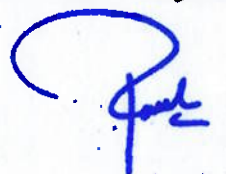


PRIVACY INFORMATION MANAGEMENT SYSTEM (PIMS) POLICY

ESL Steel Limited is committed to protecting the privacy and confidentiality of personal information and ensuring compliance with applicable data protection laws and regulations. This Privacy Information Management System (PIMS) Policy outlines our commitment to safeguarding personal information and our approach to managing privacy risks.

- This policy applies to all employees, contractors, and third-party service providers of ESL Steel Limited who have access to personal information in any format (paper, electronic, or verbal). It covers all personal information collected, processed, stored, or transmitted by the company.
- We will comply with all applicable privacy laws and regulations governing the collection, use, and disclosure of personal information.
- Personal information will only be collected for specified and legitimate purposes. ESL Steel Limited will obtain consent from individuals before collecting their personal information and will only use the information for the purposes for which it was collected.
- We will only collect and retain personal information that is necessary for the intended purpose. Personal information will be kept accurate, complete, and up-to-date, and efforts will be made to rectify inaccurate information in a timely manner.
- Appropriate technical and organizational measures will be implemented to protect personal information against unauthorized access, disclosure, alteration, and destruction. ESL Steel Limited will regularly assess and update security measures to ensure the ongoing integrity and confidentiality of personal information.
- ESL Steel Limited recognizes the rights of individuals regarding their personal information, including the right to access, correct, delete, or restrict the processing of their data. As per request from data subjects will be promptly addressed in accordance with applicable laws.
- When engaging business partners as service providers ESL Steel Limited will ensure that they adhere to similar privacy standards and rules practices. Contracts with third parties will include provisions to protect the privacy and security of personal information.
- We will provide regular privacy training and awareness programs to employees and contractors to ensure their understanding of privacy obligations and best practices.
- ESL management team is responsible for enforcing this policy. Data Privacy Officer appointed to oversee the company's privacy initiatives to conduct regular privacy assessments and ensure continuous improvement of the Privacy Information Management system.

This policy will be reviewed annually and revised as necessary to ensure its effectiveness and compliance with applicable laws and regulations. ESL Steel Limited is committed to the principles outlined in this Privacy Information Management System Policy and will continuously work towards the highest standards of privacy protection.



Ravish Sharma
Dy. CEO & WTD
ESL Steel Limited

Date: 02.05.2025, Rev. 01
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