



Materiality Assessment

PURPOSE OF THE DOCUMENT

This position statement sets out HZL's approach to materiality assessment. HZL has always believed in open and transparent interactions with our stakeholders for enhancing the trust factor, leading to growth. We strive to engage in continuous interactions with our stakeholders to understand their perspectives and be the first to respond to the evolving market scenarios. HZL conducts materiality assessment, which facilitates us to identify topics of significance for our internal as well as external stakeholders. This exercise helps the organisation to plan strategies for managing the risks and harnessing the opportunities. Our approach to sustainability is strengthened by this robust process that we have in place to identify and understand the most material ESG priorities.

GOVERNANCE

The Board-level Sustainability and ESG Committee is aligned with our efforts towards the accomplishment of our 2025 goals and Environmental, Social and Governance priorities. The committee is led by an independent director as the chairperson of the committee. The role of the Sustainability and ESG Committee is to assist the Board in meeting its responsibilities in ESG matters and to ensure a strong governance on sustainability matters. It is also responsible for providing oversight on sustainability strategy, material issues, setting long-term goals & targets, ensuring continual improvement of our sustainability related performance as well as implementation of appropriate processes and policies across the Company. It also plays a key strategic role in eliminating potential damage to the environment and enhance our commitment towards stakeholders.

The Board Committee is supported by the Executive Sustainability Committee at the corporate level, chaired by CEO and includes senior executives to oversee delivery of the programs. The Executive Committee is tasked with ensuring that ESG risks are identified, acted upon throughout the lifecycle of the project. The ESC consists of multi-functional representation of senior leaders.

OUR APPROACH

We work to maintain constant communication with our stakeholders so that we can understand their views and be the first to react to changing market conditions. This enables us to foresee market risks and develop quick-response measures to mitigate them. Our confidence lies in our stakeholders, who possess the ability to influence our business and vice versa.

HZL performs a materiality evaluation every three years, which is then reviewed annually to ensure resilience and preparedness. Since FY 2022-23, we've adopted a double materiality approach to conduct our materiality analysis. This method involves a comprehensive assessment that considers both financial and impact materiality strategies,

guided by the principles embedded in the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB). Additionally, we've integrated the approach and principles of Double Materiality outlined by the European Financial Reporting Advisory Group (EFRAG) and the EU Corporate Sustainability Reporting Directive (CSRD).

Our comprehensive approach to materiality assessment enables us to identify topics of relevance to stakeholders, like sectoral outlook, megatrends, and risk perspectives with relevant mitigation strategies. This ensures that we keep pace with emerging priorities and stakeholder expectations. The process that we adopt for our materiality assessment involves:

Identification of significant ESG matters:

- Complete assessment to identify all significant material topics offering risks and opportunities to the business and external environment.
- Comprehensive exercise to identify and prioritise other ESG matters important for long term business success and impact on economy, environment, and society through analysis of four industry specific standards, peer reviews.
- Creation of Mutually Exclusive and Cumulative Exhaustive (MECE) set of 24 material topics for HZL.

Understanding the significance of identified topics:

- Evaluation of identified topics on the level of significance through extensive engagement with diverse stakeholder groups via surveys and focussed group discussions
- 483 stakeholders were consulted using multiple channels including senior management, employees, customers, suppliers, business partners, Investors, Civil Society, Regulators, Industry forums, CSR and community partners.

Risk and Opportunity Assessment:

Analysed the potential impact of identified topics against the effectiveness of internal systems and associated financial implications. The topics are then assessed against the risk threshold as defined in Enterprise Risk Management matrix.

Prioritisation of material topics:

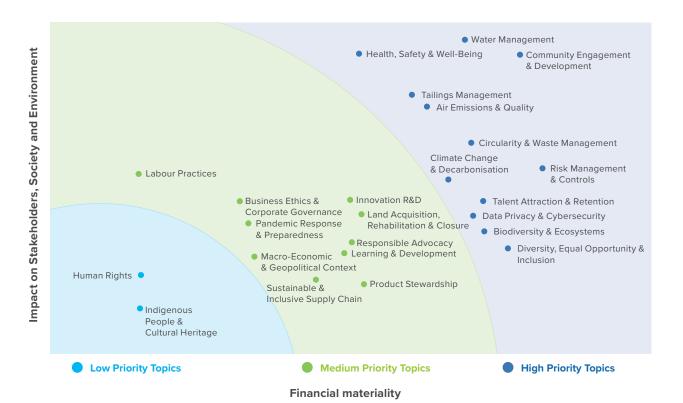
Determination of the high priority material issues was based on the risk assessment and stakeholder responses that were analysed using a scoring methodology. On the basis of severity and likelihood, these issues were classified as high-high and medium high priority areas. The materiality matrix was developed following a thorough analysis of all stakeholder data.



