

MICL SUPPLIER CODE OF CONDUCT

1. Introduction

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.

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 understand 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.

Man Infraconstruction Limited (MICL) is committed to conducting business in an ethical manner, and in a way that promotes business integrity, environmental and social responsibility. This includes compliance with the laws of land and adherence to well-established ESG principles and standards such as National Guidelines on Responsible Business Conduct (NGRBC), the UN Sustainable Development Goals (UNSDG's), the United Nations Guiding Principles on Business and Human Rights and Companies Act 2013.

The United Nations Sustainable Development Goals (UNSDGs) and the National Guidelines for Responsible Business Conduct (NGRBC) invite action from the private sector to address some of the world's most pressing development issues. This Supplier Code of Conduct is one way in which MICL aligns with the SDGs and the Principles of NGRBC.

In support of this commitment, MICL has developed Supplier Code of Conduct. This Code sets forth the basic minimum requirements that the Company expects its Suppliers to respect and adhere to while conducting business with MICL. The elements of the 9 NGRBC Principles which forms the framework of "MICL ESG Policy" and also the "MICL Supplier Code of Conduct" is detailed in the "NGRBC Principles as applicable to MICL".

The Supplier Code applies specifically to MICL Suppliers and seeks to encourage comparable standards of behavior, hence driving commitment to ethical improvements throughout the company's supply chain. The company encourages

its suppliers to not just comply with the Code, but to use reasonable endeavors to exceed it and promote continual improvement.

2. Scope

The terms of this Code apply to all Suppliers of MICL that are supplying goods and/or services. This policy applies to MICL including its Associate Companies, Subsidiaries, and Joint Ventures.

3. Definitions

In this Code:

- “Supplier” means suppliers/ service providers/ vendors/ traders consultants/ contractors/ third parties including their employees, agents and other representatives, who have a business relationship with MICL and provide goods and/or services.
- “Worker” means any individual whom the Supplier employs, hires, engages or otherwise uses to conduct its business, on a full time or on contract basis.
- “Child Labour” - Our definition of child labor is consistent with the ILO’s (International Labor Organization), core labor standards and the United Nations Global Compact principles.
- “ESG” is an acronym which denotes Environmental, Social and Governance aspects.

4. MICL Business Responsibility and Sustainability Framework

Principle 1	MICL conducts and govern themselves with integrity, and in a manner that is ethical, transparent, and accountable
Business ethics, transparency, and accountability	
Principle 2	MICL provides Construction and associated services in a manner that is sustainable and safe
Sustainability and Safety in all Construction and associated Services	
Principle 3	MICL respects and promotes the wellbeing of all employees, including those in their value chain
Employee wellbeing	
Principle 4	MICL respects the interests of and is responsive to all its stakeholders
Stakeholder engagement and inclusiveness	
Principle 5	MICL respects and promotes human rights
Promotion of human rights	
Principle 6	MICL respects and makes efforts to protect and restore the environment
Environmental Protection	
Principle 7	MICL , when engaging in influencing public and regulatory policy, does so in a manner that is responsible and transparent
Responsible Public Policy Advocacy	
Principle 8	MICL promotes inclusive growth and equitable development
Inclusive Growth and Equitable Development	
Principle 9	MICL engages with and provides value to their customers in a responsible manner
Responsible provision of value to Customer	

5. Supplier Code of Conduct Obligations

I. Legal Compliance

- Suppliers shall abide by all applicable laws and regulations that govern their business activities.

Implementation Guidelines

Suppliers shall maintain documentation necessary to demonstrate conformance with the expectations and compliance with applicable regulations.

- Legal Register indicating the various Acts and Rules applicable to it and the status of compliance against the same.
- Various applicable Licenses related to the Company.
- Documentation on key issues, for example: audit findings; injury & illness logs; worker benefits and pay information; inspections by regulatory agencies; worker complaints; performance assessments.
- Documentation methods are in the form of the most suitable medium, (i.e., paper, electronic), and are accessible on demand for review or updating.

