



MAN INFRACONSTRUCTION LIMITED

Date: July 13, 2023

To,

The Listing Department

National Stock Exchange of India Limited

Exchange Plaza, Bandra Kurla Complex,

Bandra (E), Mumbai- 400051

To,

The Corporate Relationship Department

BSE Limited

P. J. Towers, Dalal Street,

Mumbai - 400 001

Symbol: MANINFRA

Script Code: 533169

Sub.: Submission of Business Responsibility and Sustainability Reporting for the

financial year 2022-2023.

Dear Sir/Madam,

With reference to the captioned subject, please find enclosed Business Responsibility and Sustainability Reporting for the financial year 2022-2023 for your information and records.

Thanking you.

Yours truly,

For Man Infraconstruction Limited

Durgesh Dingankar Company Secretary Membership No: F7007

Encl.: as above







a

BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORTING

SECTION A: GENERAL DISCLOSURES

- I. Details of the listed entity
 - 1 Corporate Identity Number (CIN) of the Listed Entity

L70200MH2002PLC136849

2 Name of the Listed Entity

Man Infraconstruction Limited

3 Year of incorporation

2002

4 Registered office address

12th Floor, Krushal Commercial Complex, G. M. Road, Chembur (West), Mumbai - 400089

5 Corporate address

12th Floor, Krushal Commercial Complex, G. M. Road, Chembur (West), Mumbai - 400089

6 E-mail

investors@maninfra.com

7 Telephone

+91 22 42463999

8 Website

www.maninfra.com

9 Financial year for which reporting is being done

FY 2022-2023

- 10 Name of the Stock Exchange(s) where shares are listed
 - a) National Stock Exchange of India Limited (NSE)
 - b) BSE Limited (BSE)
- 11 Paid-up Capital (in Rs.)

74,25,00,810

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. Vinay Kamat

vkamat@maninfra.com

+91 22 42463999

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).

The disclosures under the BRSR Report are on a standalone basis.

- II. Products/services
- 14. Details of business activities (accounting for 90% of the turnover):

| S. No. | Description of Main Activity | | | Descri | otior | n of Busines | s Activity | % of Turnover of the entity | |
|-----------|------------------------------|-------------|-----|--------------|-------|--------------|------------|--------------------------------------|--|
| 1 | Engineering, (EPC) | Procurement | and | Construction | | owr | - | & infrastructure asis or on a fee or | |





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 | Construction of residential, commercial & industrial projects. | 41001 | 100% |

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 | 4 | 1 | 5 |
| International | 0 | 0 | - |

17. Markets served by the entity:

a. Number of locations

| Locations | Number |
|----------------------------------|--------|
| National (No. of States) | 1 |
| International (No. of Countries) | 0 |

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

Not Applicable, since the company does not serve international markets

c. A brief on types of customers

The company is in the business of Engineering, Procurement and Construction (EPC). Some of its major clients include real estate developers and port authorities.

IV. Employees

18. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

| S. | Particulars | Total (A) | Male | | Female | |
|-----|--------------------------|-----------|---------|-----------|---------|-----------|
| No. | | | No. (B) | % (B / A) | No. (C) | % (C / A) |
| EMP | LOYEES | | | | | |
| 1. | Permanent (D) | 239 | 230 | 96% | 9 | 4% |
| 2. | Other than Permanent (E) | - | - | - | - | - |
| 3. | Total employees (D + E) | 239 | 230 | 96% | 9 | 4% |
| WOF | RKERS | | | | | |
| 4. | Permanent (F) | 115 | 115 | 100% | - | - |
| 5. | Other than Permanent (G) | 725 | 725 | 100% | - | - |
| 6. | Total workers (F + G) | 840 | 840 | 100% | - | - |

b. Differently abled Employees and workers:

| S. | Particulars | Total (A) | Ma | ale | Fen | nale |
|------|---|-----------|---------|-----------|---------|-----------|
| No | | | No. (B) | % (B / A) | No. (C) | % (C / A) |
| DIFF | ERENTLY ABLED EMPLOYEES | | | | | |
| 1. | Permanent (D) | 1 | 1 | 100% | - | - |
| 2. | Other than Permanent (E) | - | - | - | - | - |
| 3. | Total differently abled employees (D + E) | 1 | 1 | 100% | - | - |
| DIFF | ERENTLY ABLED WORKERS | | | | | |
| 4. | Permanent (F) | - | - | - | - | - |
| 5. | Other than permanent (G) | - | - | - | - | - |
| 6. | Total differently abled workers (F + G) | - | _ | _ | - | _ |

Annual Report 2022-23

19. Participation/Inclusion/Representation of women

| | Total (A) | No. and percentage of Females | | |
|--|-----------|-------------------------------|-----------|--|
| | | No. (B) | % (B / A) | |
| Board of Directors | 7 | 1 | 14% | |
| Key Management Personnel (Excluding KMP already covered under BoD) | 1 | - | 0% | |

20. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

| | FY 23 | | | | FY 22 | | | FY 21 | | |
|---------------------|-------|--------|-------|--------|--------|--------|--------|--------|--------|--|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total | |
| Permanent Employees | 6.50% | 0.00% | 6.50% | 4.30% | 0.00% | 4.30% | 5.10% | 0.00% | 5.10% | |
| Permanent Workers | 5.50% | 0.00% | 5.50% | 11.60% | 0.00% | 11.60% | 12.20% | 0.00% | 12.20% | |

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 | Man Realtors & Holding Pvt. Ltd | Subsidiary | 62.79% | No |
| 2 | Man Vastucon LLP | Subsidiary | 99.99% | No |
| 3 | Starcrete LLP | Subsidiary | 75.00% | No |
| 4 | MICL Builders LLP | Subsidiary | 52.10% | No |
| 5 | Man Infra Contracts LLP | Subsidiary | 70.00% | No |
| 6 | MICL Creators LLP | Subsidiary | 99.99% | No |
| 7 | Man Projects Limited | Subsidiary | 100.00% | No |
| 8 | Manaj Infraconstruction Limited | Subsidiary | 64.00% | No |
| 9 | Man Aaradhya Infraconstruction LLP | Subsidiary | 98.00% | No |
| 10 | Manaj Tollway Pvt. Ltd. | Subsidiary | 100.00% | No |
| 11 | Manmantra Infracon LLP | Subsidiary | 60.00% | No |
| 12 | MICL Developers LLP | Subsidiary | 99.99% | No |
| 13 | MICL Realtors Pvt. Ltd. | Subsidiary | 100.00% | No |
| 14 | MICL Global Inc. | Subsidiary | 100.00% | No |
| 15 | MICL Properties LLP | Subsidiary | 99.99% | No |
| 16 | MICL Estates LLP | Subsidiary | 99.99% | No |
| 17 | MICL Homes LLP | Subsidiary | 99.99% | No |
| 18 | Atmosphere Realty Pvt. Ltd. | Associate | 17.50% | No |
| 19 | MICL Realty LLP | Associate | 46.00% | No |
| 20 | Platinumcorp Affordable builders Pvt. Ltd. | Associate | 33.33% | No |
| 21 | Man Chandak Realty LLP | JV Entity | 50.00% | No |

