



Accelerating Today for a better Tomorrow



Mahindra Intertrade Ltd. | Mahindra Steel Service Centre Ltd. | Mahindra Auto Steel Pvt. Ltd.
Mahindra MiddleEast Electrical Steel Service Centre FZC

We are engaged in the business of processing *steel coils into blanks* for the automotive industry; *steel coils into laminations* for the transformer industry, and *stampings and motor cores* for the home appliance industry.

In line with our vision and group EHS policy, we remain committed to continual improvement in our Quality, Environmental, Occupational Health and Safety Management System and to raising the bar in our QEHS performance in the years to come.

Towards this endeavour, we are committed to:

1. Establishing ourselves as a customer centric organization by delighting our customers with our products & services;
2. Working to fulfil customer requirements proactively and with agility;
3. Integrating QEHS requirements at the planning, manufacturing and delivery stages of our products and services;
4. Eliminating, substituting, minimizing or controlling environmental risks as well as occupational health and safety hazards;
5. Complying with current applicable EHS legal & other applicable requirements that are related to environmental risks and QH&S hazards;
6. The Protection of environment including elimination, prevention, reduction of pollution, & Prevention of injury and ill health and other specific commitments relevant to our organization;
7. Optimizing consumption of resources such as raw materials, water & energy.
8. Effective management of waste generated in plant;
9. Strengthening awareness, skill and competence of employees, other business associates to enable delivery of QEHS management best practices through on-going training, communication, consultation and participation;
10. Creating an environment that facilitates enthusiasm on safety-related matters, encouraging safe behaviour and providing prompt and proactive feedback for unsafe behaviour;
11. Establishing, reviewing and strengthening QEHS management systems to ensure their continuing suitability, adequacy and effectiveness;
12. Communicating, understanding and applying this policy within the organization;
13. Making the policy available to relevant interested parties and maintained as a documented information.

Sumit Issar
Managing Director

Contents

1

General Disclosure

a. Executive Messages	5
b. About the Report	10
c. Organizational Profile	11
d. Ethics and Integrity	15
e. Governance	16
f. Stakeholder Engagement	18
g. Reporting Practices	21

2

Economic Aspects

a. Economic Performance	25
b. Economic Value generated, distributed and retained	29
c. Procurement Practices	31
d. Anti-Corruption	31

3

Environmental Aspects

a. Material	34
b. Energy	36
c. Water	40
d. Emissions	41
e. Effluent and Waste	43

4

Social Aspects

a. Employment	47
b. Occupational Health and Safety	48
c. Training and Education	50
d. Diversity and Equal Opportunity	52
e. Local Communities	54

Board of Directors



Mr. Parag Shah
Director

Mr. Ashok Barat
Independent Director

Mr. Sudhir Mankad
Independent Director

Mr. Rajeev Dubey
Director

Mr. Bharat Doshi
Chairman

Mr. Zoooben Bhiwandiwala
Executive Vice Chairman

Dr. Punita Kumar Sinha
Independent Director

Mr. Pravin Shah
Director

Mr. Sumit Issar
Managing Director

Chairman's Message

Dear Stakeholders,

We are India's leading steel solutions company with a substantial presence in the automotive, power, electrical stampings, purlins and auto recycling segments. Mahindra Accelo is poised to venture in the technology driven areas going forward.

With India's largest independent steel service network, we are amongst top 3 in processed automotive steel space, market leader in India and world no. 2 in processed electrical steel space. We are also India's first organised automotive recycler (CERO).



For a company in a new 'avatar', with sustainability as a business goal it is natural that Mahindra Accelo is publishing its first Sustainability Report based on the GRI Standards' reporting framework.

Responsible use of energy and water, reduction and reuse of waste, enhancing community and stakeholder relations and a strong economic performance are the pillars of our sustainability roadmap by which we aim to create a sustainable business and add value to our organisation.

A system-based approach coupled with science based targets defines our sustainability DNA and I am sure that with a young, energetic and committed workforce we can realise our dream of "Accelerating Today for a Better Tomorrow"

I am happy to place on record our thanks to our stakeholders at the onset of our sustainable journey. Without you it will not be possible.

Bharat Doshi
(Chairman)

Vice Chairman's Message

Dear Stakeholders,

As Mahindra Accelo consolidates its leadership position in the steel processing industry in India and overseas, the Company actively embraces a philosophy of Purpose led growth - which recognises our governance, social and sustainability obligations. In furtherance of those goals, I am delighted to release this first sustainability report of Mahindra Accelo as an independent company. In order to better capture its ethos of agility, flexibility and speed, the company, recently re-branded Mahindra Accelo, is a leading supplier of processed steel in India servicing



the needs of the Automotive, Power and Home appliance industries with facilities located at key consumption points in India and globally. This customer focused network coupled with the strategic sourcing alliance with one of the world's largest electrical steel producers makes Mahindra Accelo the unquestioned leader in the processed steel industry.

Reducing energy consumption remains one of the major concerns of the company. To achieve this objective the Company has implemented various renewable energy projects across its production facilities. End of life recycling of aged vehicles is still very nascent in India as compared to other developed nations where it is a significant industry. Recycling, if executed in full compliance with established policies, is not only environment friendly but also reduces the continued usage of older polluting vehicles. Mahindra Accelo in partnership with MSTC Limited has taken a major step towards mitigating this by setting up CERO, India's first organised vehicle recycling entity where end-of-life vehicles are recycled in an environment friendly, compliant manner. CERO is committed to create a culture of zero tolerance to unscientific processes of recycling automobiles and reduce dependence on import of steel scrap in the country.

We have a sustained focus on customer delight and quality but what makes us unique is our happy and enthused employees, and this reflects in the consistently high employee satisfaction ratings and awards. The company is driven by a young and passionate team of go-getters committed to its growth vision. The Company was recognized in the 6th Position in the mid-size category by "Great Place to Work". The company is a responsible corporate citizen committed to the upliftment of the less privileged. Our many initiatives include the construction of schools and colleges which improve the area's educational infrastructure to setting up of play parks and community centers aligned with Mahindra's Rise tenets.

I am grateful to our stakeholders for supporting us on this journey and helping us to continually improve the way we do business.

Zhooben Bhiwandiwala
(Executive- Vice Chairman)

Managing Directors' Message

Dear Stakeholders,

Let us together embark on our journey of sustainability reporting with the publishing of our first Sustainability Report based on GRI Standards this year.

At Mahindra Accelo, the country's first Auto shredding plant in partnership with MSTC Ltd., we view sustainability not merely as a responsibility but as an opportunity to create lasting value across economic, environment and social bottom lines. As such sustainability has been integrated in all our business operations and decision-making processes.



Our sustainability roadmap lists a series of commitments to improve the Company's environmental footprint and the social impact of its business. We track our performance against these environmental and social indicators and work towards continuous improvement in these areas. Our business principles, environmental and social standards, and corporate governance continue to underpin our approach to sustainable development.

While our steel service centres do not fall in the high pollution category, we have undertaken various initiatives to minimize the negative impact of our operations on the environment such as proximity to customers for lower transport-related carbon footprint, use of metal pallets instead of wooden pallets, rain water harvesting and recycling. Recycling of waste water and natural lighting have helped us create significant value and achieve Green Building Standards certification.

Sumit Issar
Managing Director

Mahindra Accelo Senior Leadership Team



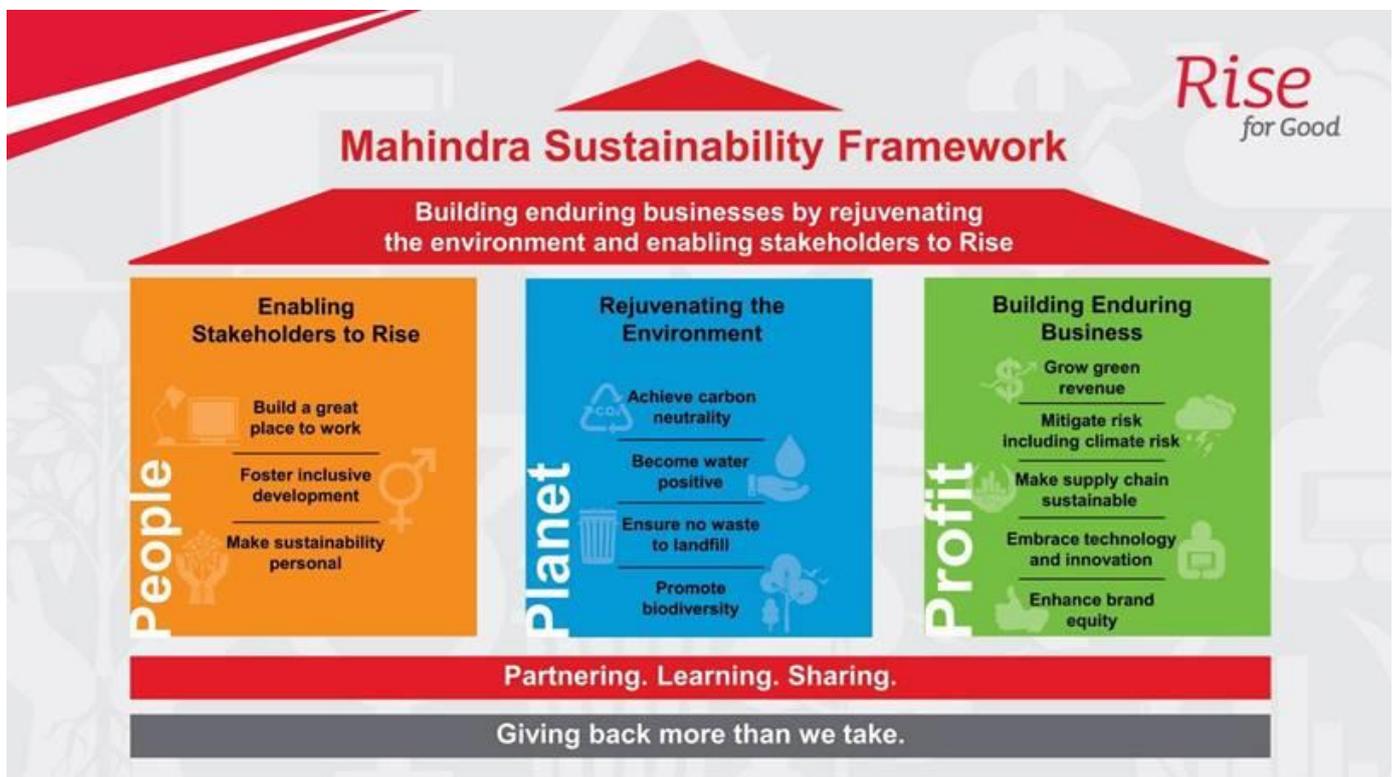
Mr. Vijay Arora
VP – Strategy, Operations & Business Development

Mr. Diwakar Srivastava
Chief, Commercial

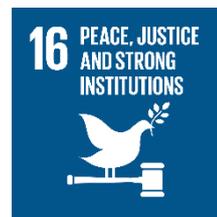
Ms. Nora Bhatia
Chief, Human Resources and Corporate admin

Mr. Percy Mahernosh
Chief Financial Office

Mr. Sumit Issar
Managing Director



GRI:100 General Disclosures





About the Report

102-46, 102-54

This is the first time that Mahindra Acelo is presenting its standalone Annual Sustainability Report of the group for FY 2018-2019. It details our performance and achievements from 1st April 2018 to 31st March 2019. This report highlights practices, initiatives and information about operations of our sites at Nashik, Pune, Vadodara, Bhopal and Noida our plant at Sharjah (UAE) has been excluded from this.

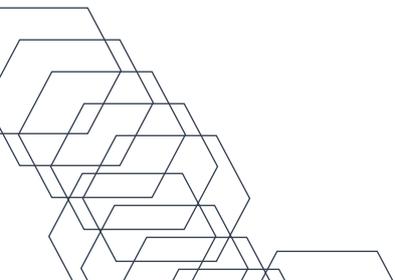
Key facts and figures regarding sustainability related data are presented in the relevant

chapters. Further advancement in the reporting will enable us to add more parameters and to expand reporting boundaries.

