



Man Infraconstruction Limited

MICL Environmental, Social, and Governance (ESG) Policy



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ESG Policies

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02	MICL Board Diversity Policy	14	MICL Policy on determination of materiality of events
03	MICL Code of Practice and Procedures for Fair Disclosure of Unpublished Price Sensitive Information	15	MICL Stakeholder Engagement Policy
04	MICL Code of Conduct	16	MICL - Stakeholder Grievance Redressal Procedure
05	MICL CSR Policy	17	MICL - Supplier Code of Conduct
06	MICL Cyber Security Policy	18	MICL Vigil Mechanism Whistle Blower Policy
07	MICL Environmental Sustainability and Waste Management Policy	19	MICL Dividend Distribution Policy
08	MICL Equal Opportunity Policy	20	MICL Anti-Competitive Behaviour Policy
09	MICL Human Rights Policy	21	Policy for Prevention of Sexual Harassment
10	MICL Integrated Management System Policy		
11	MICL Nomination and Remuneration-policy		
12	MICL Policy and Procedure for leakage of UPSI		

Overview

The Ministry of Corporate Affairs (MCA), Government of India, released a set of guidelines in 2011 called the National Voluntary Guidelines on the Social, Environmental and Economic Responsibilities of Business (NVGs). This was expected to provide guidance to businesses on what constitutes responsible business conduct. In order to align the NVGs with the Sustainable Development Goals (SDGs) and the 'Respect' pillar of the United Nations Guiding Principles (UNGP) the process of revision of NVGs was started in 2015. After, revision and updation, the new principles are called the **National Guidelines on Responsible Business Conduct** (NGRBC). As with the NVGs, the NGRBC has been designed to assist businesses to perform above and beyond the requirements of regulatory compliance.

The primary rationale for the update is to capture key national and international developments in the sustainable development agenda and business responsibility field that have occurred since the release of the NVGs in 2011. This takes into account 1) The UN Guiding Principles for Business and Human Rights (UNGPs), 2) UN Sustainable Development Goals (SDGs), 3) Paris Agreement on Climate Change (2015), 4) Core Conventions 138 and 182 on Child Labour by the International Labour Organization (ILO), 5) Annual Business Responsibility Reports (ABRRs) and 6) Companies' Act 2013.

MICL Business Governance is guided by The National Guidelines on Responsible Business Conduct, 2018 (NGRBC) which provides the framework for contributing towards wider development goals while seeking to maximize our profits. This MICL Environmental, Social, and Governance (ESG) Policy is aligned with the guidance provided by the 9 Principles and the accompanying core elements in the NGRBC. This policy provides the framework for conducting business responsibly and in a sustainable manner.

MICL is an Integrated Management System Certified Company complying to the requirements of ISO 9001:2015 Quality Management System, ISO 14001:2015 Environment Management System, ISO 45001:2018 Occupational Health & Safety Management System and the management systems documented and implemented therein is in line with the 9 Principles and the accompanying core elements in the NGRBC.



MICL BRSR Policy Framework

Man Infraconstruction Limited (**MICL**) strives to achieve excellence in the fields of Real Estate Development and Civil Construction of Port & Infrastructure projects, Township & Residential Projects, Institutional, Hotels & Club Projects and Commercial & Industrial Projects.

This policy applies to MICL including its Associate Companies, Subsidiaries, and Joint Ventures.

MICL firmly believes in sustainable growth through planned achievement of balanced set of results that meet and sometimes exceed the short- and long-term needs of our stakeholders. MICL understands the importance of Responsible Business Conduct and recognizes that MICL can perform its business better when engaged in re-vitalizing the society from which we extract resources for our construction activities.

MICL is committed to the implementation of all the 9 Principles and the associated Core Elements detailed in National Guidelines on Responsible Business Conduct (NGRBC) and has adopted the same while formulating its ESG Policy.



The following table is the checklist developed to assess the policy framework:

[illegible]

[illegible]

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Business Integrity - Ethics, Transparency & Accountability	Sustainability and Safety in all Construction and	Well-being of all Employees and those in value chain	Stakeholder Engagement	Promotion of human rights	Environmental Protection	Responsible Public Policy Advocacy	Inclusive Growth and Equitable Development	Responsible provision of value to Customer
Does the Company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to policy/policies?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Has the Company carried out independent audit/evaluation of the working of this policy by an internal or external agency?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

The policies are developed and aligned with following standards prescribed by /under;

Securities and Exchange Board of India

Ministry of Corporate Affairs National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business



Applicable legal requirements

The Company's internal requirements, detailed consultations and research on the practices adopted by organizations

The policies are approved by the board and signed by the heads of the respective department responsible for the implementation of the policies.

ESG Committee is in place to ensure effective adherence to the 9 principles and respective Elements of NGRBC. The said Committee can be reached at esg@maninfra.com

ESG Committee

1. Mr. Ashok Mehta
2. Mr. Vinay Kamat
3. Mr. Ravi Yevale
4. Mr. Ashwin Pariakar
5. Mr. Suresh Balan
6. Mrs. Lakshmi Ramanathan
7. Mr. Vivek Maru

Principle 1:

Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent, and accountable.

