers	766	77	10	198	42	21

Note: From the current reporting year, the 'Other than Permanent' category has been reclassified to include third-party employees and workers, which were not accounted for in FY 2023-24

2. Details of minimum wages paid to employees and workers, in the following format:

Category	FY 2024-25					FY 2023-24				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	632	0	0	632	100	701	0	0	701	100
Male	587	0	0	587	100	648	0	0	648	100
Female	45	0	0	45	100	53	0	0	53	100
Other than Permanent	387	0	0	387	100	636	306	48	330	60
Male	330	0	0	330	100	585	296	51	289	49
Female	57	0	0	57	100	51	10	20	41	80
Workers										
Permanent	133	0	0	133	100	136	0	0	136	100
Male	122	0	0	122	100	122	0	0	122	100
Female	11	0	0	11	100	14	0	0	14	100
Other than Permanent	633	622	98	11	2	62	62	100	0	0
Male	585	574	98	11	2	58	58	100	0	0
Female	48	48	100	0	0	4	4	100	0	0

Note: From the current reporting year, the 'Other than Permanent' category has been reclassified to include third-party employees and workers, which were not accounted for in FY 2023-24

3. Details of remuneration/salary/wages

a. Median remuneration /wages:

	Male		Female	
	Number	Median remuneration/salary/wages of respective category	Number	Median remuneration/salary/wages of respective category
Board of Directors (BoD)*	5	₹ 80,000	3	₹ 80,000
Key Managerial Personnel	2	₹ 30,60,011	1	₹ 38,33,375
Employees other than BoD and KMP**	746	₹ 13,05,280	69	₹ 8,74,091
Workers#	122	₹ 6,32,844	11	₹ 6,32,499

* The remunerations cover only median of sitting fees.

** Includes only permanent employees, excluding retirees from the same category.

Includes permanent workers.

b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

	FY 2024-25	FY 2023-24
Gross wages paid to females as % of total wages*	6.46	6.41

* Includes permanent and other than permanent employees.

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes, GMDC has established a duly constituted Internal Committee under the Prevention of Sexual Harassment (POSH) Act, 2013, in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act. The Committee is chaired by a senior woman officer and comprises members who are trained to handle complaints with sensitivity and confidentiality. It is responsible for overseeing prevention, redressal, and awareness related to sexual harassment, thereby ensuring a safe, inclusive, and respectful work environment across all operational locations. The scope of the Committee also extends to matters of Equal Opportunity and Human Rights, reinforcing GMDC's commitment to non-discrimination, fairness, and inclusivity across the workforce.

In addition, GMDC has an active HR Committee that supports the formulation and implementation of employee-centric policies and monitors issues related to workforce development, diversity, and workplace ethics. The Committee also plays an advisory role in ensuring alignment with applicable labour laws and HR priorities.

Further, GMDC has implemented a Whistleblower Policy that provides employees and stakeholders with a secure and anonymous channel to report concerns related to ethical misconduct, workplace harassment, or violations of internal policies. These mechanisms are reinforced by oversight from various State Legislative Committees, including those for Scheduled Castes and Scheduled Tribes, reflecting GMDC's strong commitment to human rights, inclusion, and institutional accountability.

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

GMDC addresses grievances related to human rights through formally designated committees and structured review procedures applicable to both internal operations and value chain partners. The company has constituted a POSH (Prevention of Sexual Harassment) Committee in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. This committee is responsible for handling complaints related to workplace harassment in a confidential, timely, and impartial manner.

In addition, broader human rights issues—such as fair treatment, non-discrimination, and workplace dignity—are addressed by the Human Resources Committee, which reviews concerns raised by employees and contract workers. The committee ensures resolution in line with GMDC's internal policies and applicable legal provisions.

Further, GMDC engages with vendors and contractors through its procurement process and onboarding mechanisms, where expectations related to ethical conduct and basic human rights compliance are communicated. Any concerns arising from value chain partners, including contract labour, are typically escalated through project-level administrative officers or site management and are addressed in coordination with the HR function.

This framework reflects GMDC's commitment to upholding human rights principles across its ecosystem and promoting a responsible and inclusive working environment.

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	Nil	Nil	NA	Nil	Nil	Nil
Discrimination at workplace	Nil	Nil	NA	Nil	Nil	Nil
Child Labour	Nil	Nil	NA	Nil	Nil	Nil
Forced Labour / Involuntary Labour	Nil	Nil	NA	Nil	Nil	Nil
Wages	Nil	1*	Ongoing assessment by HR committee	2	2	Nil
Other human rights related issues	Nil	Nil	NA	Nil	Nil	Nil

* 1 grievance was addressed and resolved in May 2025.