VI. CSR Details

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)

Yes

(ii) Turnover (Rs. In Crs)

797.79

(iii) Net worth (Rs. In Crs)

1,136.11





- 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 | Grievance Redressal Mechanism in Place | | FY 23 | | | FY 22 | | |
|--|--|--|------------|---------|---|------------|---------|--|
| received | (Yes/No) (If Yes, then provide web-link for grievance redress policy) | Number of complaints filed during the year | complaints | Remarks | | complaints | Remarks | |
| Communities | | - | N/A | - | - | N/A | | |
| Investors (other than shareholders) | | - | N/A | - | - | N/A | | |
| Shareholders | Yes - | 3 | Nil | - | - | N/A | | |
| Employees and workers | https://www.maninfra. | - | N/A | - | - | N/A | | |
| Customers | policies/#ir | - | N/A | - | - | N/A | | |
| Value Chain Partners | | - | N/A | - | - | N/A | | |
| Other - Govt./ Regulatory bodies | | - | N/A | - | - | N/A | | |

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/ 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 | Green building & Infra projects | Opportunity | Green building & infra projects help reduce emissions, waste and negative impact on the environment. Green building projects also get additional benefits from regulatory authorities. With increasing focus on sustainability and increasing preference for green buildings amongst corporates this also represents an area of increasing market opportunity for us. | N/A | Positive |
| 2 | Occupational Health & Safety | Risk | Unhygienic working conditions can lead to illness among workers and employees. Safety related hazards can cause injuries, accidents, deaths. | its employees and workers. Being an ISO 45001:2018 | Negative |

Annual Report 2022-23

| S. No. | Material issue identified | Indicate whether risk/ 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) |
|-----------|---|---|--|--|--|
| 3 | Human Rights and labor conditions | Risk | Violation of human rights or poor labour conditions can cause reputational damage and also lead to fines and penalties. | The company is fully committed to protect and fulfil human rights as laid down in the Constitution of India, relevant national laws and policies, and the International Bill of Human Rights and their application to businesses as outlined in the United Nations Guiding Principles for Business and Human Rights. Policies such as 'MICL Code of Conduct', 'MICL Equal Opportunity Policy', 'MICL Human Rights Policy' and 'Policy for Prevention of Sexual Harassment' are in place. | Negative |
| 4 | Anti-bribery & anti-corruption | Risk | Bribery & corruption can lead to imprisonment. | The company has zero tolerance in case of bribery and corruption. Mechanism to deal with the same is laid down in the 'Anti-bribery and Anti-corruption policy'. | Negative |
| 5 | Corporate Governance | Risk | Failure to comply with the law or meet stakeholder obligations, corruption & bribery, etc. | The company's policies provide guidance for transparency & disclosure, compliance towards statutory obligations, conflict of interest, antibribery & anti-corruption, whistle blower policy, etc. | Negative |
| 6 | Data Security | Risk | MICL recognizes that, in this complex digital world, a single security breach can have far-reaching consequences, including operational difficulties, financial loss and loss of customer trust. | Policy' details all the measures taken for ensuring data security and protection, including purchase of legal softwares, virus protection | Negative |





| S. No. | Material issue identified | Indicate whether risk/ 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) |
|-----------|---|---|---|--|--|
| 7 | Extreme weather conditions | Risk | Heavy rainfall can lead to unfavorable working conditions in terms of safety and health. | | Negative |
| 8 | Participation in Government Infrastructure Development Projects / Programs | Opportunity | The techno-commercial competency gained by the Company in the EPC segment enables us to bid / participate in various Government Infrastructure Development Programs / Projects like Pradhan Mantri Awas Yojana (PMAY) for quality affordable housing for the economically weaker section of the society, SagarMala Project etc. | N/A | Positive |
| 9 | Skill Development of Workforce | Opportunity | MICL firmly believes in enabling a large number of Indian youth to take up construction-relevant skill training that will help them in securing a better livelihood. We are actively exploring the possibility of participating in the Pradhan Mantri Kaushal Vikas Yojana (PMKVY), a flagship scheme of the Ministry of Skill Development & Entrepreneurship (MSDE) implemented by National Skill Development Corporation. | N/A | Positive |

Annual Report 2022-23

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.

- P1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transarent and Accountable
- P2 Businesses should provide goods and services in a manner that is sustainable and safe
- P3 Businesses should respect and promote the well-being of all employees, including those in their value chains.
- P4 Businesses should respect the interests of and be responsive to all its stakeholders
- P5 Businesses should respect and promote human rights
- P6 Businesses should respect and make efforts to protect and restore the environment
- P7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
- P8 Businesses should promote inclusive growth and equitable development
- P9 Businesses should engage with and provide value to their consumers in a responsible manner

| Dis | sclosure Questions | | P1 | P2 | Р3 | P4 | P5 | P6 | P7 | P8 | P9 | | | | |
|-----|--|---|---|------------|----------|-----------|-----------|----------|-----------------|-----|------------------|--|--|--|--|
| Ро | licy and management prod | cesses | | | | | | | | | | | | | |
| 1. | a. Whether your entit policies cover each and its core eleme NGRBCs. (Yes/No) | n principle | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | | | | |
| | b. Has the policy beer by the Board? (Yes/ | | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | | | | |
| | c. Web Link of the available | Policies, if | | <u>htt</u> | ps://www | w.maninfr | ra.com/co | odes-and | nd-policies/#ir | | | | | | |
| 2. | Whether the entity has the policy into procedu No) | | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | | | | |
| 3. | Do the enlisted policies your value chain partn No) | | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | | | | |
| 4. | Name of the nati international codes / cer labels/ standards (e. Stewardship Council, Rainforest Alliance, standards (e.g. SA 800 ISO, BIS) adopted by and mapped to each printernational standards. | g. Forest Fairtrade, Trustea) 0, OHSAS, your entity | endeavors to incorporate best practices in its policies. The Policy framework guided by ISO 9001:2015 Quality Management, ISO 14001:2015 Environment, Management, ISO 45001:2018 Occupational Health & Safety Management at ISO 26000: 2010 Social Responsibility Standards | | | | | | | | ework is ronment | | | | |
| 5. | Specific commitment and targets set by the defined timelines, if any. | entity with | No | No | No | No | No | No | No | No | No | | | | |
| 6. | Performance of the ent the specific commitme and targets along-with case the same are not m | ents, goals reasons in | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | | | | |





| ernance, leadership and Statement by director re for the business respon report, highlighting ESC related challenges, targ achievements (listed en flexibility regarding the of this disclosure) | esponsible sibility G ets and atity has | the Com necessa sustaina The Co | npany an ry tool fo bility. | d it firmly | , believe | es that so | und princ | | | |
|---|---|---|---|--|--|--|--|--|---|--|
| for the business respon report, highlighting ESC related challenges, targ achievements (listed en flexibility regarding the | sibility G lets and atity has | the Com necessa sustaina The Co | npany an ry tool fo bility. | d it firmly | , believe | es that so | und princ | | | |
| | placement | | Doing business in a responsible and sustainable manner is a key imperat the Company and it firmly believes that sound principles of governance necessary tool for creating long-term value for all stakeholders and pronsustainability. The Company has instituted good governance practices and follows: | | | | | | | romotin |
| of this disclosure) | | | comprehensive code of conduct to carry out business activities in an ethical an sustainable manner. The organisation has been built on the founding principle of kindness, fairness, effectiveness and efficiency. | | | | | | | hical an |
| | These procedu targets talso add waste gor incine ensuring continue. | include ires for contowards in opts best enerated eration. If their he es to sup | reducing flust contr reduction t practices from the The comp alth and v | carbo ol, mon in cons s for wa ir opera bany de vell-beir | umption of ste managetions, to employed monstrates g along w | nt, follownsumptions of electric gement to the ensure mess care to the empore that the empore | wing stand on of resolute, fuel, of to recycle dinimal discowards in wering the | andard of cources and etc. The Ce/reuse niversion to the court of the | pperation of taking Compan naximur o landfi byees b compan | |
| | The Con | The Company shall constantly endeavor to improve its exisiting practices. | | | | | | | | |
| responsible for impleme and oversight of the Bu | Mr. Ashok M. Mehta, Director ashok@maninfra.com DIN: 03099844 | | | | | | | | | |
| Committee of the Board responsible for decision sustainability related is: | sustaina consists | bility rela | ated as w | ell as hu | man right | s impact | s or issue | es. The co | mmitte | |
| Details of Review of NG | | | | | | | | | | |
| ject for Review | | r / Comm | ittee of t | he Board | - | | | | | |
| | P1 P2 F | P3 P4 | P5 P6 | P7 P8 | P9 | P1 P2 | P3 P4 | P5 P | 6 P7 | P8 P9 |
| cies and follow up | | | | | | | | eviewed | periodica | lly or or |
| | | | | | | | | | | |
| irements of relevances | | | | | | l. The cor | mpany c | omplies | with all | externa |
| | | | | | | | | | | |
| | | | | | | | | | | |
| Has the entity service as | + D1 | D 2 | D 2 | D 4 | |) 5 | 0.6 | D 7 | D e | Р9 |
| | | | | | | | - | | - | |
| evaluation of the working of its policies by an external agency? (Yes/No). | | | ent Systopational | em, ISO 14 Health an | 4001:20 ⁻ d Safet | 5 Environ / Manager | ment Ma nent Sys | nagemer stem, mos | nt System st of the e | and IS0 element |
| | responsible for implement and oversight of the Burden and oversight of the Board Committee of the Board responsible for decision sustainability related is: / No). If yes, provide de Details of Review of NGF Company: ject for Review formance against above cies and follow up on. Inpliance with statutory direments of relevances are principles, and, iffication of any non-inpliances. Has the entity carried out independent assessment evaluation of the working of its policies by an external agency? (Yes/N | ject for Review P1 P2 F formance against above cies and follow up on. Inpliance with statutory direments of relevances are principles, and, diffication of any non-upliances. 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 | targets a also add waste g or incin ensuring continue Social a The Con Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies). 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. Details of Review of NGRBCs by the Company: ject for Review Indicate whether reby Director / Commother Company: ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Indicate whether reby Director / Commother Company: Ject for Review Ject for Review | targets towards also adopts best waste generated or incineration. ensuring their he continues to sup Social activities. The Company sh Mr. Ashok M. Me ashok@maninfra DIN: 03099844 Mr. Ashok M. Me ashok@maninfa Mr. Ashok M. Me ashok@maninfa Mr. Asho | targets towards reduction also adopts best practices waste generated from the or incineration. The compensuring their health and waste generated from the or incineration. The compensuring their health and waste generated from the or incineration. The compensuring their health and waste generated from the or incineration. The compensuring their health and waste generated from the or incineration. The compensuring their health and waste generated from the or incineration. The compensuring their health and waste generated from the or incineration. The compensuring their health and waste generated from the or incineration. The compensuring their health and waste generated from the or incineration. The compensuring their health and waste generated from the or incineration. The compensuring their health and waste generated from the or incineration. 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The company de ensuring their health and well-bein continues to support the weaker's Social activities. The Company shall constantly end ensuring their health and well-bein continues to support the weaker's Social activities. The Company shall constantly end Mr. Ashok M. Mehta, Director ashok@maninfra.com DIN: 03099844 Yes, the company has an ESG co sustainability related as well as hu consists of Mr. Ashok M. Mehta an departments. Yes, the company has an ESG co sustainability related as well as hu consists of Mr. Ashok M. Mehta an departments. Yes, the company has an ESG co sustainability related as well as hu consists of Mr. Ashok M. Mehta an departments. Yes, the company has an ESG co sustainability related as well as hu consists of Mr. Ashok M. Mehta an departments. Yes, the company has an ESG co sustainability related as well as hu consists of Mr. Ashok M. Mehta an departments. Yes, the company has an ESG co sustainability related as well as hu consists of Mr. Ashok M. 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Mehta and Senio | targets towards reduction in consumption of electricalso adopts best practices for waste management waste generated from their operations, to ensure in or incineration. The company demonstrates care the ensuring their health and well-being along with emporent continues to support the weaker sections of the soc Social activities. The Company shall constantly endeavor to improve in the company shall constantly endeavor to improve in the properties of the soc Social activities. The Company shall constantly endeavor to improve in the companities of the Board of Director ashok@maninfra.com DIN: 03099844 Yes, the company has an ESG committee which is sustainability related issues? (Yes / No). If yes, provide details. Details of Review of NGRBCs by the Company: Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee P1 P2 P3 P4 P5 P6 P7 P8 P9 P1 P2 P3 P4 Ormance against above cies and follow up other Committee of the Board / Any other Comm | targets towards reduction in consumption of electricity, fuel, also adopts best practices for waste management to recycle waste generated from their operations, to ensure minimal d or incineration. The company demonstrates care towards ensuring their health and well-being along with empowering the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the continues to support the weaker sections of the society through the support to support the weaker sections of the society through the support to support the weaker sections of the society through the support to support the weaker sections of the society through the sample of the society through the support the weaker | The Company shall constantly endeavor to improve its exisiting practice. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies). 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. Details of Review of NGRBCs by the Company: Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee of the Board and reviewed periodical eneed basis by the ESG committee as a part of ESG review. During the review, the effectiveness of the policies is evaluated and necessary ament to policies and procedures are implemented. The company complies with all regulations and principles as applicable. The Company Shall constantly pricetor ashok@maninfra.com DIN: 03099844 Yes, the company has an ESG committee which is responsible for ad sustainability related as well as human rights impacts or issues. The composition of Mr. Ashok M. Mehta and Senior Management Members from departments. Frequency (Annually / Half year Quarterly / Any other -please specified of the Committee of the Board / Any other -please specified of the Committee as a part of ESG review. During the review, the effectiveness of the policies is evaluated and necessary ament to policies and procedures are implemented. The company complies with all regulations and principles as applicable. P1 P2 P3 P4 P5 P6 P7 P8 P5 P6 P7 P8 P6 P7 P8 P7 P8 P8 P9 P1 P2 P3 P4 P5 P6 P7 P8 P9 P1 P2 P3 P4 P5 P6 P7 P8 P9 P1 P2 P3 P4 P5 P6 P7 P8 P9 P1 P2 P3 P4 P5 P6 P7 P8 P9 P1 P2 P3 P4 P5 P6 P7 P8 P9 P1 P2 P3 P4 P5 P6 P7 P8 P9 P1 P2 P3 P4 P5 P6 P7 P8 P9 P1 P2 P3 P4 P5 P6 P7 P8 P9 P1 P2 P3 P4 P5 P6 P7 P8 P9 P1 P2 P3 P4 P5 P6 P7 P8 P9 P1 P2 P3 P4 P5 P6 P7 P8 P9 P1 P2 P3 P4 P5 P6 P7 P8 P1 P2 P3 P4 P5 P6 P7 P8 P1 P2 P3 P4 P5 P6 P7 P8 P1 P2 P3 P4 P5 P |