During our discussions, we not only consulted with subject specialists but also conducted various brainstorming sessions with our internal business functions, which helped us map the relevant potential material topics. We took care to pay attention to the positive and negative impacts arising from the ESG risks and opportunities. We, at Hindustan

Zinc, have established an ERM framework to help identify the strategic, financial, and operational risks. These risks play a huge role in our assessment process because of their significant impact on our business model and other value drivers, such as revenue growth, margins and required capital.

Water Management, Health and Safety, and Human Capital Management were identified as the top 3 material topics.



High Priority Topics	Medium Priority Topics	Low Priority Topics		
1 Climate Change & Decarbonisation	1 Sustainable & Inclusive Supply Chain	1 Human Rights		
2 Air Emissions & Quality	2 Labour Practices	2 Indigenous People &		
3 Water Management	3 Land Acquisition, Rehabilitation & Closure	Cultural Heritage		
4 Circularity & Waste Management	4 Learning & Development			
5 Tailings Management	5 Business Ethics & Corporate Governance			
6 Biodiversity & Ecosystems	6 Responsible Advocacy			
7 Community Engagement & Development	7 Innovation R&D			
8 Health, Safety & Well-Being	8 Pandemic Response & Preparedness			
9 Talent Attraction & Retention	9 Macro-Economic & Geopolitical Context			
10 Diversity, Equal Opportunity & Inclusion	10 Product Stewardship			
11 Risk Management & Controls				
12 Data Privacy & Cybersecurity				





alternate sources.

Material Issues for External Stakeholders	Cause of Impact	Why is it Material (Business case)	Mitigation Approach	Targets	Performance
♦ Risk	Risk, Cost	Water forms an indispensable part of our operations considering our extraction, processing & smelting activities. Due to this, it is imperative that we strive to reduce the water consumption throughout our value chain and reuse it in the	For our business, water is a very important resource, and is extremely critical for our mining and smelting process. We always work towards protecting water quality downstream for improved water use efficiency. We also engage with our communities for enhanced water security via	5 times Water positive company and achievement of 25% reduction in freshwater by 2025	1.73 million m3 (8.67%) reduction in freshwater consumption from base line 2020 41.3 % Water
		best possible way.	initiatives such as watershed management.	from base year 2020	Recycle
		climate change, we may face an increase in extreme weather events, leading to resource shortages. Parts of our operational sites in Rajasthan are a designated water stressed area as per the WRI Aqueduct Tool's analysis, and they face	Our Approach to water management includes increasing water efficiency and exploring new technologies which are less water intensive. Installation of ETP & ZLD plants across our operational		
		the probability of drought-like situations and extreme heat waves. Water being a significant input in our business operations, both for mining and smelting operations, these events have a huge potential to disrupt our operations, impact the	sites, and augmenting water recycling across the operations. Maintaining zero discharge across sites.		
			Exploring alternatives to fresh water- Utilisation of treated municipal wastewater (sewage)		
		productivity of our staff, and lead to revenue loss as well. For instance, we faced similar	Installation of Dry tailing plantRainwater harvesting		
		drought issues in 2020 in one of our sites at Rajasthan, which restricted our water withdrawal capacity due to regulatory issues of restricted water supply, leading to a loss in revenue on account of sourcing water from	Water risk assessment using WRI Aqueduct Water Risk Atlas, Water Risk Monetiser, WWF Water Risk Filter.		