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

	FY 2024-25	FY 2023-24
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Nil	Nil
Complaints on POSH as a % of female employees / workers	Nil	Nil
Complaints on POSH upheld	Nil	Nil

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

GMDC has instituted robust policies such as the Code of Conduct and Whistleblower Policy to promote transparency, accountability, and stakeholder protection. The company raises awareness on the prevention of sexual harassment through targeted training programs and has constituted an Internal POSH Committee, chaired by a senior woman officer, to ensure sensitive and confidential handling of complaints. The Whistleblower Policy provides safeguards against retaliation, reinforcing GMDC's commitment to human rights and employee welfare.

Additionally, GMDC's HR Committee plays a key role in shaping and overseeing employee-centric policies, focusing on workforce development, diversity, inclusion, and ethical workplace practices. It also advises on compliance with labour laws and supports the company's broader human resource priorities.

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

Yes, as part of GMDC's commitment to responsible business conduct, human rights considerations are also integrated into the vendor selection and procurement process. RFPs issued by GMDC include specific clauses that require bidders to uphold ethical labour practices, ensure non-discrimination, and comply with all applicable human rights and labour laws.

10. Assessment for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100
Forced/involuntary labor	100
Sexual harassment	100
Discrimination at workplace	100
Wages	100
Others	NA

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

Not Applicable, as there are no such cases or incidents being reported during the current financial year.

LEADERSHIP INDICATORS

1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.

Not Applicable, as there have been no complaints related to human rights reported during the reporting period. Consequently, no modifications to business processes have been required or made in this regard.

2. Details of the scope and coverage of any Human rights due diligence conducted.

The company has not yet conducted a human rights due diligence process. However, it plans to undertake this important assessment across value chain in the future to strengthen its commitment to human rights.

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes, GMDC is committed to fostering an inclusive and accessible workplace for all employees. The company has implemented key infrastructure features to support individuals with disabilities, including lift access across all floors and dedicated washrooms equipped with accessibility aids. Ramps are installed at building entrances and key transition points to ensure smooth mobility for wheelchair users and those with limited mobility. GMDC continues to assess and upgrade its facilities to maintain a barrier-free, disability-friendly environment aligned with universal design principles.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	Value chain partners associated with GMDC are expected to comply with applicable human rights laws and maintain ethical and responsible business practices. GMDC requires that vendors and contractors operate in a manner that ensures the protection of human rights across all stages of the value chain, including fair treatment, safe working conditions, and non-discriminatory practices. As part of its procurement process, GMDC follows a transparent Request for Proposal (RFP) and bidding mechanism through which partners are evaluated on pre-defined technical and commercial parameters, including adherence to regulatory and ethical standards. Going forward, GMDC is working to further strengthen its value chain engagement practices by exploring structured assessments and due diligence mechanisms to ensure that its partners continue to align with its core values of sustainability, compliance, and human rights protection.
Discrimination at workplace	
Child Labour	100
Forced Labour/Involuntary Labour	100
Wages	100
Others	NA

5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.

Not Applicable, as there are no such cases or incidents being reported during the current financial year.

PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment

GMDC is committed to conducting its operations in an environmentally responsible manner by integrating sustainability into every stage of its mining, mineral development, and power businesses. Key initiatives include implementing energy efficiency, advancing coal gasification for cleaner lignite use, expanding renewable energy capacity, electrifying its operational fleet, and implementing scientific overburden management with emphasis on land restoration and biodiversity. These initiatives reflect GMDC’s dedication to minimizing its ecological footprint and supporting India’s broader environmental goals.



ESSENTIAL INDICATORS

1. Details of total energy consumption (in GJ) and energy intensity, in the following format:

Parameter	FY 2024-25	FY 2023-24
From renewable sources		
Total electricity consumption (A)	657	1,152
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total energy consumed from renewable sources (A+B+C)	657	1,152
From non-renewable sources		
Total electricity consumption (D)	1,94,268	9,68,619
Total fuel consumption (E)	11,86,206	65,34,644
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewable sources (D+E+F)	13,80,474	75,03,263
Total energy consumed (A+B+C+D+E+F)	13,81,131	75,04,415
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations) (GJ/ crore INR)	484	3,047
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)*		
(Total energy consumed / Revenue from operations in crores adjusted for PPP) (GJ/ million USD)	1,001	6,972 [^]
Energy intensity in terms of physical output (GJ/MT of Lignite and Bauxite extracted)	0.16	1.32

* The Purchasing Power Parity (PPP) for the current FY 2025 is sourced from the International Monetary Fund (IMF). The PPP factor applied is 20.662 as per the 2025 update.