Annual Report 2022-23

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 | Р3 | 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) | N/A |
| The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No) | N/A |
| The entity does not have the financial or/ human and technical resources available for the task (Yes/No) | N/A |
| It is planned to be done in the next financial year (Yes/No) | N/A |
| Any other reason (please specify) | N/A |

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as "Essential" and "Leadership". While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

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 | % of persons in respective category covered by the awareness programmes |
|-----------------------------------|--|---|---|
| Board of Directors | 1 | A preliminary | 100% |
| Key Managerial Personnel | 1 | understanding of the nine | 100% |
| Employees other than BoD and KMPs | 1 | principles of NGRBC | 100% |
| Workers | 52 | Environmental, health & safety training | 100% |

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.

There are no fines/ penalties / punishments / etc. in the current financial year.

Monetary

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





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 |
|--------------|---|
| - | - |
| - | - |

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, the Company has an anti-corruption & anti-bribery policy in place. The policy is intended to serve as a guide for all Company personnel and associated persons in order to ensure compliance with applicable the anti-bribery & anti-corruption laws, rules & regulations.

The policy currently covers all individuals at all levels, including board members & senior management, employees, interns, contractors, consultants, agents and any other person associated with the company and it also covers any such person acting on behalf of the company. The company has zero tolerance for any practices that may be classified as corruption or bribery and undertakes periodic review/assessment of operations to ensure strict compliance with the anti-corruption and anti-bribery policy and undertake proactive corrective measures if required.

The weblink to the policy: https://www.maninfra.com/codes-and-policies/#ir

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

No disciplinary action has been taken by any law enforcement agency for the charges if bribery / corruption against any Directors/KMPs/employees/workers.

| | FY 2022-23 | FY 2021-22 |
|----------------------|------------|------------|
| Directors | - | - |
| KMPs | - | - |
| Employees | - | - |
| Employees Workers | - | - |

6 Details of complaints with regard to conflict of interest:

No complaints regarding conflict of interest have been received during the year.

| | FY 20 | 22-23 | FY 2021-22 | | |
|--|--------|---------|------------|---------|--|
| | Number | Remarks | Number | Remarks | |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | - | - | - | - | |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs | - | - | - | - | |

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.

There have been no cases of corruption and conflicts of interest during FY23 and therefore no corrective action has been required to be taken

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 2022-23 FY 2021-22 Details of Improvement in environmental | | | | | | |
|-------|---|---|-------------------|--|--|--|--|
| R&D | - | - | No such instances | | | | |
| Capex | - | - | No such instances | | | | |

2 a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)

Yes. Preference is given to suppliers from nearby locations/districts to reduce carbon footprint of the transport activity. The company will continue to explore all options for increasing the scope of sustainable sourcing.

Annual Report 2022-23

b. If yes, what percentage of inputs were sourced sustainably?

Nearly 90% of raw materials are purchased from local providers, reducing the distance of transportation of materials to reach the sites, cutting back on mileage and fuel consumption, reducing the carbon footprint.

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.

The company's waste mainly consists of the following -

Construction & demolition waste - It is generated during construction and is segregated and disposed off to designated agencies at regular intervals during the construction phase.

Steel waste - Steel waste is mainly from tracks cut-outs, which is stacked and later sold to third party vendors. Steel scrap is sold to authorised dealers for further processing and recycling.

E-waste - The quantity of e-waste generated is not significant. However, all end of life electric equipments are sold to authorized third party vendors.

Sewage waste - Septic tanks are installed at all construction sites to treat waste water. The capacity of the septic tanks is based on the number of workforce employed at the particular site.

Packaging/Plastic waste - are segregated and disposed off to designated agencies at regular intervals during the construction phase.

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.

EPR rules are not applicable to the company given the nature of services.

<u>Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains.</u>

Essential Indicators

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

| Category | % of employees covered by | | | | | | | | | | |
|----------|---------------------------|---------------|--------------|---------------|---------------------------------------|---------------|--------------------|---------------|---------------------|---------------|--------------|
| | Total | Health in | surance | Accident | Accident insurance Maternity benefits | | Paternity Benefits | | Day Care facilities | | |
| | (A) | Number (B) | % (B / A) | Number (C) | % (C / A) | Number (D) | % (D / A) | Number (E) | % (E / A) | Number (F) | % (F / A) |
| | | | | F | Permanent | employees | 3 | | | | |
| Male | 230 | 230 | 100% | 230 | 100% | N/A | - | 230 | 100% | - | - |
| Female | 9 | 9 | 100% | 9 | 100% | 9 | 100% | N/A | - | - | - |
| Total | 239 | 239 | 100% | 239 | 100% | 9 | 100% | 230 | 100% | - | - |
| | | | | Other | than Perma | anent empl | oyees | | | | |
| Male | - | - | - | - | - | - | - | - | - | - | - |
| Female | - | - | - | - | - | - | - | - | - | - | - |
| Total | - | - | - | - | - | - | - | - | - | - | - |

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

| Category | % of workers covered by | | | | | | | | | | | |
|----------|-------------------------|------------------|--------------|---------------|--------------------|---------------|--------------------|---------------|--------------------|---------------|---------------------|--|
| | Total (A) | Health insurance | | Accident | 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) | |
| | | | | I | Permanent | workers | | | | | | |
| Male | 115 | 115 | 100% | 115 | 100% | N/A | - | 115 | 100% | - | - | |
| Female | - | - | - | - | - | - | - | - | - | - | - | |
| Total | 115 | 115 | 100% | 115 | 100% | - | - | 115 | 100% | - | - | |
| | | | | Other | than Perm | anent worl | kers | | | | | |
| Male | 725 | - | - | 725 | 100% | - | - | - | - | - | - | |
| Female | - | - | - | - | - | - | - | - | - | - | - | |
| Total | 725 | - | - | 725 | 100% | - | - | - | - | - | - | |





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

| Benefits | | FY 2022-23 | | FY 2021-22 | | | |
|-------------------------|--|--|--|--|--|--|--|
| | 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.) | |
| PF | 87% | 95% | Υ | 90% | 94% | Υ | |
| Gratuity | 100% | 100% | N | 100% | 100% | N | |
| ESI | 9% | 25% | Υ | 3% | 31% | Υ | |
| Others – please specify | N/A | N/A | N/A | N/A | N/A | N/A | |

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, currently the company's premises / offices are not accessible to differently abled persons in accordance with the requirements of the Rights of Persons with Disability Act, 2016. As with the case of one existing employee, the company tries to accommodate differently-abled employees in management roles which involve minimal manual work. The company will also try to prioritise providing for wheelchair ramps, braille signage, accessible restrooms and digital accessibility etc. depending on business requirements.

