

# BEIL INFRASTRUCTURE LIMITED



ESG Factbook | 2023-25



## About this ESG Factbook

This ESG Factbook hereafter referred to as “**Factbook**”, serves as a strategic summary of the ESG performance of BEIL Infrastructure Limited (Consolidated), hereafter referred to as “**BEIL**” or “**we**” or “**us**” or “**Company**”. It presents key highlights from our initiatives, offering stakeholders a focused view of our actions and outcomes. For a comprehensive understanding of our sustainability vision and detailed performance metrics, we encourage readers to refer to our full [Sustainability Report 2023-25](#).

# Company Information

## Reporting Period

In this Factbook, the reporting Financial Year (FY) corresponds to the Indian financial year, covering two reporting period from April 1<sup>st</sup>, 2023 to March 31<sup>st</sup>, 2025.

This Factbook presents the consolidated non-financial information of BEIL Infrastructure Limited and Group based on operational control. The operations of the following entities are covered:



### **BEIL Infrastructure Limited**

- Ankleshwar unit
- Dahej unit
- Ahmedabad unit
- Baddi unit

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**CIWMCPL**

**Enviro Technology Limited (ETL)**



**Coimbatore Integrated Waste Management Company Private Limited (CIWMCPL)**



**Kerala Enviro Infrastructure Private Limited (KEIL)**



**Shivalik Solid Waste Management Limited (SSWML)**

The operations covered in this Factbook contribute to over 90% of the total revenue generated.

## Independent Assurance

The data and disclosures presented in this Factbook are derived from our Sustainability Report for the reporting period from April 1<sup>st</sup>, 2023, to March 31<sup>st</sup>, 2025. The Sustainability Report has been independently assured by the British Standards Institution (BSI) Group India Private Limited and therefore the ESG performance numbers reflect the assured data.

## Company Information

The table below outlines our key company information:

| Company Data    | UOM        | FY22           | FY23           | FY24           | FY25           |
|-----------------|------------|----------------|----------------|----------------|----------------|
| Revenues        | INR        | 4,42,96,12,000 | 4,74,10,56,000 | 5,98,51,22,000 | 7,90,72,20,000 |
| Revenues        | US Dollars | 58,384,236.19  | 57,684,097.82  | 71,815,718.74  | 92,557,883.65  |
| Total Employees | Number     | 355            | 371            | 378            | 375            |

The exchange rates used to convert revenue from INR to USD are based on the financial year-end rates published by the Federal Reserve Board. For FY 2021-22, the rate was USD 0.013 as of 31<sup>st</sup> March 2022. In FY 2022-23, it was USD 0.012 as of 31<sup>st</sup> March 2023. For FY 2023-24, the rate remained USD 0.012 as of 31<sup>st</sup> March 2024, and for FY 2024-25, it was 0.012 as of 31<sup>st</sup> March 2025.

# 1. Governance and Economic Dimension

## 1.1. Transparency & Reporting

### 1.1.1. Sustainability Reporting Boundaries

This Factbook covers sustainability disclosures of BEIL Infrastructure Limited on a consolidated basis based on operational control. All activities fully consolidated for financial reporting purposes are covered as part of this Factbook. This Factbook covers sustainability disclosures of BEIL Infrastructure Limited on a consolidated basis based on operational control. All activities fully consolidated for financial reporting purposes are covered as part of this Factbook.

### 1.1.2. Sustainability Reporting Assurance

The Sustainability Report for FY 2023-24 and FY 2024-25 has been independently assured by British Standards Institution (BSI) Group India Private Limited, which provided limited assurance in accordance with ISAE 3000 (Revised) standard for ESG parameters. For Greenhouse Gas (GHG) emissions-related information, assurance is based on ISO 14064-3:2019.

The Assurance Statement is available on page 60 of this Factbook.

### 1.1.3. Sustainable Taxonomies

Our Company does not report its revenues, capital expenditure, or operating expenditure in accordance with any recognized sustainable activity reporting framework. Such frameworks are not applicable to BEIL's current regulatory obligations or operational context. Additionally, sustainability taxonomies in India are still evolving, and the Company is not yet subject to mandatory taxonomy-aligned financial disclosures.

## 1.2. Corporate Governance

### 1.2.1. Board Independence

Our Company is not listed on any stock exchange and therefore does not follow a specific stock exchange governance code. However, we have adopted internal Board independence standards that align with global best practices and the provisions of the Companies Act, 2013. Each Independent Director provides an annual declaration of independence as required under Section 149(7) of the Companies Act.

These independence requirements include:

- The Director does not accept, nor does any family member accept, any payments from the Company or any parent or subsidiary of the Company in excess of the prescribed threshold during FY 2024-25, other than payments permitted under applicable rules.
- The Director has not been employed by the Company or any of its subsidiaries in an executive capacity within the last year.
- The Director is not a Family Member of an individual employed by the Company or any parent or subsidiary of the Company as an executive officer.

- The Director is not, and is not affiliated with, a Company, that is, an adviser or consultant to the Company or a member of the Company's senior management.
- The Director is not affiliated with a significant customer or supplier of the Company.
- The Director does not have, and has never had, any personal services contract(s) with the Company or a member of the Company's senior management.
- The Director is not affiliated with a not-for-profit entity that receives significant contributions from the Company.
- The Director has not been a partner or employee of the Company's outside auditor during the past year.
- The Director does not have any other conflict of interest that would preclude them from being considered independent by the Board.

At BEIL, we have set a target to ensure that 22% of the Board of Directors comprises Independent Directors.

### 1.2.2. Board Type

We are reporting on the Board of Directors of BEIL Infrastructure Limited, as it has operational control over the entities covered in this Factbook.

At BEIL Infrastructure Limited, we have a one-tier structure for the Board of Directors, with a combination of Non-Executive Directors and Independent Directors. In FY 2024-25, we had two Independent Directors and seven Non-Executive, Non-Independent Directors.

The table below outlines the composition of our Board of Director:

| Particulars                   | Number of Members |
|-------------------------------|-------------------|
| Executive Directors           | 0                 |
| Independent Directors         | 2                 |
| Other Non-Executive Directors | 7                 |
| <b>Total Board Size</b>       | <b>9</b>          |

Please refer to our [Sustainability Report](#) on page 36 for our Board Composition.

### 1.2.3. Non-Executive Chairperson/ Lead Director

At our Company, the role of Chief Executive Officer (CEO) and Chairperson is split, and the Chairperson is Non-Executive but not Independent. Mr. B.D. Dalwadi serves as the CEO, while Mr. Ashok Amarlal Panjwani holds the position of Non-Executive, Non-Independent Chairperson at BEIL Infrastructure Limited.

### 1.2.4. Board Diversity Policy

BEIL has a Board Diversity Policy that reaffirms our Company's commitment to maintaining a diverse, inclusive and high-performing Board, recognizing that diversity is a driver in innovation, resilience and long-term value creation. The Policy emphasizes diversity in the Board nomination process, considering factors such as differences in

thought, perspective, regional and industry experience, cultural and geographical background, age, ethnicity, race, gender, and professional expertise.

The Nomination and Remuneration Committee (NRC) is responsible for evaluating Board diversity, recommending measures to maintain a diverse and balanced composition, and periodically reviewing and reporting diversity requirements to the Board.

Please refer to our Board Diversity Policy [here](#).

#### 1.2.5. Board Gender Diversity

Out of nine Board members at BEIL Infrastructure Limited, one is a woman Director—Ms. Sandra Rajnikant Shroff, representing 11% of the Board.

#### 1.2.6. Board Accountability

BEIL ensures the accountability of our Board of Directors and alignment with the long-term interests of our shareholders.

##### Board Meeting Attendance

The average Board meeting attendance in FY 2024-25 was 70%.

In accordance with Section 173 of the Companies Act, we mandate a minimum of four Board meetings each year. Additionally, as per Section 167, we require Directors to attend at least one meeting annually.

##### Shareholder Approval

Any amendment to the Memorandum of Association or Articles of Association or bylaws requires shareholder approval, in line with the provisions of the Companies Act, 2013. This ensures that the Board remains fully accountable and transparent to its shareholders.

##### Board Mandates

In line with our commitment to strong corporate governance, BEIL monitors the external mandates held by the Board members to ensure the Board's effectiveness and accountability.

The table below outlines our Board members who hold four or fewer external mandates:

| Particulars                                                    | FY25                                                       |
|----------------------------------------------------------------|------------------------------------------------------------|
| Total number of Board members with four or less other mandates | 3                                                          |
| Names of Directors                                             | Dr. Vimal Gandhi<br>Dr. Sachin Parikh<br>Mr. Hardik Jadeja |

##### Board Performance Review

The Board, including Independent Directors, undergoes a formal performance evaluation that reviews its composition, diversity, and overall effectiveness in achieving organizational objectives. The evaluation is carried out through a combination of internal questionnaires, peer reviews, and independent assessments. These methods ensure that the process remains objective and unbiased, thereby strengthening transparent governance and enabling informed decision-making.