II. Human Rights

All Suppliers of **MICL** are expected to be committed to protecting and preserving Human Rights.

Suppliers "Human Rights Policy" in line with **MICL's** "Human Rights Policy" should be guided by human rights contents of the Constitution of India, relevant national laws and policies, United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and National Guidelines for Responsible Business Conduct (NGRBC) 2018.

In line with the same,

- Suppliers shall not engage in child labour in any form.
- Supplier shall not use forced labour including bonded labour, paid or unpaid.
- Suppliers shall support equal opportunities and prevent discrimination at

the workplace.

- Suppliers shall respect and support free association of labour and employee rights to join a trade union where allowable by law.

Implementation Guidelines

- Proof of age documentation for all Workers is in place.
- The Supplier does not take fees or other obligations as a pre-condition of employment, with the consequence of indebting the Worker and binding him or her to employment.
- The Workers have the freedom to terminate employment at any time according to the agreed notice
- Period as stated in the employment contract
- Supplier shall not retain employee's original government-issued identification, passports or work permits as a condition of employment.
- The supplier shall ensure there is no discrimination with regards to workers based on race, religion, gender identity, marital or family status, age, political affiliation, nationality, physical ability, sexual orientation, ethnicity or any other dimension of their identity during recruitment and employment.
- Every worker shall be treated with respect and dignity. No worker shall be subject to any physical, sexual, psychological or verbal harassment or abuse.
- Supplier shall not engage in human trafficking or exploitation, or import goods tainted by slavery or human Trafficking.
- The supplier shall establish and maintain an internal reporting mechanism through which matters of potential human rights violation, concerns and issues can be brought to the attention of accountable individuals in a confidential manner without fear of retribution.

III. Labour Practices

- Suppliers shall comply with all applicable laws and regulations in areas of wages and working hours, including minimum wage, overtime and maximum working hours.
- Supplier shall provide all workers with written and understandable information about their terms of recruitment and employment, wages and benefits before they enter employment.

Implementation Guidelines

- The Worker is paid a wage equal to or exceeding the legal minimum wage.
- Minimum wage notifications and working hour limitations are either posted, communicated or freely made available to employees upon request
- Compensation systems ensure that employees are paid promptly and on a regular basis in a manner that is direct, convenient and which does not rely on such instruments as coupons, promissory notes or other forms of transfer
- Payrolls records relating to the documented payment of wages for each Worker are maintained for a period consistent with the organization's record retention program
- Attendance records are in place to accurately track hours worked by permanent and contractual employees and to identify potentially irregular and unusual work patterns, including excessive overtime
- The organization ensures that each employee receives an accurate payroll receipt with each payment and that each payment is accurately recorded in payroll records that are subject to audit and verification

IV. Quality

- Supplier shall ensure all products and services delivered to MICL meets the quality and safety criteria specified and shall be safe for their intended use.

Implementation Guidelines

- Supplier should have a Quality Assurance Plan to test all raw materials, semi-finished materials and finished products.
- All Internal Testing Equipment which has a bearing on maintaining Quality should be calibrated.
- Third Party Testing should be carried out at NABL Accredited Laboratory.
- All relevant testing reports need to be sent along with consignment.

v. Occupational Health and Safety

- Suppliers shall adopt all measures to ensure a Safe and Healthy Workplace.
- Supplier shall ensure facilities have adequate HSE procedures and practices in place.

Implementation Guidelines

- All facilities are regularly cleaned and maintained in good condition.
- Suppliers should adhere to all requisite country, state and local workplace health and safety regulations and demonstrate its compliance through on ground implementation and documentation
- Suppliers should have obtained all the necessary permits, licenses for health and safety.

Implementation Guidelines (Contd.)

