



G R INFRAPROJECTS LIMITED

(Formerly known as G.R. Agarwal Builders and Developers Limited)

CIN : L45201GJ1995PLC098652

1st September 2023

To,
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort
Mumbai – 400001
Scrip Code: 543317

National Stock Exchange of India Limited
Exchange Plaza, Plot No. C-1
G Block, Bandra-Kurla Complex, Bandra(E)
Mumbai -400051
Symbol: GRINFRA

Sub: Business Responsibility and Sustainability Report (“BRSR”) for the Financial Year 2022-23.

Dear Sir,

Pursuant to Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the BRSR for the Financial Year 2022-23, which forms part of the Annual Report for the Financial Year 2022-23.

This is for your information and record.

Thanking you,

Yours sincerely,

For G R Infraprojects Limited

Sudhir Mutha
Company Secretary
ICSI Membership No. ACS18857

Enclosed: As above.

CORPORATE OFFICE :
2nd Floor, Novus Tower
Plot No. 18, Sector-18
Gurugram, Haryana-122015, India
Ph.: +91-124-6435000

HEAD OFFICE :
GR House, Hiran Magri, Sector-11
Udaipur, Rajasthan-313002, India
Ph.: +91-294-2487370, 2483033

REGISTERED OFFICE :
Revenue Block No. 223
Old Survey No. 384/1, 384/2, Paiki
and 384/3, Khata No. 464, Kochariya
Ahmedabad, Gujarat-382220, India

Email : info@grinfra.com | Website : www.grinfra.com



Annexure I

Business Responsibility & Sustainability Reporting

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity	L45201GJ1995PLC098652
2. Name of the Listed Entity	G R Infraprojects Limited (GRIL)
3. Year of Incorporation	22-12-1995
4. Registered Office Address	Revenue Block No. 223, Old Survey No. 384/1, 384/2 Paiki and 384/3, Khata No. 464, Kochariya, Ahmedabad, Gujarat - 382220, India
5. Corporate Address	G R Infraprojects Limited 2 nd Floor, Novus Tower, Plot No. 18, Sector 18, Gurugram, Haryana - 122015, India
6. E-mail	Info@grinfra.com
7. Telephone	91-124-6435000
8. Website	https://www.grinfra.com
9. Financial year for which reporting is being done	2022-23
10. Name of the Stock Exchange(s) where shares are listed	BSE Limited and National Stock Exchange of India Limited
11. Paid-up Capital	₹ 4834.45 lakhs
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Sudhir Mutha cs@grinfra.com +91-2942487370
13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Standalone Basis

II. Products/Services

14. Details of business activities (accounting for 90% of the turnover)

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Infrastructure Development	GRIL executes a diverse range of infrastructure projects using various models such as Engineering Procurement and Construction (EPC), Built Operate and Transfer (BOT), and Hybrid Annuity Mode (HAM). The infrastructure portfolio includes projects in the road sector, railways, metros, tunnels, power transmission, ropeways and Optic Fibre Cable (OFC) infrastructure.	93.15%

15. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1	The design, building and maintenance of transportation infrastructure, including roads, railways, bridges, tunnels, ropeways, ports, power transmission lines and runways, among others.	45203	93.15%

III. Operations**16. Number of locations where plants and/or operations/offices of the entity are situated:**

Location	Number of plants	Number of offices	Total
National	6	86*	92
International	0	0	0

* Number of offices includes all office locations and ongoing construction sites as on 31st March 2023.

17. Markets served by the entity:**a. Number of locations**

Locations	Number
National (No. of States)	23
International (No. of Countries)	0

b. What is the contribution of exports as a percentage of the total turnover of the entity? 0%

c. A brief on types of customers

- Government and semi-government organizations such as the National Highways Authority of India (NHA), Bihar State Road Development Corporation (BSRDC), and Uttar Pradesh Education for Development of Industries and Agriculture (UPEDIA) are potential customers for goods or services.
- GRIL manufacturing plants produce goods like emulsion, ad mixture, electric panels, metal crash barriers, etc. These products are produced for captive consumption as well as purchased by external customers.

IV. Employees**18. Details as at the end of Financial Year:****a. Employees and workers (including differently abled):**

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)*
EMPLOYEES						
1.	Permanent (D)	5,175	5,114	98.82%	61	1.18%
2.	Other than Permanent (E)	13	13	100.00%	0	0%
3.	Total employees (D + E)	5,188	5,127	98.82%	61	1.18%
WORKERS						
4.	Permanent (F)	10,966	10,964	99.98%	2	0.02%
5.	Other than Permanent (G)	963	963	100.00%	0	0%
6.	Total workers (F + G)	11,929	11,927	99.98%	2	0.02%

*The low gender diversity in our workforce may be due to physical demands and safety concerns of certain roles which may discourage some women from pursuing careers in this field. However, gender diversity is crucial for a successful business as it brings diverse perspectives and ideas, enhances creativity and innovation, and improves overall performance. We are committed to building a more inclusive and diverse workforce and will track our progress through regular diversity metrics and feedback from employees.

b. Differently abled Employees and workers:

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
Differently Abled Employees						
1.	Permanent (D)	8	8	100%	0	0%
2.	Other than Permanent (E)	0	0	0%	0	0%
3.	Total differently abled employees (D + E)	8	8	100%	0	0%
Differently Abled Workers						
4.	Permanent (F)	6	6	100%	0	0%
5.	Other than permanent (G)	0	0	0%	0	0%
6.	Total differently abled workers (F + G)	6	6	100%	0	0%

19. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	8	1	12.50%
Key Management Personnel*	5	0	0.00%

*Total KMP is inclusive of the Managing Director and Whole Time Directors.