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, the Company has Equal Opportunity Policy as per the Rights of Persons with Disabilities Act, 2016. The company does not discriminate based on race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability, or any other category protected by applicable law. The weblink of the Policy: https://www.maninfra.com/codes-and-policies/#ir

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 | 100% | 100% | N/A | N/A | |
| - emale | N/A | N/A | N/A | N/A | |
| Total | | | | | |

No female employee had taken parental leave in FY 23.

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.

| Category | Yes/No (If Yes, then give details of the mechanism in brief) |
|--------------------------------|--|
| Permanent Workers | Yes. Permanent Employees and Permanent Workers can raise their grievance to Departmental Head / Site Head who resolves the issue or forwards it to HR Department. HR Department facilitates the resolution. The Other than Permanent Workers (Contract Labor) raise their concern with their Site Officer (of the respective Contractor). The Site Officer takes up the matter with the Site Head for resolution. It is encouraged to raise all concerns through email or letter. We endeavour to resolve all the grievances within 15 days. |
| Other than Permanent Workers | |
| Permanent Employees | |
| Other than Permanent Employees | |

Annual Report 2022-23

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

Currently no employees or workers are covered under any associations or unions.

| Category | | FY 2022-23 | | FY 2021-22 | | | |
|---------------------------------|--|--|--------------|--|--|--------------|--|
| | 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 | 239 | - | 0% | 186 | - | 0% | |
| - Male | 230 | - | 0% | 178 | - | 0% | |
| - Female | 9 | - | 0% | 8 | - | 0% | |
| Total Permanent Workers | 115 | - | 0% | 107 | - | 0% | |
| - Male | 115 | - | 0% | 107 | - | 0% | |
| - Female | 0 | - | - | 0 | - | - | |

8 Details of training given to employees and workers:

| Category | | FY 2022-23 | | | | | FY 2021-22 | | | | |
|-----------|--------------|-------------------------------|--------------|----------------------|--------------|--------------|----------------------------------|--------------|----------------------|--------------|--|
| | 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 | 230 | 230 | 100% | 160 | 70% | 178 | 178 | 100% | 107 | 60% | |
| Female | 9 | 9 | 100% | 7 | 78% | 8 | 8 | 100% | 6 | 75% | |
| Total | 239 | 239 | 100% | 167 | 70% | 186 | 186 | 100% | 113 | 61% | |
| Workers | | | | | | | | | | | |
| Male | 840 | 840 | 100% | - | 0% | 807 | 807 | 100% | - | 0% | |
| Female | - | | - | - | - | - | | - | - | 0% | |
| Total | 840 | 840 | 100% | - | 0% | 807 | 807 | 100% | - | 0% | |

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

| Category | | FY 2022-23 | | | | FY 2021-22 | | | |
|-----------|-----------|------------|-----------|-----------|---------|------------|--|--|--|
| | Total (A) | No. (B) | % (B / A) | Total (C) | No. (D) | % (D / C) | | | |
| Employees | | | | | | | | | |
| Male | 230 | 230 | 100% | 178 | 178 | 100% | | | |
| Female | 9 | 9 | 100% | 8 | 8 | 100% | | | |
| Total | 239 | 239 | 100% | 186 | 186 | 100% | | | |
| *Workers | | | | | | | | | |
| Male | 115 | 115 | 100% | 107 | 107 | 100% | | | |
| Female | - | | - | - | | - | | | |
| Total | 115 | 115 | 100% | 107 | 107 | 100% | | | |

^{*}Only permanent workers included





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?

Yes, the Company is an Integrated Management System Certified Company meeting the requirements specified in ISO 45001:2018 Occupational Health and Safety Management System. The company is certified by TUV Nord. The company conducts safety programs at all sites to ensure safety of all the laborers/workers on site. National safety week is celebrated every year from 4th March at all the sites. Health office is also maintained at all sites to take care of the occupational health of it's workforce & it is managed by health professionals. All sites have tie-ups with nearby hospitals to take care of any medical emergencies. Safety shoe, jackets, helmets, gloves are mandatory for onsite workforce - periodic safety assessment are undertaken to ensure compliance

b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

As required by ISO 45001:2018 Occupational Health and Safety Management System, at the start of every Project and at the start of every activity, the company has a process of Hazard Identification and Risk Assessment wherein the Safety and Execution team together identify the hazards associated with these activities and evaluates the risks vis a vis the control measures in place. This is done for all routine and non-routine activities.

The company also has health & safety professionals on site to regularly keep a check on the activities carried out and a regular check of all the safety equipments takes places.

c. Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Y/N)

Yes, various forums such as Daily Tool Box Talk, Weekly Safety Review Meetings are made available for workers to express their safety concerns and work related hazards. Appropriate proactive action is undertaken to mitigate all work related hazards based on worker inputs. The company also adheres to all other health & safety related requirements specified in ISO 45001:2018 Occupational Health and Safety Management Standard.

d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)

Yes, the employees and workers (other than contractual workers) of the entity have access to non-occupational medical and healthcare services in the form of Mediclaim Policy Premium reimbursement based on the grade and number of years of association with the Company.

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

| Safety Incident/Number | Category | FY 2022-23 | FY 2021-22 |
|---|-----------|------------|------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person | Employees | 0.73 | 0.69 |
| hours worked) | Workers | 0.28 | - |
| Total recordable work-related injuries | Employees | 1.00 | 1.00 |
| | Workers | 2.00 | - |
| No. of fatalities | Employees | - | - |
| | Workers | 1.00 | - |
| High consequence work-related injury or ill-health (excluding | Employees | - | - |
| fatalities) | Workers | - | - |

Note - LTIFR is taken as a simple average across all four sites.

12 Describe the measures taken by the entity to ensure a safe and healthy work place.

There are various measures undertaken by the entity so as to ensure a safe and healthy work place, namely, the company has a standard operating procedure (SOP) of each construction activities; the company undertakes hazard identification and risk assessment (HIRA) of each activity undertaken; audio - video induction of new workers is done; daily tool box talk is carried out before the starting of an assigned job; trade specific training is carried out; barricading is done of openings, lift shafts or any cutouts; duct openings are covered; horizontal and vertical safety netting is done; jumping/working platforms (wind/safety screen) is provided; employees and workers are motivated by way of motivational programs; fitness test and medical check is conducted by the site doctors for all new workers, operators & signal-man.