[^] The energy intensity per rupee of turnover, adjusted for Purchasing Power Parity, has been restated for FY 2023–24 due to a calculation error.

Note: The reduction in energy consumption is primarily attributed to the shutdown of the lignite-based Thermal Power Plant and the closure of Rajpardi mines.

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)

No

If yes, name of the external agency.

Not Applicable

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

Yes, The PAT (Perform, Achieve and Trade) scheme is applicable to GMDC's ATPS (Thermal Power Plant) operations for the current financial year. However, the assigned targets could not be met as the plant remained under shutdown for three quarters. To address this, both units have been taken up for capital overhauling (turnaround) aimed at improving operational efficiency. These measures are expected to support compliance with PAT targets in the upcoming performance cycles.

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

Parameter	FY 2024-25	FY 2023-24
Water withdrawal by source (in kilolitres)		
(i) Surface water	1,15,503	1,10,445
(ii) Groundwater	6,20,461	4,85,684
(iii) Third party water	42,744	75,478
(iv) Seawater / desalinated water	16,65,862	48,65,289
(v) Others*	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	24,44,570	55,36,896
Total volume of water consumption (in kilolitres)	12,85,868	26,15,847
Water intensity per rupee of turnover (Total Water consumption / Revenue from operations) (kilolitre/ crore INR)	451	1,062
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)** (Total water consumption / Revenue from operations adjusted for PPP) (kilolitre/ million USD)	932	2,430^
Water intensity in terms of physical output (kilolitre/ MT of Lignite and Bauxite extracted)	0.15	0.46

*The water that was previously reported as mine pit water is now classified under the groundwater category.

** The Purchasing Power Parity (PPP) for the current FY 2025 is sourced from the International Monetary Fund (IMF). The PPP factor applied is 20.662 as per the 2025 update.

^The water intensity per rupee of turnover, adjusted for Purchasing Power Parity, has been restated for FY 2023–24 due to a calculation error.

Note: The reduction in Water consumption & Withdrawal is primarily attributed to the shutdown of the lignite-based Thermal Power Plant.

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

No

If yes, name of the external agency.

Not Applicable

4. Provide the following details related to water discharged:

Parameter	FY 2024-25	FY 2023-24
Water discharge by destination and level of treatment (in kiloliters)		
(i) To Surface water		
- No treatment	-	-
- With treatment – Primary and Tertiary	-	3,79,408
(ii) To Groundwater		
- No treatment	-	-
- With treatment – NA	-	-
(iii) To Seawater		
- No treatment	-	-
- With treatment – Primary and Secondary	11,28,543	19,46,116
(iv) Sent to third parties		
- No treatment	-	-
- With treatment – NA	-	-
(v) Others		
- No treatment (Domestic sewage to Soak Pit/Septic Tank)	30,158	-
- With treatment	-	-
Total water discharged (in kiloliters)	11,58,701	23,25,524

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

No

If yes, name of the external agency.

Not Applicable

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

Yes, GMDC has adopted Zero Liquid Discharge (ZLD) systems at most of its mining sites as part of its commitment to sustainable water management. Treated wastewater is fully recycled and reused for non-potable purposes such as plantation, dust suppression, and other operational needs. This approach minimises water discharge, conserves freshwater resources, and ensures responsible water stewardship across operations.

6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:

Parameter	Unit	FY 2024-25	FY 2023-24
NOx	µg/m ³	12 to 33	18 to 32
SOx	µg/m ³	8 to 12	12 to 28
Particulate matter (PM 10)	µg/m ³	53 to 79	60 to 84
Particulate matter (PM 2.5)	µg/m ³	26 to 45	25 to 43
Persistent organic pollutants (POP)	NA	-	-
Volatile organic compounds (VOC)	NA	-	-
Hazardous air pollutants (HAP)	NA	-	-
Carbon monoxide (CO)	µg/m ³	0.39 to 0.51	0.33 to 0.42

Note: The values provided pertain to Air ambient quality.

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N)

No

If yes, name of the external agency.

Not Applicable

7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	1,20,200	4,53,999
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	39,231	1,91,883
Total Scope 1 and Scope 2 emissions	tCO₂e	1,59,431	6,45,882
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	tCO ₂ e / Crore INR	56	262
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations in crore adjusted for PPP)*	tCO ₂ e / million USD	116	600 [^]
Total Scope 1 and Scope 2 emission intensity in terms of physical output	tCO ₂ e / MT of Lignite & Bauxite extracted	0.02	0.11

*The Purchasing Power Parity (PPP) for the current FY 2025 is sourced from the International Monetary Fund (IMF). The PPP factor applied is 20.662 as per the 2025 update.