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HEALTH AND SAFETY	Risk, Cost	Within the complex domain of the mining industry, the repercussions of health and safety-related incidents result in financial and human losses. The ineffectiveness of safety controls intertwines with productivity dynamics, as these incidents and health issues lead to worker downtime, hampered operational efficiency, and business disruptions. Inadequate health and safety practices also lead to damage company's reputation, brand image, leading to a loss of trust among stakeholders. As the company navigates these dimensions, strong health and safety considerations are imperative and integral to responsible and sustainable business practices	It is our constant endeavour to make our workplace free of fatalities, injuries, and occupational diseases. Identifying, understanding, controlling, and eliminating the risks associated with hazards at the workplace, including man-machine interactions, molten metal handling, and underground fire Implementation of critical risk management measures to ensure all identified critical control are being monitored and effective on ground Structured skill improvement and competency enhancement of employees and business partners Automation and mechanisation plan to eliminate high-risk manual activities Exposure monitoring for better and timely controls The Company partnered with a globally recognised industrial hygiene service company to develop a sustainable industrial hygiene programme to reduce potential health risks by recognising, evaluating, and controlling occupational health hazards and occupational exposures.	Zero Work related fatalities and 50% reduction in TRIFR by 2025 from base year 2020	Zero Fatalities • TRIFR decreased by 32% from FY 2019-20





Material Issues for External Stakeholders	Cause of Impact	Why is it Material (Business case)	Mitigation Approach	Targets	Performance
HUMAN CAPITAL MANAGEMENT	Risk, Cost	We have always identified our people as our top priority. We focus on maintaining a culture that is safe, diverse, and high on employee engagement to make us the employer of choice. We would continue our efforts to attract and retain top talent via an effective employee engagement framework. We believe in deploying best-in-class talent management practices that boost performance and help in building our brand to attract and retain talent. The inclusion of diversity (Women, LGBTQ, and special abilities) in the workforce leads to better decision-making and higher productivity. We believe that workforce diversity is a business imperative and strive to ensure that our workforce represents all sections of society. This open mindset, we believe, will help us deliver better business results. The core operations at Hindustan Zinc including mining, smelting & refinery require workforce with niche skills. Attrition in this talent pool is considered as a threat to the business deliverables. We have hence committed ourselves to providing equal employment opportunities without any discrimination based on sexual orientation or gender identity.	Our workforce management model, policies and tools have guided our investments in our people throughout their careers, by offering a workplace culture that appeals to more diverse workers. We build and leverage talent through a robust framework, as mentioned below: • Promoting Young Talent – we proactively deploy various interventions to identify 'stars'; provide growth platforms (like Chairman workshop, V-Build, CEO Connect among others); give them early opportunities to showcase their potential and talent to lead from the front in various business roles and cross-functional roles. • Capability Building – focus on building capabilities across employee levels through comprehensive learning platforms to enhance safety, technical & business excellence, behavioural & leadership skills; We continuously leverage technology and offer integrated learning platform's ranging from online training through video libraries, classroom training, virtual labs, video sharing portals, assessment centers, to partnerships with universities, and executive coaching by industry experts. • Driving Diversity – We encourage diversity at workplace to promote the organisation's collective experience and skill set; We provide the right work culture to promote inclusion and have aligned our policies to encourage diversity in workforce. • Formulated a well-articulated D&I and LGBTQ Policy. • Partnered with 'The Humsafar Trust', which is a pioneer organisation in India dedicated towards counselling, advocacy, and provision of health care to LGBTQ communities. • Initiated an awareness and sensitization drive for all employees across Hindustan Zinc.	Inclusive and diverse workplace with 30% diversity by 2025 from base year 2020	Gender diversity increased from 14.4% in FY 2019-20 to 21.7% • 15,264 Training man-days for executives' skill upgradation • 16 people from LGBTQ community introduced in workforce