20. Turnover rate for permanent employees and workers(Disclose trends for the past 3 years)

	FY 22-23 (Turnover rate in current FY)			FY 21-22 (Turnover rate in previous FY)			FY 20-21 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	29.46%	36.52%	29.53%	21.59%	24.44%	21.61%	20.49%	39.02%	20.66%
Permanent Workers	47.27%	40.00%	47.27%	38.47%	0.00%	38.47%	34.22%	0.00%	34.22%

V. Holding, Subsidiary and Associate Companies (including joint ventures)
21. (a) Names of holding / subsidiary / associate companies / joint ventures

S. No.	Name of the holding /subsidiary/ associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/ No)
1	Reengus Sikar Expressway Limited	Subsidiary	100%	No
2	Nagaur Mukundgarh Highways Private Limited	Subsidiary	100%	No
3	Varanasi Sangam Expressway Private Limited	Subsidiary	100%	No
4	GR Aligarh Kanpur Highway Private Limited	Subsidiary	100%	No
5	GR Shirsad Masvan Expressway Private Limited	Subsidiary	100%	No
6	GR Govindpur Rajura Highway Private Limited	Subsidiary	100%	No
7	GR Ujjain Badnawar Highway Private Limited	Subsidiary	100%	No
8	GR Bhimsar Bhuj Highway Private Limited	Subsidiary	100%	No
9	GR Phagwara Expressway Limited	Subsidiary	100%	No

S. No.	Name of the holding /subsidiary/ associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/ No)
10	GR Sangli Solapur Highway Private Limited	Subsidiary	100%	No
11	GR Akkalkot Solapur Highway Private Limited	Subsidiary	100%	No
12	GR Dwarka Devariya Highway Private Limited	Subsidiary	100%	No
13	GR Bilaspur Urga Highway Private Limited	Subsidiary	100%	No
14	GR Galgalia Bahadurganj Highway Private Limited	Subsidiary	100%	No
15	GR Bahadurganj Araria Highway Private Limited	Subsidiary	100%	No
16	GR Ludhiana Rupnagar Highway Private Limited	Subsidiary	100%	No
17	GR Bandikui Jaipur Expressway Private Limited	Subsidiary	100%	No
18	Porbandar Dwarka Expressway Private Limited	Subsidiary	100%	No
19	GR Gundugolanu Devarapalli Highway Private Limited	Subsidiary	100%	No
20	GR Ena Kim Expressway Private Limited	Subsidiary	100%	No
21	GR Amritsar Bathinda Highway Private Limited	Subsidiary	100%	No
22	GR Madanapalli Pileru Highway Private Limited	Subsidiary	100%	No
23	GR Bamni Highway Private Limited	Subsidiary	100%	No
24	Rajgarh Transmission Limited	Subsidiary	100%	No
25	GRIL - MSKEL (JV)	Joint Venture	60%	No
26	GR-TRIVENI (JV)	Joint Venture		No
	A - Hata - Musabani Road Project	Joint Venture	51%	No
	B - Rites NTPC Lara PKG IV-B	Joint Venture	49%	No
	C - Chaibasa -Tonto -Roam Road	Joint Venture	45%	No
27	SBEPL - GRIL (JV)	Joint Venture	35%	No
28	RAVI INFRA - GRIL - SHIVAKRITI (JV)	Joint Venture	10%	No
29	GRIL - Cobra - KIEL (JV)	Joint Venture		No
	A - Dholpur- Antri - NC Railway, Madhya Pradesh & Rajasthan	Joint Venture	51%	No
	B - Vijaywada - SC Railway, Andhra Pradesh	Joint Venture	67%	No
30	GR-Gawar (JV):	Joint Venture		No
	A - Rohtak Project	Joint Venture	25%	No
	B - Nepal Project	Joint Venture	51%	No
	C - Jhajjar Project	Joint Venture	51%	No
	D - Faridabad Project	Joint Venture	54%	No
	E - Sonapat Project	Joint Venture	25%	No
	F - Rohtak Gohana - Panipat Section	Joint Venture	30%	No
31	M/s. DIBANG POWER (LOT 4) CONSORTIUM	Joint Venture	50%	No

VI. CSR Details

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)	Yes
(ii) Turnover (₹ in Lakhs)	8,14,758.83
(iii) Net worth (₹ in Lakhs)	5,21,516.11

VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)*	FY 22-23 Current Financial Year			FY 21-22 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	0	0	NA	0	0	NA
Investors (other than shareholders)	Yes	0	0	NA	0	0	NA
Shareholders	Yes	38	0	NA	9417	0	NA
Employees and workers	Yes	0	0	NA	0	0	NA
Customers	Yes	0	0	NA	0	0	NA
Value Chain Partners	Yes	0	0	NA	0	0	NA
Other (please specify)	No	0	0	NA	0	0	NA

* <https://www.grinfra.com/>

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Circular Economy	Opportunity	The Circular Economy model of production and consumption promotes the reusing, refurbishing and recycling of existing materials and products. The transition to a circular economy will affect a change in building design and material usage. A shift in regulations and demand, combined with new technology, has the potential to reduce costs.	We have undertaken initiatives that help reduce generation of waste, to identify waste that can be reused and to dispose the waste generated in an environmentally friendly manner.	Positive

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
2	Emissions and Pollutants	Risk	Building infrastructure is an energy-intensive activity and generates significant direct and indirect greenhouse gas (GHG) emissions, including carbon dioxide and methane from fuel use. Uncontrolled pollutants and emissions during operation and associated activities impose legal and environmental risks for the company.	We have focused interventions towards monitoring and reducing energy consumption through various energy and emission saving initiatives like: <ul style="list-style-type: none"> - decrease in energy intensity ratio - increased use of renewable energy - to implement Internet of Things for plants - increased use of technology such as Video Conferencing, Electric Vehicle to commute 	Positive
3	Climate Change Risk and Adaptation	Risk	Climate Change can have adverse impact on our business and not having a correct strategy or its right implementation will severely affect the business continuity.	GRIL's mission is to achieve a sustainable society by taking on the challenges of climate change and the efficient use of resources. In response to climate change, which is particularly an urgent issue. We will work on solutions for targeting decarbonization, carbon neutrality through the value chain. As a responsible company in the creation of environmental value, we will further accelerate our initiatives aimed at realizing these goals.	Positive
4	Water Management	Risk	Water is a critical resource required during construction, operation and maintenance. Water use for various business activities impacts the quality and quantity of local water resources. Improper discharge of water can result in contamination of water bodies. This in turn increases the operating cost and imposes a legal risk to the company.	We are undertaking initiatives that help to reduce, reuse and recycle water to minimize freshwater consumption.	Positive
5	Consumer Experience	Opportunity	To distinguish ourselves as market leaders and as the best infrastructure company.	GRIL has always ensured the timely and quality delivery in all its projects. It has helped us to build trust amongst our customers and the final consumers of the infrastructure we build. We are also diversifying to take our experience into other sectors and help build a better India.	Negative

