



MAN INFRACONSTRUCTION LIMITED

(CIN: L70200MH2002PLC136849)

Date: July 12, 2024

To,
The Listing Department
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (E), Mumbai- 400051
Symbol: MANINFRA

To,
The Corporate Relationship Department
BSE Limited
P. J. Towers, Dalal Street,
Mumbai - 400 001
Script Code: 533169

Sub.: Submission of Business Responsibility and Sustainability Reporting for the financial year 2023-2024.

Dear Sir/Madam,

With reference to the captioned subject, please find enclosed Business Responsibility and Sustainability Reporting for the financial year 2023-2024 for your information and records.

Thanking you.

Yours truly,
For Man Infraconstruction Limited



Durgesh Dingankar
Company Secretary
Membership No: F7007

Encl.: as above

L I V E B E T T E R





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 2023-2024

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 ₹)

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.

14 Name of assurance provider

N.A.

15 Type of assurance obtained

N.A.

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II. Products/services

16. 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 | Engineering, Procurement and Construction (EPC) | Construction of buildings & infrastructure carried out on own account basis or on a fee or contract basis. | 100% |

17. 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

18. Number of locations where plants and/or operations/offices of the entity are situated:

| Location | Number of plants | Number of offices | Total |
|---------------|------------------|-------------------|-------|
| National | 3 | 1 | 4 |
| International | 0 | 0 | - |

19. 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

20. 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) | 234 | 222 | 95% | 12 | 5% |
| 2. | Other than Permanent (E) | - | - | - | - | - |
| 3. | Total employees (D + E) | 234 | 222 | 95% | 12 | 5% |
| WORKERS | | | | | | |
| 4. | Permanent (F) | 94 | 94 | 100% | - | - |
| 5. | Other than Permanent (G) | 400 | 400 | 100% | - | - |
| 6. | Total workers (F + G) | 494 | 494 | 100% | - | - |

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) | 1 | 1 | 100% | - | - |
| 2. | Other than Permanent (E) | - | - | - | - | - |
| 3. | Total differently abled employees (D + E) | 1 | 1 | 100% | - | - |
| DIFFERENTLY ABLED WORKERS | | | | | | |
| 4. | Permanent (F) | - | - | - | - | - |
| 5. | Other than permanent (G) | - | - | - | - | - |
| 6. | Total differently abled workers (F + G) | - | - | - | - | - |

21. Participation/Inclusion/Representation of women

| | Total (A) | No. and percentage of Females | |
|---------------------------------------|-----------|-------------------------------|-----------|
| | | No. (B) | % (B / A) |
| Board of Directors[#] | 7 | 2 | 29% |
| Key Management Personnel* | 1 | - | 0% |

[#] Including Director who retired on March 31, 2024

*The Managing Director and CFO are included in the Board of Directors

22 Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

| | FY 24 | | | FY 23 | | | FY 22 | | |
|----------------------------|--------|--------|--------|-------|--------|-------|--------|--------|--------|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent Employees | 10.20% | 0.00% | 10.20% | 6.50% | 0.00% | 6.50% | 4.30% | 0.00% | 4.30% |
| Permanent Workers | 6.50% | 0.00% | 6.50% | 5.50% | 0.00% | 5.50% | 11.60% | 0.00% | 11.60% |

V. Holding, Subsidiary and Associate Companies (including joint ventures)

23. (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 | 63.93% | 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 | 60.00% | 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 |

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| 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) |
|-------|--|--|-----------------------------------|--|
| 11 | MICL Developers LLP | Subsidiary | 99.99% | No |
| 12 | MICL Realtors Pvt. Ltd. | Subsidiary | 100.00% | No |
| 13 | MICL Global Inc. | Subsidiary | 100.00% | No |
| 14 | MICL Properties LLP | Associate | 34.00% | No |
| 15 | MICL Estates LLP | Subsidiary | 99.99% | No |
| 16 | Arhan Homes LLP (Formely known as MICL Homes LLP) | Associate | 31.00% | No |
| 17 | Atmosphere Realty Pvt. Ltd. | Associate | 30.00% | No |
| 18 | MICL Realty LLP | Associate | 46.00% | No |
| 19 | Man Chandak Realty LLP | JV Entity | 50.00% | No |
| 20 | Royal Netra Constructions Private Limited | Associate | 33.33% | No |
| 21 | Atmosphere Homes LLP | Associate | 31.00% | No |

VI. CSR Details

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

Yes

(ii) Turnover (₹ In Crs)

708.33

(iii) Net worth (₹ In Crs)

1,399.77

VII. Transparency and Disclosures Compliances

25. 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 24 | | | FY 23 | | |
|---|---|--|--|---------|--|--|---------|
| | | 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 - https://www.maninfra.com/codes-and-policies/#ir | - | N.A. | - | - | N.A. | - |
| Investors (other than shareholders) | | - | N.A. | - | - | N.A. | - |
| Shareholders | | - | N.A. | - | 3 | Nil | - |
| Employees and workers | | - | N.A. | - | - | N.A. | - |
| Customers | | - | N.A. | - | - | N.A. | - |
| Value Chain Partners | | - | N.A. | - | - | N.A. | - |
| Other - Govt./ Regulatory bodies | | - | N.A. | - | - | N.A. | - |