- Supplier shall provide all its workers with a safe, healthy and hygienic working environment, with access to clean toilet and drinking water facilities, adequate sanitary hygienic facilities and eating and food preparation areas.
- Worker exposure to potential safety hazards, physical agents and physically demanding tasks is controlled through proper hazard identification, design, engineering and administrative controls, preventative maintenance, safe work procedures, and personal protective equipment.
- Suppliers shall ensure adequate fire and emergency preparedness through documentation and adequate implementation at the Site.
- All machinery and other equipment used in production and operations are safe to use and equipped with the necessary safety mechanisms in order to prevent injuries.
- The equipment is inspected internally, Records of maintenance are kept and/or stickers/tags placed on the equipment.
- Appropriate PPE and protective clothing, shoes is available, maintained, used and provided for Workers and visitors in any harmful or potentially risky work areas.
- First aid kit is adequately stocked and available to Workers during all shifts as required in the regulations
- The chemicals are stored inside the chemical storage room or designated place in well-organized manner
- The chemical's MSDS are readily retrievable for purposes of review or verification
- Applicable laws and regulations relating to health and safety issues, including classification, reporting and inspections by authorities are complied with.
- Inspection records are maintained in a manner that is retrievable for purposes of review or verification.

VI. Environmental Protection

- Supplier is expected to operate in a manner that complies with all applicable environmental laws and regulations. Compliance will include, but not be limited to, air, water, solid waste, hazardous waste, electronic waste, energy efficiency and carbon footprint reduction.
- Supplier shall implement all necessary steps to reduce, reuse or recycle waste as much as possible.
- Suppliers shall show responsibility towards the communities in which they operate, manage community impact resulting from company operations and implement procedures for impact control.

Implementation Guidelines

- All necessary permits, licenses, forms, returns as required under the various environmental laws
- All compliance associated with the applicable environmental laws.
- The suppliers ensures that their operations are not adversely impacting environment (across all media).
- Applicable laws & regulations relating to handling, storage, transportation, recycling and disposing of hazardous and non-hazardous waste are complied with
- Contractors for transport, storage and final disposal of waste are licensed according to applicable legislation.

VII. Fair Operating Practices

- Supplier shall not be involved in any form of bribery and facilitation payments.
- Supplier shall take appropriate steps to safeguard and not infringe any of MICL confidential and proprietary information/intellectual property/technology.
- Supplier shall conduct business in transparent, lawful and ethical manner.

Implementation Guidelines

- Monitoring and enforcement procedures shall be implemented to ensure that the practices are fair, ethical and in conformance with the anti-bribery and corruption practices/ processes;
- A reliable mechanism or approach such as helpline number/point of contact is in place to anticipate, identify and resolve bribery conflicts that may arise.
- Suppliers shall conduct business in transparent, lawful and ethical manner. Training programs have been conducted to communicate the definition of bribery.
- Complaints Register and Training records are maintained in a manner that is retrievable for purposes of review or verification
- Supplier shall maintain the confidentiality and integrity of MICL related information ex: Packing material, Hologram, Packing art work, Agreement copy, rates, quantity of packing material etc.

VIII. Business continuity and emergency preparedness

- Supplier shall make a reasonable effort to implement an emergency response program that addresses the most likely anticipated emergencies and the provisions made to mitigate risks to product supply.

Implementation Guidelines

- The organization establishes and maintains clean and orderly housekeeping practices
- Safe and adequate lighting and ventilation is provided
- All emergency exits and means of egress remain unobstructed at all times
- Emergency plans are in place with potential hazards and emergency scenarios (fire, natural disasters, chemical accidents, etc.)
- Evacuation route plans are mapped within the facility
- Emergency contact number is displayed at a commonly visible location at different parts of the site premises
- Suppliers will ensure that they have trained manpower to deal with emergency scenarios
- Health and safety-related information will be clearly posted in supplier facilities in appropriate local/regional languages
- Worker training and fire drills are provided on a frequent basis
- Plans are monitored under the authority and oversight of competent and trained professionals
- Appropriate fire detection and suppression equipment's are tested and maintained regularly, with no overdue on the maintenance dates
- Fire suppression equipment's are well mounted onto the wall
- Combustible items are not stored near live electrical meter room/panels, battery chargers.
- The electrical equipment's are properly grounded/earthed and are in safe working conditions.