### Limitation on Directors' Liabilities

There is no limitation to Directors' liabilities beyond what is permitted under Indian law, and Directors remain personally liable in circumstances defined by the statutory framework.

We comply with all applicable provisions under Indian law regarding Directors' liabilities. Under the Companies Act, 2013, Directors are held accountable for their actions, particularly in cases involving fraud, breach of fiduciary duty, or non-compliance with statutory obligations. While Directors are generally protected when acting in good faith and within the scope of their duties, we do not provide blanket immunity or unrestricted limitations of liability.

### Board Election Process

The NRC ensures that the selection of Directors and senior executives is aligned with our Company's long-term strategic objectives. New members of the Board are elected individually on the recommendation of the NRC, which ensures transparency and accountability in the appointment process. As per the requirements of Section 152(6) of the Companies Act, 2013, at least two-thirds of the total Directors (excluding Independent and Nominee Directors) are liable to retire, with one-third of these Directors stepping down at each Annual General Meeting (AGM) to be eligible for reappointment. Non-Independent Board members are re-elected on an annual basis, in compliance with the Companies Act, 2013.

The NRC follows a structured process to evaluate potential candidates by taking into account identified skill gaps, diversity requirements, and independence criteria. It also ensures that remuneration structures are fair, merit-based, and competitive within the industry. Remuneration is aligned with performance outcomes and is regularly benchmarked against industry peers.

To ensure transparency and objectivity in Board appointments and compensation decisions, we have adopted a comprehensive Nomination and Remuneration Policy, which can be accessed [here](#).

Please refer to our Nomination and Remuneration Policy [here](#).

#### **1.2.7. Board Average Tenure**

The average tenure of the Board members at BEIL Infrastructure Limited is 13.01 years.

#### **1.2.8. Board Industry Experience**

Our Board consists of experienced professionals who provide the domain knowledge and strategic guidance essential to our Company's business model. Its current composition represents a balanced mix of skills, expertise, experience, and diversity, ensuring alignment with our Company's objectives and the responsibilities assigned to the Board.

Board members bring a wealth of knowledge across a wide array of domains, including the chemical industry, leadership, finance and banking, ESG initiatives, climate action, risk management, legal frameworks and more. These competencies enable the Board to

effectively contribute towards crafting a visionary approach to BEIL's sustainable development, driving long-term growth and resilience.

All nine of our Board members bring relevant industry experience within the Industrial category as defined by GICS Level 1 classifications.

The table below outlines our Board members with industry experience:

| Name                            | Position                            | Experience in Industrial Category |
|---------------------------------|-------------------------------------|-----------------------------------|
| Rajnikant Devidas Shroff        | Non-Executive Director              | Yes                               |
| Sandra Rajnikant Shroff         | Non-Executive Director              | Yes                               |
| Arun Chandrasen Ashar           | Non-Executive Director              | Yes                               |
| Ashok Amarlal Panjwani          | Non-Executive Director              | Yes                               |
| Vimalkumar GopalDas Gandhi      | Non-Executive, Independent Director | Yes                               |
| Sachin Prakashbhai Parikh       | Non-Executive, Independent Director | Yes                               |
| Hardik Jayendrasinh Jadeja      | Non-Executive, Nominee Director     | Yes                               |
| Himmatbhai Balubhai Sheladia    | Non-Executive, Nominee Director     | Yes                               |
| Amitkumar Purushotambhai Dharva | Non-Executive, Nominee Director     | Yes                               |

#### 1.2.9. CEO Compensation - Success Metrics

At BEIL, the CEO's variable compensation is closely linked to the Company's financial performance, primarily through metrics such as Return on Capital Employed (ROCE) and Return on Assets (ROA). These metrics measure the efficiency and profitability of asset and capital utilization. The CEO's incentive is structured as a percentage of net profits, which are directly influenced by ROA and ROCE. At the end of each financial year, the Board of Directors review the CEO's performance, considering these metrics along with turnover, net profits, and individual achievements. This ensures the CEO's compensation aligns with our Company's financial health and shareholder interests.

#### 1.2.10. CEO Compensation - Long-Term Performance Alignment

BEIL has established clear guidelines for the CEO's variable compensation, including provisions for deferred bonuses, time vesting, and defined performance periods.

- **Deferred Bonus for Short-Term Incentives:** A portion of the CEO's short-term incentive is deferred in the form of shares or stock options. This ensures long-term alignment with Company performance and shareholder value. The percentage deferred is determined based on internal policy and performance outcomes.
- **Performance Period:** The longest performance period applied to evaluate the CEO's variable compensation is one financial year. The incentive is directly linked to BEIL's net profits for that year, as reported in the audited financial statements.

#### 1.2.11. Management Ownership

At BEIL Infrastructure Limited, the CEO and one of the Non-Executive Director hold a nominal number of Company shares.

As of FY 2024–25, out of a total of 4,143,744 shares, the CEO, Mr. B. D. Dalwadi, holds only two shares, while Non-Executive Director, Mr. Ashok Amarlal Panjwani, holds 90 shares. Based on their respective base salaries, the shareholding results in a multiple of zero for both, indicating nominal equity ownership.

The table below outlines the Company share of CEO and other executive committee members as multiple of base salary:

| Position                | Name                       | Multiple of base salary |
|-------------------------|----------------------------|-------------------------|
| Non-Executive Director  | Mr. Ashok Amarlal Panjwani | 0                       |
| Chief Executive Officer | Mr. B. D. Dalwadi          | 0                       |

#### **1.2.12. Management Ownership Requirement**

There is no management share ownership requirement at BEIL.

#### **1.2.13. Government Ownership**

At BEIL Infrastructure Limited, no government institution owns more than 5% of voting rights. Our Company does not issue golden shares to any governmental institutions.

#### **1.2.14. Family Ownership**

No founding individuals or family members individually have more than 5% of the voting rights.

#### **1.2.16. ESG Governance Oversight**

At BEIL, ESG principles are embedded at the Board level, with our Company's sustainability performance monitored by a dedicated committee at the Board level for ESG and sustainability-related matters, ensuring that our organization consistently prioritizes environmental, social, and governance considerations in decision-making processes and strategic planning. This responsibility lies with the Risk Assessment Committee.

We are in the process of establishing an Environment Committee to oversee implementation of environment as well as social related aspects, monitor compliance with regulatory and voluntary standards, and guide our ESG performance.

We have a designated role below our C-suite to oversee ESG and sustainability-related issues. The General Manager – Environment is responsible for driving initiatives related to environmental performance, regulatory compliance, and the integration of sustainability principles across the organization.

## 1.3. Materiality

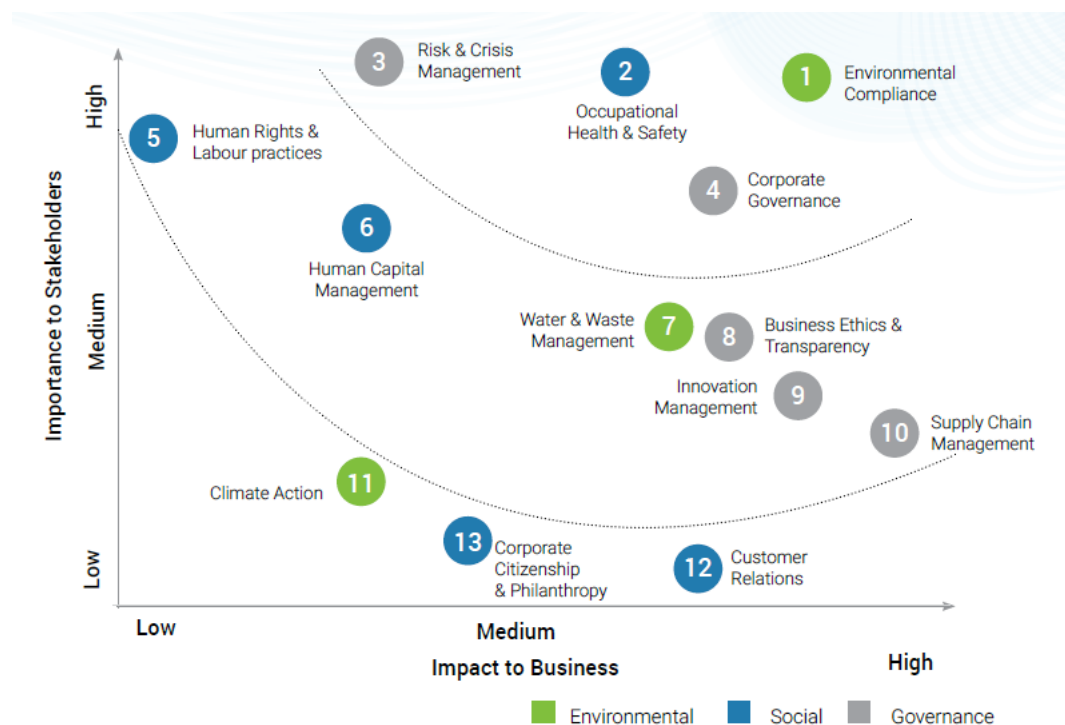
### 1.3.1. Materiality Analysis

At BEIL, we review our materiality assessment every two years or one need-basis to identify ESG topics most relevant to our internal and external stakeholders, as well as our strategic priorities. The most recent assessment was completed in FY 2024-25 and involved engagement with a broad range of external stakeholders, including customers, suppliers, regulators, investors, industry associations, NGOs, media, and research partners.

