



TATA RYERSON LIMITED

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Message from Managing Director, Tata Ryerson Limited

Tata Ryerson has signed the Compact in 2005, which requires our business to adhere to the ten principles laid out by the UN Global Compact, related to human rights, labour standards, anti-corruption and environment. Pursuant to the Tata Group signing the Compact, the Company is in the process of adopting the Global Reporting Initiatives (GRI), which, when complied, will enable the Company to identify gaps and take appropriate actions to bridge these gaps.

Tata Ryerson has built business sustainability into all its processes with keen focus on all the three bottom lines, viz., **economic, social and environmental**. We have the Tata Ryerson Code of Conduct, which is the guiding principle for us to conduct our business ethically and we follow the Code in letter and spirit. All the ten guiding principles have been incorporated in the Code; as such adherence to the Code automatically ensures that the global principles are never violated.

On the economic front, the Company has had consistent upwardly mobile statistics. The CAGR has grown at an average of 50% on an annualized basis for over a decade. Simultaneously, the Company has registered turnover growth from Rs.20 million to Rs.13,000 million also in a span of 10 years. The Company is acutely conscious of its social responsibilities for which it has evolved sustainability programmes, both at the corporate and unit levels with a view to sharing its economic success.

The company takes direct cognizance of all its stakeholders in formulating its vision, mission and core values. This is an exercise, which is undergone at appropriate intervals, when inputs are sought from its stakeholders and after extensive deliberations; directions on all the three attributes are arrived at. The company also conducts various methods of stakeholder engagements, through other means, like - Customer/Supplier/Vendor Meets (Direct Stakeholders), dialogues & employee satisfaction/engagement (Employees), Direct Contacts with key target communities, as identified by TRYL (Corporate Sustainability Initiatives).

Ensuring balance between Strategic Objectives & Key Stakeholders has been achieved by the adoption of the Balanced Scorecard Approach. The annual Communication of Progress (COP) is also shared via our newsletter "*Sparsh*", relevant financial and social performances are published in the Annual Report, apart from significant announcements made on specific communication platforms. This time, we shall upload the COP on our website, too.

The industry accolades we have received further vouch for the robustness of actions towards sustainability in all the three bottom lines. To cite a few examples:

- We won the prestigious Rajiv Gandhi National Quality Award 2007 in large scale Services Industry Sector for our Jamshedpur unit.
- Tata Ryerson received the Best Steelium Distributor Trophy for our Pune unit and a certificate of appreciation for initiating market development activities for GP sheets and coils for the Faridabad sales location from Tata Steel at the Steelium and Shaktee Parivaar meet held at Sri Lanka.
- Our Jamshedpur as well as Pune units possess high ISO, TS and QS certifications.

Tata Ryerson firmly believes that the aim of wealth generation through its business inextricably extends to sharing it with the community it serves. It looks towards long-term corporate sustainability through pursuit of continuous improvement in the environment in which it operates.