The reporting principle and methodology are adopted as per “in accordance – Core” option of the Global Reporting Initiative’s (GRI) Sustainability Standards.

Quantitative data has been represented in the metric system and the currency has been reported as Indian National Rupees (₹). The report adheres to the reporting principles of GRI Standards addressing 3 principles of Accountability as per AA1000 APS-2008 namely, materiality, stakeholder inclusiveness, sustainability context and completeness.

Plant Locations





Organisational profile

Name of the organisation

102-1

Mahindra Accelo

India's leading steel solutions provider and India's first organised automotive recycler.

MIL (Mahindra Intertrade Limited), MSSCL (Mahindra Steel Services Centre Limited), MME (Mahindra Middle East Electrical Steel Service Centre), MASPL (Mahindra Auto Steel Private Limited), MESL (Mahindra Electrical Steel Private Limited), MMRPL (Mahindra MSTC Recycling PVT. Ltd.) etc. Products are Slit Coils, Steel Sheets, Profile Blanks, Flux Plates, Laminations, Built Cores, Motor Stampings, Stators and Rotors, Purlins, Car Bales, Baled Scrap etc.

Location of headquarters

102-3

6th Floor, Mahindra Towers, P.K. Kurne Chowk, Worli, Mumbai, Maharashtra, 400018

Tel: 91 22 2493 5185/5186
www.mahindraacelo.com

Activities, brands, products, and services

102-2

Location of operations

102-4

Pune, Nashik, Vadodara, Bhopal, Noida and Sharjah are the operational sites for Mahindra Accelo.

Ownership and legal form

102-5

Unlisted Public Company (Company listed by shares)

Markets served

102-6

India and UAE.

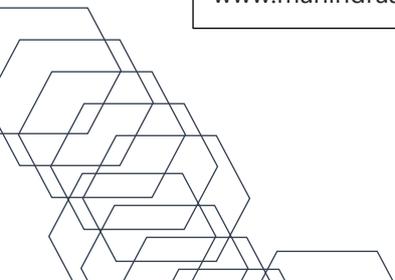
Scale of Organisation

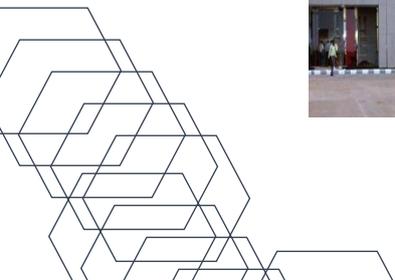
102-7

Medium

Permanent Employees: 298

Contractual Employees: 435

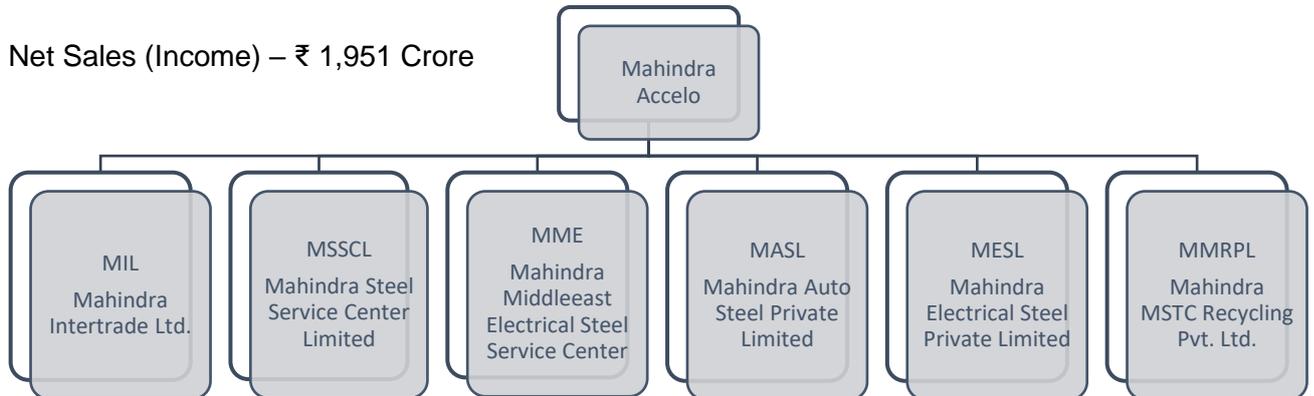




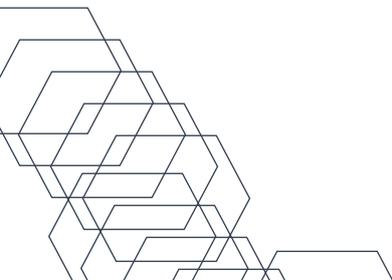


Total number of operations –

Net Sales (Income) – ₹ 1,951 Crore



**IGBC Certified Gold Rate Building –
Mahindra Auto Steel Pvt. Ltd, Chakan, Pune**





Information on employee and other workers
102-8

This section is covered in the Employment chapter under Social Performance Section.

Supply Chain
102-9



A large-supply chain network of contractors, vendors and service providers complement Mahindra Accelo’s operations. Supply chain management is critical to increase functional efficiency and thereby helps reduce operational expenses and execution time.

Mahindra Accelo promotes indigenous companies by sourcing raw materials locally, in FY 18-19 approximately 60% procurement was from local suppliers.

Screening of supply chain is being done based on various parameters.

Significant changes to the organisation and its supply chain
102-10

Mahindra Intertrade Limited has included all its subsidiaries under the Umbrella Brand which is renamed as Mahindra Accelo. We have started two new businesses - one is Purlins manufacturing for Solar and Construction Segment and the other is Automobile Recycling which is ‘CERO’. There is no significant change in share capital structure. There is no significant

change in supply chain. Selection and termination of suppliers is based on screening criteria provided by senior management.

Precautionary Principle or approach
102-11

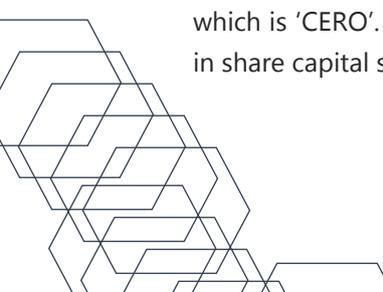
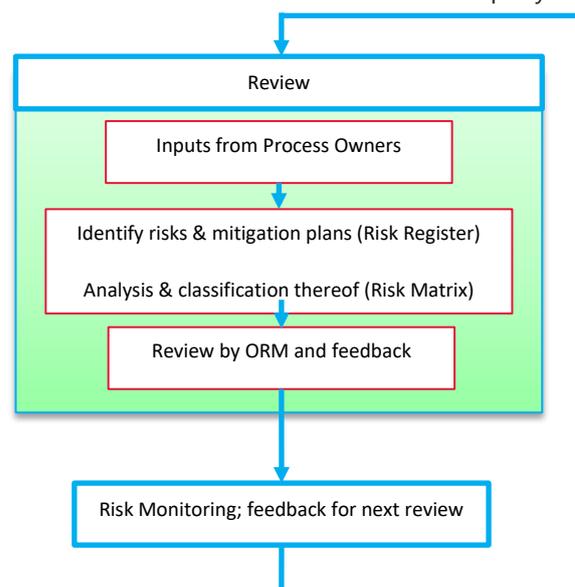
The company has a risk management approach as quoted under:

Risk Management

Mahindra Accelo continues to focus on a system-based approach to business risk management. The Risk Management Committee, through focused interactions with Businesses, facilitates the identification and prioritisation of strategic and operational risks, development of appropriate mitigation strategies and conducts periodic reviews of the progress on management of identified risks.

The Company has formulated a Risk Management Policy which identifies and evaluates risks and frames a response to Mitigate the risks, which may impact the Company.

Implementation of the Risk Management Policy is expected to be helpful in managing the risks associated with the business of the Company.





External initiatives

102-12

All plants of Mahindra Accelo are certified to OHSAS 18001: Occupational Health & Safety Management Systems and ISO 14001: Environment Management System.

Membership of associations

102-13

Mahindra Accelo is not a direct member of any association.

Strategy

Statement from the senior decision maker

102-14

This disclosure is covered in Senior Management message.

Ethics and Integrity



Values, Principles, Standards, and Norms of Behaviour

102-16

Mahindra Accelo is respected by its stakeholders for conducting business in a manner that demonstrates integrity, transparency, accountability and compliance with the law. This has infused stakeholder trust and confidence, helped attract and retain financial and human capital and meet societal expectations.

Brand Philosophy

- At Mahindra Accelo, we believe growth is the outcome of agility at every step along the way.
- As markets move at breakneck speeds and change finds its way to our doorstep every day, we must stay agile,

looking to learn and grow, or we risk becoming irrelevant.

- We must be quick footed and nimble, always working with a sense of urgency, but never in haste.
- We believe that it is not enough to diligently pursue opportunities, big or small. We must apply our business acumen, honed through years of experience and judgement to identify the ones worth pursuing.
- If we fall, we must pick ourselves up and *Rise* again, ready to take on new challenges

Code of Conduct

Mahindra Accelo has adopted Codes of Conduct for its Directors and Senior Management and Employees ("the Codes"). These Codes enunciate the underlying principles governing the conduct of the Company's business and seek to reiterate the fundamental precept that good governance must and always be an integral part of the Company's ethos.



MISSION

To become the most trusted brand for our customers, create a positive & sustainable impact on our stakeholders and achieve excellence through agility

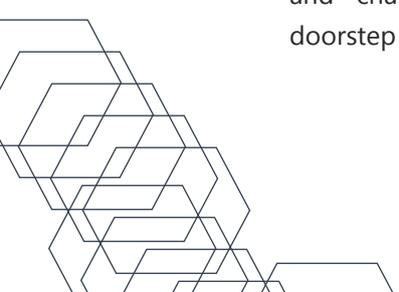
VISION

We will be a billion dollar company
(Revenue of INR 6000 crore) by 2025

LONG TERM GOALS - 2025

Revenue of INR 3000 crore each from domestic and global markets
Pan India presence and entry in four foreign markets
Customer satisfaction – an IMRB CSI score of >= 80, every year
Happy and enthused employees – MCARES score of >= 4.25, every year

AGILITY
KEEPS US AHEAD





•To be honest whatever the consequences and always standing by our commitments

INTEGRITY WITHOUT COMPROMISE

•To build capabilities at every level of the organisation by providing the freedom for thought and the freedom for actions

EMPOWERMENT

•To refuse to be pinned down by challenges. We learn from these and come back stronger, always!

RESILIENCE

•To ensure that every voice is heard, every suggestion is considered.

INCLUSIVITY

Governance

Governance structure

102-18

Name of the Director	Designation	Executive/Non-Executive Director	Independent/ Non-Independent Director
Mr. Bharat Doshi	Chairman	Non-Executive Director	Non- Independent Director
Mr. Zoooben Bhiwandiwala	Executive - Vice-Chairman	Executive Director	Non- Independent Director
Mr. Sumit Issar	Managing Director	Executive Director	Non- Independent Director
Mr. Rajeev Dubey	Director	Non-Executive Director	Non- Independent Director
Mr. Pravin Shah	Director	Non-Executive Director	Non- Independent Director
Mr. Parag Shah	Director	Non-Executive Director	Non- Independent Director
Mr. Sudhir Mankad	Director	Non-Executive Director	Independent Director
Dr. Punita Kumar-Sinha	Director	Non-Executive Director	Independent Director
Mr. Ashok Kumar Barat	Director	Non-Executive Director	Independent Director

Agility is the **key** to achieving **excellence**





Audit Committee

The Audit Committee comprises of the following Directors as its Members:

Name of the Member	Designation
Mr. Sudhir Mankad	Chairman
Mr. Rajeev Dubey	Member
Dr. Punita Kumar-Sinha	Member
Mr. Ashok Kumar Barat	Member

The Audit Committee met five times during year, i.e. on 27th April 2018, 18th June 2018, 23rd July 2018, 19th October, 2018 and 17th January, 2019.