OTHER KEY MATERIAL THEMATIC AREAS

Material Issues for External Stakeholders	Cause of Impact	Why is it Material (Business case)	Mitigation Approach	Targets	Performance
		ENVIRO	ONMENT		
TAILINGS MANAGEMENT	Risk	The monitoring and management of tailings storage facilities (TSFs) plays a significant role in reducing environmental impact on our local stakeholders. Tailings dam failure can lead to loss of life, injuries and damages to the environment, as well as can impact our Company's reputation. It can also entail significant financial costs/losses and stoppages in production.	Failing of tailings dams can cause huge environmental impact. Hence, we accord top priority to managing them responsibly • All the Company's tailings facilities are designed and constructed to the highest engineering standards and best-in-class benchmarked practices • External and internal inspection and monitoring of the TSFs to review the integrity/stability of our TSF structures and their associated management practices • Effectiveness of reclaim water system • Collection and recycling of supernatant water • Conducting periodic TSF risk assessment and developing mitigation plans to minimise associated risks • Surveillance of tailings storage facility • Effectiveness of emergency planning and response • Utilisation of tailings in backfilling • Replacement of wet tailing disposal with dry tailing disposal • Dam break analysis and emergency preparedness • Company introduced a novel, satellite-based Interferometric Synthetic Aperture Radar (InSAR) monitoring technique to provide early warning of surface ground movements • We aim to be fully compliant with the Global Industry Standards on Tailings Management (GISTM) by FY 2024-25	Complete transition from wet tailing to dry tailing disposal by 2025	Dry tailing plant commissioned at Zawar mines Commissioning of combined paste-fill and dry tailing plant at RD & SK mine Under planning stage at RA mine Zero incidents associated with existing tailing facilities







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AIR EMISSIONS & QUALITY	Risk	Failure to comply with emission norms could lead to negative/inevitable long-term impact on the environment and society, with imposition of levies/fines, escalation in costs related to monitoring and reporting, among others	Large-scale air emissions can cause serious impact on the environment and local communities. • We continuously work towards reducing air emissions. • Well-designed state-of- the-art air pollution control devices (APCD) are in place • Effective fugitive emission management • Continuous monitoring and reporting	Reduction in Non GHG emission (SOx & NOx emission) by 17% by 2025	Nox- 7,033 MT SOx- 25,199 MT PM- 1261 MT
CLIMATE CHANGE & DECARBONISATION	Risk	We are an energy-intensive industry due to the nature of our operational activities, logistics and transportation processes. That is why we seek new technologies and progress regarding sustainable energy generation. This can impact the overall market value of the products in the geographies with restrictions, thus impacting our revenues. As a result, we keep track of all transition risks and changes in regional Climate Change Policy. As per the physical risk assessment for the timeline 2030 and 2050, Hindustan Zinc is likely to face natural disasters like droughts, heat waves and increase in extreme weather conditions. These would impose challenges to mining operations. Climate change may cause or result in increase in extreme weather events and subsequent resource shortages, impacting overall cost of acquisition of resources from alternative sources.	The rising challenges of climate change and resource scarcity have put us on a path of transformation to a low carbon economy. Our strategies for mitigating these risks include: Reducing fossil fuel-based energy use in our operations by using innovative energy-efficiency technologies and process optimisation Shifting to renewables and/or lowcarbon solutions where possible The Company has committed for net-zero carbon emissions by 2050 or sooner and is planning to increase RE power portfolio by addition of 450 MW renewable energy by 2026 Replace diesel-fuelled transportation vehicles with electric vehicles. We have introduced India's first underground mining electric vehicle Introduced LNG-powered trucks and electric trucks for upstream and downstream transportation Business partners also introduced electric vehicles, several forklifts, towing vehicles, passenger vehicles introduced 100% RE power consumption at Pantnagar Metal Plant Use of biomass (5%) in power plant Climate change risk assessment based on TCFD guidelines	Committed to achieving Net Zero emission by 2050 50% reduction by 2030 in Scope 1 & 2 25% reduction in Scope-3 by 2030 0.5 mn tCO ₂ e GHG emission savings in our operations by 2025 from base year 2017	0.4 mn tCO ₂ e Cumulative GHG emission savings at all locations in FY 2023-24





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		ENVIRO	ONMENT		
BIODIVERSITY & ECOSYSTEMS	Risk	Biodiversity provides many ecosystem services. If improperly managed, mining, smelting and exploration activities have the potential to negatively affect biodiversity and ecosystem services. Impact could be loss of protected species and habitat fragmentation. Such risks could affect our social licence to operate as well as our reputation	We work to proactively manage our impact on biodiversity and strive to protect the ecosystems in which we operate. Three-year engagement with IUCN Biodiversity risk assessment Implementation of project with respect to Biodiversity Management Plan in alignment with global standard practices Miyawaki Afforestation at DSC, DZS and CLZS	Protect and enhance biodiversity throughout the life cycle 1 million Plantation drive by 2025 Achieve No Net Deforestation through compensatory afforestation whenever applicable in mining sites, throughout	Engagement with IUCN to revise BMP with an objective of NNL/NPI.) 0.67 million trees planted as part of commitment to plant 1 million trees by 2025, 122,755 planted during the year
CIRCULARITY & WASTE MANAGEMENT	Risk	Waste generated from our operations poses challenge to us in terms of increasing our cost of production, challenge in terms of its storage and risk of noncompliance.	Restoration of Jarofix Yard at CLZS using Mycorrhiza technology At Hindustan Zinc, we believe in Zero Waste and have designed a comprehensive approach in managing waste generated. We have aligned our waste management practices to '4R' strategy – Reduce, Reuse, Recycle and Reclaim	the life cycle	100% fly ash usage 1.67x increase in gainful utilisation of smelting process wast from baseline 2020 (2.55 lakhs M
			 Gainful utilisation of waste in terms of recovering minor metals and using waste in other industries (cement, road construction, etc.) Commissioning of Fumer plant will be resulting in 100% elimination of Jarosite waste from one of the hydro zinc smelter 		utilisation of jarosite and jarofix in FY 2023-24)