This Principle recognizes that ethical behaviour in all operations, functions and processes, is the cornerstone of businesses guiding their governance of economic, social and environmental responsibilities.

The Principle emphasizes that disclosures on business decisions and actions that impact stakeholders form the fundamental basis of operationalizing responsible business conduct and should be accessible to all relevant stakeholders. It recognizes that businesses are an integral part of society and that they will hold themselves accountable for the effective adoption, implementation, and the making of disclosures on their performance with respect to the Core Elements of these Guidelines. The Principle further emphasizes that the governance structure of the business should ensure this, in line with **SDG 16**.

16 PEACE, JUSTICE
AND STRONG
INSTITUTIONS



**PROMOTE PEACEFUL AND INCLUSIVE SOCIETIES FOR SUSTAINABLE
DEVELOPMENT, PROVIDE ACCESS TO JUSTICE FOR ALL AND BUILD EFFECTIVE,
ACCOUNTABLE AND INCLUSIVE INSTITUTIONS AT ALL LEVELS**



Core Elements	MICL Business Ethics Policy
<ol style="list-style-type: none"> 1. The governance structure should develop and put in place structures, policies and procedures that promote this Principle, prevent its contravention and effect prompt and fair action against any transgressions. 2. The Governance Structure should ensure that the Principles of these Guidelines are understood, adopted and implemented throughout the operations of their business. 3. The Governance Structure should also promote the adoption of this Principle across the value chain of their business. 4. The Governance Structure should disclose and communicate transparently and enable access to information about the policies, procedures, performance (financial and non-financial), and decisions of their enterprise, that impact their stakeholders, especially those that are most at risk to business impacts and communities that are vulnerable and marginalized. 5. The Governance Structure should take responsibility for meeting all its statutory obligations in line with the spirit of the law, enabling fair competition and ensuring it treats all its stakeholders in an 	<p>Man Infraconstruction Limited (MICL) is committed to ethical and transparent business conduct in the way we interact with our key stakeholders including employees, clients, business partners, suppliers, contractors, government and regulators, communities, society and the environment.</p> <p>Our Business Ethics Policy applies to Man Infraconstruction Limited, to all its Subsidiary, Associates, Joint Venture and to all their employees. When MICL deals with third parties across the value chain, where we do not have management control, we will promote the application of these business principles.</p> <p>1.0 Transparency & Disclosure</p> <p>MICL is transparent and open in its communication with all its stakeholders. All information about the policies, procedures, performance (financial and non-financial), and decisions of MICL that impact their stakeholders are displayed on our website.</p> <p>Any other specific information not available on the website can be sought from the ESG Committee by giving a written application on esg@maninfra.com.</p>

equitable manner.

6. The Governance Structure should ensure that the business avoids complicity with the actions of any third party that violates any of the Principles contained in these Guidelines.

7. The Governance Structure should put in place appropriate structures, policies and procedures to address conflicts of interest involving its members, employees and business partners.

8. The Governance Structure should put in place appropriate structures, codes, policies, and procedures to ensure that the business does not engage in illegal and abusive practices, bribery and corruption, and ensure timely and fair action in case such transgressions are detected.

9. The Governance Structure should ensure that the business contributes to public finances by timely and complete payment of all applicable taxes in the letter and spirit of the laws and regulations governing such payments.

2.0 Compliance towards Statutory Obligations

MICL is committed to fulfill all its Statutory Obligations and maintains a documented system to ensure review of laws and regulations applicable to it and has in place a review mechanism to ensure compliance.

Reference Document :

“Determination of Legal Requirements and Other Requirements and its Compliance IMS/PR/03”

“Legal and Regulatory Compliance Identification and Evaluation Register (IMS/DO/07)”

3.0 Conflicts of Interests

All **MICL** employees must avoid personal activities and financial interests that could conflict, or be perceived to conflict, with their responsibilities to the Company. MICL employees must not seek gain for themselves or others through misuse of their positions.

Any circumstances that could give rise to a potential conflict of interest must be disclosed in full to the Company.



4.0 Anti Bribery & Corruption

MICL provides a framework for ensuring compliance with legislations governing bribery and corruption globally. No employee may offer, give or receive any gift, payment or entertainment which is, or may reasonably be construed as being, a bribe.

Any gifts or entertainments offered, given or received must be incapable of appearing to interfere with the impartial discharge of duties.

Any employee who is offered an inducement which they feel is intended to interfere with the impartial discharge of their duties must report any such offer to their manager.

5.0 Whistle Blower Policy

MICL Whistle Blower Policy seeks to provide an avenue to directors and employees of the Company and other persons dealing with the Company to report without fear any instance of actual or suspected violation, wrongdoings or any unethical or improper practice which may adversely impact the image and / or the financials of the Company, through an appropriate forum, and to communicate the existence of this mechanism, within the



organization and to outsiders. This will help persons who have major concerns over any wrongdoing within the Company to report unlawful activities, accounting irregularities, etc. The objective is to maintain a redressal system which can process all such complaints /concerns and provide a resolution.