Annual Report 2022-23

Regular health check-up campaigns are arranged, camps are regularly cleaned and health & hygiene standards are maintained; tested drinking water is provided; malaria & dengue screening as per applicable guidelines is done regularly; all equipments are checked and maintained as per guidelines specified in equipment manual; Equipments are certified for fitness by professional in-house and external agencies.

Tie-ups are also arranged with nearby hospitals for prompt response in case of injuries/ hospital admission; adequate safety & medical staffing at sites; Cross site safety group is formed to share occupational health & safety improvement measures; celebration of 'safety week' every year at all sites starting 4th of March.

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

Any health & safety and working conditions related concerns of the employees and workers are addressed during the weekly review meetings. These are documented as part of the minutes of the meetings. No other formal complaints have been received from the employees or workers during the year.

| Category | | FY 2022-23 | | FY 2021-22 | | |
|--------------------|--------------------------|--|---------|--------------------------|--|---------|
| | 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 | - | - | | - | - | |
| Health & Safety | - | - | | - | - | |

14 Assessments for the year:

| Category | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) | | |
|-----------------------------|---|--|--|
| Health and safety practices | 100% | | |
| Working Conditions | 100% | | |

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.

Safety related incidents and their causes were assessed in great detail and the following corrective actions have been undertaken by the company to prevent the occurrence of such accidents in the future:

- i) Blinker lights are provided for helmets during night shifts,
- ii) Public Address systems are provided at yard area or controlling movement,
- iii) Mega phone provided at yard and six entry points for drivers,
- iv) Posters are displayed for drivers awareness,
- v) Monitoring of activities by traffic marshal,
- vi) Whistle provided to workmen working in yard activity,
- vii) Tool box talk and awareness sessions conducted for drivers on safe unloading material at unloading point,
- viii) Proper lane divider and identification are provided,
- ix) 'Go Slow' and '20 km' speed limit sign boards are provided,
- x) Instruction to all contractors to not start heighted work without permission,
- xi) Compulsory deputation of supervisor for all height work,
- xii) inspection of scaffold before issue of work permit,
- xiii) Increase in frequency of tool box talk,
- xiv) Horizontal net installed below the jumping working platform to stop the fall of small objects to the ground below.





<u>Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders</u> <u>Essential Indicators</u>

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

Stakeholders are critical to our business and their interests are key enablers for our business strategy. The company's business is mainly EPC - Engineering, Procurement & Construction. Hence, in accordance with the business activities, the company has identified the following stakeholder groups

| | Stakeholder group | Identification Process |
|---|--------------------------|---|
| 1 | Supplier/ Contractors | EPC has significant dependency on supply chain partners for - (i) Sourcing of key raw materials (ii) Outsourcing of business activities (iii) Contractors for civil and MEP services |
| 2 | Customers | The customers of the company are the founding cornerstones of MICL and play a very important role in the overall functioning and growth of the company. Customer relationships, both long-term and new, help the company to better its ESG initiatives and offer new avenues and opportunities for the company to offers its products & services. |
| 3 | Shareholders & investors | Shareholders and investors make an important contribution to the growth of the company by providing financial resources for short term i.e., working capital and long term i.e., capital expenditure and investments. They also play an important role through exercise of their voting rights with respect to important plans of the Company. |
| 4 | Employees & Workers | Construction is a labour-intensive activity. Hence, skill development, health and well-being of employees and workers are important for the Company's ongoing and future operations. |
| 5 | Communities | MICL has measures in place to ensure sufficient rehabilitation & resettlement of communities that may be impacted by the projects it undertakes, as applicable. The company endeavours to take measures to organise & improve the socio-economic & overall development of communities around the worksites of the projects it undertakes at various locations in the state. Through its CSR & Social efforts, the company places a lot of emphasis and focus is on the under-privileged and marginalized sections of society to enable and empower them to lead overall better lives. |
| 6 | Govt./ Regulatory bodies | The Company operates in the EPC sector and its operations are governed by varous regulatory bodies. It becomes important to understand priorities of these agencies and address their concerns, if any, to maintain compliance levels and establish benchmark performance levels. |

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 |
|--------------------------------|---|---|--|--|
| Suppliers / Contractors | No | Emails, Personal Interactions | Ongoing | Expectations, delivery & supply chain matters & issues, regulatory compliance, sustainable sourcing opportunities & products, EHS initiatives & opportunities, etc |
| Customers | No | Emails, Personal Interactions, Meetings, Website | Ongoing | Project delivery & execution timelines, customer satisfaction and feedback, challenges faced during execution, customer expectations & complaints if any, etc. |
| Shareholders / investors | No | Meeting, Conference Calls, Email, Website | Annually, Quarterly | Financial performance, investor updates, expectation of shareholders & investors, grievances & complaints, ESG updates, etc. |
| Employees/ Workers | No | Email, meetings, notice board | Ongoing | Employee skills & training, employee performance, Health & Safety Issues, growth opportunities, etc. |
| Communities | Yes | Meetings, Notices in Media | As and when required | Success of CSR & Social initiatives, complaints & grievances if any |
| Govt / Regulatory Bodies | No | Emails, Personal Interactions, Meetings | Ongoing | Permissions & clearances from authorities, reporting & statutory compliance, fines & penalties if any, policy formulation & discussions if so applicable |

Annual Report 2022-23

<u>Principle 5: Businesses should respect and promote human rights</u> <u>Essential Indicators</u>

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 2022-23 | | FY 2021-22 | | | |
|----------------------|-----------|---|-----------|------------|---|-----------|--|
| | Total (A) | No. of employees / workers covered (B) | % (B / A) | Total (C) | No. of employees / workers covered (D) | % (D / C) | |
| | | Employees | | | | | |
| Permanent | 239 | 239 | 100% | 186 | - | - | |
| Other than Permanent | - | - | - | - | - | - | |
| Total Employees | 239 | 239 | 100% | 186 | - | - | |
| | | Workers | | | | | |
| Permanent | 115 | 115 | 100% | 107 | - | - | |
| Other than Permanent | 725 | 725 | 100% | 700 | - | - | |
| Total Workers | 840 | 840 | 100% | 807 | - | - | |