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		SO	CIAL		
COMMUNITY ENGAGEMENT AND DEVELOPMENT	Risk	Communities are identified as foremost stakeholder group. Stakeholders especially communities may get impacted at the socio-cultural and economic level due to our business operations. Deficit of trust and relationship with the earmarked stakeholders may not only impede the progress on initiatives for furthering our societal impact but may also lead to consequential loss of reputation, brand and business continuity. Mismatch between expectations of community and actions deployed or lack of awareness or poor deployment of engagement initiatives may lead to discontented communities. A proactive and sustained approach towards consultation with stakeholders including communities is critical to strengthen the engagement levels and sustained interactions and engagement platforms would lead to presenting our commitment to driving value for both communities and organisation. We also are cognisant that each location has a different cultural and economic significance, which influences the expectations local communities have from us. Hence, community engagement for sustainable integrated land use planning, the training of community persons in specialised skills, importance to cultural values and its integration into the relationship, empowering and bringing women in leadership by focussing on equality, overall developing the assets within the community and intensely educating them thereby making self-sustained communities' local employment, local sourcing is one of the most important aspect for us to build a trust and uplift their standard of living.	Proactive and sustained engagement platforms like "Community Connect", "Community Leadership Connect" shall ensure two-way communication network and strengthen the trust element. Our approaches towards strengthening Social Performance Steering Committees (SPSC) at business locations with active involvement of the functional leaders across Hindustan Zinc is key to monitoring the grievances and its resolution, key risks and its mitigation and creating strong relationships with the stakeholder base. Thereby, reducing the collective risks and immediately addressing the grievances and feedbacks received from the communities • Engagement of senior management at village level across all BUs on a regular basis for discussing village level development and ensure resolution of concerns/grievances, if any • Model village as a strategic approach is being adopted to strengthen the village infrastructure in discussion with the villages and its elected members • Assessing the community need and impact derived of our interventions including perception studies aid us in learning the insights and further help us draw inferences and future action plans	Impacting 1 million lives by 2025 from 2020 base year	1.91 million lives impacted





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		SOC	CIAL		
DIVERSITY, EQUAL OPPORTUNITY & INCLUSION	Risk	People are our core assets and responsible for organisational success. By establishing a culture of safety, employee engagement and support for diverse groups in our workforce, we have been able to deliver in the top quartile of the business performance. We are an employer of choice and a company that continues to attract, develop and retain talent across all the levels. Diversity is a business imperative for us and we firmly believe that healthy diversity mix is more likely to have financial returns above industry median. Strategically, we focus on having a strong representation of women across levels and women currently constitute 19.5% of the strength in the executive cadre. Simultaneously, we have successfully onboarded Transgenders in front-end roles. We have flagship programmes for identification and development of diverse workgroups such as V-Build, V-Lead, ACT-UP, SheLeads, V-Aspire which focus on technical & behavioural aspects of individuals.	While we see opportunity in diverse workgroups, there are apparent risks. The workplace has to be inclusive, safe, secure, free of discrimination, harassment and bullying. • Mitigation: Policy on Prevention of Sexual Harassment, Antidiscrimination Policy, Internal Complaint Committee • Grievance Redressal Committee, Women Councils are in place which are channels to directly approach for any grievance, complaint, or suggestion • Sensitisation and awareness on these policies, external and internal pulse surveys are taken care at central as well as IBU level to ensure mitigation of the mentioned risks	Inclusive and diverse workplace with 30% diversity by 2025	Gender diversity increased from 14.4% in FY 2019-20 to 21.7%