26. 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 | In light of evolving environmental imperatives and shifting market dynamics, sustainable infrastructure development emerges as a paramount avenue for both environmental stewardship and business growth. Harnessing the synergies between regulatory support, corporate sustainability initiatives, and market demand, stakeholders stand poised to capitalize on the burgeoning opportunities within the realm of green building and infrastructure projects. By embracing sustainable practices and fostering innovation, we can not only mitigate environmental challenges but also unlock substantial economic and societal benefits in the pursuit of a greener, more sustainable future. | N.A. | Positive |
| 2 | Occupational Health & Safety | Risk | Poor hygiene standards and safety hazards in the workplace pose grave risks to both workers and employees. Unsanitary conditions increase the likelihood of illness transmission, exposing individuals to infectious diseases. Similarly, inadequate safety measures elevate the potential for accidents, injuries, and fatalities among personnel. Whether stemming from improper sanitation protocols or insufficient safety precautions, these hazards underscore the critical need for robust hygiene and safety practices on construction sites. Establishing stringent protocols and comprehensive training not only mitigates health risks and prevents injuries but also fosters a culture of responsibility and well-being among workers. | Our company prioritizes the provision of a secure and healthy work environment for our employees and workers. With our ISO 45001:2018 OH&S Management System certification, we ensure meticulous implementation of comprehensive measures to guarantee this commitment. From stringent safety protocols to proactive health initiatives, every aspect of our construction operations is geared towards fostering a workplace culture that values the well-being of all personnel. | Negative |
| 3 | Human Rights and labor conditions | Risk | The infringement of human rights or substandard labor conditions can result in severe reputational harm, accompanied by significant fines and penalties. Such violations not only tarnish our image but also undermine trust among stakeholders and the broader community. Therefore, prioritizing ethical labor practices and upholding human rights standards is not only morally imperative but also essential for safeguarding our company's reputation, ensuring compliance with regulations, and sustaining long-term success. | We are deeply committed to upholding and safeguarding human rights, as enshrined in the Constitution of India, pertinent national legislation, and the International Bill of Human Rights, including their application to business operations as delineated in the United Nations Guiding Principles for Business and Human Rights. Our dedication to this cause extends to our Construction Contract Workers, ensuring that they are equally protected and respected. Alongside implementing robust policies such as the MCL Code of Conduct, MCL Equal Opportunity Policy, MCL Human Rights Policy, and Policy for Prevention of Sexual Harassment, we prioritize the provision of a safe, fair, and dignified working environment for all individuals involved in our projects. | Negative |

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| 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) |
|--------|--|---|--|--|--|
| 4 | Corporate Governance | Risk | Failure to adhere to proper Corporate Governance standards poses significant risks for our Building and Infrastructure Construction Company. Non-compliance with legal mandates, negligence in meeting stakeholder obligations, and instances of corruption or bribery can lead to severe consequences, including damage to our reputation, financial instability, and loss of stakeholder trust. | Our company's policies are integral to fostering effective Corporate Governance. They encompass transparency, compliance with statutory obligations, conflict of interest management, anti-bribery measures, and robust whistleblower protocols. By adhering to these guidelines, we uphold integrity, accountability, and ethical conduct, mitigating risks and reinforcing our commitment to responsible business practices. | Negative |
| 5 | Data Security | Risk | MICL acknowledges the significant risk posed by data breaches in today's digital environment. Such breaches can result in operational disruptions, financial losses, and diminished customer trust, thereby highlighting the critical importance of robust data security measures. | The "MICL Cyber Security" Policy delineates comprehensive measures, encompassing the acquisition of legal and virus protection software, among other safeguards. We ensure adequate Data Server security. Through these concerted efforts, we fortify our defenses against cyber threats, safeguarding the integrity and confidentiality of sensitive information within our organization. | Negative |
| 6 | Extreme weather conditions | Risk | Heavy rainfall poses risks for MICL, impacting safety, health, and project timelines. Unsafe working conditions threaten worker well-being, while delays in project schedules jeopardize timely completion. | Work activities are meticulously planned and scheduled to prioritize safety at MICL. During periods of windy and heavy rainfall, additional measures are implemented to safeguard the health and well-being of our workers. These initiatives include proactive steps to address potential hazards associated with such adverse weather conditions, ensuring that our personnel can carry out their duties in a secure and conducive environment. MICL remains committed to upholding the highest standards of safety and welfare for all employees throughout the year. | Negative |
| 7 | Participation in Government Infrastructure Development Projects / Programs | Opportunity | The Company's adeptness in techno-commercial aspects within the EPC segment empowers us to competitively engage in diverse Government Infrastructure Development Programs and Projects. This proficiency extends to initiatives like the Pradhan Mantri Awas Yojana (PMAY) as well as the SagarMala Project. Leveraging our expertise, we actively participate in these endeavors, contributing to the nation's socio-economic growth and development goals. | N.A. | Positive |



| 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) |
|--------|---|---|--|---|--|
| 8 | Skill Development of Workforce | Opportunity | MICL is committed to empowering Indian youth by facilitating construction-related skill training opportunities, fostering improved livelihood prospects. We are actively investigating potential involvement in the Pradhan Mantri Kaushal Vikas Yojana (PMKVY), a flagship initiative of the Ministry of Skill Development & Entrepreneurship (MSDE), administered by the National Skill Development Corporation. Through our participation, we aim to contribute to the nation's skill development agenda, equipping individuals with the necessary competencies for success in the construction sector. | N.A. | Positive |
| 9 | Direct Involvement of Employees in Social Initiatives | Opportunity | As a listed entity with a philanthropic ethos, MICL is deeply committed to contributing to social causes across diverse domains. Recognizing the importance of employee engagement in such initiatives, the top management has spearheaded this endeavor. Teams of five employees each are empowered to undertake social causes independently, with two days per year designated as Work Days for employee participation in social activities. This initiative underscores our firm belief in the collective responsibility of all employees towards making meaningful contributions to society. | N.A. | Positive |
| 10 | Supply Chain Sustainability | Opportunity | MICL recognizes that the integration of Sustainable Policies, Practices, and Procedures within its business operations is essential, but acknowledges the limited impact without extending these practices throughout its entire supply chain. Understanding that building Sustainability is a national imperative, MICL has developed a comprehensive "Supplier Code of Conduct" focused on Sustainable Practices. The company sources from nearby suppliers to reduce costs, improve controls and cut down significant emissions related to transportation. | N.A. | Positive |
| 11 | Employee Wellbeing & Development | Risk | A high turnover rate poses a significant risk to business operations and growth strategies. Failure to implement appropriate policies, procedures, and training programs for employee well-being and development may impede business growth and hinder our ability to capitalize on growth opportunities. | MICL places emphasis on employee retention, well-being, and development. With a steadfast commitment to timely salary disbursements and annual performance appraisals, we ensure the economic stability of our workforce. Our dedication extends further by providing regular training programs for employee development and organizing annual events and outings to foster engagement. This proactive approach mitigates turnover risks, fostering a motivated and loyal workforce essential for sustained growth and long-term success. | Negative |