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6	Diversity & Inclusion	Opportunity	A company's high diversity and inclusion rate reflects employees' sense of belonging and fairness within the company. Improving diversity and inclusion helps companies to support vulnerable groups resulting in community, brand image creation for the company.	GRIL is managing its workplaces and maximizing the potential of its diverse talent pool in line with our basic philosophy that "Health and Safety Always Come First." We respect all people, including co-creation partners and those who support the value chain, contributing to a society in which everyone can work safely and with peace of mind. Continuous efforts are being put in place to maintain healthy ratio of female employees across levels and also employment of people with dis-abilities.	Positive
7	Impact on Local Community	Opportunity	A Needs Assessment done prior to project execution gives us the voice and stance of the community along with their consent to operate	The focus of GRIL is to create a long-term sustainable impact on the community through regular interactions, increased CSR spend, etc.	Positive
8	Employee Satisfaction and Retention	Risk	A higher employee retention rate reflects good company policies and practices that lead to higher employee satisfaction. However, a high attrition rate indicates low employee satisfaction. High attrition also increases the cost of replacing and training the employees, increases the risk of business getting impacted in case of critical roles and may reflect negatively on investors.	We are developing mechanisms to gauge employee sentiments and feedback. To drive change across the organization, we have established a digitally enabled and transparent Performance Management System to provide feedback to employees which enable them to engage with their teams better and address any concerns. These insights have led us to create focus areas for action on a quarterly basis which is socialized with the leadership team and progress on the same is updated periodically.	Positive
9	Product Quality and Design	Risk	Companies in this industry have a vital commitment to safeguard their projects through the provision of engineering, design, architectural and other services. Only by ensuring compliance with safety standards can they demonstrate professional excellence and guarantee top-tier results. Poor design and construction of buildings or infrastructure can have devastating consequences- from loss of life, to decreased property value, to economic insecurity.	Our endeavour is to deliver the projects with highest quality, design and safety standards. Our proactive risk prevention approach during the designing phase, rapid and effective mitigation of safety and quality risks identified in the field and our governance and coordination among our projects helps to deliver quality output.	Negative

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
			<p>Taking the time for proper planning is essential in order to prevent these disasters from occurring. When it comes to structural integrity and safety, companies that don't do well can face high costs for redesigning or repair, as well as legal liabilities and damage to their reputation, which could harm their growth prospects. As a consequence of climate change, companies in the construction and infrastructure industry must now consider how changing weather patterns could damage their projects – potentially endangering public safety. Compliance with the minimum codes and standards may not be enough to retain reputational value.</p>	<p>The Quality Assurance and Quality Control teams ensure that work done is as per quality assurance plan and non-conformances are reported and actioned upon timely.</p>	<p>Negative</p>
10	Human Rights and Labor Management	Risk	<p>Changing regulations around human rights pose as a challenge.</p>	<p>GRIL is committed to good citizenship and promoting better working conditions for all. We take robust and thorough measures to protect our employees. We can also promote positive change by encouraging our business partners and communities to respect human rights as well. We ensure safe, healthy and sustainable working conditions; require a respectful, harassment-free workplace; prohibit discrimination; deliver employee compensation and benefits to attract and retain strong talent; prohibit child or forced labor and ensure our business partners share this commitment; and promote responsible sourcing practices for our suppliers.</p>	<p>Negative</p>
11	Operational Health and Safety	Risk	<p>This can lead to loss of human life and can hamper productivity for the company.</p>	<p>Our Zero Tolerance Policy, strict adherence to Safety norms, employee health and safety initiatives help protect our employees and ensure our compliance with applicable laws and regulations. Periodic trainings both for employees and workers and regular monitoring at sites provide assurance to the stakeholders.</p>	<p>Negative</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
12	Sustainable Supply Chain/ Responsible Purchasing	Risk	Setting up a resilient supply chain, due diligence of suppliers before onboarding, continuous interaction and discussion on related topics.	GRIL has developed general terms & conditions including suppliers' responsibility to comply with the environment, safety and other related regulations. The Company has developed a process of conducting due diligence and technical evaluation of suppliers before onboarding. Through this process GRIL tries to communicate and emphasise on the importance of responsible sourcing to the suppliers. However, considering the industry, it's a long way to go through continuous dialogue and education to the suppliers.	Positive
13	Compliance and Business Ethics	Risk	The key issues relevant to business ethics are management of business ethics issues such as fraud, executive misconduct, corrupt practices, money laundering, or anti-trust violations. Ethics violations can lead to investigations, hefty fines, settlement costs, and damage to reputation.	GRIL is committed to the highest standards of compliance - in all places, at all times. We ensure strict adherence with GRIL Code of conduct through periodic communication, trainings and review.	Negative
14	Corporate Governance	Risk	Businesses are assessed based on their performance across all key governance issues, which include ownership & control, Board pay, accounting, business ethics, and tax transparency. This topic examines the effect that a company's corporate governance and business ethics practices have on its shareholders and other investors.	GRIL Board of Directors oversees the strategic direction of the company to advance the long-term interests of the company and its various stakeholders. Our Board, Audit Committee and Risk Managing Committee are unitedly responsible for the Enterprise Risk Management Framework, Department Policies and Standard Operating Procedures, maintaining segregation of duties. The Board and various Committees regularly review major risks.	Positive
15	Data Security, Privacy and Cybersecurity	Risk	Companies are assessed based on the amount of personal data they collect, their exposure to evolving or increasing privacy regulations, their vulnerability to potential data breaches, and their data protection systems.	GRIL respects the privacy of the people from whom it collects and processes personal information and ensures the same through data privacy policy and various control mechanisms. Protecting our company, employees and customers begins with our Cybersecurity approach. As part of our Digital Roadmap and through cyber defence strategy we detect, mitigate and respond to cyberthreats. We engage industry experts to continually improve our cyber capabilities and processes. We conduct regular assessments to validate defensive measures, employing a comprehensive risk management framework to enable effective escalation and management.	Negative