Nomination and Remuneration Committee

The Nomination and Remuneration Committee of the Board comprises of the following Directors as its Members:

Name of the Member	Designation
Mr. Bharat Doshi	Member
Mr. Rajeev Dubey	Member
Mr. Sudhir Mankad	Member
Dr. Punita Kumar-Sinha	Member

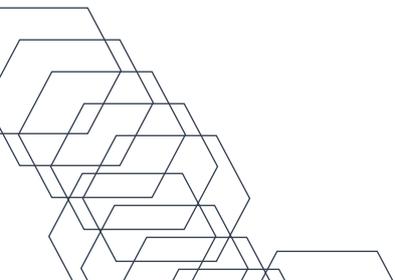
The Committee met twice during year, i.e. 27th April, 2018 and 23rd July, 2018.

Corporate Social Responsibility (CSR) Committee

The Corporate Social Responsibility Committee of the Board comprises of the following Directors as its Members:

Name of the Member	Designation
Mr. Zhooben Bhiwandiwal	Chairman
Mr. Sumit Issar	Member
Mr. Sudhir Mankad	Member

The Committee met once during year on 27th April, 2018.





Stakeholder Engagement

List of stakeholder group

102-40

Customers, Suppliers, Employees (Direct and Indirect), Local Community, Government and Regulatory Bodies, Banks and Creditors, Shareholders etc.

Collective bargaining agreements

102-41

Nearly 12% of permanent Employees are covered in Collective Bargaining Agreements (Also in Social Disclosure 407-1)

Identifying and selecting stakeholders

102-42

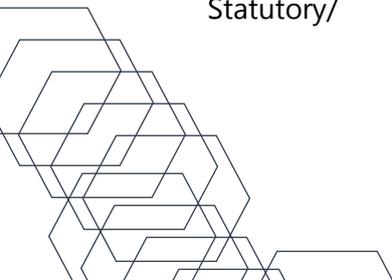
Mahindra Accelo is engaged with all its stakeholders and the level of engagement is commensurate with the impact of the stakeholders and vice-versa. Mahindra Accelo has mapped its internal and external stakeholder in consultation with the senior management for the purpose of stakeholder engagements. The key categories are as below:

- Government and Regulators
- Shareholders/Investors
- Customers & Consumers
- Suppliers & Vendors
- Employees
- Community/Civil society organisations
- Industry Associations
- Contractors/Other service providers
- Business partners/New ventures

Approach to Stakeholder Engagement

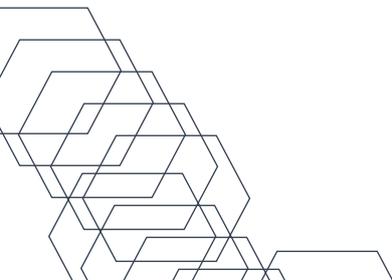
102-43

Stakeholders	Mode of Engagement	Key Concerns	Mahindra Accelo Actions
Shareholders/ Investors	Annual General Meeting. Periodic financial reports to shareholders and investors. Interactions with financial institutions/shareholders. Shareholders surveys and meets	Company's performance, Dividend, results. Grievance resolution and other issues	Enhancing Wealth creation for Shareholders. Infusion of capital in business. Communicating relevant information to stakeholders
Government Statutory/	Meeting with Centre and State Government.	Infrastructure development. Labour welfare.	Alignment with Government





Regulatory Authorities	<p>Periodic communication and submission of various compliances to statutory authorities.</p> <p>Performance Report (Quarterly & Annually), Inspections</p>	<p>Export and balance of trade.</p> <p>Import taxation and anti-dumping duty.</p> <p>Environment compliance.</p>	<p>policies and priorities.</p> <p>Various statutory submissions.</p> <p>Collaboration with district /local administration on peripheral development.</p>
Employees	<p>Industrial Relations meetings with Union leaders, Bipartite and tripartite meetings, collective bargaining interactions with officer associations, official communications, internal magazines and e-newsletters, employee satisfaction surveys, grievance redressal forums</p> <p>Employee trainings and seminars</p> <p>Organizational celebrations,</p> <p>Monthly Co-ordination meetings</p>	<p>Job Satisfaction</p> <p>Training and Development</p> <p>Welfare.</p> <p>Quality of life</p> <p>Transparency and process driven.</p> <p>Employee benefits & remunerations.</p> <p>Performance management and recognition.</p> <p>Career growth.</p> <p>Safe and healthy condition.</p>	<p>Enhancing employee satisfaction and wellbeing.</p> <p>Timely grievance resolution.</p> <p>Discussion with recognized unions</p>
Local villagers and community, including disadvantaged and marginalized	<p>Sustainable Development initiatives and CSR activities (on going).</p> <p>Regular meeting with community.</p> <p>Cultural, religious and social functions with community members and representatives, Need assessment interactions for CSR projects.</p> <p>Local community events, sports events</p>	<p>Livelihood options and Job Opportunities. Basic amenities.</p> <p>Financial, social and environmental impact of operation on community.</p>	<p>Local Infrastructure development including Road, Street lighting, Drinking water, Education, Health camps, livelihood creation, women empowerment, biodiversity management, other CSR initiatives</p>





Customers	Meeting with Industry representatives and Ministries. meetings with Customers customers visit to projects and management interactions customer feedback and grievance redressal forums	Quantity and quality. Delivery Time. Customer feedback and customer complaint resolution.	Strict quality control and timely delivery. Product information through website. Customer satisfaction survey. Product support. Customer compliant resolution system.
Suppliers/Vendors	Interactive meetings and sessions during tenders. Periodic vendor and supplier meet. Supplier relationship management.	Raw material Security. Transparency & anti-corruption practices. Supply schedule. Quality of items of supply.	Vendor development and import substitution. E-procurement & E-payment.
Business partners/JVs	Review of business and technical issues.	Review of business/technical presentations.	Meetings. Official communication between the joint venture entities.

Key topics and concerned raised

102-44

Economic	Environmental	Social
Economic Performance	Raw Material security	Community Engagement (CSR)
Economic Value and Business Performance	Energy management	Occupational Health and Safety
Operational Efficiency	Water Management	Employee Well-being
Revenue from green business	Emissions	Diversity & Inclusion





Customer Satisfaction	No waste to landfill	Human Rights
Customer Loyalty	Reduction in wood consumption for packing	Employment generation
Product Quality		Training & Education
Anti-Corruption		Compensation and benefits
Marketing and Labelling		Learning and development
		Regulatory and Statutory compliance (socio economic)

Reporting Practices

Entities included in the consolidated financial statements-

102-45

Kindly refer our website link:
www.mahindraacelo.com

Defining report content and topic Boundaries

102-46

Included in "About the Report"

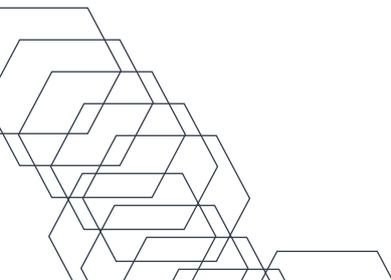
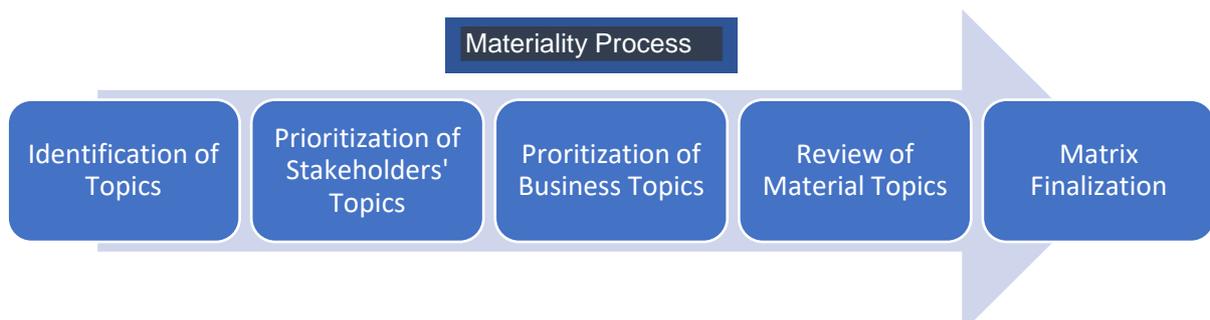
List of material Topics

102-47

Materiality Assessment being the process of identifying, prioritizing and defining the aspects that are of highest importance to the stakeholders and the management of a company, the material issues have been identified those reflect most significant

sustainability impacts and opportunities. Materiality, in this context, is the threshold at which an issue or interest should be reported. Focus areas have been identified representing the most significant challenges and opportunities facing the company in the area of sustainability which in turn are the foundation for the sustainability strategy.

Our materiality analysis process allows us to further define our report content by identifying material topics within these focus areas, as well as to identify key risks and opportunities for whole spectrum of activities. Our process is shaped and guided by Global Reporting Initiative's standard, applying the Report Content Principles and from Accountability's Five-Part Materiality Test. Our assessment of the material aspects accounts for different inputs and various engagements we have had during the year with different stakeholders. To capture perspectives of different stake holders,

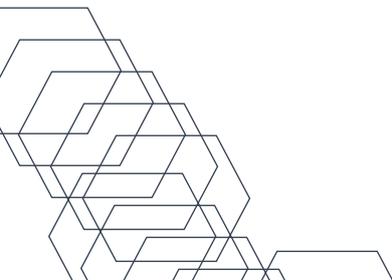
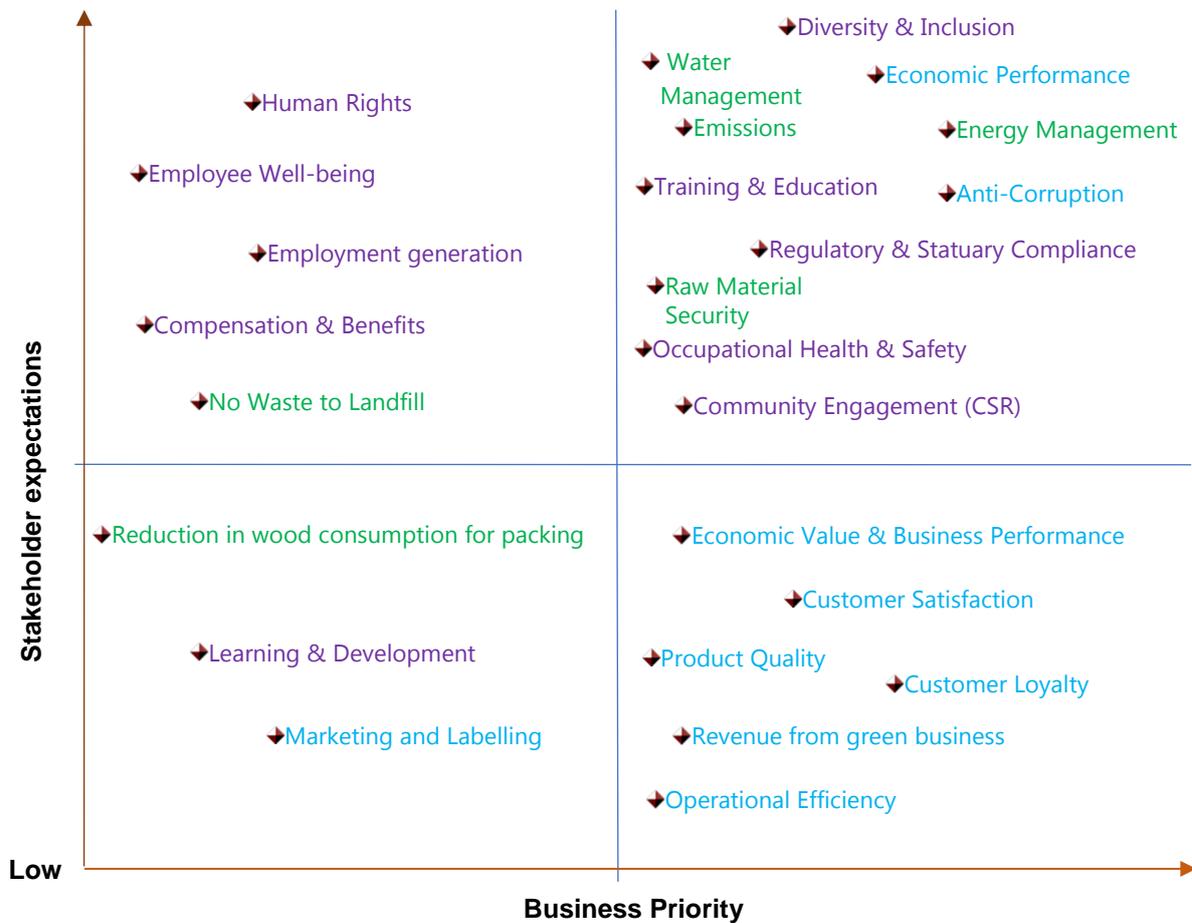




a structured materiality assessment exercise was carried out across all the operational locations. A formal workshop was organized at corporate office where we interacted with internal as well as some external stakeholders. Apart from informal verbal discussion the stakeholders were included in a survey, inputs for which were carefully selected as a questionnaire based on our experience and current challenges. Also feedback of stakeholders from site were collected by circulating the same questionnaire to selected stakeholders.