Material issues are prioritized using a materiality matrix, guided by the principle of double materiality—considering both the business impact on BEIL and our broader impact on society and the environment. Insights from this process are used to inform our risk register and support the identification and prioritization of ESG-related risks within our Enterprise Risk Management (ERM) framework. The recent materiality assessment process is independently assured by BSI Group India Private Limited, our third-party assurance provider. The Assurance Statement explicitly includes verification of the materiality analysis within its methodology section. The results of the materiality process are further formally signed off by our Board of Directors, reinforcing its strategic importance and oversight governance.

Please refer to the Assurance Statement on page 60 of this Factbook.

#### Our Materiality Matrix



### 1.3.2. Material Issues for Enterprise Value Creation

To keep our sustainability strategy focused and responsive, we conduct a comprehensive materiality assessment through active engagement with key internal and external stakeholders. This process enables us to identify and prioritize ESG topics that pose the most significant risks and opportunities for long-term enterprise value creation.

The table below outlines our material issues critical for enterprise value creation:

| Particulars                         | Material Issue 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Material Issue 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Material Issue 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Material Risk or Opportunity</b> | Water and Waste Management                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Climate Action                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Human Capital Development                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Category</b>                     | Waste and Pollutants, Water                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Energy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Human Capital Management                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Business Case</b>                | <p>Water and waste management are central to our business model, linking environmental stewardship with value creation. As a dedicated waste management provider, we deliver sustainable solutions for industrial, hazardous, and municipal waste, ensuring compliance with environmental regulations. We also integrate efficient water use, advanced treatment, and recycling into our operations. By helping industries adopt sustainable practices, we extend its impact beyond operational boundaries.</p> <p>Effective water and waste management directly influence our cost efficiency, revenue growth, and risk mitigation. Poorly managed waste and wastewater can lead to compliance penalties, reputational damage, and higher costs. In contrast, optimized treatment, recovery, and recycling reduce disposal expenses, generate revenue, and improve efficiency. Addressing water scarcity through reuse and treatment safeguards operations and positions us to seize opportunities in resource recovery and the circular economy.</p> | <p>Climate action is integral to our Company's long-term sustainability and operational resilience, especially given the environmental impact of waste management activities. From emissions generated during waste treatment and disposal to energy consumption across facilities, our operations contribute to climate-related risks that can affect regulatory compliance, community trust, and investor confidence.</p> <p>Proactive climate initiatives, such as adopting cleaner technologies, optimizing energy use, and improving waste-to-energy processes, help us mitigate risks and unlock new opportunities for innovation and growth. These efforts also strengthen our reputation as a responsible environmental services provider. Ultimately, climate action supports business continuity, enhances competitiveness, and reinforces our license to operate in a rapidly changing global landscape.</p> | <p>Human Capital Development enhances productivity, innovation, and compliance. Strategic investment in training and development equips employees with technical, safety, and regulatory skills essential for high-performance operations in hazardous waste management. Upskilling initiatives reduce operational errors, improve process efficiency, and foster a culture of continuous improvement. Targeted programs in environmental compliance, digital tools, and leadership development strengthen workforce capabilities, reduce attrition, and ensure readiness for future challenges. These efforts directly impact cost control, risk mitigation, and long-term value creation.</p> |
| <b>Type of Impact</b>               | Revenue, Risk, Opportunity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Risk, Opportunity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Business strategies</b>          | Our Company addresses water and waste management through an integrated set of strategies and service offerings that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Our Company has embedded climate action into its operations and strategy through targeted programs to reduce                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Our Company strengthens operational excellence through strategic human capital development. We invest in continuous                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

|  |                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                 |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | promote environmental sustainability and business resilience. Our Company operates advanced treatment, storage, and disposal facilities, alongside initiatives for waste recycling, co-processing, and energy recovery. Our water management approach includes wastewater treatment and recycling to reduce freshwater dependency and support industrial customers in achieving compliance and efficiency. | emissions. We have implemented clean energy solutions such as Waste Heat Recovery systems that convert residual heat into usable steam, reducing fossil fuel use. Transitioning to biomass-based boilers has further advanced our renewable energy shift. Solar installations, use of energy-efficient technologies, and upgraded equipment, help lower electricity demand. Beyond direct operations, we have also optimized logistics routes to reduce fuel consumption and emissions across our value chain. | training, technical upskilling, sponsorship programs and leadership development to build a competent, safety-conscious workforce. These initiatives enhance regulatory compliance, reduce operational risks, and foster innovation. By empowering employees with relevant knowledge and tools, we ensure resilience, adaptability, and sustained performance across our environmental services. |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### 1.3.3. Materiality Metrics for Enterprise Value Creation

To ensure accountability and drive meaningful progress on our material issues, we have established a structured framework of specific targets and performance metrics. These indicators help us monitor and manage our ESG performance effectively.

The table below outlines the metrics used evaluating our material issues:

| Particulars            | Water and Waste Management                                      | Climate Action                  | Human Capital Development                   |
|------------------------|-----------------------------------------------------------------|---------------------------------|---------------------------------------------|
| <b>Target / Metric</b> | 4% year-on-year reduction in freshwater consumption             | 5 MWp solar power installation  | Impart over 6,000 training hours to FTEs    |
| <b>Target Year</b>     | 2030                                                            | 2030                            | 2030                                        |
| <b>Progress</b>        | 22.43% year-on-year reduction in freshwater consumption in FY25 | 0.398 MWp solar power installed | 5,502 hours total training provided to FTEs |

### 1.3.4. Material Issues for External Stakeholders

At BEIL, our responsibility extends beyond internal operations to the broader network of external stakeholders impacted by our business, services, and supply chain. We recognize that actively managing our influence on local communities and supply chain partners is essential for promoting inclusive growth and building a resilient, ethical value chain.

The table below outlines critical material issues for external stakeholders:

| Particulars                                          | Water and Waste Management                                                              | Climate Action                                                                                        |
|------------------------------------------------------|-----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| <b>Cause of the Impact</b>                           | Operations<br><br><u>Business Activity Coverage:</u> More than 50% of business activity | Operations, Supply Chain<br><br><u>Business Activity Coverage:</u> More than 50% of business activity |
| <b>External stakeholder / impact areas evaluated</b> | Environment, Society                                                                    | Environment, Society                                                                                  |

|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Topic relevance on external stakeholders</b> | Water and waste management is a material issue for BEIL due to the direct environmental and societal consequences of its operations. As a provider of waste treatment and effluent management services, our activities significantly affect local ecosystems, groundwater quality, and public health. External stakeholders, including the environment and nearby communities, are impacted by the scale and severity of potential contamination or pollution. Effective waste containment and water treatment not only reduce ecological damage but also safeguard livelihoods, making this issue critical for long-term environmental resilience and social trust. | <p>We view climate action as a critical material topic because our operations directly influence greenhouse gas emissions and resource use, which have significant external impacts on the environment and on society. Fossil fuel consumption and waste treatment processes can contribute to climate change, affecting air quality, ecosystems, and community health.</p> <p>At the same time, our initiatives, such as waste heat recovery, renewable energy generation, and biogas plants, create positive impacts by lowering emissions, conserving resources, and promoting cleaner energy alternatives. These efforts reduce the severity and extent of environmental harm while delivering broader indirect societal benefits through energy circularity and reduced dependency on fossil fuels.</p> |
| <b>Type of Impact</b>                           | Positive and Negative (Both combined)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Positive and Negative (Both combined)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

### 1.3.5. Materiality Metrics for External Stakeholders

To move beyond activity-based reporting and better understand our real-world impact, we are committed to quantitatively measuring our influence on external stakeholders. We apply a structured approach to track key output and impact metrics. This enables us to assess the tangible value we create and continuously improve our efforts.