IX. Continuous improvement

- Supplier shall have or work towards a culture of continuous improvement.

Implementation Guidelines

- The supplier shall develop practical plans to reduce violations against practices and conditions covered by this code. The plans include measurable goals, responsibilities, concrete actions and timeframes.
- The Suppliers will raise appropriate nonconformity in areas of Quality, Environment and Occupational Health & Safety and initiate appropriate Corrections and Corrective actions.
- The supplier shall periodically audit or verify compliance to the plans.
- Records shall be maintained in a manner that is retrievable for purposes of review or verification

6. Ensuring Compliance and Reporting Concerns

- On request, Supplier will furnish MICL with relevant information and data to support compliance with this Code
- Subject to local laws and any legal restrictions applicable to such reporting, Supplier is expected to promptly report to MICL any violation of this Code that it becomes aware of.
- Supplier or any of its Workers may report violations or ask questions about this Code through the. Confidentiality will fully be maintained, consistent with the need to conduct an adequate review.
- Supplier agrees not to retaliate or show any form of resistance against any of its Workers who, acting in good faith, report what they reasonably believe is a violation of this Code.

7. Annexure – NGRBC Principles as applicable to MICL

Principle 1 – Ethical Business

- MICL conducts and governs themselves with integrity, and in a manner that is Ethical, Transparent and Accountable
- MICL governance structure has developed and put in place structures, policies and procedures that promotes these Principles in MICL and across the value chain of its business
- MICL Governance Structure takes responsibility for meeting all its statutory obligations in line with the spirit of the law
- MICL Governance Structure has put in place appropriate structures, policies and procedures to avoid complicity, conflicts of interest situations, to ensure that the business does not engage in illegal and abusive practices, bribery and corruption, and ensures timely and fair action in case such transgressions are detected
- MICL Governance Structure ensures that the business contributes to public finances by timely and complete payment of all applicable taxes

Principle 2 – Sustainable Construction

- MICL undertakes construction activities and associated services in a manner that is sustainable and safe.
- MICL while designing, constructing buildings & infrastructure endeavors to ensure that resource-efficient and low-carbon processes and technologies are deployed to minimize adverse environmental and social impacts.
- MICL provides stakeholders across the value chain with adequate information about environmental and social issues and impacts across building or infrastructure life cycle from design to disposal. This is done through appropriate and relevant tools such as certifications, labels, ratings and other communication and disclosure platforms including reports, websites, etc.
- MICL endeavors to take increasing 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

- MICL respects and promotes the well-being of all employees, including those in its value chain.
- MICL Governance Structure ensures 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.
- MICL ensures equal opportunities at the time of recruitment, during the course of employment, and at the time of separation without any discrimination.
- MICL does not use child labour, coercive or forced labour, or any form of involuntary labour, paid or unpaid.
- MICL has put systems and processes in place to support the work-life balance of all its employees.

Principle 3 – Employee Wellbeing

- MICL respects and promotes the well-being of all employees, including those in its value chain.
- MICL Governance Structure ensures 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.
- MICL ensures equal opportunities at the time of recruitment, during the course of employment, and at the time of separation without any discrimination.
- MICL does not use child labour, coercive or forced labour, or any form of involuntary labour, paid or unpaid.
- MICL has put systems and processes in place to support the work-life balance of all its employees.
- MICL ensures fair, timely and transparent payment of statutory wages of all its employees, including contract and casual labour without discrimination.
- MICL aspires to pay fair living wages to meet basic needs and economic security of all employees, including casual and contract labour.
- MICL provides a “workplace environment” that is safe, hygienic, accessible to the differently abled and which upholds the dignity of the employees. MICL

engages and consults with their employees on this provision.