The output received from the exercise is subjected to Management Review at Unit and Corporate level for ratification. Finally, we have

come up with a materiality matrix that is an amalgamation of both the stakeholder perspective and management perspective. The materiality matrix determined was plotted on a 2X2 matrix and the aspects were plotted based on their relevance to the management and their significant impact on the stakeholder. Through these interactions, we were able to determine the issues which are important from the business perspective of Mahindra Accelo and issues which are of concern to our stakeholders. Identified material issues, form the focus of this sustainability report. There are no significant changes in scope or topic boundary compared to previous year. All care and concern are taken to report on the identified material issues as per GRI Standards in Accordance "Core" option.





Sl. no.	Material Topic	Topic Boundary (Inside or outside the boundary)
1.	Economic Performance	Inside
2.	Anti-Corruption	Inside
3.	Materials	Inside
4.	Energy	Inside
5.	Water	Inside
6.	Emissions	Inside
7.	Training and Education	Inside
8.	Occupational Health and Safety	Inside
9.	Diversity & Inclusion	Inside
10.	Community Engagement (CSR)	Outside
11.	Regulatory & Statuary Compliance	Inside

Changes in Reporting

102-49

NA(First Report)

Date of the most recent Report

102-50

This is our first sustainability report for Mahindra Accelo

Reporting Cycle

102-51

Annual(1st April 2018-1st March 2019)

Contact Person

102-52

Mr. Nilesh Gujar,
Chief Auto Business and Sustainability
gujar.nilesh@mahindra.com

Claims of reporting in accordance with the GRI standards

102-54

Included in "About the Report"

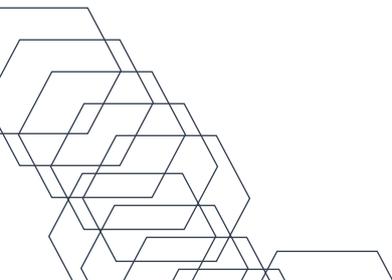
GRI Content Index

102-55

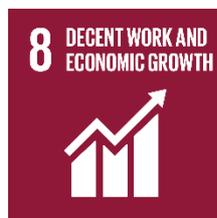
External Assurance

102-56

No third-party assurance is required, considering that the disclosed information and data are mostly based on documents reviewed by the Board i.e. Annual Report, Financial Statements etc. Further data related to environmental and safety performances are also captured through the robust monitoring system deployed within the externally certified management systems such as ISO 14001, OHSAS 18001.



GRI 200: Economic Aspects





Economic Performance 201

103-1, 103-2 and 103-3

As per the World Steel Association estimates, the automotive sector accounts for roughly 12% of the overall global steel consumption. Steel is the dominant material in automobile manufacturing, accounting for approximately 60% of the weight of an average automobile.

Automotive

In the automotive segment Mahindra Accelo is focusing on expanding its customer base and market share by providing value added services. Besides automotive segment, Mahindra Accelo was able to expand its market share in the power segment and start export in this segment.

Automotive industry has been on the rise since last couple of decades. In India, automotive sector has a strong CAGR of about 7% since last few years. Every day, 50,000 new vehicles are added to the Indian roads. In terms of materials, steel is the most important one as it forms 60% of any vehicle body. At Mahindra Accelo, we focus on supplying quality automotive steel grade to our customers which involve OEMs and tier 1 vendors. At Mahindra Accelo's state-of-the-art facilities at Nashik and Pune we process (Slitting, Shearing and profile blanking) automotive steel for our customers. We have a strong presence in west dominated market with





facilities at 3 locations and shortly coming up with a facility in South India.

Power

With more economic growth and government initiatives towards electrification, demand for electrical grade (CRGO) is on the rise. Heart of any electrical transformer is a core made of electrical steel. Mahindra Accelo has a strong presence with a market share of ~40% in electrical steel in India. Almost 35% of the transformers made in India have Accelo inside. With facilities at 4 locations (Pune, Vadodara, Bhopal and Noida) we process electrical steel for power transformer and distribution transformer industry. We also supply value added products like Built up cores, Flux plates etc. With usage of high-grade steel in transformers, we try to reduce core losses to save electricity and our precious resources.

Home appliances

With a bouquet of service ranging from slitting, punching, stator and rotor making, stress relieving we are the only electrical stampings company in the country to offer these services under one roof. With a strategically located plant at Pune, we cater to customized customer requirement with just-in-time delivery. The facility is equipped with manufacturing of motor cores for electric vehicles as well.



Economic performance is an important driver for growth, income, employment and infrastructure development for any industry. Mahindra Accelo thrives on optimal utilization of raw material and lays strong focus on sustainable and efficient production practice to

enhance the productivity and quality of steel structure.

Performance

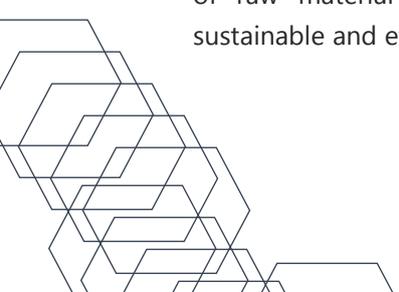
Company's sales revenue for the year was ₹ 1951 crore as compared to ₹ 1489 crore in FY 17-18. The growth was through improved sales in both – auto as well as power sector. Net profit before tax for the year was at ₹ 134 crore as compared to ₹ 124.3 crore in FY 17-18.

Completed projects

Processing of shaped blanks for automotive application is done at Pune and Nashik plant. Nashik plant has ventured into purlins manufacturing. The plant is strategically located 25 km from Nashik city, and is a merchant producer of blanked automotive skin panels. This plant has one of the most advanced blanking lines in India sourced from Müller Weingarten (now Schuler Inc.), Germany. This high precision line is capable of processing steel coils for manufacturing automotive body profiles, and rectangular or trapezoidal sheets required for press shop operations. This is the widest line operational in India in its class, capable of handling coil widths up to 2040 mm.



The plant also offers solar mounting structural purlins for rooftop and ground-mounted applications manufactured from cold rolled &





coated products, with a state of art manufacturing line imported from Europe. We provide purlins of C type and Z type, with variations thereof such as C+, C++, Z+ and Z++, as well as other sections.

Mahindra MSTC Recycling Pvt. Ltd. (CERO)

Joint venture between Mahindra Accelo and MSTC limited for foraying into the organised automotive recycling sector.

In 2017, the Union Cabinet approved the National Steel Policy (NSP), with an aim to raise India’s steel production capacity to 300 million tonnes (MT) by the year 2030. From 110 MT in 2013-14, steel capacity increased to 134 MT in 2017-18, with 7 MT added in 2017 alone. Central to the idea of implementing this policy was the availability of vast quantities of steel scrap in the country. Instead of importing steel scrap at high prices, India could simply recycle and reuse the scrap available at home. In accordance with the above policy, Mahindra Accelo has set up India’s first automobile recycling unit in a joint venture with MSTC Limited (a GoI enterprise) under the brand name ‘CERO’. Through ‘CERO’ we are focusing on recycling of automobiles in an environment friendly way. The recycled steel will aim to reduce India’s dependence on steel scraps import which is currently 8 Million tonnes annually. This enterprise is also generating more avenues for employment and steering towards the mission of ‘Make in India’.

We are planning to have 25 other vehicle recycling units in other cities within next two years.

Moving towards a Zero-pollution nation



In a move that would take lakhs of polluting commercial and personal vehicles off road, the government may fix 15 years as the lifetime for vehicles running on the road. The vehicle scrapping policy will come into force from 2020, a top government official said.

“Starting 2020, all pre 2000 registered commercial vehicles would be off road. And vehicles that are registered after the government approve this policy will have a lifetime of 20 years,” the official added.

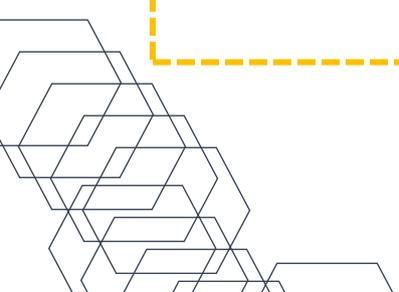
A high-level meeting in the Prime Minister’s office attended by the CEO of NITI Aayog along with secretaries of Finance, Transport, Heavy Industries, DIPP and MSME ministries has given in principle approval to the vehicle scrapping policy.

The proposal is likely to be sent to cabinet soon for final approval. There are seven lakh commercial vehicles registered pre 2000 that are currently plying on roads. “There are certain incentives that are being worked out for people who will scrap their vehicles,” the official added.

“Steel ministry will set up scrapping centres,” the official added. Under the proposed policy, pre 2000 commercial vehicles will be eligible for incentives if replaced by new ones.

Source: Economic Times, March 17, 2018

India is the 2nd largest importer of Steel Scrap, importing 8 million tonnes of scrap per annum







Economic Value Generated, Distributed and Retained

201-1

As a Business unit Mahindra Accelo focusing on vital Financial management for reinforcement of a Growth. It is important for our company to give attention on valuable rewards to all stakeholders to maintain balanced triple

bottom line approach. In addition to operating cost other segments for capital outflow such as Governmental taxes or duties, Corporate Sustainability, Investment in infrastructure or Research and development and Cost of capital are considered for financial management.

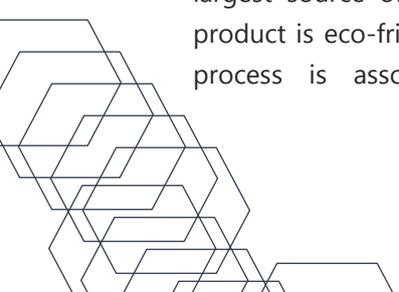


Financial implications and other risks and opportunities due to climate change

201-2

Mahindra Accelo understand the effects of climate change upon their business. Steel service business can be affected by climate change through its value chain. Production of raw material for a steel service industry is the largest source of climate change. Steel as a product is eco-friendly; however, steel making process is associated with environmental

ramifications, including energy consumptions & GHG emissions. To conquered climate change Mahindra Accelo is committed to sustainable business. Company has invested in tree plantation project like 'Hariyali' and solar roof top has been installed in a Nashik plant. Mahindra Accelo has also set up Science based targets for reduction of its direct GHG emission. It will help the organisation to monitor consequences of its efforts in the direction of GHG emission reduction.





Through 'CERO', our latest venture we are recycling 100% of an automobile which helps in reduction of primary virgin ore. *One tonne of recycled steel saves over a tonne of iron ore and half a tonne of coal. Besides that, production of steel from scrap requires almost 56% less energy as compared to production of primary steel from iron ore and coal, making it more cost-efficient and environmentally friendly.*

Defined Contribution Plan

Company's contributions paid/payable during the year to the provident fund, superannuation fund, employee state insurance corporation and labour welfare fund are recognized in the Statement of Profit and Loss based on the amount of contribution required to be made and when services are rendered by the employees.

Current Portfolio

Automotive



Electrical Stampings



Power



Purlins



Auto Recycling



Making steel from scrap reduces CO₂ emissions by 58% and reduces harmful mining activities.