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	N	Y	Y
b. Has the policy been approved by the Board? (Yes/ No)	Y	Y	Y	Y	Y	Y	N	Y	Y
c. Web Link of the Policies, if available	https://www.grinfra.com/policies/								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	N	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	N	N	Y	Y	N	N	N	Y
4. Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.		ISO 9001	ISO 45001			ISO 14001			
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	Our organization acknowledges the significance of establishing targets to assess advancement towards achieving all the principles of the NGRBC. Considering that we are in our initial year of ESG adoption, we intend to specify our objectives and targets in the upcoming reporting period. We recognize the need to align our ESG efforts with our business goals, and we are committed to implementing a comprehensive and effective ESG strategy that ensures sustainability and creates long-term value for all our stakeholders. We are dedicated to enhancing our ESG practices and performance and look forward to sharing our progress in the future.								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	NA								
Governance, leadership and oversight									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)	<p>As an organization, we understand the significance of environmental, social, and governance practices in fostering a better future for our community. Our operations are centered around the integration of ESG practices through various initiatives aimed at achieving our sustainability goals.</p> <p>We are proud to uphold eco-friendly practices, such as incorporating GPS-enabled vehicles and solar panels, to effectively reduce carbon emissions and minimize fuel consumption. Furthermore, our planned green building in Gurugram, Haryana demonstrates our commitment to promoting green construction practices and driving the green building movement in the country.</p> <p>Our CSR initiatives cover various sectors such as education, animal healthcare, sports, and rural development. All CSR initiatives of the Company are being undertaken either by Company on its own or through G R Infra Social Welfare Trust.</p> <p>We hold our employees and workers in the highest regard, acknowledging them as invaluable assets fundamental to our success. We maintain a culture of fairness and equality by providing consistent food standards, conducting regular health check-ups, health awareness campaigns, and employee engagement activities. We also prioritize their professional growth and development through timely training programs on safety, quality, behavioural and functional aspects.</p>								

Corporate governance is a top priority for us and we aim to achieve transparency and governance goals. We provide the opportunity for all shareholders to attend our quarterly meetings with investors. We also follow standard compliance practices as per applicable laws, which are reviewed and assessed by our audit mechanism. This helps our organization accomplish its objectives by bringing a systematic and disciplined approach to evaluate and improve the effectiveness of risk management, control, and regulatory compliance processes.

As an organization, we are committed to building upon our progress and making further positive contributions to the environment, society, and governance in the years to come. We believe that by integrating ESG practices into our operations, we can create a sustainable future.

Ajendra Kumar Agarwal
Managing Director

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).	1- Mr. Bharat Aggarwal Senior Vice President- HR and Admin 2- Mr. Balakrishnan Biju Senior General Manager- Safety
9. Does the entity have a specified Committee of the Board/Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes, the company has the following committees: 1. Corporate Social Responsibility Committee 2. Environmental Social and Governance Committee

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify) undertaken by Director / Committee of the Board/Any other Committee																	
	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	1	2	3	4	5	6	7	8	9	1	2	3	4	5	6	7	8	9
Performance against above policies and follow up action																		
	Committee of Board									Quarterly								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances																		
	Committee of Board									Quarterly								

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
	All policies are listed and approved by the Board and reviewed by our chartered accountant firm (Mahajan and Aibara and Protiviti India) as well as by internal audit team.								

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

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the Principles material to its business (Yes/No)	No	No	No	No	No	No	Yes	No	No
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	No	No	No	No	No	No	No	No	No
The entity does not have the financial or/ human and technical resources available for the task (Yes/No)	No	No	No	No	No	No	No	No	No
It is planned to be done in the next financial year (Yes/No)	No	No	No	No	No	No	No	No	No
Any other reason (please specify)	NA	NA	NA	NA	NA	NA	NA	NA	NA

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

PRINCIPLE 1: BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH INTEGRITY, AND IN A MANNER THAT IS ETHICAL, TRANSPARENT AND ACCOUNTABLE

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics/ principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	3	Awareness session on corporate governance, BRSR awareness, code of conduct	100%
Key Managerial Personnel	3	Awareness session on corporate governance, BRSR awareness, code of conduct	100%
Employees other than BoD and KMPs	114	Quality, Health and safety, technical (system and software), Behavioural, BRSR awareness, Onboarding, Code of conduct	100%
Workers	228	Quality, Health and safety, code of conduct	97.43%

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

Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	NA	NA	0	NA	NA
Settlement	NA	NA	0	NA	NA
Compounding fee	NA	NA	0	NA	NA
Non-Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions		Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	NA	NA		NA	NA
Punishment	NA	NA		NA	NA

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
NA	NA

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

Yes
 Section 4 and 5 of the Code of Conduct Policy covers anti-corruption and anti-bribery. Additionally, we have a Gift Policy which prohibits corruption and bribery. It is an internal HR policy, applicable to all employees.
 Web-link: <https://www.grinfra.com/policies/>

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

	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
Directors	0	0
KMPs	0	0
Employees	3*	0
Workers	0	0

* FIR no. RC 216 2022 A 007 dated June 12, 2022 has been filed by the Central Bureau of Investigation, Anti-Corruption Unit – I under Section 120-B of the IPC and Sections 7, 8, 9, 10 and 12 of the Prevention of Corruption Act, 1988 against certain employees and representatives of GRIL (the "Representatives"), GRIL, certain officials of the NHAI and others. It has been alleged that the Representatives along with certain unknown public servants have been involved in suspected offences such as criminal conspiracy, bribing of public servants, bribing of public servants by commercial organization. GRIL has received a summon to appear before the Court of Special Judge, CBI, Assam. CBI has filed its report u/s 173 of the CrPC. Matter pending adjudication before CBI Court.

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

	FY 22-23 (Current Financial Year)		FY 21-22 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA

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

On June 12, 2022, CBI took into custody, two NHAI officials on certain allegations related to demanding & accepting bribe after registering the FIR under sections 7, 8, 9, 10 and 12 of the Prevention of Corruption Act, 1988 read with section 120B of the Indian Penal Code, 1860 dated June 12, 2022. In relation to above, CBI also took into custody three employees of the Company. All the 3 employees of our Company have been granted bail from Ld. Court in the month of September 2022.

The Ld. CBI Court has taken cognizance of report filled under Section 173 of Criminal Procedure Code, 1973 (CrPC) in this matter on 11.08.2022 by CBI and issued summons. Company appeared through its authorized representative and received the copy of the report filed under Section 173 of CrPC along with the set of documents which were filed by CBI.

The Management had reviewed all documents obtained from Ld. Court and performed its detail assessment on the matter and basis of the same, they believe that there would not be any significant impact on the operation and financial position of the Company. Currently, the matter is pending with Ld. Court and the company is appearing in the Ld. court through authorised representative.