The table below outlines the metrics for evaluating material issues our external stakeholders:

| Particulars             | Water and Waste Management                                                                                                                                                                                                                                                                                                                                           | Climate Action                                                                                                                                                                                                                                  |
|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Output Metric</b>    | <ul style="list-style-type: none"> <li>• % share of recycled water in total water consumption</li> <li>• % reduction in freshwater consumption</li> <li>• Waste diverted from landfill in MT</li> </ul>                                                                                                                                                              | <ul style="list-style-type: none"> <li>• Total avoided CO<sub>2</sub> emission in % or tons</li> <li>• % reduction in Scope 1 and Scope 2 emissions</li> <li>• % share of renewable energy in total energy consumption</li> </ul>               |
| <b>Impact Valuation</b> | <ul style="list-style-type: none"> <li>• Improved access to wastewater treatment services for industrial and municipal stakeholders</li> <li>• Improved water and soil quality benefiting surrounding communities and ecosystems through reduced pollution exposure</li> <li>• Reduced environmental burden through selling of RDF, recovered metal, etc.</li> </ul> | <ul style="list-style-type: none"> <li>• Access to sustainable waste treatment (e.g., incineration with heat recovery) for industrial clients</li> <li>• Reduced environmental impact for communities through cleaner energy sources</li> </ul> |
| <b>Impact Metric</b>    | <ul style="list-style-type: none"> <li>• Increase in waste diverted from landfill</li> <li>• Increase in wastewater treatment</li> <li>• % increase in water recycling</li> </ul>                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>• GHG emissions avoided</li> <li>• % increase in consumption of renewable energy</li> </ul>                                                                                                              |

## 1.4. Risk and Crisis Management

### 1.4.1. Risk Governance

We have a risk governance framework with Board-level oversight through the Risk Assessment Committee. The Committee is chaired by an Independent Director, Non-Executive Director. The Committee identifies and discusses major risk factors affecting the business and operation of our Company. The Committee reviews control measures adopted for reducing or eliminating the risk.

We have three lines of defense for risk management

- **Operational Risk Ownership (First Line):** We ensure that front-line employees and dedicated operational roles—such as department managers and business unit heads—own and manage risks directly as part of their responsibilities.
- **Risk Management and Compliance Oversight (Second Line):** We have a Board-level Risk Assessment Committee that is responsible for setting control standards and oversees compliance with them.
- **Independent Audit Unit (Third line):** We have an internal audit function that provides independent assurance on the effectiveness of risk management and compliance processes.

### 1.4.2. Risk Management Processes

We have in place structured risk management processes, approaches, and strategies to promote an effective risk culture. This approach is embedded across our operations to proactively identify, assess, and mitigate Company-specific risks throughout the value chain.

#### Risk Review

Our risk review process involves identifying risks and assessing their impact and likelihood. This includes updating risk statuses and implementing procedures to identify hazards and assess potential negative effects at least on a yearly basis.

Our risk assessment process encompasses practices relating to identification, assessment, monitoring, and mitigation of such risks. It seeks to minimize adverse impacts on our business objectives, enhance stakeholder value, and sustain long-term competitive advantage.

BEIL determines the risk appetite of the identified risks using a methodology to assign net risk score. To estimate the net risk, the effectiveness of existing control measures, such as policies, training programs, audits, and governance structures, is evaluated and factored in. This score reflects the organization's risk appetite, indicating the level of residual risk it is willing to accept.

Additionally, a responsibility matrix is defined, assigning clear accountability to roles such as the Compliance Officer, Business Unit Heads, and the Compliance Committee for managing significant risks and ensuring consistent implementation and oversight of the

Integrity Compliance Program. The Compliance Officer ensures that the Risk Assessment Policy is periodically updated.

#### Key risks and mitigation measures

| Category of Risk                        | Risks Identified                                                                | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------------|---------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Safety</b>                           | Risk of Gas Exposure                                                            | <ul style="list-style-type: none"> <li>Installing engineering controls such as negative suction and avoiding manual handling of gas</li> <li>Ensuring job rotation in hazardous areas and providing refresher training to workers</li> <li>Ensuring the use of PPE such as gas masks and respiratory systems</li> </ul>                                                                                                                                                                                |
|                                         | Fire & Explosion Risk                                                           | <ul style="list-style-type: none"> <li>Segregating and storing waste in designated sheds</li> <li>Installing smoke and heat detectors</li> <li>Implementing hot work permit procedures and ensuring trained firemen are available 24x7</li> </ul>                                                                                                                                                                                                                                                      |
|                                         | Process Risk                                                                    | <ul style="list-style-type: none"> <li>Adopting new technology like Shredding, Mixing, Pumping (SMP)</li> <li>Conducting HAZOP study for every process change</li> <li>Performing preventive maintenance and inspection of critical equipment</li> </ul>                                                                                                                                                                                                                                               |
| <b>Environment</b>                      | Depletion of Air Quality                                                        | <ul style="list-style-type: none"> <li>Bi-weekly internal air monitoring</li> <li>Quarterly Dioxin-Furan checks by two parties</li> <li>Monthly ambient &amp; stack monitoring by third party</li> <li>Dust control via landfill water spraying</li> <li>Stricter internal air limits, reviewed fortnightly</li> <li>CAAQMS &amp; CEMS data tracking, calibrated biannually</li> <li>Leak-proof landfill shed with dust/fume control</li> </ul>                                                        |
|                                         | Depletion of Soil Quality                                                       | <ul style="list-style-type: none"> <li>Quarterly soil monitoring by third party</li> <li>Toxicity Characteristic Leaching Procedure (TCLP) tests to check for hazardous leaching</li> <li>Pre- &amp; post-monsoon soil checks</li> <li>Monsoon run-off prevention from landfills using tarpaulin cover</li> <li>Spillage collection and site cleanup</li> </ul>                                                                                                                                        |
|                                         | Disturbance to habitation due to high noise                                     | <ul style="list-style-type: none"> <li>Weekly internal noise monitoring</li> <li>Monthly third-party noise checks</li> <li>Performing regular preventive maintenance of machinery</li> <li>Acoustic enclosures on DG sets &amp; blowers</li> </ul>                                                                                                                                                                                                                                                     |
| <b>Anti-Bribery and Anti-Corruption</b> | Incidences of bribery and corruption within internal operations                 | <ul style="list-style-type: none"> <li>Board-approved Policy, multilingual communication, visual reinforcement</li> <li>Mandatory induction &amp; annual refresher training with assessments</li> <li>Anonymous whistleblower mechanism in place</li> <li>Quarterly independent audits, breach tracking, retaliation protection</li> <li>Defined sanctions, including termination; facilitation payments banned</li> <li>Systematic recordkeeping of training, acknowledgements, and audits</li> </ul> |
|                                         | Non-compliance and unethical practices from third parties and business partners | <ul style="list-style-type: none"> <li>Risk-based due diligence, including screening against World Bank debarment lists</li> <li>Business Partner Policy &amp; Code of Conduct prohibiting bribery</li> <li>Contractual compliance clauses with right to exit</li> <li>Training for high-risk partners, Whistleblower Policy shared</li> <li>Quarterly review of ICP tracker &amp; logged exceptions</li> </ul>                                                                                        |

### Risk Exposure

We review our Company's risk exposure on a yearly basis. This enables us to assess both the likelihood and magnitude of identified risks and to implement appropriate mitigating actions to reduce their potential adverse impact.

### Risk Management Process Audit

An internal audit of the risk management process is conducted every two years to evaluate the effectiveness of controls and procedures. This includes reviewing hazard identification, risk exposure, and mitigation strategies. The audit ensures risks are assessed and updated at least on a yearly basis.

### Risk Culture

At BEIL, a strong risk culture is embedded across all levels of the organization. Non-Executive Directors receive regular risk management education, while focused training is conducted throughout the workforce to build awareness and accountability. Risk criteria are integrated into service development, ensuring proactive mitigation. Additionally, financial incentives are linked to risk management metrics, reinforcing responsible decision-making and performance. This culture is supported by internal audits conducted every two years, ensuring continuous improvement and alignment with strategic objectives.

#### 1.4.3. Emerging Risks

Emerging risks like groundwater quality depletion and hazardous waste transportation are gaining prominence due to regulatory scrutiny, environmental impact, and stakeholder expectations. These risks demand proactive monitoring, engineering controls, and compliance to safeguard operations and community trust.