- MICL ensures continuous upgradation of skill and competence of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis. They should promote career development through human resource interventions.
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Principle 4 – Responsible Stakeholder Engagement

- MICL respects the interests of and is responsive to all its stakeholders.
- MICL Governance Structures ensures 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.
- MICL has developed 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.
- MICL enables all stakeholders to benefit fairly from 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 is resolved in a just, fair and equitable manner.

Principle 5 – Respect for Human Rights

- MICL respects and promotes human rights.
- MICL Governance Structure ensures that it makes 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 further ensures that the responsibility for addressing such impacts is assigned to the appropriate level and function.

- MICL Governance Structure ensures that its business has in place such policies, structures and procedures that demonstrates respect for the human rights of all stakeholders impacted by its business.
- MICL Governance Structure ensures that their business, where it is causing, contributing or otherwise linked to adverse human rights impacts, takes corrective actions to address such impacts.
- MICL promotes the awareness and realization of human rights across its value chain.
- MICL ensures that all individuals and groups whose human rights are impacted by them have access to effective grievance redressal mechanisms.

Principle 6 – Environmental Protection

- MICL respects and makes efforts to protect and restore the environment.
- MICL Governance Structure ensures that it 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.
- MICL has developed appropriate strategies for sustainable and efficient use of natural resources and manufactured materials, giving due consideration to expectations and concerns of all stakeholders.
- MICL has defined 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.
- MICL focuses 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.
- MICL learns from industry best practices for promoting reduction, reuse, recycling and recovery of material and resources, and encourage and motivate

its stakeholders, particularly consumers and business partners, to do the same.

- MICL seeks 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.

Principle 7 – Responsible Advocacy of Public & Regulatory Policies

- MICL Governance Structure ensures that its advocacy positions are consistent with the Principles contained in these Guidelines and publicly disclosed.
- MICL, to the extent possible, undertakes policy advocacy through trade and industry chambers and associations, and other similar collective platforms.
- MICL ensures that its policy advocacy positions promote fair competition and respect for human rights.

Principle 8 – Inclusive Growth & Equitable Development

- MICL promotes inclusive growth and equitable development.
- MICL Governance Structure ensures 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.
- MICL assesses, measures and understands their impact on social, and economic development, and respond through appropriate action to minimize and mitigate its negative impacts on society.
- MICL innovates and invests in products, technologies and processes that promote the well-being of all segments of society, including vulnerable and marginalized groups.
- MICL responds 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.
- MICL makes efforts to minimize the negative 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.

- MICL respects all forms of intellectual property and traditional knowledge and makes efforts to ensure that benefits derived from their knowledge are shared equitably.

Principle 9 – Responsible Customer Engagement

- MICL Governance Structures ensures that the business minimizes and mitigates any adverse impact of its goods and services on consumers, the natural environment and society at large.
- MICL ensures that they do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling their products.
- MICL discloses 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.
- MICL manages customer data in a way that does not infringe upon their right to privacy.
- MICL makes customers aware of, and provide information and guidance to them on, safe and responsible usage.
- MICL promotes and advertise their products in ways that do not mislead or confuse the customers or violate any of the Principles in these Guidelines.
- MICL provides appropriate grievance redressal mechanisms that are transparent and accessible, to address customer concerns and feedback.
- MICL provides 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.

8. Supplier Declaration

We, as a part of Supply Chain of Man Infraconstruction Limited (MICL), are committed to conducting business in an ethical manner, and in a way that promotes business integrity, environmental and social responsibility. This includes compliance with the laws of land and adherence to well-established ESG principles and standards such as National Guidelines on Responsible Business Conduct (NGRBC), the UN Sustainable Development Goals (UNSDG's), the United Nations Guiding Principles on Business and Human Rights and Companies Act 2013.

We have reviewed and understood the "MICL Supplier Code of Conduct" and the elements of the 9 NGRBC Principles and in support of our commitment to MICL, we commit to abide in letter and spirit to the same.

For,

Company Name :

Authorized Signatory
(Name & Designation)