[^]The emission intensity per rupee of turnover, adjusted for Purchasing Power Parity, has been restatement for FY 2023–24 due to a calculation error.

Note: The reduction in emission is primarily attributed to the shutdown of the lignite-based Thermal Power Plant.

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N)

No

If yes, name of the external agency.

Not Applicable

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

Yes, GMDC has undertaken several initiatives aimed at reducing greenhouse gas emissions.

Renewable Energy Projects:

- The 5 MW solar power plant generated approximately 6.4 million units (MU) of electricity, leading to an estimated reduction of 6,208 metric tonnes (MT) of CO₂ emissions.
- The 201 MW wind power project produced 336 MU of electricity, resulting a reduction of around 3,32,128 MT of CO₂ emissions.

Afforestation Efforts:

- GMDC planted 98,118 saplings spread across 84.75 hectares during FY2024-25, contributing to long-term carbon sequestration and ecosystem restoration.

These initiatives reflect GMDC's proactive efforts to lower its carbon footprint and align with national climate goals by promoting clean energy and environmental sustainability.

9. Provide details related to waste management by the entity, in the following format:

Parameter	FY 2024-25	FY 2023-24
Total waste generated (in metric tonnes)		
Plastic waste (A)	0.45	0.03
E-waste (B)	0.55	2.22
Bio-medical waste (C)	0.13	1.89
Construction and demolition waste (D)	-	0.00
Battery waste (E)	0.22	0.32
Radioactive waste (F)	0.00	0.00
Other Hazardous waste (Used Oil) (G)	4.85	13.71
Other Non-hazardous waste generated (Metal Scrap) (H)	39.40	0.58
Total (A+B + C + D + E + F + G+ H)	45.60	18.75
Waste intensity per rupee of turnover		
(Total waste generated / Revenue from operations) (MT / crore INR)	0.02	0.01
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)		
(Total waste generated / Revenue from operations adjusted for PPP) (MT / million USD)	0.033	0.022 [^]
Waste intensity in terms of physical output (MT/ MT of Lignite and Bauxite extracted)	0.0000054	0.000003
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Parameter	FY 2024-25	FY 2023-24
Category of waste		
(i) Recycled	0	0
(ii) Re-used	0	0
(iii) Other recovery operations	45.60	0
Total	45.60	0
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Parameter	FY 2024-25	FY 2023-24
Category of waste		
(i) Incineration	0	1.81
(ii) Landfilling	0	0.00
(iii) Other disposal operations	-	2.65
Total	-	4.46

*The Purchasing Power Parity (PPP) for the current FY 2025 is sourced from the International Monetary Fund (IMF). The PPP factor applied is 20.662 as per the 2025 update.

[^]The Waste intensity per rupee of turnover, adjusted for Purchasing Power Parity, has been restated for FY 2023-24 due to a calculation error.

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N)

No

If yes, name of the external agency:

Not Applicable

10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

GMDC adopts structured waste management practices across its mining and industrial operations. The primary solid waste generated is Over Burden (OB), which is systematically dumped at designated sites and later repurposed for backfilling and biological reclamation of mined-out areas. Fly ash from power plants is similarly utilized in mine restoration.

Hazardous waste is managed through authorized channels:

- Used oil is disposed of via registered recyclers or MSTC.
- Bio-medical waste is handled by certified disposal agencies.
- E-waste is centrally collected and sent to authorized vendors.
- Battery waste is managed through a buyback arrangement with suppliers.

These practices ensure compliance with environmental norms and promote resource recovery and safe disposal.

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

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any
--------	--------------------------------	--------------------	---

For the current financial year, GMDC had no major operations in ecologically sensitive areas—such as national parks, wildlife sanctuaries, wetlands, or coastal regulation zones—that would require specific environmental approvals or clearances. Hence, this disclosure is not applicable.

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Mothala Balachod Bauxite Mining Project, Gadhsisa	IA-J-11015/150/2018-IA-II(NCM)	02-07-2024	Yes	Yes	www.gmdcltd.com/
Naredi Nandra Bauxite Mining Project, Gadhsisa	SIA/GJ/MIN/453051/4704/2023	08-08-2024	Yes	Yes	www.gmdcltd.com/
Ratadia-Naggrecha Bauxite Mining Project, Gadhsisa	SIA/GJ/MIN/451417/4804/2023	08-08-2024	Yes	Yes	www.gmdcltd.com/

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

S. No.	Specify the law/ regulation/ guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
1	Waste water discharge	A Notice of Direction was issued by the Gujarat Pollution Control Board (GPCB) to the Amod Lignite Mine on 28.08.2024, citing non-compliance related to wastewater discharge from the lease area.	No	GMDC submitted an immediate response to the notice on 02.09.2024, confirming compliance with the points raised. A long-term action plan was also submitted to ensure sustained adherence to regulatory requirements.