Reference Document :

1. MICL Anti Bribery and Corruption Policy
2. Board Diversity Policy
3. Vigil Mechanism- Whistle Blower Policy
4. Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Policy for Determination of Legitimate Purpose
5. Code of Conduct
6. Nomination and Remuneration Policy
7. Policy and Procedure for inquiry in case of leak or suspected leak of Unpublished Price Sensitive Information (UPSI)
8. Policy for Determining Material Subsidiaries
9. Policy on Determination of Materiality of Events
10. Dividend Distribution Policy
11. MICL Anti-Competitive Behavior Policy

Principle 2:

Businesses should provide goods and services in a manner that is sustainable and safe.

This Principle recognizes the proposition of **SDG 12**, that sustainable production and consumption are interrelated, contribute to enhancing the quality of life and towards protecting and preserving earth's natural resources.

The Principle further emphasizes that businesses should focus on safety and resource-efficiency in the design and manufacture of their products, and use their products in a manner that creates value while minimizing and mitigating its adverse impacts on the environment and society through all stages of its life cycle, from design to final disposal. Over time, businesses should embrace the idea of circularity in all its operations. In order to do so, the Principle encourages businesses to understand all material sustainability issues across their product life cycle and value chain.



**ENSURE SUSTAINABLE CONSUMPTION
AND PRODUCTION PATTERNS**

Core Elements	MICL Sustainable Construction Policy
<p>1. Businesses should, in designing, producing and making available goods and services, endeavour to ensure that resource-efficient and low-carbon processes and technologies are deployed to minimize adverse environmental and social impacts.</p> <p>2. Businesses should provide stakeholders across the value chain with adequate information about environmental and social issues and impacts across product life cycle from design to disposal. This may be done through appropriate and relevant tools such as certifications, labels, ratings and other communication and disclosure platforms including reports, websites, etc.</p> <p>3. Businesses should increasingly take responsibility for the safe collection, reuse and recycling of their products at life so as to build a circular economy as a part of the notion of extended producer responsibility that is increasingly becoming a part of regulation in India and globally.</p>	<p>MICL is aware of the importance of preserving and responsibly using earth's natural resources including air, water, fossil fuels, raw materials used in our construction activities and mitigating the adverse impacts on the environment and society through all stages of life cycle of constructed projects right from design to final disposal of construction debris.</p> <p>MICL explores all possible methods of sustainable construction for contributing to a greener built environment while reducing MICL's overall carbon footprint.</p> <p>MICL focusses on Sustainable Construction by addressing the elements of sustainable design, durability, energy efficiency, waste reduction, indoor air quality, water conservation and sustainable building materials.</p> <ul style="list-style-type: none"> • Sustainable Design – MICL uses high end Design software to assist designers assess different design alternatives at the conceptual stage of a building life so that effective energy strategies are attained within the building constraints. Design considerations like Operating schedule, effective space planning, sun path, wind circulation flow, window to wall ratio, HVAC systems, building orientation, lighting efficiency, wall construction, roof

construction, air infiltration are all factored to alter and control the energy consumption of the building in the Design stage itself.

- **Durability** – **MICL** ensures that durable materials and products are used to develop buildings which means they will not need to be replaced or repaired as frequently, resulting in less maintenance and consequently minimizing carbon footprints during the life and after life of building.
- **Energy Efficiency** – **MICL** understands that increasing energy efficiency helps us to reduce our costs by lowering fuel consumption which, in turn, reduces the emission of CO₂. Ultimately, this enables us to lower our contribution to climate change. To make our build as energy efficient as possible we use energy efficient technology and energy efficient materials.
- **Waste Reduction** – **MICL** is aware of the importance of reducing construction and demolition waste going into landfill and the same is planned effectively. To help reduce waste at our building site, we make sure to use low impact materials that are sustainability sourced and reused from other projects as well as we ensure



sustainable recycling at every stage of the construction process.

- **Indoor Air Quality** – MICL takes care of its customers health and well-being by taking necessary design and construction efforts that provide excellent building air quality. This includes source control, adequate ventilation and use of effective air cleaners.
- **Water Conservation** - Water is an increasingly precious resource and **MICL** acknowledges the need to manage water and has taken measures towards sustainable water utilization throughout the building development process. **MICL** adopts the “Net Zero Liquid Discharge” approach towards water conservation. Water conservation techniques such as use of low-flow plumbing fixtures, water recycling, rain-water harvesting and innovative approaches to wastewater processing and stormwater management is effectively utilized to address the full scope of the building hydrologic cycle.
- **Sustainable Building Material** – MICL is aware that materials are a finite resource. As the earth’s population continues to increase, demand for housing



and infrastructure will increase pressure on material resources such as steel, concrete, copper, aluminium, plastic and many other materials. We also realize that the construction, renovation, maintenance and operation of buildings accounts for very large quantities of materials which are extracted from nature, processed, used and ultimately discarded and the extraction, transformation, use and disposal of materials all have huge environmental costs. **MICL** consciously uses sustainable building materials which are locally available, are sustainable, energy efficient and durable also.