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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, Transparent 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

| 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) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| b. Has the policy been approved by the Board? (Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| c. Web Link of the Policies, if available | https://www.maninfra.com/codes-and-policies/#ir | | | | | | | | |
| 2. Whether the entity has translated the policy into procedures. (Yes / No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| 3. Do the enlisted policies extend to your value chain partners? (Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| 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. | The policies are in compliance with applicable laws. The company always endeavors to incorporate best practices in its policies. The Policy framework is guided by ISO 9001:2015 Quality Management, ISO 14001:2015 Environment Management, ISO 45001:2018 Occupational Health & Safety Management and ISO 26000: 2010 Social Responsibility Standards | | | | | | | | |
| 5. Specific commitments, goals and targets set by the entity with defined timelines, if any. | No | No | No | No | No | No | No | No | No |
| 6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |



Governance, leadership and oversight

| | |
|---|---|
| <p>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> | <p>The MICL Group, encompassing Real Estate and EPC sectors, prioritizes responsible and sustainable business practices. We firmly believe that robust governance principles are essential for creating enduring value for stakeholders and promoting sustainability. Our organization is rooted in core values of fairness, effectiveness, and efficiency, guiding our operations.</p> <p>Environmental stewardship is integral to our business ethos. We actively work towards reducing our carbon footprint, implementing dust control measures, and monitoring resource consumption. Through targeted efforts, we aim to decrease electricity and fuel usage while adopting best practices for waste management, emphasizing recycling and minimizing landfill diversion.</p> <p>We are committed to prioritizing the health, well-being, and empowerment of our employees. Additionally, our CSR and social initiatives reflect our dedication to supporting vulnerable communities. MICL Group continually seeks to enhance existing practices, striving for excellence in environmental, social, and governance domains to create a positive impact on society and the environment.</p> <p>As a Company firmly believing in Sustainable Construction and Sustainable Development, we are in a constant quest for Continual Improvement covering processes and outcomes related to Environment, Social, and Governance and addressing all stakeholders. Our proactive approach ensures that we address environmental concerns, promote social welfare, and uphold robust governance practices. Through ongoing efforts, we strive to create a positive impact on society and the environment while fostering long-term sustainability and resilience.</p> |
| <p>8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).</p> | <p>Mr. Ashok M. Mehta, Director ashok@maninfra.com DIN : 03099844</p> |
| <p>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.</p> | <p>Yes, the company has an ESG committee which is responsible for addressing sustainability related as well as human rights impacts or issues. The committee consists of Mr. Ashok M. Mehta and Senior Management Members from various Departments.</p> |

10. Details of Review of NGRBCs by the Company:

| Subject for Review | Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee | | | | | | | | | Frequency (Annually/ Half yearly/ Quarterly/ Any other –please specify) | | | | | | | | |
|--|--|----|----|----|----|----|----|----|----|---|----|----|----|----|----|----|----|----|
| | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
| Performance against above policies and follow up action. | All the policies of the company are approved by the Board and reviewed periodically or on need basis by the ESG committee as a part of ESG review. | | | | | | | | | | | | | | | | | |
| Compliance with statutory requirements of relevances to the principles, and, rectification of any non-compliances. | During the review, the effectiveness of the policies is evaluated and necessary amendments, if any, to policies and procedures are implemented. The company complies with all external regulations and principles as applicable. | | | | | | | | | | | | | | | | | |

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| | | | | | | | | | |
|---|---|------------|------------|------------|------------|------------|------------|------------|------------|
| 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 |
| | Yes. Being an Integrated Management System Certified Company covering ISO 9001:2015 Quality Management System, ISO 14001:2015 Environment Management System and ISO 45001:2018 Occupational Health and Safety Management System, most of the elements detailed in the policies gets assessed during the Annual Audits conducted by TUV, Nord. | | | | | | | | |

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) | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | 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. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| The entity does not have the financial or/ human and technical resources available for the task (Yes/No) | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| It is planned to be done in the next financial year (Yes/No) | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Any other reason (please specify) | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | 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 understanding of the nine principles of NGRBC | 100% |
| Key Managerial Personnel | 2 | 1) A preliminary understanding of the nine principles of NGRBC | 100% |
| Employees other than BoD and KMPs | 2 | 2) Prevention of Sexual Harassment at Workplace Training 3) Environmental, health & safety training | 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 been 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 maintains a robust anti-corruption and anti-bribery policy designed to guide all personnel and associated individuals in adhering to relevant laws, rules, and regulations. This policy encompasses individuals across all levels, including board members, senior management, employees, interns, contractors, consultants, agents, and any other parties associated with the company. Acting on behalf of the company, these individuals are bound by the policy's provisions, which uphold a zero-tolerance stance towards corruption and bribery practices.

Periodic reviews and assessments of operations are conducted to ensure strict compliance with the anti-corruption and anti-bribery policy. In instances where deviations are identified, proactive corrective measures are promptly implemented. By prioritizing adherence to ethical standards and legal requirements, the Company fosters a culture of integrity and accountability across its operations, safeguarding its reputation and promoting trust among stakeholders.

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

5 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 or the chages of bribery/ corruption against any Directors/KMPs/employees/workers.

| | FY 2023-24 | FY 2022-23 |
|-----------|------------|------------|
| Directors | - | - |
| KMPs | - | - |
| Employees | - | - |
| Workers | - | - |

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6 Details of complaints with regard to conflict of interest:

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

| | FY 2023-24 | | FY 2022-23 | |
|--|------------|---------|------------|---------|
| | 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 FY24 and therefore no corrective action has been required to be taken

8 Number of days of accounts payables ((Accounts payable * 365) / Cost of goods / services procured) in the following format:

| | FY 2023-24 | FY 2022-23 |
|-------------------------------------|------------|------------|
| Number of days of accounts payables | 56 | 38 |

