



## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

### **BACKGROUND:**

The Concept of Corporate Social Responsibility has gained prominence from all avenues. The Corporate Sector has realized that the Government alone will not be able to get success in its endeavor to uplift the downtrodden of Society. With rapidly changing corporate environment, more functional autonomy, operational freedom, etc., Man Infra has adopted CSR as a strategic tool for sustainable growth. For Man Infra in present context, CSR means not only investment of funds for social activity but also integration of business processes with social processes.

Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterized by a willingness to build a society that work for everyone. This is the corner stone of our CSR policy.

### **INTRODUCTION:**

Man Infraconstruction Limited (Man Infra) is a construction company headquartered in Mumbai, providing construction services for Port infrastructure, Residential, Industrial, Commercial and Road Infrastructure Projects. Man Infra has gained significant experience and has an established track record and reputation for efficient project management, execution and timely completion of projects in the construction sector.

### **SHORT TITLE & APPLICABILITY:**

This policy is titled as the 'MICL CSR Policy' and it shall apply to all CSR initiatives and activities taken up by the company for the benefit of the society.

### **CSR PHILOSOPHY AND VISION STATEMENT:**

To leverage the capacity and capital to equip and enable the social sector achieve the greatest impact on the societies in India.

### **SCOPE OF THE ACTIVITIES:**

- (i) eradicating hunger, poverty and Malnutrition, promoting preventive health care and entries shall be making available safe drinking water;
- (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;

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- (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backwards groups;
- (iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry; conservation of natural resources and maintaining quality of soil, air and water;
- (v) protection of national heritage, art and culture including restoration of buildings and sites of historical importance and work of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- (viii) contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio-economic development and relief and funds for the welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- (ix) contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- (x) rural development projects;
- (xi) such other matters as may be prescribed by Competent Authority and thought fit by Board of Directors from time to time.

The above list is illustrative and not exhaustive. The CSR committee of Board of Directors is authorized to consider also CSR activities which not included in this list. It is clarified that all the aforesaid activities or programs shall be undertaken in India only and also that such programs and activities shall not be designed to benefit only the employees of the Company and their families.

### FUNDING & ALLOCATION:

For achieving its CSR objectives, MICL shall allocate such amount of its average Net Profits as may be approved by the Board of Directors, as its Annual CSR Budget in each Financial Year. Allocation of the Annual Budget for CSR activities in any given year shall be as per the provisions of the Companies Act, 2013 and rules made thereof as amended from time to time.

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It is clarified that, the surplus arising out of CSR projects or activities shall not form part of the business profit of the Company.

### IMPLEMENTATION:

CSR programs of MICL may be undertaken by MICL directly or through a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company or some trusts or entities or otherwise, registered with the Central Government as may be decided by the CSR Committee and the Board of Directors of the Company, and which is:

- (a) established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
- (b) established under an Act of Parliament or a State legislature; or
- (c) established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

MICL CSR Policy seeks to build a strong and high impact social sector for a better India by leveraging the capacity and capital of the profit world to equip and enable the social sector to achieve the greatest impact on the lives of the poor.

### MONITORING:

To ensure effective implementation of the CSR programs undertaken, a monitoring mechanism will be put in place.

MICL may enter into an agreement with other trusts, NGOs, etc. for the arrangement of undertaking CSR activities on its behalf and the said trusts, NGOs, etc. shall report to CSR Committee from time to time on progress of CSR programs undertaken by them. CSR initiatives of the Company will also be reported in the Annual Report of the Company.

In case of MICL's average CSR obligation is ten crore rupees or more in block of three immediately preceding financial years, it shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.

The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR. Expenditure booked towards impact assessment which shall not exceed two percent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is higher.

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### **DISCLOSURE OF THE POLICY & DISPLAY OF CSR ACTIVITIES ON WEBSITE OF THE COMPANY:**

The composition of the CSR Committee, and CSR Policy and Projects approved by the Board shall be disclosed on the website of the Company, for public access. The necessary disclosure, if any, about the Policy will also be made as per the requirements of SEBI LODR Regulations, 2015 and the Companies Act 2013.

### **FREQUENCY OF REVIEW OF THE POLICY:**

In case of any doubt with regard to any provision(s) of the policy, a reference can be made to CSR Committee of Board of Directors. In all such matters, the interpretation & decision of the CSR committee of the Board of Directors shall be final.

The Board or the Committee, is authorized to review/ change/amend this policy from time to time at its sole discretion and/or in pursuance of any amendments made in the Companies Act, 2013, SEBI LODR Regulations, 2015 and etc.

This Policy is intended to be in conformity with the SEBI LODR Regulations, 2015 as on the date of its adoption. However, if due to subsequent modifications in the SEBI LODR Regulations, 2015, the Act or any other applicable law, a provision of this Policy or any part thereof becomes inconsistent with the SEBI LODR Regulations, 2015, the Act, or any other applicable law, then the provisions of such laws, Listing Regulations as modified, shall prevail.

<b>Description</b>	<b>Adoption Date</b>	<b>Approval by</b>
Adoption of Revised Policy	20.05.2025	Corporate Social Responsibility Committee and Board of Directors