This Policy is guided by National Building Code of India, 2016, Part 11 Approach to Sustainability and IGBC Green Building Rating System Version 3, 2014.

MICL participates in Green Building Certification, whenever feasible, to build green building compliant features to address carbon, energy, water, waste, transportation, materials, health and indoor environmental quality.

MICL understands the significance of protecting the environment and is committed to integrating sustainability into all practices. All contractors, suppliers, their employees, subsidiaries, affiliates and sub-contractors are



hereby referred as 'suppliers' in this policy.

Point Charter driving our Sustainable procurement efforts are detailed below:

1. integrating sustainability considerations into sourcing of suppliers, procurement processes and activities
2. complying with all the environmental regulatory requirements
3. preference to locally sourced products to minimize carbon footprint from transportation wherever practical
4. encouraging suppliers to improve performance on sustainability parameters and assessing critical suppliers on their performance
5. enhancing awareness of responsible procurement among employees and suppliers
6. purchasing environment friendly products, wherever practical and minimizing purchase & uses of single-use disposable items
7. limiting waste over the course of product life cycle by preferring products which has low impact on environment, water and other natural resources.

Principle 3:

Businesses should respect and promote the well-being of all employees, including those in their value chains.

This Principle encompasses all policies and practices relating to the equity, dignity and well-being, and provision of decent work (as indicated in **SDG 8**), of all employees engaged within a business or in its value chain, without any discrimination and in a way that promotes diversity. The principle recognizes that the well-being of an employee also includes the well-being of her/his family.



**PROMOTE SUSTAINED, INCLUSIVE AND SUSTAINABLE ECONOMIC GROWTH,
FULL AND PRODUCTIVE EMPLOYMENT AND DECENT WORK FOR ALL**

Core Elements

1. The Governance Structure should ensure that the business complies with all regulatory requirements pertaining to its employees, and that there are systems and processes in place to enable this to be done by its value chain partners.
2. Businesses should ensure equal opportunities at the time of recruitment, during the course of employment, and at the time of separation without any discrimination.

MICL Employee Engagement and Well-being Promotion Policy

MICL recognizes that its employees are a valuable stakeholder and effective employee engagement is a crucial factor for achieving overall business objectives and continual growth.

We also believe that the workers engaged by our contractors at our site are equally important for the

3. Businesses should promote and respect the right to freedom of association, participation of workers, and collective bargaining of all employees including contract and casual labour, and provide access to appropriate grievance redressal mechanisms.
4. Businesses should not use child labour, coercive or forced labour, or any form of involuntary labour, paid or unpaid.
5. Businesses should put systems and processes in place to support the work-life balance of all its employees.
6. Businesses should ensure fair, timely and transparent payment of statutory wages of all its employees, including contract and casual labour without discrimination.
7. Businesses should aspire to pay fair living wages to meet basic needs and economic security of all employees, including casual and contract labour.
8. Businesses should provide a workplace environment that is safe, hygienic, accessible to the differently abled and which upholds the dignity of the employees. Businesses should engage and consult with their employees on this provision.
9. Businesses should ensure continuous upgradation of skill and competence of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis.

success of our objectives.

While recognizing the importance of our employees as well as workers for **MICL** business, **MICL** Leadership is fully involved and committed to providing an enabling and nurturing workspace by :

- Complying with all relevant legislation, regulations, codes of practice and construction industry standards related to our real estate & construction business.
- not using child labour, coercive or forced labour, or any form of involuntary labour, paid or unpaid
- Ensuring fair, timely and transparent payment of statutory wages of all its employees, including contract and casual labour without discrimination.
- Providing a workplace environment that is safe, hygienic, accessible to the differently abled and which upholds the dignity of the employees
- regular consultation with and participation of all stake holders including workers on social, environmental, safety, security and other relevant issues

They should promote career development through human resource interventions.

10. Businesses should create systems and practices to ensure a humane workplace free from, violence and harassment (including sexual harassment); a workplace where employees feel safe and secure, with adequate provisions for grievance redressal.

- Adopting a robust policy and setting into practice a procedure for Prevention of Sexual Harassment of Women at Workplace.
- Providing a mechanism for Grievance Redressal of all employees as well as Contract Workers engaged by our contractors.
- Promoting Career Development opportunities for all employees through an effective Annual Performance Appraisal System.
- Providing training for continuous upgradation of skill and competence of all employees.
- Conducting regular Occupational Health & Safety training at all our Construction Sites.
- Taking measures to ensure a Safe & Healthy work place.
- Taking corrective actions to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.
- MICL continuously monitors health of its employees, contract workers and labour by organizing regular

health checkups.

- **MICL** provides the employees with time to rejuvenate themselves from the stress of work; balance their work & personal lives and recover from illness.
- **MICL** provides for leave to women in employment with the organization for period before and after child-birth in accordance with the provisions as prescribed in the Maternity Benefit Act, 1961.
- Recruitment of an individual is totally based on ability and capability of the person without any discrimination on the bases of race, gender, creed, religion, color, disability or national origin.
- **MICL** has communicated the “Vigil Mechanism-Whistle Blower Policy” to all employees.