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

| Category | | F | Y 2022-2 | 3 | | | FY 2021-22 | | | |
|-----------------------|--------------|---------|-----------------|---------|----------------|------------------------------------|------------|--------------|---------------------------|--------------|
| | Total (A) | | al to m Wage | | than m Wage | Total Equal to ge (D) Minimum Wage | | 1 | More than Minimum Wage | |
| | | No. (B) | % (B / A) | No. (C) | % (C / A) | No. (E) | No. (E) | % (E / D) | No. (F) | % (F / D) |
| | | E | Employee | s | | | | | | |
| Permanent | 239 | - | - | 239 | 100% | 186 | - | _ | 186 | 100% |
| Male | 230 | - | - | 230 | 100% | 178 | - | - | 178 | 100% |
| Female | 9 | - | - | 9 | 100% | 8 | - | - | 8 | 100% |
| Other than Permanent | | | | | | | | | | |
| Male | - | - | - | - | - | - | - | _ | - | _ |
| Female | - | - | - | - | - | - | - | _ | - | - |
| | | | Workers | | | | | | | |
| Permanent | 115 | - | - | 115 | 100% | 107 | - | - | 107 | 100% |
| Male | 115 | - | - | 115 | 100% | 107 | - | - | 107 | 100% |
| Female | - | - | - | - | - | - | - | _ | - | - |
| Other than Permanent* | 725 | | | | | 700 | | | | |
| Male | 725 | | | | | 700 | | | | |
| Female | | | | | | | | | | |

^{*} The Other than Permanent workers are engaged by Contractors who are paid equal to / more than minimum wages. Break up is not available.

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) (Full time directors) | 2 | 2,25,00,000 | 0 | - | |
| Key Managerial Personnel | 1 | 37,00,000 | 0 | - | |
| Employees other than BoD and KMP | 227 | 6,00,600 | 9 | 5,00,000 | |
| Workers | 115 | 4,00,000 | 0 | - | |

Note - The two full time directors are also Key Managerial Persons





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, the company has an ESG committee which is also responsible for addressing human rights impacts or issues caused or contributed to by the business. The committee is headed by Mr. Ashok M. Mehta and consists of Senior Management members from various departments.

5 Describe the internal mechanisms in place to redress grievances related to human rights issues.

The grievance redressal mechanism related to human rights issues is included in the Human Rights policy. All stakeholders are encouraged to report any human rights violations. The company is committed to resolving all human rights complaints and taking appropriate action to put an end to any adverse human rights impacts identified as well as prevent any adverse human rights violations.

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

| | | FY 2022-23 | | FY 2021-22 | | | |
|---------------------------------------|-----------------------------|---------------------------------------|---------|-----------------------------|---------------------------------------|---------|--|
| | 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 | - | - | N/A | - | - | N/A | |
| Discrimination at workplace | - | - | N/A | - | - | N/A | |
| Child Labour | - | - | N/A | - | - | N/A | |
| Forced Labour / Involuntary Labour | - | - | N/A | - | - | N/A | |
| Wages | - | - | N/A | - | - | N/A | |
| Other human rights related issues | - | - | N/A | - | - | N/A | |

7 Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.

The Company has a WhistleBlower Policy wherein the employees can report, without fear of retaliation, any wrong practices, unethical behaviour or non-compliance which may have a detrimental effect on the organisation, including financial damage and impact on brand image. Further, the Company has POSH Policy to safeguard the interest of women at workplace.

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

No, human rights requirements do not explicitly form a specific part of the business agreement & contracts. However, the company has a zero tolerance policy for any human rights violations and adopts best practices while engaging with the employees and workers of the company as well as external customers, suppliers and other value chain partners. 'Supplier Code of Conduct' which has a section on human rights are shared with Suppliers and Contractors and they are expected to abide by the same.

9 Assessments for the year:

The company engaged in continuous assessment of its operations for human rights issues. There have been no adverse findings during the year from any such assessments.

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

Annual Report 2022-23

10 Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.

There were no significant human rights risks or concerns arising out of the above assessment.

Principle 6: Businesses should respect and make efforts to protect and restore the environment

Essential Indicators

1 Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:

| Parameter | FY 2022-23 | FY 2021-22 |
|--|------------|------------|
| Total electricity consumption in Tera Joules (A) | 7.2 | 6.1 |
| Total fuel consumption in Tera Joules (B) | 28.5 | 8.0 |
| Energy consumption through other sources (C) | - | - |
| Total energy consumption (in Tera Joules) (A+B+C) | 35.7 | 14.1 |
| Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees) (Tera Joule per Crore) | 0.045 | 0.060 |
| Energy 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

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, the company does not have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India.

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

| Parameter | FY 2022-23 | FY 2021-22 |
|---|------------|------------|
| Water withdrawal by source (in kilolitres) | | |
| (i) Surface water | - | - |
| (ii) Groundwater | - | - |
| (iii) Third party water | 1,41,743 | 1,12,814 |
| (iv) Seawater / desalinated water | - | - |
| (v) Others | - | - |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | 1,41,743 | 1,12,814 |
| Total volume of water consumption (in kilolitres) | 1,41,743 | 1,12,814 |
| Water intensity per rupee of turnover (Water consumed / turnover) (Kilolitre per Crore) | 178 | 477 |
| 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 2022-23 | FY 2021-22 |
|-------------------------------------|---------------------|------------|------------|
| BC | Kgs | 824 | 231 |
| NOx | Kgs | 20,591 | 5,782 |
| NO2 | | - | - |
| SO2 | | - | - |
| Particulate matter (PM) 10 | Kgs | 1,328 | 373 |
| Particulate matter (PM) 2.5 | Kgs | 1,328 | 373 |
| Persistent organic pollutants (POP) | | - | - |
| Volatile organic compounds (VOC) | | - | - |
| Hazardous air pollutants (HAP) | | - | - |
| Ozone (O3) | | | |
| Lead (Pb) | | | |
| Carbon Monoxide (CO) | Kgs | 6,799 | 1,909 |
| Ammonia (NH3) | | | |
| Benzene | | | |
| Benzo Pyrene (BaP) | | | |
| Arsenic (As) | | | |
| Nickel | | | |

Air emissions other than GHG have been calculated using proxy emissions factors available on EU emissions factors database. These include emissions from fuel consumption only. Air emissions from any other activities are not included. The company will consider use of tech to monitor these on an real time basis going forward.

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.

Nο

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

| Parameter | Unit | FY 20 | 22-23 | FY 2021-22 | |
|---|------------------------------------|----------|----------|------------|--------|
| Total Scope 1 emissions (Break-up of the GHG into | Metric tonnes of | CO2 | 2,113.09 | CO2 | 593.36 |
| CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | CO2 equivalent | CH4 | 2.14 | CH4 | 0.60 |
| | | N2O | 5.10 | N2O | 1.43 |
| Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | 1,626.89 | | 1,343.09 | |
| Total Scope 1 and Scope 2 emissions per rupee of turnover | Metric tonne per Crore | 4.70 | | 8.19 | |
| Total Scope 1 and Scope 2 emission 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

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

The company engages in various initiatives wherever possible in order to reduce its green house gas emissions. One of the key areas of GHG emissions for the company is use of cement for making concrete. In order to reduce these emissions, the company is increasing use of green cement (use of GGBS and fly ash in Ready-mixed concrete), thereby leading to reduction in overall GHG emissions. Additionally, the company is also committed to the reduction of overall GHG emissions by use of low-emission materials (eg. paints, adhesives, etc.), sustainable building materials, solar panels and net metering technology, energy efficient machinery/equipment which reduces fuel & energy consumption, etc.