The table below outlines our emerging risks:

| Particulars                      | Emerging Risk 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Emerging Risk 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Name of the emerging risk</b> | Depletion of Groundwater Quality                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Transportation of Hazardous Waste                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Category</b>                  | Environmental                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Environmental                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Description</b>               | Groundwater depletion is a rising environmental and operational risk for BEIL, especially given its reliance on water-intensive waste management processes. The 2024 Annual Groundwater Quality Report by the Ministry of Jal Shakti highlights widespread contamination from industrial discharge, nitrates, and salinity, with stricter monitoring protocols now in place. Additionally, amendments to the Environment Protection Rules, 1986, and enhanced enforcement mechanisms empower authorities to impose penalties for non-compliance. These developments underscore the need for BEIL to maintain rigorous groundwater monitoring, engineering controls, and compliance systems to mitigate reputational, regulatory, and community impact risks. | The transportation of hazardous waste presents growing risks in India due to increasing industrial volumes, stricter environmental regulations, and heightened public awareness. Mishandling during transit can lead to spills, accidents, and environmental damage, affecting communities along transport routes. This risk is amplified by the 2024 amendment to Rule 40 and Schedule IX of the Hazardous and Other Wastes Rules, 2016, which now states that any person—including companies—failing to comply with these rules is liable to penalties under Section 15 of the Environment (Protection) Act, 1986. These rules govern the safe handling, packaging, storage, and movement of hazardous waste. For BEIL, which manages large volumes of such waste, this underscores the need for stringent oversight, GPS-enabled tracking, emergency response systems, and full regulatory compliance to mitigate operational and reputational risks. |

|                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Impact</b>             | Any deterioration in groundwater quality near our facilities could result in regulatory penalties, reputational damage, and loss of community trust. It may also affect operational continuity, given stricter environmental compliance requirements and the possibility of restrictions on site activities. Beyond compliance, declining groundwater quality poses broader risks to public health, ecosystems, and livelihoods, which can increase scrutiny from regulators, customers, and investors. This makes groundwater quality management material for our long-term business resilience and license to operate.                 | Transportation-related incidents can lead to serious consequences, including regulatory penalties, litigation, damage to our Company's reputation, and loss of stakeholder trust. Beyond compliance risks, accidents or spills during transit may disrupt operations, increase costs of remediation, and cause adverse health and environmental impacts. Ensuring safe and efficient waste movement is therefore critical to maintaining its license to operate, protecting employees and communities, and safeguarding business continuity.                                 |
| <b>Mitigating actions</b> | We have put in place a robust groundwater protection and monitoring framework to proactively manage this risk. We conduct monthly internal and third-party monitoring of borewells upstream and downstream of our sites, along with quarterly third-party monitoring of nearby surface water bodies. Landfill construction is overseen by technical experts from IIT Delhi and DDU Nadiad to ensure engineering integrity and is further supported by internal operational monitoring. During monsoon, landfills are covered with double layers of LDPE and HDPE tarpaulin to minimize rainwater seepage and reduce leachate generation. | BEIL has established a comprehensive system to mitigate risks associated with hazardous waste transportation. Waste is transported in BEIL-registered vehicles equipped with GPS tracking, ensuring transparency and accountability in movement. Independent monitoring is conducted to validate compliance and performance. A Quick Response Team is deployed to address any emergencies within three hours, minimizing potential damage in case of incidents. Furthermore, strict adherence to all legal requirements governing hazardous waste transportation is ensured. |

## 1.5. Business Ethics

### 1.5.2. Codes of Conduct

Our ethical standards are rooted in core values that drive our decision-making processes. We have implemented a comprehensive Code of Conduct that governs all business practices, including anti-corruption, supplier engagement, customer interactions, and community relations. Senior management sets the tone by leading with integrity and embodying the principles of ethical conduct in their everyday actions. Through this steadfast leadership, we cultivate a Company-wide culture that prioritizes integrity and upholds zero tolerance for unethical behavior.

All employees at our Company are expected to abide by our values. To ensure this, we keep them informed and updated through ongoing training and awareness efforts. Employees receive regular training on anti-corruption, conflict of interest, responsible sourcing, and environmental compliance.

There have been no reported incidents of corruption or bribery during FY 2024-25.

The Code of Conduct, supported by specific Policies, covers key areas of responsible business conduct:

- **Corruption and Bribery:** Our [Anti-Bribery Corruption Policy](#) (ABC Policy) details BEIL's commitment to the prevention, detection and deterrence of fraud, bribery and all other corrupt business practices.
- **Discrimination:** Our Code protects its employees against discrimination and aims to maintain a work environment in which people are treated with dignity, decency and respect and create an environment characterized by mutual trust.
- **Confidentiality of Information:** Our Code aims to protect the confidentiality and integrity of information stored and processed on our systems. We have procedures for entering into confidentiality agreements with various vendors, which shall be executed before any information is shared with them.
- **Conflict of Interest:** Our Code states that employees must avoid situations where personal interests conflict with their professional responsibilities. Any actual or potential conflict must be promptly disclosed to the Head of Department, HR, or Compliance Officer, and appropriate steps must be taken to resolve it.
- **Antitrust and anti-competitive practices:** Our Code outlines our commitment to preventing anti-competitive behavior and provides basic guidance to help employees understand and comply with related requirements.
- **Money Laundering & Insider Dealing:** Our Code prohibits unethical financial practices, including money laundering and misuse of confidential information. Though insider trading laws do not apply to private companies, employees must ensure transparent transactions and report suspicious activity, in line with BEIL's Code of Conduct.
- **Environment, Health and Safety:** Our Code reflects our commitment to providing a safe, healthy, and clean working environment for employees and visitors. It also promotes responsible use of natural resources and supports environmental improvement. Wherever feasible, we aim to reduce, reuse, replace, recycle, or regenerate materials used in our operations.
- **Whistle Blowing:** Our Whistle Blower Policy reflects our commitment to complying with laws that protect employees from discrimination or retaliation when they report misconduct. We have procedures in place that allow anyone to raise concerns—openly, confidentially, or anonymously—which are received and addressed by designated personnel.

Please refer to our Code of Conduct [here](#).

### 1.5.3. Anti-Bribery & Anti-Corruption Policy

Our Company's Code of Conduct Policy and ABC Policy provide a comprehensive framework to prevent bribery and corruption across all levels of operations.

- **Prevention of Bribery and Corruption:** The Policy strictly prohibits offering, giving, soliciting, or accepting bribes, kickbacks, or improper advantages in any form.
- **Guidelines for Gifts:** The Policy states that employees may only accept or offer gifts and hospitality of nominal value, provided they are reasonable, transparent, and do not influence business decisions.

- **Guidelines for Political Contributions:** Our Company may make political contributions only in accordance with the criteria and compliances prescribed under the Companies Act, 2013. Employees acting on behalf of our Company are prohibited from participating in any political activities or contributions.
- **Charitable Contributions and Sponsorships:** Following our ABC Policy, all charitable contributions and sponsorships are subject to due diligence, must be transparent, and must not be used as a channel for bribery.

Employees undergo regular training and awareness programs on anti-bribery and corruption standards, ensuring adherence to both legal requirements and Company policies.

Established procedures enable employees and stakeholders to report suspected breaches confidentially through whistleblowing mechanisms detailed in our Whistle-Blower Policy. Reported cases are investigated promptly.

In the event of a confirmed breach, corrective and disciplinary actions are taken, which may include termination of employment or contracts, and, where applicable, referral to legal authorities.

The Board of Directors formally endorses the Code of Conduct and Anti-Bribery Corruption Policy, underscoring our commitment to ethical business practices at the highest level of governance.

Please refer our Anti-Corruption Bribery Policy [here](#).

#### **1.5.4. Whistleblowing Mechanism**

At BEIL, the whistleblowing mechanism is overseen by the Compliance Officer, who serves as the primary point of contact for receiving, reviewing, and investigating complaints related to misconduct. In certain cases, the CEO or Business Unit Head may also be involved, particularly when the complaint concerns the Compliance Officer or requires higher-level oversight. The Compliance Officer, in consultation with the CEO or Business Unit Head, determines the need for investigation and ensures fair handling of concerns. Additionally, outcomes of investigations are reported to the Audit Committee or Board of Directors, ensuring governance-level accountability.

The results of the investigative activity in terms of recommendation shall be made to the Audit Committee as per the Policy. Necessary actions shall be decided by the Audit Committee where majority of the members are Independent Directors, ensuring that the reporting channel has involvement of an independent third-party.

Our commitment to the highest standards of ethical, moral, and legal conduct in business operations is embodied in our Whistleblower Policy. This Policy establishes a secure channel for employees, Directors, and stakeholders to report concerns related to unethical behavior, suspected fraud, violations of the Code of Conduct, abuse, misconduct, or breaches of Indian law.

All reports received through the whistleblower mechanism are treated with strict confidentiality. The identity of whistleblowers is protected unless disclosure is legally required, and efforts to uncover anonymous complainants are strictly prohibited. This ensures a safe environment for individuals to report misconduct without fear. Complaints can be reported through whistleblower forms, which are available on BEIL website or through [whistleblower@beil.co.in](mailto:whistleblower@beil.co.in). The whistleblower form is also available in the Whistleblower Policy. All fields in the form are kept optional to allow complainants to submit their complaints anonymously.

The Company enforces a zero-tolerance policy for retaliation. Any form of discrimination, harassment, or adverse action against individuals who report concerns in good faith is considered a serious violation and may result in disciplinary action, including termination. This protection extends to those assisting in investigations or raising concerns about retaliation itself.

The Policy addresses the procedures and protections necessary for handling reportable misconduct and ensuring thorough investigations, along with step-by-step procedure for handling any conflicts.

Reported breaches are investigated using a structured process outlined in the Whistleblower Policy and aligned with the Code of Conduct. Upon receiving a complaint, the Compliance Officer, and whenever required, in consultation with the CEO or Business Unit Head, assesses the complaint's credibility and seriousness. Investigations are conducted fairly and may involve internal reviews, interviews, and external experts. Independent members are included in the investigation group to ensure objectivity and transparency.