Leadership Indicators

1. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If Yes, provide details of the same. Yes,
Via the Code of Conduct for Senior Management Policy

PRINCIPLE 2: BUSINESSES SHOULD PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE

Essential Indicators

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

	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)	Details of improvements in environmental and social impacts
R&D	0%	0%	NA
Capex	27.20%	25.82%	1- Installed sewage plant 2- Shifted from diesel to electricity for lighting source 3- Procured electric welding machine

2. a.	Does the entity have procedures in place for sustainable sourcing? (Yes/No)	No
b.	If yes, what percentage of inputs were sourced sustainably?	NA
3.	Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.	NA
4.	Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.	No

PRINCIPLE 3: BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS

Essential Indicators

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	5,114	5,114	100%	5,114	100%	0	0%	0	0%	0	0%
Female	61	61	100%	61	100%	61	100%	0	0%	0	0%
Total	5,175	5,175	100%	5,175	100%	61	1%	0	0%	0	0%
Other than Permanent employees											
Male	13	13	100%	13	100%	0	0%	0	0%	0	0%
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	13	13	100%	13	100%	0	0%	0	0%	0	0%

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent workers											
Male	10,964	10,964	100%	10,964	100%	0	0%	0	0%	0	0%
Female	2	2	100%	2	100%	2	100%	0	0%	0	0%
Total	10,966	10,966	100%	10,966	100%	2	0%	0	0%	0	0%
Other than Permanent workers											
Male	963	0	0%	963	100%	0	0%	0	0%	0	0%
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	963	0	0%	963	100%	0	0%	0	0%	0	0%

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

Benefits	FY 22-23 (Current Financial Year)			FY 21-22 (Previous Financial Year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
Provident Fund (PF)	100%	100%	Yes	100%	100%	Yes
Gratuity	100%	100%	Yes	100%	100%	Yes
Employee's State Insurance (ESI)*	1.04%	2.33%	Yes	1.12%	2.25%	Yes
Others – Please Specify	0%	0%	NA	0%	0%	NA

* All personnel who are eligible for ESI have been covered by the ESI Scheme.

3. Accessibility of workplaces

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

No.
However, steps are being undertaken to progressively enable the office premises and physical infrastructure more conducive and accessible to differently abled employees.

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

Yes
<https://www.grinfra.com/policies/>

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	0%	0%	0%	0%
Female	100%	0%	0%	0%
Total	100%	0%	0%	0%

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes,
Other than Permanent Workers	We have an online grievance redressal mechanism called "Sahyog". This is an online portal where any employee can raise their grievances. Raised grievances will be routed through central HR to respective project location to close the employee grievances.
Permanent Employees	
Other than Permanent Employees	

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

Category	FY 22-23 (Current Financial Year)			FY 21-22 (Previous Financial Year)		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees/ workers in respective category, who are part of association (s) or Union(D)	% (D / C)
Total Permanent Employees	5,175	0	0%	5,556	0	0%
- Male	5,114	0	0%	5,503	0	0%
- Female	61	0	0%	53	0	0%
Total Permanent Workers	10,966	0	0%	12,153	0	0%
- Male	10,964	0	0%	12,150	0	0%
- Female	2	0	0%	3	0	0%

8. Details of training given to employees and workers:

Category	FY 22-23 (Current Financial Year)					FY 21-22 (Previous Financial Year)				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	5,127	2,650	51.69%	1,425	27.79%	5,515	2,831	51.33%	1,966	35.65%
Female	61	41	67.21%	2	3.28%	53	30	56.60%	0	0.00%
Total	5,188	2,691	51.87%	1,427	27.51%	5,568	2,861	51.38%	1,966	35.31%
Workers										
Male	10,964	10,964	100.00%	0	0.00%	12,150	4,265	35.10%	0	0%
Female	2	0	0.00%	0	0.00%	3	0	0.00%	0	0%
Total	10,966	10,964	99.98%	0	0.00%	12,153	4,265	35.09%	0	0%

For employees both permanent and other than permanent categories were provided the trainings. For workers only permanent category were provided the trainings.

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

Category	FY 22-23 (Current Financial Year)			FY 21-22 (Previous Financial Year)		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	5,114	2,139	41.83%	5,503	2,150	39.07%
Female	61	40	65.57%	53	35	66.04%
Total	5,175	2,179	42.11%	5,556	2,185	39.33%
Workers						
Male	10,964	0	0%	12,150	0	0%
Female	2	0	0%	3	0	0%
Total	10,966	0	0%	12,153	0	0%

10. Health and safety management system:

a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?	<p>Yes, the safety plan includes establishing hazard identification, risk assessment and controls. Checklist are developed to ensure safe practices.</p> <p>The Health, Safety and Environment policy (HSE policy) upholds the company's goal to protect the health and safety of all those associated with our business activities and to minimize adverse impact on the environment.</p> <p>GRIL has implemented management systems in accordance with ISO 45001:2018 to ensure compliance with our HSE Policy, reflecting our vision and philosophy. These systems define mandatory requirements for systematic management and execution within our organization.</p>
b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?	<p>The company has various levels of site inspection checklist which are prepared for each project. It includes night works, launching gantry, accommodation camp inspection, monthly first aid, jacking platform, piling inspection, excavation, confined space, traffic management, work permit, lifting permit, all these have questionnaire related to work related hazards and risk assessment.</p>
c. Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Y/N)	Yes
d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)	Yes

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

Safety Incident/Number	Category	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
Lost Time Injury Frequency Rate(LTIFR) (per one million-person hours worked)	Employees	0.010	0.004
	Workers	0.200	0.092
Total recordable work-related injuries	Employees	14	17
	Workers	29	41
No. of fatalities	Employees	0	0
	Workers	6	3
High consequence work-related injury or ill-health (excluding fatalities)	Employees	2	17
	Workers	16	35

- 12. Describe the measures taken by the entity to ensure a safe and healthy workplace.** GRIL has developed standard checklist, standard operating procedures, regular training programs and site inspection to create awareness and ensure the safety of both own employees /workers and sub-contractors. It includes guidelines on night works, launching gantry, working at height, accommodation for employees/workers, camp inspection, monthly first aid, availability of Ambulance, Tie-up with nearby hospitals, necessary licences and work permits, canteen facility, etc. The above measures are also ensured through regular audits.
- Also the company has Integrated Management system (Quality, Environment, Health & Safety) Policy for employees and workers which includes zero tolerance towards any non-compliance.