Defined benefits plan obligations and other retirement plans

201-3

Happy and enthused employees are one of the strategic goals of our Company thus Mahindra Accelo put great emphasis on protection, security and well-being of its employee.

Defined Benefit Plan/Long Term Compensated Absences

Company's liability towards gratuity, compensated absence and post-retirement medical benefit schemes are determined by an independent actuary using the projected unit credit method at each Balance Sheet date. Past service cost is recognised on a straight-line basis over the average period until the benefits become vested. Actuarial gains and losses are recognised immediately in the statement of





Profit and Loss as income or expense. Obligation is measured at the present value of estimated future cash flows using a discounted rate that is determined by reference to market yields at the Balance Sheet date on Government Bonds where the currency and terms of the Government Bonds are consistent with the currency and estimated terms of the defined benefit obligation, as reduced by the fair value of Scheme assets.

Financial assistance received from government

201-4

Mahindra Accelo has not received any kind of financial assistance from government in the reporting year.

Proportion of spending on local suppliers (204-1)

Procurement Details from Local key Suppliers (FY-2019)

Total Procurement (₹ Crore)	1700
Total Procurement from local key suppliers (₹ Crore)	1100
Total Procurement (Million tonnes)	0.30
Total Procurement from local key suppliers (Million tonnes)	0.18

Anti-Corruption

205

103-1, 103-2 and 103-3

Mahindra Accelo is committed to conduct its business in accordance with applicable laws, rules, and regulations, highest standards of business ethics, honesty, integrity and ethical conduct. Towards this end, the Company has adopted two separate Codes of Conduct viz. one for Directors and the other for Employees (collectively referred to as "Codes" or "The Codes") and various Corporate Governance policies (collectively referred to as "CG Policies") which lay down the principles and standards that should govern the actions of the Company, its Directors and Employees. Any actual or

Procurement practices

204

103-1, 103-2 and 103-3

Steel is a major raw material required for major sectors of economy i.e. Automotive, Power, Home appliances, Construction etc. Promoting procurement from local and young entrepreneurs leads to capacity building in the vicinity of operation and augments the local economy. This in turn reduces logistics cost, lead time of procurement as well as lower inventory carrying cost. Mahindra Accelo believes that creating and supporting value chain will contribute to the growth and competitiveness of the strategic partners.

potential violation of the Codes or CG Policies, howsoever insignificant or perceived as such, would be a matter of serious concern for the Company and will be dealt in line with company policy. The role of the Directors or Employees in pointing out such violations of the Codes or CG Policies cannot be undermined. The vigil mechanism as envisaged in the Companies Act 2013 and prescribed in the Companies Rules is implemented through the Whistle-blower Policy to provide a mechanism for Directors and Employees to report their genuine concerns. The Policy has been implemented to provide adequate safeguards against victimization of persons who use such mechanism and make provision for direct access to the Chairperson of the Audit Committee.





Operations assessed for risks related to corruption

205-1

Mahindra Accelo has set-up anti-fraud policy to promote consistent legal and ethical organisational behaviour, by assigning responsibility for the development of controls and providing guidelines for reporting and conducting investigation of suspected fraudulent behaviour.

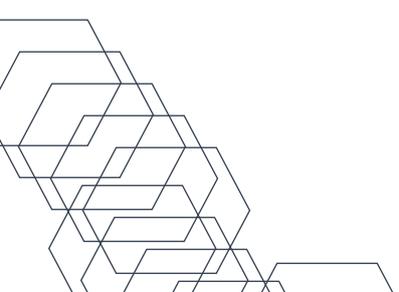
Whistle-blower Policy has been formulated with a view to provide a mechanism for Directors and Employees of the Company to approach the Managing Director/ Compliance Officer under the Code to report events of unethical conduct.

Scope for the whistle blower policy is as describe below-

- The Whistle Blower's role is that of a reporting party with reliable

information. They are not required or expected to act as investigators or finders of facts, nor would they determine the appropriate, corrective or remedial action that may be warranted in a given case.

- Whistle-blower can make a Protected Disclosure related to the below mentioned issues:
 - Fraud, theft, bribery and other corrupt business practices
 - Accounting or auditing irregularities or misrepresentations
 - Significant environmental or safety issues
 - Actual or potential conflicts of interest
 - Violation of applicable laws or regulations or of the Code of Conduct



GRI 300: Environmental Aspects





At the *Strategic & Capex* level...as reflected in our product offerings through promoting the use of

“Laser irradiated grades” of grain – oriented electrical steel for transformer applications (high efficiency, low noise).

“High strength” steels for automotive applications (low weight, low emissions, high fuel efficiency, high collision safety).

...as reflected at the Project stage (fly ash bricks, STP, under deck insulation, natural lighting, induction lamps, water harvesting, green building)

At the *Tactical & Operational* level...as reflected in our Sustainability Roadmap (waste, energy consumption, water use, ...)

At the *stakeholder* level...as reflected in initiatives such as (tree plantation, children’s park, street lighting, Aanganwadi, Jr. college, girl education, public infrastructure, health camps, healthcare awareness)



Environmental

300

Mahindra Accelo is committed to Environment Protection and has put in place Management Systems & Processes, R&D efforts, Abatement Technologies and Control Mechanisms to minimize adverse impact on environment due to its operations.

Materials

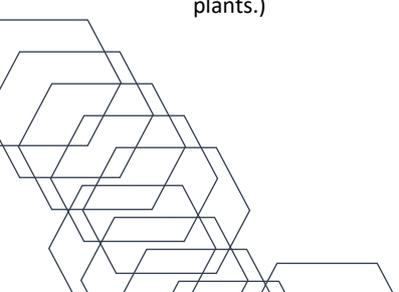
301

101-1, 101-2 and 101-3

Being a steel solutions provider, the major raw material required for Mahindra Accelo’s operations is steel coils and steel sheets. In addition to steel, usage of other raw materials such as lubricating oils and packaging materials are listed below:

List of Raw materials	Unit	Quantity (2018-19)
Semi manufacturing material		
CRCA Coil	tonnes	71,336.85
Paint	tonnes	0.76
Steel for Electric service	tonnes	16,991.90
Associated material		
Grease	tonnes	0.15
Gear/Hydraulic/Lubricant/Washing oil	litre	7,136
Thinner	litre	820
Packing Material		
Metal strip/Metal pellet/Metal rod	tonnes	1,129.80
Paper Cardboard	tonnes	6.34
Plastic Film	tonnes	33.67
Wooden Pallets	tonnes	2,551.68
BOPP tape	pc	13,711
Other materials (Seal/HDPE fabric/LDPE/Nail)	tonnes	65.75

(The above table consists of combined Raw material data for Bhopal, Kanhe-I, Kanhe-II, Nashik, Vadodara and Chakan plants.)





Silicon steel alloy is being used in transformers, whereas High Strength Steel (HSS) and Advanced High Strength Steel (AHSS) are being used for automobile parts which help in reducing the weight of a vehicle. Apart from reducing weight it also enhances fuel efficiency and lowers the life cycle GHG emission compared to vehicles which are aluminium intensive. Our approach is to minimise steel waste, thus we adopt cutting-edge technologies that utilize steel sheets to the maximum possible.

Recycled input material used
301-2

Steel is the only material which can be endlessly recycled irrespective of product grades, without loss of product strength and quality.

Government of India has set a target of producing 300 million tonnes of steel by the end of 2030-31, whether it is from scrap or iron ore. Domestic steel production is currently at 100 million tonnes. Scrap steel can play a significant role in meeting the overall target of steel production.

At Mahindra Accelo, we utilize recycled steel from our suppliers from where we get our steel sheets. Recycled steel can only be used for products like home appliances. For products like transformers, automobiles and purlin structures high grade steel is required. Mahindra Accelo also uses recycled steel made from the scrap material for certain products, thus, reducing fresh steel requirement and waste steel formation.

Case study

Utilization of CRGO end cuts scrap for making Distribution Transformer (DT) cores. At Mahindra Accelo we have utilized electrical scrap after conversion into steel lamination sheets for in house manufacture of DT cores.

Manufacture of core table, small core; small built core and clamped core using CRGO scrap, has given us entry in to the DT market space.



Steel Scrap



Steel Lamination



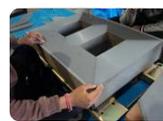
Built Core



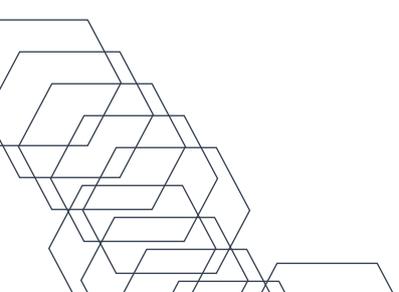
Clamped Core



Table Core



Small Core





Reclaimed products and their packaging materials

301-3

Mahindra Accelo is engaged in steel services, which provides basic structural parts for the products like automotive and purlin structure for trackers and construction. Thus, the reclamation of such a product is based on its end use. As steel can be easily and continuously recycled, at the end of our product's life cycle, steel and other metals from it can be easily reclaimed.

Our joint venture 'CERO' is completely driven by the idea of recycling of an automobile. Apart from the extraction of metal from the used automobile, it also deals with other parts of

vehicles like engines, tyre, seats, RIMS, wiring and harness. All material extracted from the vehicles is segregated & auction lots are prepared. Interested buyers can register themselves in an auction via MSTC auction site.

Waste reduction initiative

Reduction in wood consumption & recycling of packing material at Mahindra Accelo, we use reusable metallic bins for stator & rotor and new metal pallets for packaging purpose. 75% of our supplies are on recyclable metallic pallets. Total 1000 tonnes wood has been saved in FY 2019 which is equivalent to 2052 fully grown trees.

Energy

302

103-1, 103-2, 103-3

Mahindra Accelo being manufacturing plant, energy is one of the important material topics as energy consumption not only contributes to GHG emission but also to a major portion of the cost of steel fabrications.

Energy Consumption within the organisation

302-1

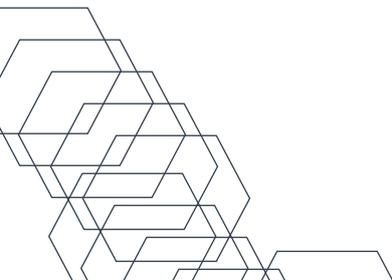
At Mahindra Accelo, for the internal plant operation, energy is mainly consumed in various fabrication processes, panel AC, Evaporative cooler, Cooling tower, Cooling pump, Pit furnace and chiller.

Total Direct Energy Consumption

Parameter	2016-2017	2017-2018	2018-2019
HSD/Diesel [m ³]	58.14	73.67	118.63
LPG [t]	91.21	179.19	254.36

Total Indirect Energy Consumption

Parameter	2016-2017	2017-2018	2018-2019
Electricity purchased from Grid [GJ]	10,784.38	10992.10	12919.76
Electricity purchased from Renewable Sources [GJ]	0	829.21	3050.03





Energy Intensity

302-3

Parameter	UoM	2018-19
Direct energy consumption	GJ	16,265.39
Indirect energy consumption	GJ	15,969.80
Total energy consumption	GJ	32,235.20
Production	tonnes	1,01,920
Energy intensity	GJ/t	0.31

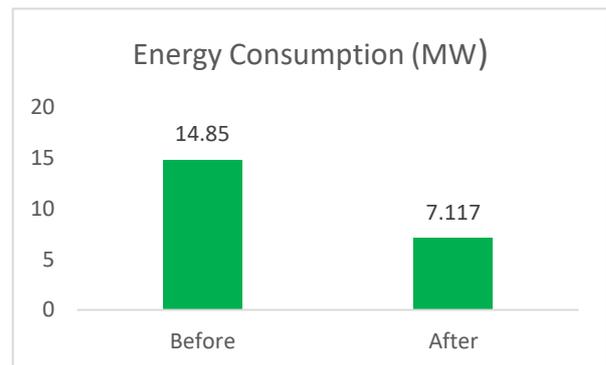
Reduction in energy consumption

302-4

Generation of energy from the solar project at Kanhe plant from the OPEX model of 650 kwp capacity contributes 60% of total energy consumption. Consequent upon the implementation of OPEX model, the energy cost has been reduced from ₹ 5.13 Lakhs to ₹ 1.07 Lakhs and energy consumption has reduced from 14.85 Mw to 7.12 Mw.