For more details on the process for investigating the reported breaches, please refer to our Whistleblower Policy [here](#).

#### 1.5.5. Reporting on Breaches

BEIL encourages reporting of misconduct through secure channels, with all breaches investigated fairly under the Whistleblower Policy. The Compliance Officer oversees structured investigations involving internal reviews and independent members. In the latest financial year, no fines (INR 0) or convictions related to corruption or bribery were reported, reflecting BEIL's strong compliance culture.

The table below outlines details of breaches in FY25:

| Reporting Areas                     | Number of Breaches |
|-------------------------------------|--------------------|
| Corruption or Bribery               | 0                  |
| Discrimination or Harassment        | 0                  |
| Customer Privacy Data               | 0                  |
| Conflicts of Interest               | 0                  |
| Money Laundering or Insider Trading | 0                  |

## 1.6. Policy Influence

### 1.6.1. Contributions & Other Spending

In FY 2023-24 and in FY 2024-25, KEIL contributed INR 40,000/- to Indian National Trade Union Congress (INTUC).

The table below outlines our monetary contributions and spendings (INR):

| Particulars                                                                  | FY22 | FY23 | FY24   | FY25 |
|------------------------------------------------------------------------------|------|------|--------|------|
| Lobbying, interest representation or similar                                 | 0    | 0    | 0      | 0    |
| Local, regional or national political campaigns / organizations / candidates | 0    | 0    | 0      | 0    |
| Trade associations or tax-exempt groups (e.g. think tanks)                   | 0    | 0    | 40,000 | 0    |
| Other (e.g. spending related to ballot measures or referendums)              | 0    | 0    | 0      | 0    |
| <b>Total contributions and other spending</b>                                | 0    | 0    | 40,000 | 0    |
| Data coverage (% of operations)                                              | 100  | 100  | 100    | 100  |

### 1.6.2. Largest Contributions & Expenditures

In FY 2024–25, BEIL did not make any contributions or spend money on political campaigns, lobbying, trade associations, or any groups that aim to influence public policy or legislation.

### 1.6.3. Lobbying and Trade Associations - Climate Alignment

Our Company did not contribute to lobbying activities aligned with the Paris Agreement in FY 2024-25.

## 1.7. Supply Chain Management

### 1.7.1. Supplier Code of Conduct

All suppliers are required to sign the Business Partners Code of Conduct, affirming their commitment to adhering to ethical standards and practices in alignment with our values and expectations. The Business Partners Code of Conduct is a comprehensive framework designed to ensure that all collaborations with our partners are conducted with utmost integrity and responsibility.

Through rigorous evaluation and continuous engagement, we aim to build long-lasting partnerships with suppliers who share our vision for integrity.

Suppliers are expected to adhere to our standards of ESG performance drawn up in our Business Partner Code of Conduct:

## Human Rights and Labor

- **Forced Labor:** Our Company strictly prohibits all forms of forced, bonded, indentured, or slave labor, and all our suppliers must ensure freedom of movement and employment without coercion.
- **Child Labor:** The use of illegal child labor is explicitly opposed. We do not engage with suppliers who violate labor laws or exploit children in any form.
- **Working Conditions:** Suppliers are required to comply with applicable laws governing wages, benefits, working hours, and overtime. The Code also prohibits the withholding of wages or personal documents and mandates respect for employees' physical autonomy.
- **Occupational Health and Safety:** Business partners must provide a safe and healthy working environment that promotes employee well-being and environmental protection.
- **Discrimination and Harassment:** Equal opportunity must be ensured across all levels, regardless of race, gender, religion, or any other status. Harassment, abuse, and victimization are considered serious misconduct, and our suppliers are expected to uphold our commitment.
- **Freedom of Association and Collective Bargaining:** Our Company respects the legal rights of employees to organize and engage in collective bargaining and expects its partners to uphold these rights.

## Environment

- **Pollution Prevention and Waste Management:** Partners must follow the Environment Protection Act, 1986 and Hazardous Waste Management Rules, 2016, ensuring safe handling, treatment, and disposal of all waste types under clause of "Compliance with laws and regulations" of our Business Partner Code of Conduct.
- **Resource Efficiency:** We encourage suppliers to adopt circular economy practices and comply with rules like Plastic Waste, E-Waste, and Construction Waste Management Rules, under clause of "Compliance with laws and regulations" of our Business Partner Code of Conduct.
- **Biodiversity, Deforestation, and Land Conservation:** Partners must comply with the Biological Diversity Act, 2002, Forest Conservation Act, 1980, and Wildlife Protection Act, 1972, ensuring no harm to protected ecosystems or species, under clause of "Compliance with laws and regulations" of our Business Partner Code of Conduct.

## Business Ethics

- **Anti-Corruption and Conflict of Interest:** Our Company enforces a zero-tolerance policy toward bribery, facilitation payments, and corruption. Suppliers must disclose any potential conflicts of interest and avoid actions that compromise ethical standards.
- **Anti-Competitiveness:** Suppliers are required to avoid anti-competitive practices such as price-fixing and collusion and must comply with all applicable antitrust and fair competition laws.

Please refer to our Business Partner Code of Conduct [here](#).

### 1.7.2. Supplier ESG Programs

We ensure implementation of supplier ESG programs through our Business Partners Code of Conduct and Integrity Compliance Program. Oversight of implementation of the supplier ESG programs lies with the Compliance Officer, who is accountable for embedding ethical, social, and governance standards in supplier relationships.

The Code sets out clear requirements covering compliance with laws, anti-bribery and corruption, labor practices, human rights, and conflict minerals.

Purchasing practices are aligned with the Code to avoid conflicts with ESG requirements, and suppliers who cannot meet minimum standards are subject to exclusion. We emphasize communication and training to ensure that suppliers and internal buyers understand their roles in maintaining compliance with the Code, thereby promoting long-term, ethical partnerships.

### 1.7.3. Supplier Screening

We screen our suppliers as part of the requirements set out in our Business Partners Code of Conduct. Screening covers environmental, social and governance aspects, including compliance with laws, labor and human rights practices, anti-bribery measures, and data protection. Business relevance is also considered to ensure that suppliers' operations align with our values and project requirements.

We assess country-specific and sector-specific risks when evaluating significant suppliers, to ensure compliance and minimize ESG challenges. This approach helps align supplier practices with our operational standards, reduces risks, and supports the integrity of our supply chain.

### 1.7.4. Supplier Assessment and Development

To uphold the highest standards of ethical conduct and ESG performance, BEIL has established a supplier development process through its ICPs and Business Partner Code of Conduct. These programs are designed to build capacity among suppliers and ensure consistent adherence to our expectations of ethical behavior and responsible business practices.

#### Key Components of our ICPs

- **Due Diligence Requirements:** All business partners undergo a thorough due diligence process to ensure alignment with BEIL's ethical, operational, and sustainability standards.
- **Compliance Undertaking Submission:** Partners must submit a formal undertaking confirming adherence to BEIL's Business Partner Code of Conduct.
- **Documentation Accuracy & Transparency:** Partners are required to provide complete and accurate documentation to support BEIL's integrity and compliance efforts.
- **Ongoing Support & Collaboration:** BEIL encourages active engagement and open communication to strengthen ethical practices and resolve compliance challenges.

Our Company conducts annual training programs on the Business Partner Code of Conduct. These sessions ensure that suppliers, agents, and subcontractors are well-informed about BEIL's ESG expectations, compliance requirements, and ethical standards.

Through due diligence and continuous engagement, we provide structured support to suppliers. Supplier desk assessments are conducted with systematic verification of evidence. Supplier performance improvement actions include guidance on documentation accuracy, ethical practices, and sustainable operations, helping partners align with BEIL's ESG goals.

We encourage open communication and collaboration with suppliers to address compliance challenges. Suppliers are invited to explain non-compliance issues, propose corrective actions, and work jointly with BEIL to implement improvements. Support may be provided remotely or on-site, depending on the nature and severity of the issue.

#### 1.7.5. KPIs for Supplier Screening

As part of our commitment to responsible sourcing and supplier governance, we track key performance indicators (KPIs) related to supplier screening. These metrics provide insights into the composition and significance of our supplier base, helping ensure transparency, risk management, and alignment with procurement standards.

The table below outlines the KPIs related to the screening of our suppliers for FY25:

| Particulars                                                   | UOM    | FY25 |
|---------------------------------------------------------------|--------|------|
| Total number of Tier 1 suppliers                              | Number | 117  |
| Total number of significant Tier 1 suppliers                  | Number | 105  |
| % of total spend on significant suppliers in Tier 1           | %      | 2    |
| Total number of significant non-Tier 1 suppliers              | Number | 115  |
| Total number of significant suppliers – Tier 1 and non-Tier 1 | Number | 220  |

#### 1.7.6. KPIs for Supplier Assessment and Development

BEIL promotes responsible sourcing and operational excellence through our ICPs for suppliers. The program focuses on enhancing supplier capabilities in ESG performance. Through targeted training, technical support, BEIL fosters long-term partnerships and strengthens the sustainability and resilience of the supply chain.