Reference Document :

1. Integrated Management System Policy
2. Policy for Prevention of Sexual Harassment
3. MICL HR Manual
4. SIPOC “Ensuring Competence AHR/SI/01”
5. MICL - Equal Opportunity Policy

Principle 4:

Businesses should respect the interests of and be responsive to all its stakeholders.

This Principle recognizes that businesses operate in an eco-system comprising a number of stakeholders, beyond shareholders and investors, and that their activities impact natural resources, habitats, communities and the environment.

The Principle acknowledges that it is the responsibility of businesses to ensure that the interests of all stakeholders, especially those who may be vulnerable and marginalized, are protected.

The Principle further recognizes that businesses have a responsibility to maximize the positive impacts and minimize and mitigate the adverse impacts of its products, operations, and practices on all their stakeholders.

Core Elements

1. Governance Structures should ensure that the business acknowledges, assumes responsibility, and is transparent about the impact of their policies, decisions, products and associated operations on all stakeholders, and the natural environment.
2. Businesses should develop systems, processes and mechanisms to identify its stakeholders, understand their expectations and concerns, define the purpose and scope of the engagement, consult with them in developing policies and processes that impact them, and commit to resolving any differences and redressing grievances in a just, fair and constructive manner.
3. Businesses should enable all stakeholders to benefit fairly from

MICL Stakeholders Identification & Engagement Policy

MICL understands the importance of identifying all stakeholders who have a direct and indirect bearing on the ability of MICL to fulfill MICL Business Objectives and have put into place a procedure for extensive and effective engagement with them.

MICL recognizes that Employees and Contract Workers are one of the important stakeholder and the engagement with them is elaborated in “**MICL Employee Engagement and Well-being Promotion Policy**”

MICL addresses all the feedbacks and grievances. Some of

the value generated by the businesses, and any conflicts or differences arising from the impact of business operations or the sharing of the value generated by the businesses should be resolved in a just, fair and equitable manner.

the key highlights of these policies are as follows.

- MICL regularly communicates with all the key stakeholders of the Company to understand their concerns and feedback on the areas of operation concerning them.
- **MICL** employs fair and non-discriminatory tendering processes so that all capable and technically compliant vendors get an equal opportunity to work with us.
- Feedback form is provided to every customer, contractors and suppliers for their suggestions and **MICL** implements the suggestion, if found appropriate.
- **MICL** has an established customer feedback mechanism which enables to have regular interactions with new customers and members.
- **MICL** has established a mechanism to communicate the “Whistle Blower Policy” to all employees, contractors and suppliers to ensure that any malpractices, if any, are promptly identified and



addressed.

Reference Document :

1. Needs and Expectations of Interested Parties IMS-DO-02
2. MICL - Stakeholder Engagement Policy
3. MICL - Stakeholder Grievance Redressal Procedure
4. MICL - Supplier Code of Conduct



Principle 5:

Businesses should respect and promote human rights.

This Principle recognizes that human rights are rights inherent to all human beings, and that everyone, individually or collectively, is entitled to these rights, without discrimination. It further recognizes that human rights are inherent, inalienable, interrelated, interdependent and indivisible.

The Principle is inspired, informed and guided by the Constitution of India and the International Bill of Rights and recognizes the primacy of the State's duty to protect and fulfil human rights.

The Principle is further informed and guided by the UN Guiding Principles on Business and Human Rights in its articulation of the responsibility of businesses to respect human rights. It affirms that the responsibility of businesses to respect human rights requires that it avoids causing or contributing to adverse human rights impacts, and that it addresses such impacts when they occur. The Principle urges businesses to be especially responsive to such persons, individually or collectively, who are most vulnerable to, or at risk of, such adverse human rights impacts.

Core Elements

1. The Governance Structure should ensure that the business undertakes to make its employees aware of the human rights content of the Constitution of India, relevant national laws and policies, and the International Bill of Human Rights and their application to businesses as outlined in the United Nations Guiding Principles for Business and Human Rights. It should

MICL Human Right Promotion Policy

MICL is fully committed to protect and fulfil human rights as laid down in the Constitution of India, relevant national laws and policies, and the International Bill of Human Rights and their application to businesses as outlined in the United Nations Guiding Principles for Business and Human Rights.

MICL has adopted these principles which includes :

further ensure that the responsibility for addressing such impacts is assigned to the appropriate level and function within the business.

2. The Governance Structure should ensure that the business has in place such policies, structures and procedures that demonstrate respect for the human rights of all stakeholders impacted by its business. This includes carrying out human rights due diligence to identify, prevent, mitigate and account for how they address adverse human rights impacts.

3. The Governance Structure should ensure that their business, where it is causing, contributing or otherwise linked to adverse human rights impacts, takes corrective actions to address such impacts.

4. Businesses should promote the awareness and realization of human rights across its value chain.

5. Businesses should ensure that all individuals and groups whose human rights are impacted by them have access to effective grievance redressal mechanisms.