9 Open-ness of business

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties in the following format:

| Parameter | Metrics | FY 2023-24 | FY 2022-23 |
|----------------------------|--|--|------------|
| Concentration of purchases | a. Purchases from trading houses as % of total purchases | Nil | Nil |
| | b. Number of trading houses where purchases are made from | Nil | Nil |
| | c. Purchases from top 10 trading houses as % of total purchases from trading houses | Nil | Nil |
| Concentration of Sales | a. Sales to dealers / distributors as % of total sales | Not Applicable - MICL is an EPC Company. | |
| | b. Number of dealers / distributors to whom sales are made | | |
| | c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors | | |
| Share of RPTs in | a. Purchases (Purchases with related parties / Total Purchases) | 0.85% | 2.84% |
| | b. Sales (Sale to related parties / Total Sales) | 15.69% | 24.42% |
| | c. Loans & Advances (Loans & advances given to related parties / Total Loans & advances) | 78.94% | 83.12% |
| | d. Investments (Investments in related parties / Total Investments made) | 80.05% | 95.75% |

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 2023-24 | FY 2022-23 | Details of Improvement in environmental & social impacts |
|-------|------------|------------|--|
| R&D | - | - | No such instances |
| Capex | - | - | No such instances |



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

Yes. MICL implements a structured procedure for sustainable sourcing. This involves developing a clear policy aligning with environmental, social, and governance (ESG) principles, evaluating suppliers based on sustainability criteria, and engaging them to communicate expectations. Supply chain transparency is prioritized, with continuous monitoring and improvement efforts in place. MICL has developed the “MICL Supplier Code of Conduct” to communicate these expectations to suppliers. Additionally, suppliers are selected from locations within a radius of a maximum of 300 km, whenever possible to reduce carbon footprint, further enhancing the company’s commitment to sustainability.

Through these measures, MICL ensures that its procurement practices contribute to sustainable development in the construction industry, promoting environmental conservation, social responsibility, and ethical business practices.

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

Approximately 90% of materials are locally sourced, reducing transportation distances and minimizing fuel consumption, thus lowering 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.

MICL has procedures in place for the safe recycling of its waste. The company has agreements with authorized recyclers for the disposal of such waste.

The waste primarily consists of:

- Construction & demolition waste: The waste generated during construction is segregated systematically and sent to designated agencies at regular intervals during the construction phase.
- Steel waste - Steel scraps are stacked and later sold to authorized third-party vendors for recycling and further processing.
- Packaging/ Plastic waste: Packaging waste is segregated and sent to designated agencies at regular intervals.
- E-waste - The amount of e-waste generated is negligible. However, all the electric equipment nearing its end of life is sold to authorized third-party vendors.
- Sewage waste – Wastewater is treated in a septic tank installed at the site. The capacity of the septic tanks is based on the number of workers and staff employed at a particular site.

In addition, MICL adopts the following practices to reduce its waste generation:

- Reuse of aluminum formwork of MIVAN shuttering. The formwork is reused multiple times before disposing to authorized vendors. MIVAN shuttering also eliminates the use of external cement plaster, resulting in overall waste reduction.

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.

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 | 222 | 222 | 100% | 222 | 100% | N.A. | - | 222 | 100% | - | - |
| Female | 12 | 12 | 100% | 12 | 100% | 12 | 100% | N.A. | - | - | - |
| Total | 234 | 234 | 100% | 234 | 100% | 12 | 100% | 222 | 100% | - | - |

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| 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) |
| Other than Permanent employees | | | | | | | | | | | |
| Male | - | - | - | - | - | - | - | - | - | - | - |
| Female | - | - | - | - | - | - | - | - | - | - | - |
| Total | - | - | - | - | - | - | - | - | - | - | - |

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 | 94 | 94 | 100% | 94 | 100% | N.A. | - | 94 | 100% | - | - |
| Female | - | - | - | - | - | - | - | - | - | - | - |
| Total | 94 | 94 | 100% | 94 | 100% | - | - | 94 | 100% | - | - |
| Other than Permanent workers | | | | | | | | | | | |
| Male | 400 | - | - | 400 | 100% | - | - | - | - | - | - |
| Female | - | - | - | - | - | - | - | - | - | - | - |
| Total | 400 | - | - | 400 | 100% | - | - | - | - | - | - |

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format:

| | FY 2023-24 | FY 2022-23 |
|---|------------|------------|
| Cost incurred on well-being measures as % of total revenue of the company | 0.21% | 0.20% |

Note : This includes the cost incurred on well-being measures of employees and workers including contract workers. The costs are related to spendings on health insurance reimbursement, children education reimbursements and accident insurance.

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

| Benefits | FY 2023-24 | | | FY 2022-23 | | |
|-------------------------|--|--|--|--|--|--|
| | 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 | 89% | 96% | Y | 87% | 95% | Y |
| Gratuity | 100% | 100% | N.A. | 100% | 100% | N.A. |
| ESI | 9% | 17% | Y | 9% | 25% | Y |
| 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, our premises and offices do not meet the accessibility standards outlined in the Rights of Persons with Disabilities Act, 2016, due to the location of the Head Office being within a Commercial Complex not owned by the Company, and the temporary nature of construction sites. Presently, the company has only one differently-abled employee at site for whom the Company has made necessary arrangements for easy access. The company endeavors to accommodate differently-abled employees in management roles with minimal manual work.

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 upholds an Equal Opportunity Policy in compliance with the Rights of Persons with Disabilities Act, 2016. We are committed to fostering an inclusive environment where discrimination based on race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability, or any other legally protected category is strictly prohibited. Our steadfast commitment to equal opportunities ensures fairness, respect, and dignity for all individuals within our organization. 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. |
| Female | N.A. | N.A. | N.A. | N.A. |
| Total | 100% | 100% | N.A. | N.A. |

No female employee had taken parental leave in FY 24.