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

	FY 22-23 (Current Financial Year)			FY 21-22 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	1	1	NIL	0	0	NIL
Health & Safety	0	0	NIL	0	0	NIL

- 14. Assessments for the year:**
- | | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|---|
| Health and safety practices | 63% |
| Working Conditions | 63% |

- 15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.**
- At our organization, we place a high priority on incident reporting and investigation as a means of identifying potential areas for improvement. We conduct thorough investigations to establish appropriate corrective and preventative actions, and we believe in sharing the lessons learned across all project sites to promote a culture of safety and continuous improvement. As part of this effort, we also regularly revise our Hazard Identification, Risk Assessment, and Control (HIRAC) and Standard Operating Procedure (SOP) protocols to ensure that our procedures are up to date and reflective of the latest best practices in the industry.
- The Company also ensures the adequate insurance cover and motivate the sub-contractors to ensure the labour related statutory compliances.

Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of
- | | |
|---------------------|--|
| (A) Employees (Y/N) | Yes, as per the Workmen's Compensation Act, 1923 |
| (B) Workers (Y/N) | |

PRINCIPLE 4: BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL ITS STAKEHOLDERS

Essential Indicators

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

As an infrastructure company, we recognize the importance of stakeholder identification in the success of our projects. The process begins with a comprehensive analysis of our operations to identify key stakeholders, including employees, customers, shareholders, suppliers, vendors, government entities, and regulatory authorities. We also consider the impact of our projects on the local communities where we operate, and strive to engage with them as valuable stakeholders in our communication efforts. By understanding the needs and concerns of our stakeholders, we can proactively address their expectations, minimize potential risks, and foster long-term relationships that are essential to our success. Our stakeholder identification process is an ongoing effort that helps us to stay informed, engaged, and responsive to the evolving needs of our stakeholders.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees and Workers	No	Email, SMS, Meetings, Website, Social Media, Circulars, etc	Regular	Employee Engagement: Various initiatives related to employees' growth, benefits, professional development, learning & development, internal communication, etc
Customers	No	Email, SMS, Meetings, Website, Business interactions, Advertisement	Regular	Pertaining to projects (delivery, timeline, challenges, etc)
Shareholders and Investors	No	General Meeting, Investors Meet, Email, Website, Newspaper, Stock Exchange Filings	Annual, Periodic	GRIL Performance
Suppliers & Vendors	No	Email, SMS, Business Meetings	Regular	Delivery status, supply chain issues, compliance, development
Government and Regulatory Bodies	No	Email, Meetings, Website, Annual Report, Stock Exchange Filings, Industry Body Representations	As and when required	Statutory compliance, reporting requirements, engaging with the government for the growth and benefit of the Infrastructure Industry, etc
Local Communities	May be (in some cases)	Onsite Community Meetings, Direct engagement through project teams	Regular	Corporate Social Responsibilities

PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS**Essential Indicators**

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

Category	FY 22-23 (Current Financial Year)			FY 21-22 (Previous Financial Year)		
	Total (A)	No. employees workers covered (B)	% (B / A)	Total (C)	No. employees workers covered (D)	% (D / C)
Employees						
Permanent	5,175	0	0%	5,556	0	0%
Other than permanent	13	0	0%	12	0	0%
Total Employees	5,188	0	0%	5,568	0	0%
Workers						
Permanent	10,966	0	0%	12,153	0	0%
Other than permanent	963	0	0%	740	0	0%
Total Workers	11,929	0	0%	12,893	0	0%

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

Category	FY 22-23 (Current Financial Year)					FY 21-22 (Previous Financial Year)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No.(B)	% (B/A)	No. (C)	% (C/A)		No.(E)	% (E/D)	No.(F)	% (F/D)
Employees										
Permanent										
Male	5,114	0	0%	5,114	100%	5,503	0	0%	5,503	100%
Female	61	0	0%	61	100%	53	0	0%	53	100%
Other than permanent										
Male	13	0	0%	13	100%	12	0	0%	12	100%
Female	0	0	0%	0	0%	0	0	0%	0	0%
Workers										
Permanent										
Male	10,964	0	0%	10,964	100%	12,150	0	0%	12,150	100%
Female	2	0	0%	2	100%	3	0	0%	3	100%
Other than permanent										
Male	963	963	100%	0	0%	740	740	100%	0	0%
Female	0	0	0%	0	0%	0	0	0%	0	0%

3. Details of remuneration/salary/wages, in the following format:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	7	3,20,000	1	3,60,000
Key Managerial Personnel*	5	3,89,41,583	0	0
Employees otherthan BoD and KMP	5,125	3,84,000	61	6,96,000
Workers	10,964	2,56,800	2	1,69,776

*Total KMP is inclusive of the Managing Director and Whole Time Directors.

4. **Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)** Yes, we have the Internal Complaints Committee (ICC) as required for Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (PoSH).
5. **Describe the internal mechanisms in place to redress grievances related to human rights issues.** At GRIL, we are proud to offer the Sahyog mechanism, a highly efficient and user-friendly online portal designed to address any employee grievances. With Sahyog, our valued team members can voice their concerns securely and confidentially. Once a grievance is raised, our central HR team will promptly route the matter to the respective project location, ensuring a swift and satisfactory resolution. We are committed to fostering a positive work environment where our employees feel heard, valued, and respected.

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

	FY 22-23 (Current Financial Year)			FY 21-22 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Child Labour	0	0	NA	0	0	NA
Forced Labour/Involuntary Labour	0	0	NA	0	0	NA
Wages	7	3	NA	0	0	NA
Other human rights related issues	0	0	NA	0	0	NA

7. **Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.** In Sahyog, if any grievance is raised by the employee, then it comes directly to Single point of contact (SPOC) of Central HR in the Corporate Office. If any grievance has some sensitivity and there is need to maintain the confidentiality of the names of concerned persons, the Human Resources Business Partner (HRBP) and Chief Human Resources Officer (CHRO) deals with those grievances accordingly.

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

9. **Assessments for the year:**

	%age of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	70%
Forced/involuntary labour	70%
Sexual harassment	100%
Discrimination at workplace	100%
Wages	100%
Others – please specify	0%

10. **Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.**
- Subcontractor Work Order Terms & Conditions includes the clause to comply with all applicable statutory rules & regulations.
 - Compliance to ensure the same is done by the site Human Resource department through regular site visit and inspection of ID cards of the labour deployed.

PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

Essential Indicators

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

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
Total electricity consumption (A)	87,625.96 (GJ)	94,263.70 (GJ)
Total fuel consumption (B)	30,93,318.88 (GJ)	35,24,995.96 (GJ)
Energy consumption through other sources (C)	0	0
Total energy consumption (A+B+C)	31,80,944.84 (GJ)	36,19,259.66 (GJ)
Energy intensity per rupee of turnover (Total energy consumption/turnover in lakhs)	3.81	4.49
Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.		No

2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.
- No

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

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
(i) Surface water	30,963.00	43,617.00
(ii) Groundwater	3,57,807.20	2,31,627.13
(iii) Third party water	1,55,859.36	1,13,743.74
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	5,44,629.56	3,88,987.87
Total volume of water consumption (in kilolitres)	7,10,563.16	5,30,471.47
Water intensity per rupee of turnover (Water consumed / turnover in lakhs)	0.85	0.66
Water intensity (optional) – the relevant metric may be selected by the entity		
Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.		No

4. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.
- No

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

Parameter	Please specify unit	FY 22-23* (Current Financial Year)	FY 21-22* (Previous Financial Year)
Nox	Parts per million by volume	0.02	0.02
Sox	Parts per million by volume	0.02	0.02
Particulate matter (PM)	Microgram per cubic metre	75.07	70.15
Persistent organic pollutants (POP)	Microgram per cubic metre	0.00	0.00

Parameter	Please specify unit	FY 22-23* (Current Financial Year)	FY 21-22* (Previous Financial Year)
Volatile organic compounds (VOC)	Microgram per cubic metre	0.00	0.00
Hazardous air pollutants (HAP)	Microgram per cubic metre	0.00	0.00
Others- PM 2.5	Microgram per cubic metre	36.30	42.39
Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.		No	

*We do not continuously monitor the above-mentioned emissions. However, we conduct periodic monitoring of other emissions. The data presented above represents the averages obtained from our most recent monitoring.

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

Parameter	Unit	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	2,07,208.54	2,43,431.23
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	19,287.93	21,209.33
Total Scope 1 and Scope 2 emissions per rupee of turnover in lakhs		0.27	0.33
Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.		No	

* EPA's GHG Emission Factors Hub has been used for the purpose of Scope 1 GHG Emissions calculations. CEA's CDM - CO₂ Baseline Database User Guide Version 18 has been used for the purpose of Scope 2 GHG Emissions calculations.

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

- Yes
- 500 KW solar Roof top Solar Power plant installed. Of which 40000KWH is consumed in-house.
 - We have developed a portable solar power source product of 400 Watts, which will replace the need for DG set for lighting at remote locations. This would result in diesel savings of 10Ltr per day.
 - Sand Conservation.
 - Adblue fluid to reduce/ remove carbon emissions. ADBLUE/AUS32 is a liquid used to reduce the air pollution created by a diesel engine. We installed a new Unit for inhouse production of AdBlue which is used with diesel to reduce emissions of the Company.

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

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
Plastic waste (A)	37.28	95.07
E-waste (B)	4.22	4.32
Bio-medical waste (C)	6.56	4.33
Construction and demolition waste (D)	11,942.62	6,054.03
Battery waste (E)	61.43	53.20
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	974.57	1,041.06

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
Other Non-hazardous waste generated (H) - Scrap	8,858.71	10,565.1
Total (A+B + C + D + E + F + G + H)	21,885.39	17,817.11

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)

Category of waste		
(i) Recycled	13,054.98	10,628.19
(ii) Re-used	6,414.56	3,959.48
(iii) Other recovery operations	24.61	0.85
Total	19,494.15	14588.52

For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)

Category of waste		
(i) Incineration	0.06	0
(ii) Landfilling	1,074.42	442.14
(iii) Other disposal operations	1108.4	2,477.66
Total	2,182.88	2,919.21

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

No

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

- 1) Plastic waste, E-waste and hazardous waste generated at operation sites are stored at dedicated warehouse and details are sent to the Head Office (HO) for further action.
- 2) In some cases the HO sells to registered vendors where reuse is not possible and in other cases, as per policy the waste is reused and recycled.

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

S.No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
1	Govindpur Rajura	Construction activities	Yes
2	Bilaspur Urga	Construction activities	Yes
3	Mej River-Junction	Construction activities	Yes

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Name – Shirsad Masvan Expressway Details – Construction of Eight lane access controlled Expressway from Km 26.582 to Km 50.700 of Main Expressway and Km 0+0 to Km 3+000 of SPUR (Shirsad to Masvan Section of Vadodara Mumbai Expressway) in the State of Maharashtra on Hybrid Annuity Mode under Bharatmala Pariyojana (Phase II-Package XIII)	MoEFCC F. No. No 10-80/2016-IA- III (Proposal No. IA/MH/ MIS/59976/ 2016)	06-07-2020	Yes	Yes	NA
Name – Metro Construction, Bangalore Metro Rail Project Phase II – Reach 6 Details – Construction of elevated structures of length 7.50 kms (approx.) From Gottigere to Swagath road cross including Kothnur depot entry line, road widening & allied works and 5 numbers of metro stations of Bangalore metro rail project, phase-2 (balance works)	-	01-08-2017	Yes	Yes	NA
Name – Ganga Path Details – Construction of 4-lane elevated road as part of under construction Ganga path (Digha to Deedarganj) from Dulli Ghat (km 13+525.79) to Nuruddin Ghat (km 16+975.79) from Dharamshala Ghat (km 19+890) to old NH-30 (km 20+530.5) along with connectivity to Ashok Rajpath to Kangan Ghat (km 15+700) and Patna Ghat (km 16+600) with facilities at Patna in the state of Bihar on EPC mode	-	27-11-2011	No	No	NA
Name – Mej river Details – Construction of eight lane carriageway starting near major bridge on Mej river to junction with SH-37a ch:331+030 to 359+170) section of Delhi - Vadodara access controlled green field alignment (NH-148n) on EPC mode under Bharatmala Pariyojana in the state of Rajasthan. (package –12).	(As amended on 04/05/1994, 10/04/1997, 27/1/2000 and 13/12/2000)	01-05-2021	No	Yes	Environmental Impact Assessment Notification – 2006 Archive The Official Website of Ministry of Environment, Forest and Climate Change, Government of India (moef.gov.in)

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Name – Naviganj – Mitrasen Details – Four laning of Aligarh-Kanpur section from Km 289.000 (Design Chainage 302.108) to Km 356.000 (Design Chainage 373.085) (Package-IV from Naviganj - Mitrasen) of NH-91 in state of Uttar Pradesh on Hybrid Annuity Mode under Bharatmala Pariyojana	(As amended on 04/05/1994, 10/04/1997, 27/11/2000 and 13/12/2000)	18-02-2021	No	Yes	Environmental Impact Assessment Notification – 2006 Archive The Official Website of Ministry of Environment, Forest and Climate Change, Government of India (moef.gov.in)

*The EIA listed above have been conducted by the NHA/ or the respective authority. We begin our projects post environmental clearance.

12. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). Yes

If not, provide details of all such non-compliances, in the following format:

S. No.	Specify the law/ regulation/ guidelines which was not complied with	Provide details of the non- compliance	Any fines / penalties/ action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
NA				

Leadership Indicators

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
From renewable sources		
Total electricity consumption (A)	1,901.84	0.00
Total fuel consumption (B)	0.00	0.00
Energy consumption through other sources (C)	0.00	0.00
Total energy consumed from renewable sources (A+B+C)	1,901.84	0.00
From non-renewable sources		
Total electricity consumption (D)	85,724.12	94,263.70
Total fuel consumption (E)	30,93,318.88	35,24,995.96
Energy consumption through other sources (F)	0.00	0.00
Total energy consumed from non-renewable sources (D+E+F)	31,79,043.00	36,19,259.66
Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.		No

PRINCIPLE 7 BUSINESSES, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations. 1 (One)
- b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

S.No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Construction Industry Development Council	National

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

Name of authority	Brief of the case	Corrective action taken
NA	NA	NA

PRINCIPLE 8: BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

Essential Indicators

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

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes / No)	Relevant Web link
NA					

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

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

3. Describe the mechanisms to receive and redress grievances of the community. **Stakeholder Engagement Plan** - We engage with the local community through various means like onsite community meetings and direct engagement through project teams. The community members can reach out to us through letters, email and in person for any of their concerns or grievances.

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

	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
Directly sourced from MSMEs/ small producers	17%	10%
Sourced directly from within the district and neighbouring districts	46%	42%

Leadership Indicators

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

S. No.	State	Aspirational District	Amount spent (In ₹)
1	Rajasthan	Baran	1,40,00,000
2	Uttarakhand	Haridwar	21,00,000

2. Details of beneficiaries of CSR Projects:

S. No.	Name of CSR Project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
1	Construction of Hospital Block for Cows at Shri Mahaveer Gaushala Kalyan Sansthan at Baran, Rajasthan	Not available	Not available
2	Construction of Godown to store Dry husk at Sri Krishan Gau Sewa Samiti at Churu, Rajasthan	Not available	Not available
3	Construction of Gaushala at Sidhmukh (Shri Shiv Gaurakshak Gaushala) at Churu, Rajasthan	Not available	Not available
4	Financial Support for promotion of Education at New Delhi	Not available	Not available
5	Financial Support by providing Annual Education Fees for 10 Students of Gyan Mandir Samiti at Udaipur, Rajasthan	Not available	Not available
6	Contribution by providing venue and distributing educational materials at Udaipur, Rajasthan	Not available	Not available
7	Construction of Classrooms at Chanani Senior Secondary Govt. School at Sidhmukh, Churu, Rajasthan	Not available	Not available
8	Contribution of land for setting up a school at Bahadurpur, Ujjaina, Kannauj, Uttar Pradesh	Not available	Not available
9	Financial Support for Construction of Academic Block, Shree Prakhar Paropkar Mission Trust at Haridwar, Uttarakhand	Not available	Not available
10	Construction of Smt. Shakuntala Devi Govt. College Sidhmukh at Churu, Rajasthan	Not available	Not available
11	Financial support provided to Society for Education of the Differently Abled (SEDA) for procurement of various necessary items at Udaipur, Rajasthan	Not available	Not available
12	Construction of Room at Govt. Girls Sr. Sec. School at Udaipur, Rajasthan	Not available	Not available
13	Financial Support for Construction and Building of Infrastructure for Education and Hostel Facilities for students (Sri Aurobindo Divine Life Trust) at Jhunjhunu, Rajasthan	Not available	Not available
14	Maintenance of Children Ward at Maharana Bhupal (MB) Government Hospital at Udaipur, Rajasthan	2,954	Not available
15	Maintenance of Mohini Devi Chachan Rajkiya Samudayik Kendra at Churu, Rajasthan	77,881	Not available
16	Installation of Oxygen Generator Plant at Seth Baldev Das District Hospital and District Women's Hospital at Saharanpur, Uttar Pradesh	Not available	Not available
17	Support to Old Age Persons through Sewa Samiti at Pali, Rajasthan	Not available	Not available
18	Installation of Inverter & Fan in community centres at various rural locations at Muzaffarnagar, Uttar Pradesh	Not available	Not available
19	The excavation of pond under Amrit Sarovar Scheme for water conservation at Ratlam, Madhya Pradesh	Not available	Not available
20	Reconstruction of Pond at Sidhmukh for water conservation at Churu, Rajasthan	Not available	Not available
21	Financial support to Scouts & Guides for sports activities at Udaipur, Rajasthan	Not available	Not available
22	Installation of Gym Equipments and Kabaddi Mats at Muzaffarnagar, Uttar Pradesh	Not available	Not available
23	Contribution for promotion of sports (Kabaddi) at Chandrapur, Maharashtra	Not available	Not available

PRINCIPLE 9: BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER

Essential Indicators

- | | |
|--|--|
| 1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback. | All the complaints raised in form of Non Conformance Reports (NCR) are received at site office. Upon receipt of such complaints, concerned person appointed takes necessary action within given timeline which is witnessed jointly with consumer. At the end of each month, summary of complaints prepared including actions taken and reviewed for any lapses. Lapses, if any, are followed up on weekly basis for earliest closure. |
|--|--|

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

	Total number of training and awareness programmes held
Environmental and social parameters relevant to the product	0%
Safe and responsible usage	1.07%
Recycling and/or safe disposal	0%

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

Benefits	FY 22-23 (Current Financial Year)		Remarks	FY 21-22 (Previous Financial Year)		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	0	NA	0	0	NA
Advertising	0	0	NA	0	0	NA
Cyber-security	0	0	NA	0	0	NA
Delivery of essential services	0	0	NA	0	0	NA
Restrictive Trade Practices	0	0	NA	0	0	NA
Unfair Trade Practices	0	0	NA	0	0	NA
Other	0	0	NA	0	0	NA

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

	Number	Reasons for recall
Voluntary recalls	0	0
Forced recalls	0	0

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

Yes
<https://www.grinfra.com/policies/>

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

NA