- a) freedom of association and the effective recognition of the right to collective bargaining;
- b) the elimination of all forms of forced or compulsory labour;
- c) the effective abolition of child labour;
- d) the elimination of discrimination in respect of employment and occupation; and
- e) a safe and healthy working environment.

MICL conducts Awareness Training to make its employees aware of the human rights content.

MICL has constituted ESG Committee for identifying, preventing, mitigating and accounting for any adverse human rights violations.

MICL promotes the awareness and realization of human rights across its value chain.

MICL has put into place a Grievance Redressal Mechanism related to any human right violation.

Recruitment of an individual is totally based on ability and capability of the person without any discrimination on the basis of race, gender, creed, religion, color, disability or



national origin.

MICL is committed to develop a culture where employees are encouraged to raise issues observed by them relating to unethical/ unfair/ unacceptable behavior or practices and to report instances of any fraud/ misconduct/ violation of Code or employment policies without any fear of reprisal or victimization for whistle-blowing in good faith, without necessarily informing their supervisors.

Reference Document :

MICL - Human Rights Policy

Principle 6:

Businesses should respect and make efforts to protect and restore the environment.

This Principle recognizes that environmental responsibility is a prerequisite for sustainable economic growth and for the well-being of society.

The Principle emphasizes that environmental issues are interconnected at the local, regional and global levels, which makes it imperative for businesses to address issues like pollution, biodiversity conservation, sustainable use of natural resources and climate change (mitigation, adaptation and resilience) in a just, comprehensive and systematic manner. These are aligned with SDGs 11, 13, 14 and 15.

The Principle encourages businesses to assess environment impacts of its products and operations and take steps to minimize and mitigate its adverse impacts where these cannot be avoided.

The Principle encourages businesses to adopt environmental practices and processes that minimize or eliminate the adverse impacts of its operations and across the value chain.

The Principle encourages businesses to follow the Precautionary Principle in all its actions.

11 SUSTAINABLE CITIES
AND COMMUNITIES



**MAKE CITIES AND HUMAN SETTLEMENTS INCLUSIVE,
SAFE, RESILIENT AND SUSTAINABLE**

13 CLIMATE
ACTION



**TAKE URGENT ACTION TO COMBAT
CLIMATE CHANGE AND ITS IMPACTS**

14 LIFE
BELOW WATER



**CONSERVE AND SUSTAINABLY USE THE OCEANS, SEA AND
MARINE RESOURCES FOR SUSTAINABLE DEVELOPMENT**

15 LIFE
ON LAND



**PROTECT, RESTORE AND PROMOTE SUSTAINABLE USE OF TERRESTRIAL
ECOSYSTEMS, SUSTAINABLY MANAGE FORESTS, COMBAT DESERTIFICATION,
AND HALT AND REVERSE LAND DEGRADATION AND HALT BIODIVERSITY LOSS**



Core Elements	MCL Sustainable Development & Environment Protection Policy
<p>The Governance Structure should ensure that the business formulates appropriate policies, procedures and structures to assess, measure and address its adverse impacts on the environment at all its locations, at all stages of its life cycle from establishment to closure. Special care should be taken where these impacts occur in eco-sensitive areas.</p> <p>Businesses should develop appropriate strategies for sustainable and efficient use of natural resources and manufactured materials, giving due consideration to expectations and concerns of all stakeholders.</p> <p>Businesses should define measurable key performance indicators and targets to monitor their performance on environmental aspects such as water, air, land-use, forest, energy, materials, waste, biodiversity, built environment and so on.</p> <p>Businesses should focus on addressing climate change through development of both mitigation and adaptation measures, and build climate resilience and in line with India's Nationally Determined Contributions to the Paris Climate Change Agreement and the National/State Action Plans on Climate Change.</p> <p>Businesses should learn from industry best practices for promoting</p>	<p>MCL recognizes that environmental responsibility is a prerequisite for sustainable economic growth and for the well-being of society and is committed to address issues like pollution, sustainable use of natural resources and climate change in a just, comprehensive and systematic manner in their own business and in areas where it can exercise positive influence.</p> <p>MCL is aware of the importance of preserving and responsibly using earth's natural resources including air, water, fossil fuels, raw materials used in our construction activities and mitigating the adverse impacts on the environment and society through all stages of life cycle of constructed projects right from design to final disposal of construction debris. This is documented in "MCL Sustainable Construction Policy".</p> <p>MCL has put in place a mechanism to assess environment impacts of its Construction and it's associated operations and take steps to minimize and mitigate its adverse impacts where these cannot be avoided. MCL extends this mechanism across the value chain including Contractors and Suppliers.</p>

reduction, reuse, recycling and recovery of material and resources, and encourage and motivate its stakeholders, particularly consumers and business partners, to do the same.

Businesses should seek to improve their environmental performance by adopting innovative, resource-efficient and low-carbon technologies and solutions resulting in lower resource footprint, lesser material consumption and more positive impact on environment, economy and society.