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 | |

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 2023-24 | | | FY 2022-23 | | |
|----------------------------------|--|--|-----------|--|--|---------|
| | 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 | 234 | - | 0% | 239 | - | 0% |
| - Male | 222 | - | 0% | 230 | - | 0% |
| - Female | 12 | - | 0% | 9 | - | 0% |
| Total Permanent Workers | 94 | - | 0% | 115 | - | 0% |
| - Male | 94 | - | 0% | 115 | - | 0% |
| - Female | 0 | - | - | 0 | - | - |

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8 Details of training given to employees and workers:

| Category | FY 2023-24 | | | | | FY 2022-23 | | | | |
|------------------|------------|-------------------------------|-------------|----------------------|------------|------------|-------------------------------|-------------|----------------------|------------|
| | 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 | 222 | 222 | 100% | 164 | 74% | 230 | 230 | 100% | 160 | 70% |
| Female | 12 | 12 | 100% | 10 | 83% | 9 | 9 | 100% | 7 | 78% |
| Total | 234 | 234 | 100% | 174 | 74% | 239 | 239 | 100% | 167 | 70% |
| Workers | | | | | | | | | | |
| Male | 494 | 494 | 100% | - | 0% | 840 | 840 | 100% | - | 0% |
| Female | - | - | - | - | - | - | - | - | - | - |
| Total | 494 | 494 | 100% | - | 0% | 840 | 840 | 100% | - | 0% |

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

| Category | FY 2023-24 | | | FY 2022-23 | | |
|------------------|------------|------------|-------------|------------|------------|-------------|
| | Total (A) | No. (B) | % (B / A) | Total (C) | No. (D) | % (D / C) |
| Employees | | | | | | |
| Male | 222 | 222 | 100% | 230 | 230 | 100% |
| Female | 12 | 12 | 100% | 9 | 9 | 100% |
| Total | 234 | 234 | 100% | 239 | 239 | 100% |
| *Workers | | | | | | |
| Male | 94 | 94 | 100% | 115 | 115 | 100% |
| Female | - | - | - | - | - | - |
| Total | 94 | 94 | 100% | 115 | 115 | 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?

The Company is an Integrated Management System Certified Company, meeting the requirements specified in ISO 45001:2018 Occupational Health and Safety Management System, 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. Mandated safety gear such as safety harnesses, shoes, jackets, helmets, and gloves are provided to onsite personnel, with periodic assessments ensuring adherence. Extensive use of barricading and safety nets minimizes fall hazards, while OH&S Induction Training and daily Toolbox talks are standard practices across operational sites.

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

In accordance with ISO 45001:2018 Occupational Health and Safety Management System requirements, the company initiates a Hazard Identification and Risk Assessment (HIRA) process at the outset of each project and activity. The Safety and Execution team collaborates to identify associated hazards and assess risks relative to existing control measures. This comprehensive evaluation extends to both routine and non-routine activities. Based on the HIRA assessment, additional control measures are incorporated if required. Health and safety professionals are stationed onsite to monitor ongoing operations, while regular inspections ensure the effectiveness of safety equipment.



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

Yes, The company provides platforms like Daily Tool Box Talk and Weekly Safety Review Meetings for workers to voice safety concerns and identify work-related hazards. Proactive measures are promptly taken to address these concerns and mitigate hazards based on worker inputs. Additionally, the company complies with all health and safety requirements outlined in the 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 are provided access to non-occupational medical and healthcare services through a Mediclaim Policy Premium reimbursement scheme. The eligibility for reimbursement is determined based on the individual’s grade and length of association with the Company. We also have a tie-up with Sushrut Multi-speciality Hospital for non-occupational medical and healthcare services for the employees, workers and their families where the services are provided at discounted rate.

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

| Safety Incident/Number | Category | FY 2023-24 | FY 2022-23 |
|---|-----------|------------|------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | 0.99 | 0.73 |
| | Workers | 0.43 | 0.28 |
| Total recordable work-related injuries | Employees | 1 | 1 |
| | Workers | 2 | 2 |
| No. of fatalities | Employees | - | - |
| | Workers | - | 1 |
| High consequence work-related injury or ill-health (excluding fatalities) | Employees | - | - |
| | Workers | - | - |

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

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

MICL implements a variety of measures to ensure the safety and well-being of its workforce. Firstly, standard operating procedures (SOP) are established for all construction activities, ensuring consistency and adherence to safety protocols across the board. Additionally, hazard identification and risk assessment (HIRA) are conducted for each task undertaken, enabling proactive identification and mitigation of potential risks.

MICL prioritizes the thorough induction of new workers through audio-video sessions, supplemented by daily toolbox talks and trade-specific training. This comprehensive approach ensures that all employees are equipped with the necessary knowledge and skills to perform their tasks safely and effectively.

A range of physical safety measures is implemented on-site, including barricading openings, covering duct openings, and providing horizontal and vertical safety netting. These precautions minimize the risk of accidents and injuries, fostering a secure working environment for all personnel.

MICL emphasizes continuous improvement in occupational health and safety practices through initiatives such as regular health check-up campaigns, cleanliness drives, and adherence to hygiene standards. Additionally, tie-ups with nearby hospitals, first aid and CPR training sessions, and the formation of cross-site safety groups demonstrate a proactive commitment to employee well-being. Annual safety week celebrations serve to reinforce the organization’s dedication to fostering a culture of safety and ensuring the health and welfare of its workforce.

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 2023-24 | | | FY 2022-23 | | |
|--------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
| | 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 | - | - | | - | - | |

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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.

MICL has conducted a comprehensive assessment of safety-related incidents, including Loss Time Injuries and Near-Misses, and has implemented various corrective actions to prevent their recurrence in the future.:

- i) Inspection Checklist of Pneumatic Gun, Crane Transformer, etc amended to include relevant inspection points.
- ii) Emphasis placed during toolbox talks on securely anchoring both hooks of the full-body harness at appropriate location, along with continued utilization of horizontal safety nets.
- iii) Supervisors are always present for all height-related work, ensuring enhanced oversight and safety measures.
- iv) Subcontractors were instructed to unload only debris through the debris chute, with attendants stationed at collection points to prevent blockages.
- v) Horizontal nets were installed beneath jumping working platforms to halt falls of workers and objects.
- vi) Vertical safety nets were installed on all excavation slopes to mitigate the risk of loose materials falling.

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.

Any individual or institution that adds value to the business of the Company or who can influence or/ is impacted by our operations/activities, is identified as a core stakeholder. This inter alia includes employees/workers, shareholders and investors, suppliers / contractors, customers, govt. / regulatory bodies, communities, industry associations, financial institutions, and non-governmental organizations. Stakeholders, both Internal and External 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. Identifying key stakeholder groups in the EPC business, particularly in the building and infrastructure sector, involves a systematic approach to ensure that all relevant parties are considered.