LEADERSHIP INDICATORS

1. Water withdrawal, consumption, and discharge in areas of water stress (in kilolitres):

For each facility / plant located in areas of water stress, provide the following information:

Water-stressed regions have been identified based on the Central Ground Water Authority (CGWA) classifications of semi-critical and critical areas.

(i) **Name of the area:** Ahmedabad and Gadhsisa

(ii) **Nature of operations:** Ahmedabad is GMDC's Corporate Office, while its Bauxite mining operations are located at Gadhsisa.

(iii) **Water withdrawal, consumption and discharge in the following format:**

Parameter	FY 2024-25	FY 2023-24
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Groundwater	19,534	42,465
(iii) Third party water	723	-
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilolitres)	20,257	42,465
Total volume of water consumption (in kilolitres)	20,257	42,465
Water intensity per rupee of turnover (Water consumed / turnover) (kilolitre / crore INR)	6.21	17
Water intensity (optional) – the relevant metric may be selected by the entity	-	-
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water		
- No treatment	-	-
- With treatment – NA	-	-
(ii) Into Groundwater		
- No treatment	-	-
- With treatment – NA	-	-
(iii) Into Seawater		
- No treatment	-	-
- With treatment – NA	-	-
(iv) Sent to third parties		
- No treatment	-	-
- With treatment – NA	-	-
(v) Others		
- No treatment	-	42,465
- With treatment – NA	-	-
Total water discharged (in kilolitres)	-	42,465

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N)

No

If yes, name of the external agency

Not Applicable

2. Please provide details of total Scope 3 emissions & its intensity, in the following format:

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	-	NA	NA
Total Scope 3 emissions per rupee of turnover	-	NA	NA
Total Scope 3 emission intensity (optional)– the relevant metric may be selected by the entity	-	NA	NA

GMDC is currently undertaking a detailed value chain mapping exercise, subsequent to which the estimation of Scope 3 emissions will be initiated.

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)

Not Applicable

If yes, name of the external agency:

Not Applicable

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

GMDC remains committed to environmental stewardship and proactively aligns its operations with wildlife conservation norms. While statutory wildlife clearances may not be uniformly mandated across all operational sites, including those in or around ecologically sensitive areas, GMDC ensures compliance wherever applicable and is prepared to secure approvals as required. Conservation measures are implemented in accordance with the Wildlife Conservation Plan, focusing on minimizing impacts such as noise, vehicular emissions, and land degradation, and enhancing local biodiversity through strategic plantation and habitat development initiatives.

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

Sr. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Installation of Solar and Wind Power	GMDC has operationalised 5 MW solar power project on reclaimed mined out reclaimed area. Additionally, it operates 201 MW of wind power across the districts of Kutch, Porbandar, Devbhoomi Dwarka, Jamnagar, Rajkot and Bhavnagar.	The solar plant generated ~6.4 million units (MU) of electricity in FY25, reducing ~6,208 MT of CO ₂ emissions. The wind power projects produced 336 MU, leading to an estimated reduction of ~3,32,128 MT of CO ₂ .
2	Installation of Fog Cannon	A 60-meter fog cannon has been installed in the mining areas to control airborne dust.	Significantly reduced dust emissions within mine premises, improving air quality and visibility.
3	Installation of New ETP and RO plant	GMDC has installed new pH neutralization plant (ETP) and a containerized RO plant to treat acidic mine water.	Enhanced capacity to treat acidic water, enabling safer reuse and environmental compliance.
4	Green Belt Development (Plantation)	Around 84.75 hectares of biologically reclaimable and arid land were covered through plantation and seed ball distribution during FY 2024-25.	Improved soil quality and stability, reduced runoff, enhanced biodiversity, and sequestered carbon—supporting land reclamation.
5	Use of mining pits as water reservoirs	GMDC has converted mined-out pits into reservoirs as part of sustainable post-mining land use.	Supports groundwater recharge, enables water conservation, and benefits local communities and biodiversity.
6	Creation of Green Grass Gaucher field	Development of pastures with uniform green grass cover to support livestock grazing	Improves cattle nourishment, boosts rural livelihoods, and restores ecological balance.
7	Sustainable Irrigation Practices	Drip irrigation systems have been implemented to support plantation activities with minimal water usage.	Optimised water use, improved plant survival, reduced wastage through evaporation and runoff—reinforcing GMDC’s commitment to resource efficiency and sustainability.
8	Rainwater Harvesting	Developed Rainwater harvesting pond - Mata no Madh - 3,00,197 kL & Mevasa - 1,73,000 kL within mine lease boundary for freshwater utilisation	By rainwater harvesting, GMDC is conserving rainwater and utilising it in dust suppression and plantation. By this means, dust pollution reduction has been achieved as well as reduced freshwater consumption.