SANDIPAN CHAKRAVORTTY
MANAGING DIRECTOR
TATA RYERSON LIMITED

The Adherence to the Ten Guiding Principles

Principles (GRI indicators correlated with)	Company's Policy & Direction (Approach/ Process/ Deployment)	Specific actions taken (Outcomes with Key results and measurements)
Human Rights		
Principle 1		
Businesses should support and respect the protection of internationally proclaimed human rights	We follow the International Declaration of Human Rights. Our HR policies and procedures have been modelled accordingly.	<p>1. Tata Ryerson Code of Conduct (CoC), which embodies the values of both the JV partners, is explained (in languages besides English, also in Hindi & Marathi). At the entry point, all employees in the organization including new entrants sign the TRyL CoC.</p> <p>2. At entry point of their engagement, all employees are provided with a Service Rule book, which lay down various rules for the officers, like working hours of all employees, facilities provided by the company, etc.</p> <p>3. Regular dialogues/feedbacks are conducted across the organization with/from all employees during various Communication Meets.</p>
Principle 2		
Make sure they are not complicit in human rights abuses	<p>The TRyL CoC expressly commits to treat all employees with dignity and to conduct its business fairly without making any discriminations.</p> <p>Also, our HR/IR processes are derived through a consultative process, i.e. joint discussion of the management with the Union.</p>	<p>1. The Company ensures that it engages in business with suppliers, vendors, etc. who are compatible with the practices of the Company.</p> <p>2. Any issue of conflict is addressed and peacefully resolved by the top management in discussion with the Union.</p> <p>3. There is also a Safety Council, Welfare Committee to address the various issues raised by the employees.</p>
Labour Standards		
Principle 3		
Businesses Should uphold the freedom of association and the effective recognition of the right to collective bargaining	TRyL engages in a process of 'collective bargaining' through employee Union and periodic negotiations take place (every 3 years, a Wage Negotiated settlement is arrived at) as per our Company policy.	The management interacts with labour Unions for fixation of salaries, labour welfare measures, productivity bonus and all such decisions are arrived at with mutual consent, considering the performance parameters of the Company.
Principle 4		
The elimination of all forms of forced and compulsory labour	As per the Govt of India policies, forced and compulsory labour is banned. The Company policies support this Principle.	There is no forced and/or compulsory labour in Tata Ryerson Limited.
Principle 5		
The effective abolition of child labour	<p>The Company's Recruitment & Selection Policy ensures that only adults over 18 years of age are employed by the Company.</p> <p>All suppliers/ Dealers/ Vendors are also informed on this issue for strict compliance.</p>	<p>1. The Company engages employees over 18 years of age only and deals with suppliers and vendors who comply with this .</p> <p>2. There is a continuous review & monitoring policy in place to ensure this.</p>
Principle 6		
Eliminate discrimination in respect of employment and occupation	We abide by our CoC and do NOT discriminate our recruitment & selection process on the basis of caste/creed/sex/religion etc.	Our HR policies on recruitment and selection are strictly non-discriminatory. Right to employment in the organization is protected & practised regardless of religion, caste, creed or sex.

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Environmental Protection

Principle 7		
Businesses should support a precautionary approach to environmental challenges	The company is pro-environmental in its approach & practices and specific policies and guidelines exist to set direction that address these Principles and beyond.	<p>1. Certain units of the Company are certified to ISO 14000 Environment System Standards.</p> <p>2. Environmental Assessment Impact study is conducted at regular intervals for different business units.</p> <p>3. Operates ETPs to neutralize effluents.</p> <p>4. TRyL products do not have any immediate adverse impact on the society, as the process of sizing the steel through slitting, cutting-to-length, roll forming and rebar are all "green".</p> <p>5. Rainwater harvesting is carried out.</p> <p>6. All e-wastes have been disposed off in an environment-friendly manner.</p> <p>5. Maintains norms of air & water emissions, noise pollution and Forest Act.</p>
Principle 8		
Undertake initiatives to promote greater environmental responsibility	Awareness amongst employees of upkeep and protection of safe & healthy environment as an inclusive work practice requirement is continuously imparted.	<p>1. Reducing usage of LDPE, HDPE by using single VCI stretch film in our Cold-Rolled Processing.</p> <p>2. Effective trial is on to replace wood with steel pallets.</p>
Principle 9		
Encourage the development and diffusion of environmentally friendly technologies		<p>1. Impact of products/operations on society is considered at the project feasibility stage itself so that correct technology can be chosen and used.</p> <p>2. Emphasis is on the use of re-generated acid for pickling operations, or even replacing pickling operations entirely with EPS technology.</p> <p>3. Effluent water is treated to eliminate harmful elements and used for other purposes.</p>

Anti-Corruption & Prevention of Bribery

Principle 10		
Businesses should work against corruption in all its forms, including extortion and bribery	<p>As a Tata Group Company, there is an elaborate system and processes on the 'Management of Business Ethics' (MBE) and all employees sign our CoC.</p> <p>The CoC spells out in clear terms the norms on gifts & donations and the ethical ways for conducting the company's business affairs such that corruption in workplace is prevented/eliminated.</p> <p>All Management and supervisory staff sign the TRyL Code of Conduct (CoC).</p> <p>At the vendor / Suppliers meets, our CoC is explained.</p>	<p>1. A copy of TRyL Code of Conduct (CoC) is given at the time of employment offer to all, read and signed by every employee.</p> <p>2. The company has a Chief Ethics Counsellor and locational Ethics Coordinators across the major locations of the Company. The name and contact number of the Company's Ethics Counsellor is displayed on all Purchase Orders of the Company to report any untoward ethical breach. A lady Ethics Coordinator has also been nominated to address ethical concerns of female employees.</p> <p>3. A "Whistle-Blower Policy" has been in place since the year 2005. It has been re-visited again in the year 2008 and appropriate changes made.</p> <p>4. Breaches on ethics, after thorough probe with full transparency, are addressed through exemplary punishment including dismissal, suspension & warnings, with feedback to the top management. This is an ongoing process.</p>