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

| No. | 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 |
|-----|--------------------|---|---|--|---|
| 1 | Employees/ Workers | No | Email, meetings, notice board | Ongoing | The purpose is to foster a motivated and skilled workforce, crucial for successful project delivery. Key topics include safety, training, career development, and fair compensation. Concerns raised often involve workplace safety, job security, and opportunities for growth and advancement within the company. |

| No. | 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 |
|-----|--------------------------|--|---|--|--|
| 2 | Shareholders & Investors | No | Meeting, Conference Calls, Email, Website | Annually, Quarterly | The purpose is to provide transparency and build trust in the company's financial health and strategic direction. Key topics include financial performance, ESG performance, return on investment, strategic plans, and corporate governance. Concerns often center on growth prospects, dividend policies, risk management, and the company's ability to achieve sustainable long-term success. |
| 3 | Suppliers / Contractors | No | Emails, Personal Interactions | Ongoing | The purpose is to establish strong partnerships and ensure the timely delivery of high-quality materials and services. Key topics include expectations, contract terms, delivery & supply chain matters & issues, regulatory compliance, sustainable sourcing opportunities & products, EHS initiatives & opportunities, etc. Concerns revolve around supply chain disruptions, cost management, and aligning work schedules with project requirements. |
| 4 | Customers | No | Emails, Personal Interactions, Meetings, Website | Ongoing | The purpose is to understand and meet their needs and expectations, ensuring project success and fostering long-term relationships. Key topics include project timelines, quality of work, cost estimates, and communication. Concerns raised often involve meeting deadlines, staying within budget, and ensuring satisfaction with the final outcome. |
| 5 | Govt / Regulatory Bodies | No | Emails, Personal Interactions, Meetings | Ongoing | The purpose is to ensure compliance with laws, standards, and regulations governing construction and infrastructure projects. Key topics include permissions & clearances from authorities, reporting & statutory compliances, fines & penalties if any, safety standards, environmental impact, and ethical practices. Concerns revolve around adherence to policies, timely approvals, and maintaining transparent communication to avoid legal and regulatory issues. |
| 6 | Communities | Yes | Meetings, Notices in Media, Personal Interactions | As and when required | The purpose is to foster positive relationships and ensure responsible project development while addressing community needs. Key topics include environmental impact, community benefits, and Corporate Social Responsibility (CSR) activities. Concerns often involve safety & noise levels. |

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| No. | 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 |
|-----|--------------------------------|---|---|--|---|
| 7 | Industry Associations | No | Emails, Personal Interactions, Meetings | As and when required | The purpose is to stay informed on industry trends, best practices, and regulatory changes. Key topics include networking opportunities, knowledge sharing, and professional development. Concerns raised often involve industry trends, policy advocacy, and the potential for collaborative projects or partnerships to advance mutual interests. |
| 8 | Financial Institutions | No | Emails, Personal Interactions, Meetings | As and when required | The purpose is to secure funding and manage financial risks effectively for projects. Key topics include terms of facilities, interest rates, financial health, and repayment schedules. Concerns revolve around creditworthiness, timely repayments, and the overall economic environment's impact on project financing and stability. |
| 9 | Non Governmental Organisations | No | Emails, Personal Interactions, Meetings | Ongoing | The purpose is to have positive engagements and ensure effective utilization of CSR funds. |

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 2023-24 | | | FY 2022-23 | | |
|------------------------|------------|--|-----------|------------|--|-----------|
| | Total (A) | No. of employees / workers covered (B) | % (B / A) | Total (C) | No. of employees / workers covered (D) | % (C / D) |
| Employees | | | | | | |
| Permanent | 234 | 234 | 100% | 239 | 239 | 100% |
| Other than Permanent | - | - | - | - | - | - |
| Total Employees | 234 | 234 | 100% | 239 | 239 | 100% |
| Workers | | | | | | |
| Permanent | 94 | 94 | 100% | 115 | 115 | 100% |
| Other than Permanent | 400 | 400 | 100% | 725 | 725 | 100% |
| Total Workers | 494 | 494 | 100% | 840 | 840 | 100% |

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

| Category Employees | FY 2023-24 | | | | | FY 2022-23 | | | | |
|------------------------------|------------|-----------------------|-----------|------------------------|-------------|------------|-----------------------|-----------|------------------------|-------------|
| | 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) |
| Permanent | 234 | - | - | 234 | 100% | 239 | - | - | 239 | 100% |
| Male | 222 | - | - | 222 | 100% | 230 | - | - | 230 | 100% |
| Female | 12 | - | - | 12 | 100% | 9 | - | - | 9 | 100% |
| Other than Permanent | | | | | | | | | | |
| Male | - | - | - | - | - | - | - | - | - | - |
| Female | - | - | - | - | - | - | - | - | - | - |
| Workers | | | | | | | | | | |
| Permanent | 94 | - | - | 94 | 100% | 115 | - | - | 115 | 100% |
| Male | 94 | - | - | 94 | 100% | 115 | - | - | 115 | 100% |
| Female | - | - | - | - | - | - | - | - | - | - |
| Other than Permanent* | 400 | - | - | - | - | 725 | - | - | - | - |
| Male | 400 | - | - | - | - | 725 | - | - | - | - |
| 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

a. Median remuneration / wages:

| | 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 | 3,52,50,000 | 0 | - |
| Key Managerial Personnel | 1 | 45,00,000 | 0 | - |
| Employees other than BoD and KMP | 219 | 6,80,000 | 12 | 5,50,000 |
| Workers | 94 | 4,50,000 | 0 | - |

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

b. Gross wages paid to females as % of total wages paid by the entity, in the following format :

| | FY 2023-24 | FY 2022-23 |
|---|------------|------------|
| Gross wages paid to females as % of total wages | 3.20% | 2.60% |

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. MICAL's ESG committee, headed by Mr. Ashok M. Mehta and comprising senior management members from various departments, is tasked with ensuring sustainability and responsible practices.