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

Yes, GMDC has a comprehensive Business Continuity and Disaster Management Plan in place to ensure operational resilience and safeguard employee and community well-being during unforeseen events. The plan outlines clear protocols for emergency response, data recovery, and alternate work arrangements across mining and power operations. It is regularly updated and tested through mock drills to assess preparedness. Roles and responsibilities are clearly defined to enable swift coordination. This proactive approach minimises downtime, ensures safety, and maintains stakeholder confidence during disruptions. The plan aligns with statutory guidelines and supports uninterrupted functioning of critical operations.

6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard?

GMDC recognizes environmental impacts across its value chain—from extraction to transportation. Key risks include land degradation, dust emissions, noise pollution and water use. To mitigate these, GMDC implements afforestation, land reclamation, dust suppression, PUC certified vehicles, No Horn Zone and water recycling. It also monitors environmental performance and explores cleaner technologies. Supplier and contractor practices are aligned with sustainability standards to minimize upstream and downstream impact.

7. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.

GMDC ensures that value chain partners comply with applicable environmental regulations through structured procurement processes, including RFPs and contractual provisions. While comprehensive environmental assessments are not yet conducted routinely, compliance with statutory requirements is mandated during vendor selection. GMDC is enhancing its supplier engagement framework and exploring phased implementation of formal ESG assessments across its value chain.

8. How many Green Credits have been generated or procured:

a. By the listed entity

Nil

b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners.

The company has not yet conducted a value chain assessment specific to Green Credit applicability. However, recognising its strategic importance, we plan to initiate a detailed assessment in the near future to map environmental impacts and opportunities across the value chain.

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

GMDC engages in public policy advocacy through structured and transparent participation in government-led consultative processes. As a State Government PSU, it contributes to policy discussions, stakeholder consultations, and inter-agency forums on matters related to mining, environment, sustainability, labour, and social welfare. The company provides its perspectives on draft rules, amendments, and sector-specific guidelines through formal written submissions, departmental consultations, and industry forums. Engagements are typically routed through appropriate state and central government ministries such as the Ministry of Mines, Ministry of Environment, Forest and Climate Change (MoEFCC), and Labour & Employment Department, either independently or via industry associations. GMDC ensures that any feedback or suggestions shared during such engagements are aligned with the principles of responsible business, community welfare, environmental stewardship, and operational feasibility. This approach allows the company to contribute meaningfully to the policy-making process while upholding transparency and regulatory integrity.



ESSENTIAL INDICATORS

1. a) Number of affiliations with trade and industry chambers/ associations.

Three

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

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Federation of Indian Mineral Industries	National
2	Gujarat Chamber of Commerce and Industries	State
3	Gujmin Industries Association	State

2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.

Name of Authority	Brief of the case	Corrective action taken
No adverse orders related to anti-competitive conduct have been issued against the company by any regulatory authorities.		

LEADERSHIP INDICATORS

1. Details of public policy positions advocated by the entity:

S. No.	Public policy advocated	Method resorted for such advocacy	Whether the information is available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly/ Other-please specify)	Web Link, if available
1	Commercial coal & lignite roadshow at The Leela, Gandhinagar	Workshop	Yes	Annually	youtu.be/5JcLNpzL5IU
2	Setting timelines for restricting substitutable grades of Therman coal imports in India with FIMI (Federation of Indian Mineral Industries)	Emails	No	As per requirement	-

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

GMDC promotes inclusive growth by aligning its operations with the socio-economic needs of local communities. Recognising that equity, diversity, and inclusion are fundamental to a resilient mining sector, The Company takes ensures fairness across its workplace, operations, supply chains, and the communities. Through targeted CSR interventions in areas such as education, healthcare, skill development, and infrastructure, the company strives to uplift marginalised and under-served populations around its mining locations. GMDC also prioritises local employment and engages regularly with stakeholders to ensure that development is participatory and impactful.