Material Issues for External Stakeholders	Cause of Impact	Why is it Material (Business case)	Mitigation Approach	Targets	Performance
		SO	CIAL		
HUMAN RIGHTS	Commitment	We consider Human Rights as an important material topic, given its significance for our internal and external stakeholders. We at Hindustan Zinc are cognisant of this fact and are addressing this challenge by partnering with our communities in ensuring an equitable and fair culture as part of our human rights commitment, which is a core element of our business strategy.	 Respect the rights of our employees by not indulging in child or forced labour, avoiding human trafficking, and eliminating harassment and discrimination Ensure that employees are given wages that equal or exceed legal requirements, or represent a competitive wage within that job market (whichever is higher) Implementing policies and procedures to promote workplace diversity Training to our employees on human rights expectations as laid out in our Code of Conduct; and also give enhanced specialist human rights training to our security staff Robust mechanisms like employee grievance processes, collective bargaining and contract labour management cells are in place Conduct basic due diligence in the prequalification process, including for human rights issues, for all direct suppliers before contracting with them 	By FY 2025, we commit to define the living wage across all our locations of operation and to assess the wage structure of full-time employees, contractors, business partners and suppliers.	Zero complaints relating to child labour, forced labour and involuntary labour 6 cases reported and three upheld for sexual harassment





Material Issues for External Stakeholders	Cause of Impact	Why is it Material (Business case)	Mitigation Aprroach	Targets	Performance
		ECONOMIC &	GOVERNANCE		
DATA PRIVACY & CYBER SECURITY	Risk	Risk of leakage of personal information of stakeholder and organisation's business critical information and also non-adherence to legal and statutory compliances may lead to financial/reputational loss. Unavailability of business critical systems or change in integrity of system/data due to cybersecurity incident may lead to wrong business decision and/ or business loss	Implementation of right set of policies, procedures and practices for IT operations and their effective communication and enforcement to all stakeholders • Structured and comprehensive approach for data governance through its life cycle including policies, procedures and deployment of best-in-class tools and technologies	-	Total number of information security breaches- Zero
			Comprehensive Vulnerability Management programme to proactively identify vulnerabilities in technology systems/landscape and remediate them in a timely manner		
			 Effective management of accesses to all systems, including privilege access management 		
			Periodically conduct Business Impact Assessment for all business-critical system and deploy effective Business Continuity and Disaster Recovery Plan		
			Company has adopted a globally recognised ISO frameworks for various domains of its IT operations and has been certified on an integrated ISO certification including ISO 27001, 27701, 31000 and 22301		
			Company has also implemented a very comprehensive programme for Vulnerability Management, Data Governance and Cyber Security Awareness across all its stakeholders. Company has defined a set of Risk Controls Matrix in line with ISO and Sarbanes-Oxley Compliance framework to regularly and proactively review and monitor all its IT processes		







Material Issues for External Stakeholders	Cause of Impact	Why is it Material (Business case)	Mitigation Aprroach	Targets	Performance
		ECONOMIC &	GOVERNANCE		
	Risk	The nature of our business involves a major interaction with our value chain partners, owing to a number of activities range from production to		100% Responsible sourcing in the supply chain by 2025	88% material/ services sourced directly from India
SUPPLY CHAIN		ranging from production to distribution and delivering the final product to our customers. Hence, it is imperative for Hindustan Zinc to ensure that all the supply chain partners abide by the Code of Conduct to help the Company achieve sustainability across its operations.	We have undertaken a digital transformation across the value chain for achieving higher operational efficiency. Launched a vendor grievance portal for fair and unbiased resolution of disputes Conducted assessment for ~75% critical raw material suppliers under quality management framework Launched a cloud-based platform for system-enabled engagement and created a process for mutual assessment of BP's performance to track critical contract performance A business process outsourcing partner engaged	by 2025	India 73% of total supplier by value (total 309 suppliers) have been assessed by third party for sustainable sourcing and ESG criteria during the year
			for spare procurement and managing inventory To adopt on sustainable		
			practices, deployed eco- friendly transportation for inter-unit movement		
			Developed five alternate vendors for critical commodities to reduce supply chain disruptions		