At Chakan plant, 98% of the factory is operated in natural light which reduces the major part of electricity required for lighting.

In Chakan, 100% of the roof area is covered with high reflective index material thus reducing the urban heat effect. In this plant, 75% of the parking area is covered. In addition, non-air-conditioned areas have been naturally ventilated with a significant opening to carpet



area ratio, which provides 20% more fresh air than the international requirement. This enhances work zone air quality and long-term well-being of all occupants.





Energy saving opportunities at the operational level

- For steam blowing, we have changed to a batch type furnace from the large (36 t), LPG fired continuous furnace which has resulted in annual savings of ₹ 96 lakhs

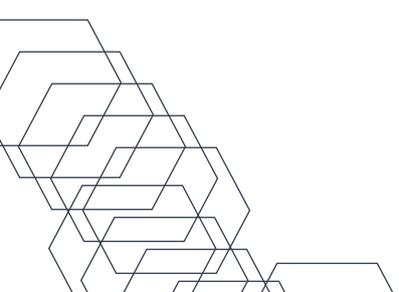


Before -
Cooling Tower



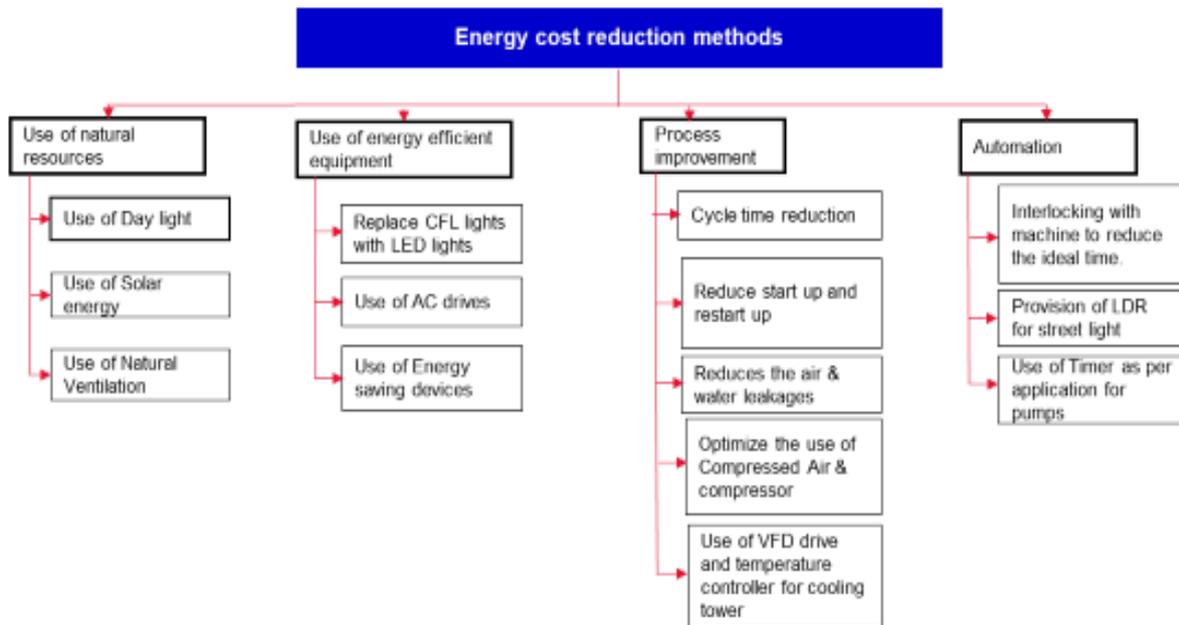
After - VFD
installed

- Evaporative coolers suck outside air and pass it through the water jacket, which saved running costs of nearly ₹ 35 Lakhs
- VFD and temperature controller have been attached to the cooling tower, which reduced energy consumption by 50%.



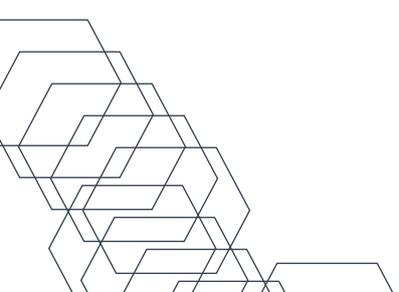
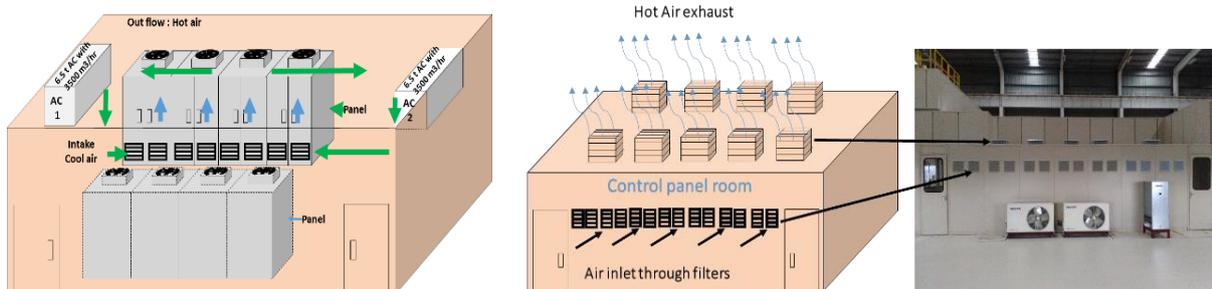


Energy savings



Case Study: Reduction in energy Consumption by alternative thinking

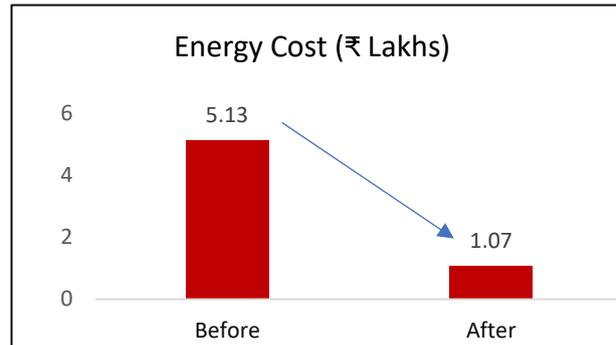
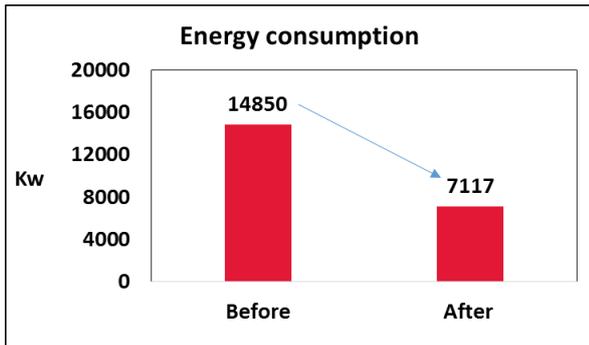
In our main panel lines, we need to maintain the temperature at 30° Celsius throughout 24 hours. In order to attain this, quite a few alternative solutions were tried but as they were not effective, we came up with the following solution after a lot of brainstorming.





Cooling solution	Power Consumption	Life of AC	Remark
Cooling with hot air re-circulation	High	Short	X
Use of fresh air maintain the temperature	Less	Long	√
Use of high air flow.	High	Long	X

Thus, instead of forced cooling we have installed, two air conditioners of 6800 m³/hr of 5.5 tonnes capacity each.



Water

303

102-1, 102-2 and 102-3

We believe that in order to prosper in our business, it is our responsibility to practice proactive water management in our operations. At Mahindra Accelo, we have facilitated water management through installation of water quality monitoring system; besides that, effluents are treated through installed ETP and STP. Optimization of water usage at each plant is being made possible through water auditing and monitoring.

Water withdrawal by source

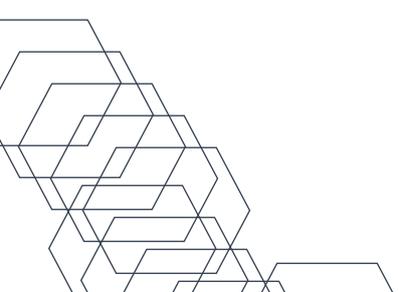
303-1

Water withdrawal details at different plants by different sources. At each plant, water sourcing differs considerably based on the water quality & quantity, the requirement of the operation as well as availability of water at that location

Water Consumption

Specific water consumption data for different plants (for FY 18-19) are tabulated below.

Source of Water	unit	Quantity
Bottled Water	[m ³]	193
Ground Water	[m ³]	15,690
Municipality Water	[m ³]	8,678
Tanker Water	[m ³]	17,748.2
Total water withdrawal	[m ³]	42,309.2





Plant Location	Total Prod.(t)	Total Water Cons. (m3)	Specific water Cons.(m3/t)
Bhopal	16,345.55	7,592	0.46
Kanhe-I	147,020.07	5,148	0.03
Kanhe-II	22,285.00	6,292	0.28
Nashik	71,336.85	8,098	0.11
Vadodara	30,583.57	8,871	0.29

Water recycled and reused

303-3

Rainwater harvesting initiatives at Chakan plant.

At our Chakan plant, a rainwater harvesting system is installed which can capture 100% of rainwater run-off from the premises. Further, harvested water is used after primary treatment.

Water recycling initiatives

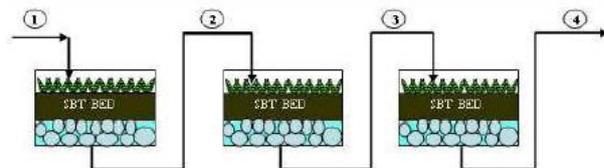


sip. save . recycle

At Mahindra Accelo we have shifted towards Bio-sanitizer concept. We are the first company in Mahindra Group to go for Bio-STP. At Kanhe plant, Bio-STP has replaced conventional STP. Domestic wastewater from the plant is treated in Bio-STP and finally treated water is used for gardening.



Eco technology Bio-sanitizer



@ 95% of non -process waste water is treated on site and used for gardening, land scaping

Emissions

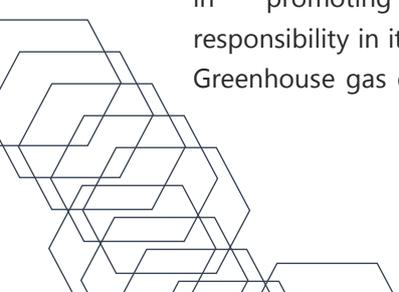
305

103-1, 103-2 and 103-3

We understand and recognize the implications that climate change would have on our business, environment and community. Mahindra Accelo has framed policies around the climate change and other global environmental challenges. It stands committed in promoting greater environmental responsibility in its operations. We believe that Greenhouse gas emissions are one of the key

concerns of "cost to environment" for modern businesses. It is therefore necessary to embark on low carbon growth trajectory in its operations. Primarily impacts are caused by burning of fuel and use of electricity.

By conducting an annual energy audit, we ensure that energy has been utilized optimally in operations with minimum possible loss. We are keeping record our scope-1, scope-2 GHG inventory data. The approach is to minimize GHG emission by applying technical and operational expertise.





Direct (Scope 1) GHG emissions, Energy indirect (Scope 2) GHG emissions & Other indirect (Scope 3) GHG emissions

305-1, 305-2 and 305-3

Emission Details (t CO ₂ e)	2017-2018	2018-2019
Scope 1 Emissions	728.80	1071.74
Scope 2 Emissions	2503.78	2942.86
Scope 3 Emissions	14050.03	14677.20
Total Emissions	17282.62	18691.80

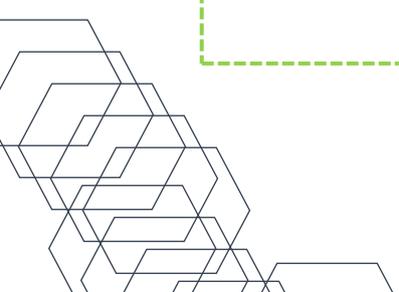
Reduction of GHG emissions 305-5

Science Based Target provides a clearly defined pathway by specifying how much and how quickly we need to reduce our greenhouse gas emissions.