ESSENTIAL INDICATORS

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

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes / No)	Relevant Web link
EFG Valia (7 villages)	• Jabu gam-AM-M-2025-72-LBR-2025-283-GH	06-02-2025	Yes	No	-
	• Umargam-AM-M-2024-562-LBR-2024-1327-GH	26-09-2024			
	• Vandariya-AM-M-2024-563-LBR-2024-1326-GH	26-09-2024			
	• Pithor-AM-M-2024-562-LBR-2024-1191-GH	09-09-2024			
	• Singala-AM-M-2024-494-LBR-2024-1189-GH	09-09-2024			
	• Kesargam-AM-M-2024-493-LBR-2024-1190-GH	09-09-2024			
	• Itakala-AM-M-2024-495-LBR-2024-1188-GH	09-09-2024			

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

S. No.	Name of the project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (in ₹)
--------	--	-------	----------	---	--------------------------	---------------------------------------

For the current year, none of the projects triggered the need for Rehabilitation and Resettlement measures

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

GMDC has a structured and responsive mechanism to engage with communities and address their grievances across all operational locations. Each project site is supported by a dedicated CSR team, which acts as the primary interface for the local community. These teams maintain regular contact with village representatives, Panchayats, and community groups to understand local issues and facilitate timely resolution.

Grievances are received through in-person visits, community meetings, village-level consultations, and public hearings conducted as part of the Environmental Clearance process. In addition, village coordinators appointed under CSR initiatives serve as a bridge between GMDC and the community for day-to-day communication and issue escalation.

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

	FY 2024-25*	FY 2023-24
Directly sourced from MSMEs/ Small producers	61.43%	6.40%
Directly from within India	100.00%	93.60%

* The figures represent transactions executed through the GeM portal; non-GeM transactions were immaterial and thus excluded.

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

Location	FY 2024-25	FY 2023-24
Rural	73.50%	76.50%
Semi-urban	1.62%	1.50%
Urban	10.81%	0.40%
Metropolitan	14.06%	21.60%

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

LEADERSHIP INDICATORS

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
No negative social impacts have been identified; therefore, no corrective actions were required.	

2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

Sr. No.	State	Aspirational District	Amount Spent (in ₹)
---------	-------	-----------------------	---------------------

Currently, none of GMDC's CSR initiatives are located in government-designated aspirational districts. However, the company continues to focus on high-impact projects in areas where its operations are based, prioritizing community needs in education, healthcare, livelihood, and infrastructure. GMDC remains open to expanding its CSR footprint to aspirational districts in alignment with future strategic and developmental priorities.

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

Yes, GMDC supports inclusive and equitable procurement practices by incorporating provisions in its Request for Proposal (RFP) documents that extend preferential treatment to Micro, Small, and Medium Enterprises (MSMEs), which often include businesses led by marginalized and vulnerable groups. This includes specific allowances such as exemptions or reductions in RFP fees and earnest money deposits (EMD) for eligible MSME bidders, in line with government guidelines. By embedding such provisions within our procurement framework, GMDC aims to promote wider participation, strengthen local supply chains, and contribute to the economic empowerment of underrepresented groups.

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

GMDC’s procurement practices are designed to be inclusive and supportive of marginalized and vulnerable groups, primarily through its preference for Micro, Small, and Medium Enterprises (MSMEs), as defined under applicable government regulations. While GMDC does not currently maintain a group-wise disaggregated procurement database, the MSME segment often includes enterprises led by or employing individuals from Scheduled Castes (SC), Scheduled Tribes (ST), women entrepreneurs, persons with disabilities (PwDs), and other socially or economically disadvantaged communities. By enabling access and providing concessions in RFP processes, GMDC facilitates the participation of such groups in its supply chain, thereby contributing to equitable economic development.

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

Not Ascertained at this point

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes/No)	Basis of calculating benefit share
Not Applicable				

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Name of authority	Brief of the case	Corrective action taken
Not Applicable		

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No of persons benefited from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Health and Sanitation	1,18,780	82%
2	Art and Culture	89,634	70%
3	Rural Development	79,981	80%
4	Environment and Water	12,210	81%
5	Education	67,510	76%
6	Sports	13,817	83%
7	Livelihood and Skill Development	2,405	90%

PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner

GMDC is committed to responsible consumer engagement through transparent communication, prompt grievance redressal, and a strong focus on customer satisfaction. Robust systems are in place to address complaints efficiently, backed by thorough investigations and timely corrective actions. Cybersecurity and data privacy are treated as top priorities, with stringent safeguards ensuring the protection of sensitive information. These efforts reflect GMDC’s dedication to accountability, trust, and ethical business conduct.



ESSENTIAL INDICATORS

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

- GMDC has established accessible mechanisms for receiving and responding to consumer complaints and feedback. A dedicated Customer Help Desk is available on the official website, enabling stakeholders to lodge complaints or suggestions online, with options to select categories and upload supporting documents. Additionally, consumers can reach out via email (contact@gmdcltd.com) and phone (079-27913501/27913200) for direct assistance.
- Grievances are routed to relevant departments and overseen by designated officials, to ensure timely and accountable resolution. While GMDC does not currently operate a centralized grievance software system, it ensures transparency through these multiple accessible channels.
- As a public sector enterprise, GMDC also complies with statutory grievance redressal frameworks, public grievance mechanisms like CPGRAMS, where applicable. These mechanisms enhance stakeholder access and reinforce public accountability.
- GMDC periodically reviews feedback and uses insights to improve service quality, demonstrating its commitment to transparency, responsiveness, and consumer satisfaction.