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

“The Human Rights Policy” at MICL incorporates a robust grievance redressal mechanism for addressing human rights issues. Stakeholders are actively encouraged to report any violations they encounter. With a firm commitment to addressing complaints swiftly and effectively, MICL pledges to resolve all human rights grievances promptly. The company is dedicated to taking appropriate actions to rectify any identified adverse impacts on human rights and to prevent future violations. By fostering a culture of accountability and responsiveness, MICL endeavors to uphold its commitment to respecting and safeguarding human rights across its operations.

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

| | FY 2023-24 | | | FY 2022-23 | | |
|------------------------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
| | 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 Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

| | FY 2023-24 | FY 2022-23 |
|--|------------|------------|
| Total Complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | 0 | 0 |
| Complaints on POSH as a % of female employees / workers | 0% | 0% |
| Complaints on POSH upheld | N.A. | N.A. |

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

MICL maintains a comprehensive Whistleblower Policy, empowering employees to report wrongdoing, unethical conduct, or non-compliance without fear of reprisal. This policy covers practices that could potentially harm the organization, including financial losses and reputational damage. Additionally, the company upholds a POSH (Prevention of Sexual Harassment) Policy, specifically designed to safeguard the interests of women in the workplace. Through these proactive measures, MICL fosters a culture of transparency, accountability, and respect, ensuring a safe and ethical work environment for all employees.

9 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. While human rights requirements are not explicitly outlined in business agreements and contracts, MICL maintains a zero-tolerance policy towards human rights violations. The company prioritizes ethical conduct and adopts industry best practices when engaging with employees, workers, customers, suppliers, and other partners throughout its value chain. MICL shares its “Supplier Code of Conduct” with suppliers and contractors, which includes a dedicated section on human rights. Suppliers and contractors are expected to adhere to these standards, reflecting MICL’s commitment to upholding human rights principles across its operations and extended network.

10 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 | - |



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

Note: FY 2022-23 BRSR Report included 4 Sites & Head Office for Standalone Reporting. In FY 2023-24, the below data for reporting on Principle 6, includes 3 Sites & Head Office. One Site from last year has been completed. Head Office and one Site are completely under MICL. The holding structure at two other Sites has changed. At these two Sites some activities are conducted under MICL and some activities under a Subsidiary Company. For this Site the data is segregated and used. No new Sites are added in MICL Standalone. Hence the values of all Environmental Indicators including Total Energy Consumption, Water Consumption, Non GHG Gas Emission, GHG Gas Emission and Waste generated is significantly less. For Data Parity, in case we include Head Office and 3 Sites fully then the values of Environmental Indicators for FY2023-24 are as detailed below :

- 1) Total Energy Consumption (in Terra Joules) : 13.8
- 2) Energy Intensity (Tera Joules per Crore) : 0.0195
- 3) Total Water Consumption (in Kilolitres) : 125,676
- 4) Water Intensity (Kilolitre per Crore) : 177
- 5) Total Scope 1 GHG emissions (Metric Tonnes of CO2 eq.) : 441
- 6) Total Scope 2 GHG emissions (Metric Tonnes of CO2 eq.) : 1372
- 7) Total Emission Intensity (Metric Tonnes of CO2 eq. per Cr.) : 2.56
- 8) Total Non GHG emissions in (Kgs) : 6855
- 9) Total Waste Generated (Metric Tonnes) : 5,116
- 10) Total Waste Intensity (Metric Tonnes per Crore) : 7.223

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

| Parameter | FY 2023-24 | FY 2022-23 |
|---|------------|-------------|
| From renewable sources | | |
| Total electricity consumption (A) | | |
| Total fuel consumption (B) | | |
| Energy consumption through other sources (C) | | |
| Total energy consumed from renewable sources (A+B+C) | | |
| From non renewable sources | | |
| Total electricity consumption in Tera Joules (D) | 1.5 | 7.2 |
| Total fuel consumption in Tera Joules (E) | 6.2 | 28.5 |
| Energy consumption through other sources (F) | - | - |
| Total energy consumed in Tera Joules from non renewable sources (D+E+F) | 7.7 | 35.7 |
| Total energy consumed in Tera Joules (A+B+C+D+E+F) | 7.7 | 35.7 |
| Energy intensity per rupee of turnover (Total energy consumption/ Revenue from operations) (Tera Joule per Crore) | 0.011 | 0.045 |
| Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumption/ Revenue from operations adjusted for PPP) (Tera Joule per \$Crore) | 0.244 | 0.992 |
| Energy intensity in terms of physical output | | |
| Energy intensity (optional) – the relevant metric may be selected by the entity | | |

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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 2023-24 | FY 2022-23 |
|---|---------------|-----------------|
| Water withdrawal by source (in kilolitres) | | |
| (i) Surface water | - | - |
| (ii) Groundwater | - | - |
| (iii) Third party water | 52,796 | 1,41,743 |
| (iv) Seawater / desalinated water | - | - |
| (v) Others | - | - |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | 52,796 | 1,41,743 |
| Total volume of water consumption (in kilolitres) | 52,796 | 1,41,743 |
| Water intensity per rupee of turnover (Water consumed / Revenue from operations) (Kilolitre per Crore) | 75 | 178 |
| Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Water consumed / Revenue from operations adjusted for PPP) (Kilolitre per \$Crore) | 1,670 | 3,939 |
| Water intensity in terms of physical output | | |
| 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 Provide the following details related to water discharged:**

| Parameter | FY 2023-24 | FY 2022-23 |
|--|------------|------------|
| Water discharge by destination and level of treatment (in kilolitres) | | |
| (i) To Surface water | - | - |
| - No treatment | | |
| - With treatment - please specify level of treatment | | |
| (ii) To Groundwater | - | - |
| - No treatment | | |
| - With treatment - please specify level of treatment | | |
| (iii) To Seawater | - | - |
| - No treatment | | |
| - With treatment - please specify level of treatment | | |
| (iv) Sent to third parties | - | - |
| - No treatment | | |
| - With treatment - please specify level of treatment | | |
| (v) Others | - | - |
| - No treatment | | |
| - With treatment - please specify level of treatment | | |
| Total water discharged (in kilolitres) | - | - |



5 Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

Yes, a mechanism for Zero Liquid Discharge has been initiated. In one of the project sites, 100% of the rainwater runoff is harvested during the monsoon period and reused for construction activities, thereby reducing the dependency on external sources by 9,00,000 litres.