In this year Mahindra Accelo has invested in Science Based Target initiatives (SBTi) to achieve emission reduction needed for the transition to a low-carbon, sustainable service. By adapting Science based target approach we are committed to reducing our Scope-3

emission by 40% of the total emission (Scope-1, Scope-2, Scope-3).

Mahindra Accelo commits to reduce absolute scope 1 and 2 GHG emissions 28% by 2030 from a 2018 base year. We are also committed to reducing absolute scope-3 GHG emissions 26% by 2030 from 2018 base year.



Effluent and Waste

306

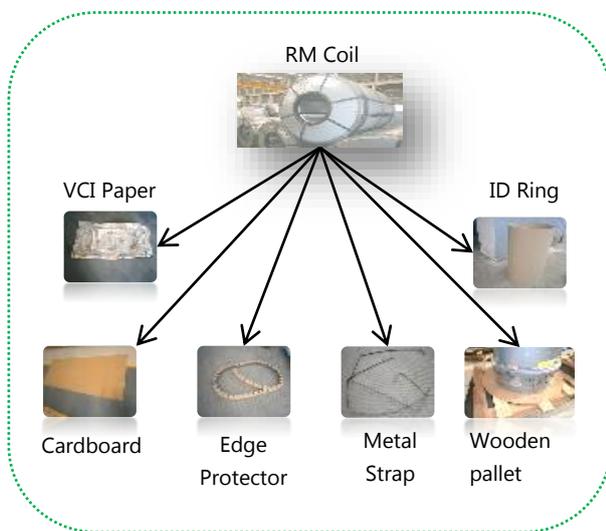
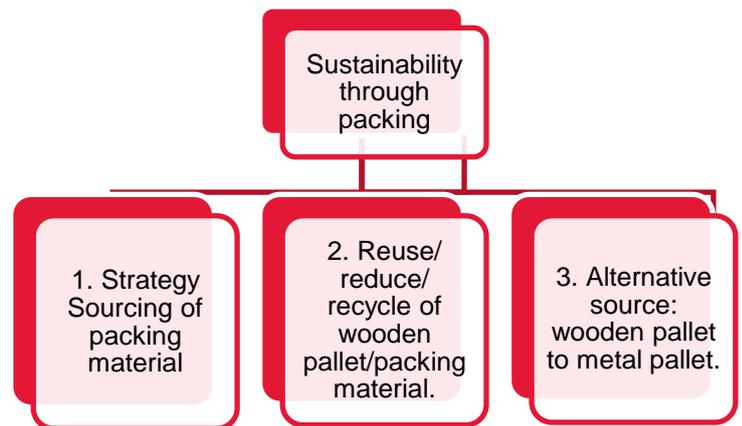
103-1, 103-2 and 103-3

Waste generation - its utilization/disposal and treatment of effluent are critical issues for any business. Thus, best in class environmental management system requires consideration of treatment and disposal for both, effluent and waste.

All effluents and wastes generated by Mahindra Accelo are monitored on a regular basis. As per our current practice not a single piece of steel is wasted and is directly transferred to the foundry for melting.

At Mahindra Accelo, we have been reporting quality of effluent that is discharged from the plant and ensured that it is in line with with environmental norms. Comparison aids us in

achieving statutory norms by implementing technical expertise. The Environmental Management System implemented under ISO 14001 provides a strong platform for identifying, evaluating and reviewing the key projects related to waste minimisation, recycling and improvement in wastewater quality.



Water discharge by quality and destination

306-1

Compared to steel manufacturing industries, water requirement at steel service industries is significantly lower. Water that is discharged from any of Mahindra Accelo's Plants is comparatively less polluted. Nevertheless, our approach is shifting towards minimum water contamination thus significantly reducing requirement of effluent treatment.



Waste by type and disposal method

306-2

Waste Details		2016-17	2017-18	2018-19
Hazardous waste				
Oil / Waste	m ³	7.43	516	1.78
Hazardous Waste-Solid	kg	2,093	840	2,129
Chemical Bottles/Drums/Containers	kg	990	0	599
Cotton Waste	kg	1,103	840	1,530
Hazardous waste-Solid	No.	9.00	8.00	0
Battery/Battery Scrap	No.	9.00	8.00	0
Non-hazardous waste				
Non-Hazardous Waste - Solid	kg	91,17,597	17,30,440	66,22,416
Cardboard/Paper	kg	9,275		
CRGO Scrap	kg	8,63,428		
Steel Scrap	kg	74,33,263	12,48,260	61,32,636
Garbage	kg	3,32,175		
Packing Material Scrap	kg	3,53,723	4,82,180	4,89,780

Significant spill

306-3

No major spill has been reported.

Transport of hazardous waste

306-4

Hazardous wastes that are generated at different plants of Mahindra Accelo are handled carefully keeping in mind norms and regulations of government. Once the waste has been discarded carefully from the plant, it is handed over to authorized Hazardous waste handlers for the final disposal.

Water bodies affected by water discharge and/or runoff

306-5

Till date, no water bodies have been affected by water discharge and/or water runoff. At Chakan plant, rain-water runoff from premises is being caught by rain-water harvesting system. Domestic water that discharges from the plant is being treated in the STP and parameters are

being lowered down to meet the standard limits given by authorities.

Environmental compliances

307

103-1, 103-2 and 103-3

Our approach for environmental compliances is not merely based on governmental regulations but we believe in maintaining a holistic balance between business and its impact on environment around us.

As a part of the Mahindra group we are committed to our group philosophy of *Rise for good*. The philosophy focuses on our commitment to prevent and control environmental pollution, conservation of natural resources, monitoring and ensuring compliances, continual environment performance improvement, educating our employee and communities about the environmental commitments and applying proven management practices to prevent or mitigate negative environmental impacts.

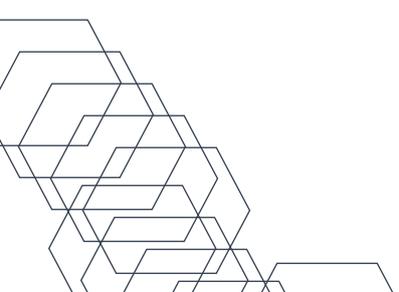




Non-compliance with environmental laws and regulations

307-1

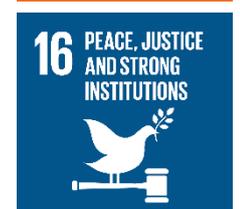
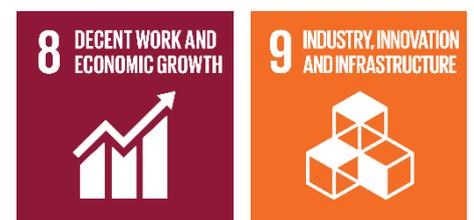
The board of management committee has devised proper systems to ensure compliances with the provision of all applicable laws and that such systems are adequate and operating effectively.





GRI: 400

Social Aspects



Social Performance

400

Employment

401

103-1, 103-2 and 103-3

Motivating and balanced working environment has been provided to employees by Mahindra Accelo, which ensures recognition of their contribution in the growth of the company.

Strong commitment of the employees towards the company enables us to accelerate our agility.

We strongly believe in cultivation of employee's knowledge and are concerned about their health, safety and career enhancement. Our employees are the most valuable assets for us, consequently we are committed to build a unique collaborative work culture for their well-being which includes financial compensation, amenities, capability building, engagement and facilitating realization of their potential.

New Employee hires and employee turn over

401-1

Age wise new hiring						
Category	<30 Year		30-50 Year		>50 year	
	Male	Female	Male	Female	Male	Female
Junior Management	23	1	22	0	0	0
Middle Management	0	0	3	0	0	0
Senior Management	0	0	1	0	0	0
Workmen	0	0	3	0	0	0
Fixed Term Contract	1	0	0	0	0	0
Third Party Contract	0	0	0	0	0	0
Others	29	0	3	0	0	0
Total	53	1	32	0	0	0

Employee leaving the organisation in the reporting year						
Category	<30 Year		30-50 Year		>50 year	
	Male	Female	Male	Female	Male	Female
Junior Management	9	0	11	0	0	0
Middle Management	0	0	3	0	1	0
Senior Management	0	0	0	0	0	0
Fixed Term Contract	0	0	0	0	0	0
Third Party Contract	0	0	0	0	0	0
Workmen	0	0	1	0	0	0
Others	6	1	0	0	0	0
Total	15	1	15	0	1	0

'Others' category comprises of: Diploma Trainees, Graduate Trainees, Junior Support staff and Trainees



Benefits that provided to full-time employee that are not provided to temporary or part time employee

401-2

- We have sessions conducted on (a) financial planning and (b) Welcoming retirement and its different phases. This is conducted for all retiring

employees as and when the retirement occurs.

- Based on skillsets and position available, we do consider employing the retired person on retainership basis.
- We have not terminated any employee. Severance pay, if any, is as per the terms of employment, which refers to notice period clause (may be either one month or 3 months).

Index	Benefits offered to all the employees	Benefits offered to Full time employees that are not provided to temporary or part-time employees
Life Insurance	No	Yes
Health Care	Yes	Yes
Disability/Invalidity Coverage	Yes	Yes
Parental Leave	No	Yes
Stock Ownership	No	No

Note: Health, Personal accidents and Food facilities are provided to permanent and contract employees

Parental leave

401-3

Details	Male	Female	Total
Employees entitled for parental leave	280	18	298
Employees that availed parental leave	7	1	8
Employees who are employed 12 months after availing parental leave	5	1	6
Employees who returned to work after availing parental leave	7	1	8

Maternity leave taken, employee has resumed work and continues to remain with us

Occupational health and safety

403

103-1, 103-2 and 103-3

Mahindra Accelo provides highest priority to the health and safety of its workforce as evident

from its policy, procedure and performance monitoring and elaborate training activities. In line with our policy we have developed a comprehensive health and management system to strive towards our goal of zero accidents.





All plants are certified with OHSAS 18001:
Occupational Health & Safety Management
Systems

Workers representation in formal joint management-worker health and safety committees

403-1

No. of employee representing in Occupational Health and Safety committee.

Representation in Occupational Health and Safety Committee	2017-18	2018-19
Senior management	7	15
Middle Management	15	22
Junior Management	7	10
Workmen	13	24
Fixed Term Contract	0	0
Third Party Contract	14	19
Others	0	0

Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities

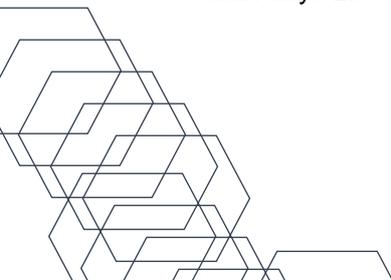
403-2

Total working hours for Permanent, Contractual and other Employees.

Category	Unit	FY 17-18	FY 18-19
Permanent Employees	hours	370762	404064
Contract Employees	hours	963384.5	1153201
Other Employees	hours	90004	92700
Total	hours	1424151	1649965

Types of injury and rates of injury, lost days, and number of work-related fatalities

Event	Description	Gender	FY 17-18	FY 18-19
Reportable Accidents	Permanent Employees	Male	0	0
		Female	0	0
	Contract Employees	Male	1	0
		Female	0	0
	Other Employees	Male	0	0
		Female	0	0
Man-days Lost	Permanent Employees	Male	0	0
		Female	0	0





	Contract Employees	Male	29	0
		Female	0	0
	Other Employees	Male	0	0
		Female	0	0
Fatalities	Permanent Employees	Male	0	0
		Female	0	0
	Contract Employees	Male	0	0
		Female	0	0
	Other Employees	Male	0	0
		Female	0	0

For the year 2018-19 both Lost Time Injury Frequency Rate (LTIFR) and Severity Rate (SR) are zero, as there were no Reportable Accidents.