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

	As a percentage to total turnover
Environment and Social parameters relevant to the product	Not applicable, as GMDC is in the business of mining of minerals and generation of power and there are no such goods or services that may carry the required information.
Safe and responsible usage	
Recycling and/or safe disposal	

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

Category	FY 2024-25			FY 2023-24		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	0	0	NA	0	0	NA
Advertising	0	0	NA	0	0	NA
Cyber-security	0	0	NA	0	0	NA
Delivery of essential services	0	0	NA	0	0	NA
Restrictive Trade Practices	0	0	NA	0	0	NA
Unfair Trade Practices	0	0	NA	0	0	NA
Others – Customer Grievances on quality related aspects	114	0	NA	0	0	NA

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

	Number	Reason for recall
Voluntary recalls	0	NA
Forced recalls	0	NA

Note: There have been no instances of product recalls due to safety concerns, as GMDC's current operations are limited to mining and selling raw materials to industries, not directly to end-consumer.

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

Yes, GMDC has established a framework for cybersecurity and data privacy, with a formal policy currently under development. This framework is designed to identify both internal and external risks and is supported by a dedicated team. GMDC has implemented robust measures to protect its data and IT infrastructure, including advanced firewalls, intrusion detection systems, regular security audits, and vulnerability assessments. The Company uses a combination of in-house servers and cloud-based communication systems, along with data encryption and secure backups, to ensure information security and business continuity.

6. **Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.**

Not Applicable

7. **Provide the following information relating to data breaches:**

- a. **Number of instances of data breaches**

Nil

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

Nil

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

Not Applicable

LEADERSHIP INDICATORS

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

All Information related to GMDC's Products and services is readily available to the public through multiple channels. Stakeholders can access comprehensive details about the company's operations, product offerings, pricing, and service-related updates are available on the company's official website (<http://www.gmdcltd.com>). In addition, GMDC regularly publishes statutory disclosures such as annual reports, investor presentations, and press releases, which are accessible through its website. These documents provide stakeholders with transparent insights into business performance, strategic developments, and governance practices. By maintaining multiple touchpoints and ensuring timely updates, GMDC promotes transparency and empowers stakeholders to make informed decisions.

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

GMDC follows a rigorous and structured customer onboarding process to ensure regulatory compliance and responsible usage of its mineral resources. Customer registration is completed only after a thorough verification of all mandatory documents and clearances, including the Gujarat Pollution Control Board (GPCB) Consent to Operate/Establish (CCA), Boiler Inspector Certificates, and relevant Installation Certificates. This ensures that customers meet all environmental and safety standards before beginning any commercial transactions.

To reinforce responsible mineral usage, GMDC conducts regular site visits to customer manufacturing units and plant facilities. These visits are intended not only for operational verification but also to educate customers on safe handling, storage, and application of minerals. Customers receive detailed information on the quality parameters and chemical composition of the materials supplied, enabling them to use the resources more effectively and responsibly.

Additionally, GMDC provides hands-on training and guidance to promote best practices in occupational safety and environmental stewardship. The company encourages compliance with environmental norms and supports customers in aligning with regulatory frameworks. Digital portals and a dedicated help desk facilitate real-time communication, grievance redressal, and continued compliance support—ensuring transparency, accountability, and long-term customer engagement.

3. **Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.**

GMDC supplies minerals based on projected production availability for a given period and, submits advance schedules for power generation where applicable. To ensure transparency and preparedness, GMDC has established robust mechanisms to inform customers and relevant authorities of any potential disruption or discontinuation of essential services. In cases of planned or forced shutdowns, advance notifications are issued through formal communication channels such as emails, letters, and digital portals. Dedicated relationship managers keep key customers informed, while service alerts are also posted on the help desk portal. Additionally, business continuity protocols are in place to manage unforeseen disruptions, and regular stakeholder meetings are conducted to discuss risks, mitigation plans, and service continuity.

4. **Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable)? If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)**

Not applicable, as GMDC is primarily engaged in the mining and bulk supply of raw minerals such as lignite, bauxite, and manganese, as well as in power generation through thermal, wind, solar, and green energy sources. These products are delivered at scale through industrial or utility infrastructure and do not involve retail packaging. Therefore, displaying product information is not required, as GMDC's offerings are not intended for direct retail or end consumers distribution.