20

Annual Report 2022-23

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

| Parameter | FY 2022-23 | FY 2021-22 |
|---|------------|------------|
| Total Waste generated (in metric tonnes) | | |
| Plastic waste (A) | - | - |
| E-waste (B) | - | - |
| Bio-medical waste (C) | - | - |
| Construction and demolition waste (D) | 4,777 | 2,162 |
| Battery waste (E) | - | - |
| Radioactive waste (F) | - | - |
| Other Hazardous waste. Please specify, if any. (G) | - | - |
| Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) - CARDBOARD WASTE | 23 | 6 |
| Total (A+B+C+D+E+F+G+H) | 4,800 | 2,168 |
| 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 | - | - |
| (ii) Re-used** | 478 | 216 |
| (iii) Other recovery operations | - | - |
| Total | 478 | 216 |
| For each category of waste generated, total waste disposed by nature of disposal method (in | | |
| metric tonnes) | | |
| Category of waste | | |
| (i) Incineration | - | - |
| (ii) Landfilling | - | - |
| (iii) Other disposal operations - Authorised agencies | 4,322 | 1,952 |
| Total | 4,322 | 1,952 |

^{*} Tonnage of Construction and Demolition Waste derived from Volumetric Value based on theoretical conversion factor.

** Estimated

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.

MICL is Certified for ISO 14001: 2015 Environment Management System. Most of the waste generated by the company's operations comprises of construction and demolition waste or packaging waste. Part of the concrete waste from the construction process is used for land filling at site. Other construction and demolition waste is segregated and disposed off to authorised agencies. Some of the waste (such as steel) is sold to authorised dealers or third party vendors.

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. |
|--------|---------------------------------|--------------------|--|
| | | | |
| | | | |

^{*} The Company being an EPC Contractor, the onus of getting environmental approvals/ clearances is on the Principal Employer





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

The Company has not conducted any environmental impact assessments (EIA) of projects in FY23. EIA for construction projects are under the scope of the Principal Employer. For the ongoing construction projects, all the applicable EIAs were duly carried out by the Principal Employer before the construction projects were awarded to the Company.

| 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 |
|-----------------------------------|-------------------------|------|---|--|----------------------|
| _ | _ | _ | _ | _ | _ |

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

The company complies with all applicable environmental law/ regulations/ guidelines in India. Since the company is IMS certified and has to conform to the requirements of ISO 9001:2015 QMS, ISO 14001:2015 EMS and ISO 45001:2018 OH&SMS, there is a formal documented system in place to monitor compliances. However, there has been one instance of non-compliance during the year, presented here.

| 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 boards or by courts | Corrective action taken, if any |
|-----------|---|--|---|---|
| 1 | The Air (Prevention And Control Of Pollution) Act, 1981 | Higher Particulate Matter found in the air due to ongoing land filling material transportation during land reclamation activity - exceeding permissible limits (at BMCT Site). | None | Measures taken towards improvements in air quality - Deployed a team to clear the access route of any spill over of the filling material being transported through dumpers. Ensured that the dumpers are covered. Increase in the frequency of sprinkling of water within site to arrest the dust. |

<u>Principle 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.</u>

Essential Indicators

1 a. Number of affiliations with trade and industry chambers/ associations.

The company has affiliations with 3 (three) trade and industry associations/ chambers.

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) |
|-----------|---|--|
| 140. | | associations (State/National) |
| 1 | Builders Association of India | National |
| 2 | CREDAI - MCHI | State |
| 3 | National Real Estate Development Council (NAREDCO) | National |

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.

No adverse orders from any regulatory authorities have been received in relation to matter of anti-competitive conduct.

| Name of authority | Brief of the case | Corrective action taken |
|-------------------|-------------------|-------------------------|
| N/A | | |
| N/A | | |

Annual Report 2022-23

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.

No Social Impact Assessment activities of projects has been undertaken during 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 |
|--------------------------------------|----------------------------|----------------------|---|--|----------------------|
| N/A | N/A | | N/A | N/A | N/A |

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

No projects undertaken during the current financial year have had any Rehabilitation and Resettlement (R&R).

| S. No. | | Name of for which ong | | State | District | Affected | Project Families (Fs) | % of PAFs covered by R&R | | paid to PAFs Y (In INR) |
|--------|---|-----------------------------|---|-------|----------|----------|-----------------------------|--------------------------------|---|----------------------------|
| - | - | - | - | - | - | _ | - | - | - | _ |

3 Describe the mechanisms to receive and redress grievances of the community.

The company has a 'Stakeholder Grievance Redressal Form' available on its website, to be filled in case any community members have grievances or complaints. The company aims to resolve each complaint within 15 working days. Necessary actions will be taken by the stakeholder point of contact. In case if the community member is unhappy with the resolution provided, there is provision to escalate the issue to the ESG Committee and engage in mediation/arbitration.

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

| | FY 2022-23 | FY 2021-22 |
|--|------------|------------|
| Directly sourced from MSMEs/ small producers | 1.97% | N/A |
| Sourced directly from within the district and neighbouring districts | 90% | N/A |

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.

In case of EPC Projects, the Company is bound to address all concerns raised during the Defect Liability Period. The customer directly communicates with the heads of the respective projects, who then coordinate with all concerned for satisfactory resolution.

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

| | As a percentage to total turnover |
|--|-----------------------------------|
| Environmental and social parameters relevant to the product Safe and responsible | N/A |
| Safe and responsible usage | N/A |
| Recycling and/or safe disposal | N/A |

Not Applicable, since no such specific products or services.





3 Number of consumer complaints in respect of the following:

No consumer complaints in respect to the below points.

| | FY 2022-23 | | Remarks | FY 2 | FY 2021-22 | |
|--------------------------------|--------------------------|-----------------------------------|---------|--------------------------------|---|--|
| | Received during the year | Pending resolution at end of year | | Received during the year | Pending resolution at end of year | |
| Data privacy | N/A | N/A | | N/A | N/A | |
| Advertising | N/A | N/A | | N/A | N/A | |
| Cyber-security | N/A | N/A | | N/A | N/A | |
| Delivery of essential services | N/A | N/A | | N/A | N/A | |
| Restrictive Trade Practices | N/A | N/A | | N/A | N/A | |
| Unfair Trade Practices | N/A | N/A | | N/A | N/A | |
| Other | N/A | N/A | | N/A | N/A | |

4 Details of instances of product recalls on account of safety issues:

| | Number | Reasons for recall |
|-------------------|--------|--------------------|
| Voluntary recalls | N/A | N/A |
| Forced recalls | N/A | N/A |

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, the company has a cyber security policy in place, which also addresses various risks related to data privacy. The weblink of the Policy: https://www.maninfra.com/codes-and-policies/#ir

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.

During the Financial Year, there have been no issues with respect to advertising and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls within the reporting period. No penalty /action have been taken by any regulatory authorities in this regard.