Workers with high incidence or high risk of diseases related to their occupation

403-3

Each location has a Health and Safety Policy that is applicable to all the employees. There are no workmen with high incidence or high risk of diseases related to their occupation. Annual health check-ups are conducted for employees.

Health and safety topics covered in formal agreements with trade unions

403-4

Each location has Health and Safety agreement that is applicable to all the employees. The Agreement covers non-use of tobacco/gutka & alcohol, use of safety gears / equipment and a mandate for the employees to adhere to company safety norms. Use of mobile phones is not permitted in the factory.

100 % of the employees are covered under the health and safety agreements

Mahindra Accelo has consistently cultivated a culture that rewards continuous learning, collaboration and talent for the organisation to be future-ready. In order to grow and thrive in today's competitive market, we have developed a strong culture of learning – where executives and workmen are supported and encouraged to enhance their skills and competencies.

Programs for upgrading employee skills and transition assistance

404-2

The programs that are conducted through the year for Employee's Capability Building and to sharpen their skills are as follows -

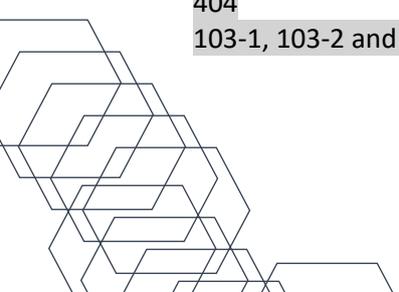
UDAAN: A learning and development initiative to build and develop capabilities for the future especially designed for Mahindra Accelo's 'Gen Next'. This can be enabling a goal driven culture based on agility to enhance their skills, knowledge and ability. It aids in facilitating learning interventions which focus on Capacity Development. It is conducted through interventions by HR team, Leaders and External Faculties.

- Learning café at Accelo
- The 'Make you happen Work-shop'
- 'Mile swar tumhara hamara' – A conversation session at Vadodara.

Training and education

404

103-1, 103-2 and 103-3





- Shishya Award - for learning and applying best practices from others.
- Shiksha Award - for Mastering, inspiring and mentoring.
- Shadow the Senior Leaders – A program that focuses on junior management which enable them to

spend their entire day in learning with Senior Management.

- Overseas learning opportunities for employees across levels.

Leaders Teach series – this series focuses on building leaders for tomorrow.

Percentage of employees receiving regular performance and career development reviews

404-3

Index	No. of Employees			No. of employees who received performance review			% of employees who received performance review		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Junior Management	139	10	149	139	10	149	100	100	100
Middle Management	52	5	57	52	5	57	100	100	100
Senior Management	24	3	27	24	3	27	100	100	100
Workmen	35	0	35	35	0	35	100	-	100
Fixed Term Contract	1	0	1	1	0	1	100	-	100
Third Party Contract	435	0	435	0	0	0	0	-	0
Others	64	0	64	64	0	64	100	-	100

11
LEARNING Days

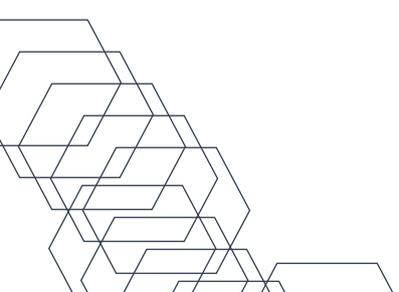
100%
Coverage

14
Training Programs

Leaders Teach Series



Overseas Learning Opportunities at Steel Mills (employees across levels)





Mahindra Accelo strongly believes that diversity in the organisation leads to immense benefits as people from diverse backgrounds possess unique abilities and skills which add value to the culture of an organisation. This positively impacts the work performance and work environment through innovative ideas and talent.

Diversity and equal opportunity

405

103-1, 103-2 and 103-3

We ensure that there is no discrimination in monetary rewards, training, and employee benefits based on gender, religion, marital status or personal disability.

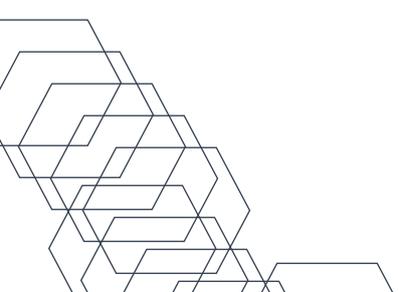


Diversity of governance bodies and employees

405-1

	No. of Employees in governance bodies					
	Age <30		Age 30-50		Age >50	
	Male	Female	Male	Female	Male	Female
Senior Management	0	0	1	1	3	0

	No. of Employees					
	Age <30		Age 30-50		Age >50	
	Male	Female	Male	Female	Male	Female
Senior Management	0	0	16	3	8	0
Middle Management	1	1	48	4	3	0
Junior Management	67	5	70	5	2	0
Others	50	0	13	0	1	0





Ratio of basic salary and remuneration of women to men

405-2

Average Basic salary Details (Data as on 31 March 2019)		
	Female	Male
Junior Management	2,76,820.00	210897.32
Middle Management	5,68,301.40	519814.06
Senior Management	8,16,818.40	1079590.26
Workmen	-	287675.66
Fixed Term Contract	-	90000.00
Third Party Contract	-	112942.44
Others	-	105389.50

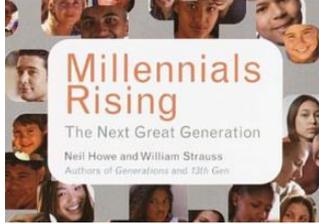
Gati mein Pragati - The ONE Accelo Collaborative Culture

42%
Of our workforce are millennials



32
Average age of employees

24
Average age of millennials



85%
New recruit hiring from Tier 2 and Tier 3 cities

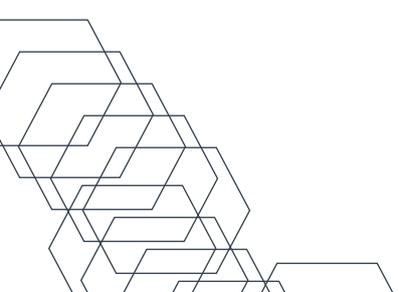
23%
New recruits

Non-discrimination

406

103-1, 103-2 and 103-3

The constitution of India, under Article 15, unambiguously prohibits discrimination on grounds of religion, race, caste, sex or place of birth. As a measure of protecting and improving the condition of the marginalised sections of the society, special provisions have been made for them in line with the Government directives.





Incidents of discrimination and corrective actions taken

406-1

There is no incident of discrimination reported during the Reporting year.

The actions that have been deployed in the organisation for prevention/reporting of any such incident are as follows:

- Regular engagement of Business Heads / Leaders with teams.
- Quarterly engagement of all employees with the CEO at the 'Employee Connect: U Come First' forum.
- 'CEO Mailbox' – An initiative wherein employees are encouraged to write directly to the CEO on ideas, any challenge areas / grievance at the workplace.
- Whistle Blower policy and policy on sexual harassment is in place. Employees also have the option of requesting anonymity if they so choose.
- We have a Corporate Governance Cell which looks into grievances.

- We also have an Internal Complaints Committee (ICC) and a Social Media Policy.

Local Communities

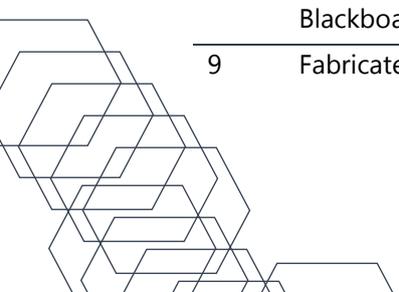
413

103-1, 103-2 and 103-3

Mahindra Accelo believes that it is our responsibility to transform communities and societies through community engagement, building of assets & infrastructure, providing health services and creating employment opportunities through programs under Corporate Social Responsibility (CSR). These initiatives directly stimulate the economic growth of the surrounding areas.

The CSR policy approved by the Board provides a framework to achieve the National Priorities and Sustainable Development Goals. Key societal challenges are identified, facilitating collaborative design and implementation of CSR programs leading to value added and meaningful outcomes.

S. No	Project Description	Actuals spent (₹ Lakhs)
Environmental sustainability		
1	Tree Plantations (3320)	4.62
Healthcare		
2	Connect with Red Cross to help Thalassemia patients	11.98
3	Eye check-up & Spectacles Distribution Camp	1.35
4	Health check-up & Blood donation camp	0.32
5	Distribution of Pollution mask & Jackets in PCMC/ Chakan and adjoining areas.	0.18
Promotion of Education		
6	Construction of classrooms in schools near Kanhe	43.4
7	E-learning module i.e K-Yan distribution in nearby schools	5.99
8	Infrastructure facilities at nearby schools e.g. Benches, Blackboard, Distribution of Notebooks, Bags etc.,	3.8
9	Fabricated Shed at nearby Schools	9.76





10	Distribution of Desktop for Central lab in ZP school, Chakan	1.8
11	Basic computer course training program for teachers in ZP school, Chakan	0.15
12	Sports uniform for outstanding school athletes with Accelo branding	0.3
13	Education of the under-privileged girl child under the Nanhi Kali project	127.3
Rural Development		
14	Safety and welfare activity for Farmers/ Villagers near plant vicinity	0.73
15	Play park for kids at Nearby Village/School - including Play toys, Garden & Shrubs	1.74
16	Constructions of Sabhamandap for local panchayat	8.72
Skill development initiatives		
17	Skill Development - Contribution towards fees and study material for local Nursing course	1.79
18	Skill Development (MSCIT Course)	2.78
19	Skill India initiative (Beautician and Stitching course)	2.33
Swachh Bharat		
20	Swachh Bharat, Bottle Shredding machine at Talegaon station and various activities.	0.78
Total		229.92





Operations with significant actual and potential negative impacts on Local communities.

413-2

Mahindra Accelo’s operations do not have any significant adverse impacts on the local community. On the other hand, through CERO we are reducing air emissions by scraping old vehicles. A scientific technique for destruction of old vehicles ensures health and safety of workers. CERO follows governmental legislation for handling metal scrap which has reduced illegal dumping of oil and metal scrap.

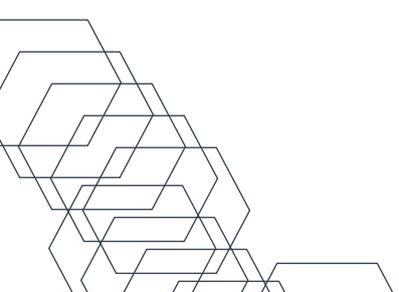
Non-compliance with laws and regulations in the social and economic area

419-1

There has been no significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in the reporting period.

Mahindra Accelo has not identified any Non-Compliance with laws and/or Regulations

Total CSR spent in the Financial year is ~2% of the average net profit of the last three years.





Awards and Accolade

11th CII National Competitiveness & Cluster Summit 2018



Kaizen Award in Environment Category



Runner up award in Championship case study competition in 'New Product Development' stream



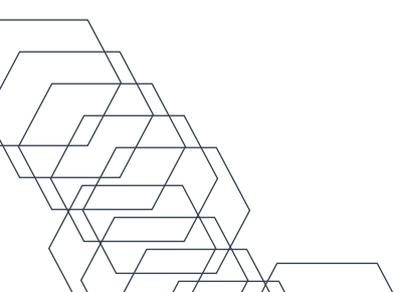
Winner Award in Championship Case Study Competition in 'Zero Effect' stream



Winner Award in Championship Case Study Competition in 'Next Employee Practices'



Runner up award in Zero Defect' stream





Excellence in Customer Service by Manufacturing Today



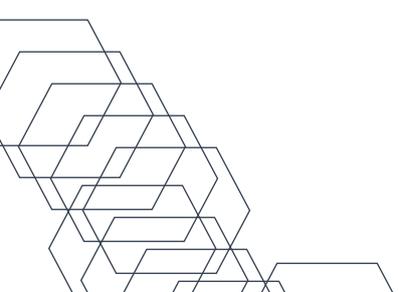
Runner up in Innovation by Manufacturing Today



Secured 6th Position in Great Places to Work



Winner Award in Change Management and Excellence in HRM. CII National HR Circle Competition 2018





Happy Employees → Happy Customers → Happy Investors





Mahindra
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