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

| <i>Parameter</i> | <i>Please specify unit</i> | FY 2023-24 | FY 2022-23 |
|-------------------------------------|----------------------------|-------------------|-------------------|
| BC | Kgs | 179 | 824 |
| NOx | Kgs | 4,451 | 20,591 |
| NO2 | | - | - |
| SO2 | | - | - |
| Particulate matter (PM) 10 | Kgs | 287 | 1,328 |
| Particulate matter (PM) 2.5 | Kgs | 287 | 1,328 |
| Persistent organic pollutants (POP) | | - | - |
| Volatile organic compounds (VOC) | | - | - |
| Hazardous air pollutants (HAP) | | - | - |
| Ozone (O3) | | | |
| Lead (Pb) | | | |
| Carbon Monoxide (CO) | Kgs | 1,470 | 6,799 |
| 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 which has also been crosschecked with the revised 2006 IPCC Guidelines for National Greenhouse Gas Inventories. These include emissions from fuel consumption only. Air emissions from any other activities are not included. The company also has a protocol to monitor the ambient air quality on-site on a regular basis.

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

| <i>Parameter</i> | <i>Unit</i> | FY 2023-24 | | FY 2022-23 | |
|--|--|-------------------|--------|-------------------|----------|
| Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | CO2 | 431.00 | CO2 | 2,113.09 |
| Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | CO2 | 307.00 | CO2 | 1,626.89 |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover | Metric tonne of CO2 equivalent per Crore | 1.04 | | 4.70 | |
| Total Scope 1 and Scope 2 emission per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 emissions / Revenue from operations adjusted for PPP) | Metric tonne of CO2 equivalent per \$Crore | 23.3 | | 104.1 | |
| Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity | | | | | |

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**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

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

The company's primary business is providing EPC (engineering, procurement, and construction) services to building and infrastructure projects. The following initiatives are taken by the company to reduce its Green House Gas emissions:

- Use of solar energy in one of the projects for site offices, cabins, roads, weigh-bridge, and parking resulting in total diesel savings of 30,576 litres.
- Use of energy-efficient equipment and LED lighting to minimize the total electricity consumption, thereby reducing scope 2 emissions.

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

| Parameter | FY 2023-24 | FY 2022-23 |
|--|--------------|--------------|
| Total Waste generated (in metric tonnes) | | |
| Plastic waste (A) | - | - |
| E-waste (B) | - | - |
| Bio-medical waste (C) | - | - |
| Construction and demolition waste (D) | 2,661 | 4,777 |
| 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 | 19 | 23 |
| Total (A+B + C + D + E + F + G+ H) | 2,680 | 4,800 |
| Waste Intensity per rupee of turnover (Total waste generated / Revenue from operations) (Metric Tonnes per Crore) | 3.784 | 6.016 |
| Waste Intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) (Metric Tonnes per \$Crore) | 85 | 133 |
| Waste Intensity in terms of physical output | | |
| Waste Intensity (optional) in terms of physical output - the relevant metric may be selected by the entity | | |
| 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** | 266 | 478 |
| (iii) Other recovery operations | - | - |
| Total | 266 | 478 |
| 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 | 2,414 | 4,322 |
| Total | 2,414 | 4,322 |

* **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

- 10 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.**

MIGL is Certified for ISO 14001 : 2015 Environment Management System. Most of the waste generated by the company's operations comprises construction and demolition waste or packaging waste. In two of the sites, part of the concrete waste from the construction process is re-used for landfilling. Other construction and demolition waste is segregated systematically and sent to designated agencies at regular intervals during the construction phase. Some of the waste (such as steel) is sold to authorised dealers or third party vendors.

- 11 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

- 12 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 FY24. For the construction projects, it is under the scope of the Principal Employer. For the ongoing construction projects, all the applicable EIAs are carried out by the Principal Employer before the construction project are 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 |
|-----------------------------------|----------------------|------|---|--|-------------------|
| - | - | - | - | - | - |

- 13 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 adheres to all applicable environmental laws, regulations, and guidelines in India. As an IMS-certified entity, conforming to ISO 9001:2015 QMS, ISO 14001:2015 EMS, and ISO 45001:2018 OH&SMS standards, it has established a formal, documented system for regularly obtaining statutory and regulatory updates and monitoring compliance. These updates are sourced from Sheel Technologies - Sheel Online and recorded in the "Legal Register" for ongoing compliance tracking.

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

No Non-Compliance related to any of the environmental law/ regulations/ guidelines in India in FY 2023-24.

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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.

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

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. | | |

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. | 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 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 INR) |
|--------|--|-------|----------|---|--------------------------|---|
| - | - | - | - | - | - | - |

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

The "Contact Us" section on our MICL website <https://www.maninfra.com> provides an avenue for community members to report grievances or complaints. The company commits to resolving each complaint within 15 working days, with the stakeholder point of contact responsible for necessary actions. Should a community member remain dissatisfied with the resolution, there is a provision to escalate the matter to the ESG (Environmental, Social, and Governance) Committee for further review and potential mediation or arbitration. This structured process underscores MICL's dedication to addressing stakeholder concerns promptly and transparently, fostering trust and accountability within the communities it serves.

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

| | FY 2023-24 | FY 2022-23 |
|--|------------|------------|
| Directly sourced from MSMEs/ small producers | 35.72% | 5.72% |
| Sourced directly from within the district and neighbouring districts | 92% | 90% |

5 Job creation in smaller towns - Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost.

| Location | FY 2023-24 | FY 2022-23 |
|--------------|------------|------------|
| Rural | - | - |
| Semi-urban | - | - |
| Urban | - | - |
| Metropolitan | 100% | 100% |

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 2023-24 | | | FY 2022-23 | | |
|--------------------------------|--------------------------|-----------------------------------|---------|--------------------------|-----------------------------------|---------|
| | Received during the year | Pending resolution at end of year | Remarks | Received during the year | Pending resolution at end of year | Remarks |
| 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. | - |

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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.

7 Provide the following information related to data breaches:

- a. Number of instances of data breaches
- b. Percentage of data breaches involving personally identifiable information of customers
- c. Impact, if any, of the data breaches

There has been no instances of data breaches in the Financial Year.