The table below outlines the KPIs related to capacity building training provided to suppliers for FY25:

| Particulars                                                     | UOM    | FY25 |
|-----------------------------------------------------------------|--------|------|
| Total number of suppliers in capacity building programs         | Number | 220  |
| % of unique significant suppliers in capacity building programs | %      | 100  |
| Target for FY25                                                 | Number | 210  |

## 1.8. Information Security

### 1.8.1. Information Security Governance

At BEIL, the Information Technology (IT) Department is responsible for monitoring IT systems and ensuring compliance with applicable regulations. Any issues or concerns identified are promptly escalated to the respective Unit Heads for timely resolution.

### 1.8.2. Information Security Policy

At BEIL, we are committed to continuously improving our information security systems to stay ahead of evolving risks and ensure robust protection of our digital assets, as outlined by our Information Security Policy. Our Company prioritizes the integrity and protection of data by enforcing strict access controls, secure handling practices, and regular backups.

We actively monitor and respond to information security threats through dedicated oversight by our IT team, ensuring timely detection and resolution of incidents. Individual responsibilities for information security are clearly defined across our entire workforce, with mandatory adherence to our policies and procedures. While our Policy applies to third parties, we recognize the importance of further strengthening information security requirements specifically for suppliers to ensure end-to-end protection across our ecosystem.

Please refer to our Information Security Policy [here](#).

### 1.8.3. Information Security Management Programs

To strengthen cybersecurity and support sustainable IT practices, our Company has implemented robust measures aligned with our Information Security Policy. We are committed to continuously improving information security systems through regular audits and reviews. Our protocols ensure the integrity and protection of data via strict access controls, secure backups, and data handling guidelines. As part of our business continuity plan, we have implemented a data backup solution across all user systems. If a system fails to back up for four consecutive days, email alerts are automatically triggered and sent to the user and IT department, ensuring timely resolution and data integrity. We actively monitor and respond to information security threats, with our IT team overseeing threat detection and incident response. Individual responsibilities for information security are clearly defined for all employees, who are required to report incidents, vulnerabilities, or suspicious activities. Information security awareness training is conducted regularly to build a culture of vigilance and compliance.

In FY 2024-25, we have zero reported incidents of data breach.

To strengthen cybersecurity and support sustainable IT practices, the following measures have been implemented across the organization:

- FortiGate firewalls are deployed at all locations to monitor and filter traffic, protecting critical IT infrastructure from cyber threats.
- Multi-Factor Authentication (MFA) is enabled for email systems, and advanced filtering in Office 365 helps block phishing and spam.

- A backup solution is implemented across user systems, with automatic alerts triggered if backups fail for four consecutive days.
- Protocols are in place to ensure swift recovery from cybersecurity incidents, supporting business continuity.
- SAP is hosted on the cloud to reduce electricity use and reliance on physical servers, supported by a hybrid Office 365 setup.
- The Data Protection Policy includes clear incident response plans to handle security breaches effectively.
- Regular training and awareness campaigns enhance understanding of data privacy and information security across the organization.

## 2. Environment

### 2.1. Environmental Policy and Management

#### 2.1.1. Environmental Policy

At BEIL, our Environment Policy serves as a guiding framework for proactive environmental stewardship and compliance with applicable regulatory requirements. The Policy applies to all our Group Companies, including BEIL Infrastructure Limited, ETL, CIWMCPL, KEIL, and SSWML, and covers our own operations, our employees, suppliers, contractors, and partners across our value chain.

The Policy establishes clear accountability for implementation. Unit Heads are responsible for execution at their respective sites, while Executive Management endorses the Policy and oversees its periodic review. This includes evaluating environmental objectives, setting measurable targets, and monitoring performance to drive continual improvement. These governance mechanisms ensure effective oversight and alignment with our environmental commitments.

To support continuous improvement, the Policy promotes regular environmental risk assessments, efficient resource use, and waste minimization through recycling and reuse. It also integrates environmental considerations into the planning and execution of new projects, procurement processes, and employee development programs.

The Policy further commits to setting and reviewing objectives and targets aimed at reducing environmental impacts. This includes minimizing GHG emissions, increasing share of renewable energy consumption, reducing freshwater consumption, minimizing adverse effects from hazardous waste management activities and ensuring the safe operation of secured landfill sites, common incinerators, and effluent treatment systems.

Stakeholder engagement is a key component of the Policy. We actively consult and involve external and internal stakeholders in the development or implementation of the Environment Policy, including workers, contractors, transporters, and other interested parties through participatory mechanisms. Our Company also promotes the principles of Responsible Care among industry peers and the broader community.

To build internal capacity, we conduct regular training and awareness programs for employees. These initiatives ensure that all relevant parties understand our Company's environmental impacts and are aligned with the environmental objectives.

Please refer to our Environment Policy [here](#).

### 2.1.2. Environmental Management Systems Verification

BEIL has implemented Environmental Management Systems (EMS) certified under ISO 14001:2015 across the major operational sites, including BEIL Ankleshwar, Baddi, BEIL Dahej, ETL, and SSWML, covering 62.50% of total operations.

Our KEIL operations have undergone a third-party environmental audit conducted by the National Productivity Council (NPC), New Delhi as per the Kerala State Pollution Control Board (KSPCB) guidelines.

Additionally, our operations at CIWMCPL have also undergone a third-party environmental audit conducted by NPC at their integrated waste management facility.

#### Coverage of Environmental Management Systems Verification (%)

| Certification                                                                                      | Coverage of Group-wise Operations |
|----------------------------------------------------------------------------------------------------|-----------------------------------|
| EMS is verified through international standards (e.g. ISO 14001, JIS Q 14001, EMAS certification). | 62.50                             |
| Third party certification / audit / verification by specialized companies.                         | 25                                |
| Internal certification / audit / verification by Company's own specialists from headquarters.      | 0.00                              |
| <b>Total</b>                                                                                       | <b>87.50</b>                      |

Please refer to the Report on the Environmental Audit of our operations at KEIL [here](#).

## ISO 14001:2015 Certifications and Third-Party Audit Reports

**BEIL INFRASTRUCTURE LIMITED**

PLOT NO. 9021, 9A, 9B, 10, 10B, 11, 12C INDUSTRIAL ESTATE, HANALSHWAR - 333 002, DIST. BHARUWACHA, GUJARAT, INDIA

Bureau Veritas Certification (BVQ) - UK Branch certifies that the Management System of the above organization has been audited and found to be in accordance with the requirements of the Management System Standards detailed below.

**ISO 14001:2015 & ISO 45001:2018**

Scope of certification:

COMMERCIAL FACILITY FOR OPERATIONS & MAINTENANCE OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL (INCURR LANDFILL, INCINERATION & WEE) AND WASTE RELATED ANALYTICAL SERVICES

Original cycle start date for ISO 14001: 28 March 2015  
Original cycle start date for ISO 45001: 22 May 2018  
Recertification cycle start date: 19 March 2024  
Subject to the continued satisfactory operation of the organization's Management System, this certificate is valid until: 21 March 2027  
Certificate No. IND.24.10143MVI Version: 1 Issue date: 19 March 2024

For certified authority, see here: <https://www.bureauveritas.com>

Report on number of ISO 14001 & ISO 45001 clauses met: 22/22  
Compliance: 100%  
Compliance: 100%  
Compliance: 100%  
Compliance: 100%

Contracted and awarded by: The client named and located at the address specified in the contract.

Location: Bhavnagar, Gujarat, India

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BEIL Ankleshwar

**BEIL INFRASTRUCTURE LIMITED**

PLOT NO. 9021, 9A, 9B, 10, 10B, 11, 12C INDUSTRIAL ESTATE, HANALSHWAR - 333 002, DIST. BHARUWACHA, GUJARAT, INDIA

Bureau Veritas Certification (BVQ) - UK Branch certifies that the Management System of the above organization has been audited and found to be in accordance with the requirements of the Management System Standards detailed below.

**ISO 14001:2015 & ISO 45001:2018**

Scope of certification:

OPERATION & MAINTENANCE OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITY (INCURR LANDFILL, WEE & INCINERATION WITH DRUM DECONTAMINATION AND RELATED ANALYTICAL SERVICES)

Original cycle start date for ISO 14001: 28 June 2016  
Original cycle start date for ISO 45001: 22 June 2018  
Recertification cycle start date: 21 June 2024  
Subject to the continued satisfactory operation of the organization's Management System, this certificate is valid until: 21 June 2027  
Certificate No. IND.24.2033MVI Version: 1 Issue date: 21 June 2024

For certified authority, see here: <https://www.bureauveritas.com>

Report on number of ISO 14001 & ISO 45001 clauses met: 22/22  
Compliance: 100%  
Compliance: 100%  
Compliance: 100%  
Compliance: 100%

Contracted and awarded by: The client named and located at the address specified in the contract.