MICL is committed to optimally utilize all natural resources related to its Construction Operations by

- Monitoring and optimizing Energy consumption by effective utilization of electricity and fuel for its Construction Operations.
- Promoting the use of Renewable Energy resources like Solar panels.
- Monitoring and optimizing Water consumption by effective utilization of water for its Construction Operations.

MICL is fully cognizant of the importance of trees for protecting biodiversity and overall environmental protection and takes all necessary steps to avoid cutting of trees during the design and construction phase. In case trees have to be removed from the existing location, MICL relocates the trees, wherever possible or in case tree cutting is unavoidable then it compensates the same by planting at least twice the number of trees cut. We also take adequate care to ensure that saplings which are planted survive.



MICL monitors and minimizes, wherever feasible, Emissions both GHG's and other than GHG's during Construction Operations.

MICL has a comprehensive approach towards minimizing energy consumption, especially energy generated from non-renewable resources, that addresses all forms of energy consumption, including operational energy, embodied energy, and commuting energy.

MICL monitors Greenhouse Gas (GHG) emissions including Scope 1, Scope 2 and Scope 3 emissions and take necessary measures to minimize GHG emissions, wherever feasible.

MICL is conscious about minimizing Waste and explores all recycling, re-using or other recovery operations. We dispose all Hazardous wastes through Authorized Agencies.

MICL undertakes Environmental Impact Assessments of all construction projects based on and as mandated by applicable laws.

MICL is compliant with 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.

MICL adopts the Zero Liquid Discharge (ZLD) engineering water treatment approach where all water is recovered and contaminants are reduced to solid waste. MICL adopts a balanced and holistic approach to understand the balance between treatment goals, economics, and regulatory requirements and works out the most optimized water treatment solution.

MICL adopts innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated.

Reference Document :

1. MICL - Environmental Sustainability and Waste Management Policy

Principle 7:

Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.

This Principle recognizes that businesses operate within specified national and international legislative and policy frameworks, which guide their growth and also provide for certain desirable restrictions and boundaries.

The Principle recognizes the legitimacy of businesses to engage with governments for redressal of a grievance or for influencing public policy.

The Principle emphasizes that public policy advocacy must expand public good.

Core Elements

1. The Governance Structure should ensure that its advocacy positions are consistent with the Principles contained in these Guidelines and publicly disclosed.
2. Businesses should, to the extent possible, undertake policy advocacy through trade and industry chambers and associations, and other similar collective platforms.
3. Businesses should ensure that its policy advocacy positions promote fair competition and respect for human rights.

MICL Public Policy Advocacy Policy

MICL understands that it is a part of the economic ecosystem and engages with various government and non-government bodies including trade and industry chambers and associations, and other similar collective platforms on matters of policy formation which have impact on the sector/ larger public interest and which has a bearing on our growth. It recognizes that public policy advocacy should not only serve the business objective of **MICL** but also expand public good. Some of the key highlights of these policies are as follows:



- **MICL**, wherever required engages with the Government through relevant industrial bodies/associations and strive to provide support to shaping public policy related to our business.
- **MICL** engages with public policymakers, governmental and regulatory agencies, industry trade associations and political and advocacy organizations in support of our legitimate business interests
- **MICL** ensures that our policy advocacy and liaison reflect our commitment to integrity, transparency and high ethical standards, and are conducted in strict compliance with all applicable central, state and local laws, regulations, and rules and good corporate governance practices.
- Participate in public policy development and discussion that address issue affecting industry, business, product, customers, and other major stakeholders.
- Ensure that our policy advocacy position promote fair competition and respect for human rights.
- Encourage our employees to associate with activities of professional bodies for the purpose of shaping the public policy in the desired direction.

Principle 8:

Businesses should promote inclusive growth and equitable development.

This Principle recognizes the challenges of social and economic development faced by India, and builds upon the national and local development agenda as articulated in government policies and priorities. This is particularly significant in zones affected by social disharmony and low human development.

The Principle recognizes the value of the energy and enterprise of businesses and encourages them to innovate and contribute to the overall development of the country with a specific focus on disadvantaged, vulnerable and marginalized communities, as articulated in Section 135 of the Companies Act, 2013.

The Principle also emphasizes the need for collaboration amongst businesses, government agencies and civil society in furthering this development agenda in line with SDG 17. The Principle reiterates that business success, inclusive growth and equitable development are interdependent.

17 PARTNERSHIPS
FOR THE GOALS



**STRENGTHEN THE MEANS OF IMPLEMENTATION AND REVITALIZE
THE GLOBAL PARTNERSHIP FOR SUSTAINABLE DEVELOPMENT**



<u>Core Elements</u>	MICL Inclusive Growth & Equitable Development Policy
<p>1. The Governance Structure shall ensure that the business takes appropriate actions to minimize any adverse impacts that it has on social, cultural and economic aspects of society including arising from land acquisition and use, construction of facilities and operations.</p> <p>2. Businesses should assess, measure and understand their impact on social, and economic development, and respond through appropriate action to minimize and mitigate its negative impacts on society.</p> <p>3. Businesses should innovate and invest in products, technologies and processes that promote the well-being of all segments of society, including vulnerable and marginalized groups.</p> <p>4. Businesses should respond to national and local development priorities and understand the needs and concerns of local communities, particularly vulnerable and marginalised groups and in regions that are underdeveloped, while designing and implementing their CSR programmes.</p> <p>5. Businesses should make efforts to minimize the negative</p>	<p>MICL firmly believes in inclusive growth and equitable development and is fully aware that sustainable business growth of the company is only possible if it is able to successfully balance the aspirational needs of business growth with challenges of social and economic development needs of the Indian Society at large.</p> <p>CSR activities undertaken by MICL is a step towards the objective of contributing towards the betterment of society at large as part of its obligations as a responsible corporate citizen. The CSR Policy of MICL lays the foundation of our commitment towards development of society. The key CSR areas and highlights of this policy are as follows:</p> <ul style="list-style-type: none">• The fund allocation towards the CSR activities is approved by the Board. The company spends at least 2% of the average net profits.• The funds are utilized towards eradicating hunger, poverty and malnutrition, fulfilment of nutritional requirements of needy, promoting health care and sanitation, including by way of creating aids and facilities for differently abled persons, promotion of education for



impacts of displacement of people and disruption of livelihoods through their business operations and where displacement is unavoidable, this process must be undertaken in a humane, participative, informed and transparent manner, where just and fair compensation is paid to those impacted.

6. Businesses should respect all forms of intellectual property and traditional knowledge and make efforts to ensure that benefits derived from their knowledge are shared equitably.

needy children, Disaster Management, etc.

- Contribution towards the Prime Minister's Relief Fund or such other funds as may be recognized under Schedule VII of Companies Act, 2013.
- **MICK** pays attention to vulnerable and marginalised groups and in regions that are underdeveloped, while designing and implementing our CSR programmes.
- **MICK** undertakes Slum development and housing for economically weaker sections.

Reference Document :

1. Corporate Social Responsibility (CSR) Policy

Principle 9:

Businesses should engage with and provide value to their consumers and customers in a responsible manner.

This Principle is based on the fact that the basic aim of a business entity is to provide goods and services to its consumers that are safe to use, and in a manner that creates value for both.

The Principle recognizes that consumers have the freedom of choice in the selection and usage of goods and services, and that the enterprises will strive to make available products that are safe, competitively priced, easy to use and safe to dispose of, for the benefit of their consumers.

The Principle also recognizes that businesses should play a key role, along with other relevant stakeholders, in mitigating the adverse impacts that excessive consumption of its products may have on the overall well-being of individuals, society and our planet, in line with SDG 12.



**ENSURE SUSTAINABLE CONSUMPTION
AND PRODUCTION PATTERNS**



Core Elements

1. Governance Structures should ensure that the business minimizes and mitigates any adverse impact of its goods and services on consumers, the natural environment and society at large.
2. Businesses should ensure that they do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling their products.
3. Businesses should disclose all information accurately, through labelling and other means, including the risks to the individual, to society, and to the planet, from the use of the products, so that the consumers can exercise their freedom to consume in a responsible manner.
4. Businesses should manage consumer data in a way that does not infringe upon their right to privacy.
5. Businesses should make consumers aware of, and provide information and guidance to them on, safe and responsible usage and disposal of their products (including reuse and recycling), and to eliminate over-consumption.
6. Businesses should promote and advertise their products in ways that do not mislead or confuse the consumers or violate

MICL Customer Engagement & Well-Being Policy

MICL believes in engaging with and providing value to their consumers and customers in a responsible manner.

To this end, our Policy on “Customer Engagement and Well-Being” elucidates the following :

- **MICL** adopts Fair Contractual Practices and provides complete, accurate, and understandable information to customer enabling him to take informed decisions. The information to customer is provided through website and brochures. The correctness of the information is vetted at 2 levels by the Marketing Head, by the Sales & Marketing Head.
- **MICL** provides Infrastructure and Building Construction and Services that, under normal and reasonably foreseeable conditions of use, are safe for users and other persons and the environment. Customers are provided with safety guidelines and we make them aware on the safety features of their property at the time of handover and possession.
- **MICL** assesses the adequacy of health and safety laws, regulations, standards and other specifications to address all health and safety aspects. We go beyond

any of the Principles in these Guidelines.

7. Businesses should provide appropriate grievance redressal mechanisms that are transparent and accessible, to address consumer concerns and feedback.

8. Businesses that provide essential services, e.g. utilities, should enable universal access, including to those whose services have been discontinued for any reason, in a non-discriminatory and responsible manner.

minimum safety requirements where there is evidence that higher requirements would achieve significantly better results.

- All our buildings are developed with features which make it earthquake and fire resistant and all the buildings have Fire Fighting Systems as mandated by regulatory bodies.
- MICL maintains the Customer data in a “Confidential” manner and ensures that it does not in any way infringe upon their rights to privacy.
- MICL ensures that “Customer Feedback” and “Customer Complaints” are collected periodically and necessary remedial actions taken to address any concerns.

Reference Document :

1. Customer Feedback and Complaints
2. MICL - Cyber-Security Policy