Location: Bhavnagar, Gujarat, India

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BEIL Dahej

**ENVIRO TECHNOLOGY LIMITED**

PLOT NO. 24/27/4 & 2/21, CHC ESTATE, ANKUSHWAR - 360 002, GUJARAT, INDIA

Bureau Veritas Certification (BVQ) - UK Branch certifies that the Management System of the above organization has been audited and found to be in accordance with the requirements of the Management System Standards detailed below.

**ISO 14001:2015 & ISO 45001:2018**

Scope of certification:

MS CS/PT, TMS AT/MT/PT AND DISPOSAL OF SOLID WASTE IN MEMBER INDUSTRIES.

Original cycle start date for ISO 14001: 19 March 2016  
Original cycle start date for ISO 45001: 21 May 2018  
Recertification cycle start date: 21 March 2024  
Subject to the continued satisfactory operation of the organization's Management System, this certificate is valid until: 19 March 2027  
Certificate No. IND.24.2503MVI Version: 1 Issue date: 07 March 2024

For certified authority, see here: <https://www.bureauveritas.com>

Report on number of ISO 14001 & ISO 45001 clauses met: 22/22  
Compliance: 100%  
Compliance: 100%  
Compliance: 100%  
Compliance: 100%

Contracted and awarded by: The client named and located at the address specified in the contract.

Location: Ankushwar, Gujarat, India

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ETL

**bsi.**

**Certificate of Registration**

ENVIRONMENTAL MANAGEMENT SYSTEM - ISO 14001:2015

This is to certify that:

**BEIL Infra Structure Limited**  
Village: Ankleshwar  
PO: Ankleshwar, District: Bharuch  
Dist: Bharuch, Gujarat  
Pincode: 333 002

Holds Certificate No: **EMS 715732**

and operates an Environmental Management System which complies with the requirements of ISO 14001:2015 for the following scope:

Treatment of Waste Water:

For and on behalf of BSI:

Thomas Glick, Managing Director Assurance - JDETA

Original Registration Date: 2012-11-01  
Latest Review Date: 2022-11-01

Effective Date: 2022-11-01  
Expiry Date: 2025-10-31

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Baddi

**bsi.**

**Certificate of Registration**

ENVIRONMENTAL MANAGEMENT SYSTEM - ISO 14001:2015

This is to certify that:

**Shivali Solid Waste Management Limited**  
Village: Rajga  
PO: Rajga, District: Bharuch  
Dist: Bharuch, Gujarat  
Pincode: 333 002

Holds Certificate No: **EMS 580718**

and operates an Environmental Management System which complies with the requirements of ISO 14001:2015 for the following scope:

1. Collection, Treatment, Storage and Disposal of Hazardous Waste, and  
2. Providing Environmental Impact Assessment and Monitoring Services and Environmental Consultancy.

For and on behalf of BSI:

Thomas Glick, Managing Director Assurance - JDETA

Original Registration Date: 2012-09-05  
Latest Review Date: 2022-09-05

Effective Date: 2022-09-05  
Expiry Date: 2025-08-31

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SSWML

**Report**

on

**Solid Waste Assessment and Management Study at Integrated Solid Waste Management Facility at Coimbatore Submitted to**

M/s  
**Coimbatore Integrated Waste Management Company, Pvt. Ltd**

By

**National Productivity Council**  
Environment & Climate Action Group,  
New Delhi  
(January 2023)

CIWMCP

## 2.2. Energy

### 2.2.1. Energy Management Programs

We conduct energy audits to identify opportunities for improving energy performance once every two years. The most recent audit was conducted in FY 2024–25.

We have established quantified targets to drive energy savings across our operations. To reduce reliance on non-renewable energy sources, we have set specific targets to increase the share of solar energy in our overall energy mix.

Further, we have implemented a range of measures to reduce energy consumption and promote the use of clean energy. These include waste heat recovery systems, decentralized waste-to-energy solutions and biogas generation. As part of our energy management program, we regularly evaluate progress against these initiatives to ensure continuous improvement.

We prioritize investments in innovation and R&D to enhance energy efficiency and reduce consumption. This includes piloted solar-over-landfill projects that convert unused landfill space into clean energy zones, alongside exploring innovative solutions like solar-over-water installations.

We are conducting energy-efficiency training for all employees to promote sustainable practices and responsible energy use across operations. The program focuses on building awareness of energy-saving techniques, optimizing resource consumption, and aligning employee actions with the Company's environmental goals. This initiative supports our commitment to operational excellence and climate-conscious growth.

Target and Baseline

| Target for FY30                    | FY25 Baseline                          |
|------------------------------------|----------------------------------------|
| 5 MWp<br>Solar Energy Installation | 0.398 MWp<br>Solar Energy Installation |

Please refer to our [Sustainability Report](#) on page 50 for more details.

### 2.2.2. Energy Consumption

We closely monitor our energy consumption to track our progress towards our target on energy consumption. Our Company sources renewable energy through rooftop solar at ETL, solar plants at capped landfills in BEIL Dahej and SSWML and purchased hydel electricity at our Baddi and SSWML facilities. Further, renewable sources of fuel such as biomass and briquettes are utilized to reduce dependence on non-renewable sources. We have installed a waste heat recovery system attached to our incineration plants and steam generated is used for evaporation.

We are progressively increasing the share of renewable energy in our operations. In FY 2023–24, we initiated the use of biomass in boilers at our Dahej facility, marking a significant step toward cleaner energy sources. This transition has contributed to a measurable rise in renewable energy consumption across our operations from

FY 2023–24 onwards. In FY 2024-25, we reduced our non-renewable energy consumption by 14.27% compared to the previous year.

## 22%

Share of renewable energy consumption in FY25

### Energy Consumption Within the Organization (MWh)

| Particulars                     | FY22        | FY23        | FY24        | FY25        | Target for FY25 |
|---------------------------------|-------------|-------------|-------------|-------------|-----------------|
| Total Non-Renewable Energy      | 2,25,202.71 | 1,78,006.24 | 2,46,670.52 | 2,11,465.80 | 2,15,000.00     |
| Total Renewable Energy          | 8,278.23    | 8,731.83    | 57,771.45   | 30,236.01   |                 |
| Total Energy Consumption        | 2,33,480.94 | 1,86,738.07 | 3,04,441.97 | 2,41,701.81 |                 |
| Data coverage (% of operations) | 100         | 100         | 100         | 100         |                 |

The Company's data for FY 2024-25 has been third party verified. The Assurance Statement is available on page 60 of this Factbook.

## 2.3. Waste & Pollutants

### 2.3.1. Waste Management Programs

At BEIL, we conduct waste audits internally to identify opportunities for improving waste performance. We have developed targeted action plans to reduce waste generation from our own operations and implement resource-efficient processes. These include converting suitable waste streams for use in co-processing in cement manufacturing and segregating municipal solid waste (MSW) into refuse-derived fuel (RDF) and compost, thereby reducing overall waste disposal in landfills. We have established quantified targets to minimize in-house landfill waste generation. We aim to reduce our in-house landfill waste generation by 5% by FY 2029-30 from the FY 2024-25 baseline of 1,37,667 MT. We promote investment in innovation and R&D to minimize waste, including projects collaborating with UPL University on paint sludge primer and recovery of gold and silver from e-waste. We also provide regular waste reduction training to employees to raise awareness and strengthen performance.

As a core part of our operations, we have also implemented integration of recycling programs to reduce the waste sent to landfill by processing plastic waste into granules, diverting MSW into RDF and compost.

Additionally, the waste we have diverted from landfills through recycling, co-processing and RDF and compost generation is regularly certified by the Pollution Control Boards of the respective states, which are accredited bodies for certification.

#### Target and baseline

| Target for FY30                                                          | FY25 Baseline                                            |
|--------------------------------------------------------------------------|----------------------------------------------------------|
| 5%<br>Reduction in in-house landfill waste generation from FY25 baseline | 1,37,667 MT<br>Landfill waste generated in-house in FY25 |

Please refer to our [Sustainability Report](#) on page 67 for more details.

### 2.3.2. Waste Disposal

As a waste management company, we provide safe treatment, recycling, and disposal services of diverse waste streams for our customers. Our operations are designed to manage hazardous waste, municipal solid waste, plastic waste, e-waste, and industrial wastewater, ensuring compliance with environmental standards while promoting sustainable practices. In this role, we receive waste from a wide range of customers across industries and process it for recovery, recycling, co-processing, or secure disposal. We are committed to reducing the volume of waste sent to landfills by maximizing resource recovery through integrated and scalable waste management solutions. By transforming waste into valuable inputs for other industries, we actively support the principles of a circular economy and environmentally sound treatment practices.

#### 1,12,120 MT

Waste diverted from landfill in FY25

In the table below, the total waste generated reflects only in-house generation, while the totals for waste recycled/reused and waste disposed include both in-house waste and waste received from customers for processing.

BEIL Dahej operates both incineration plants with and without energy recovery for waste processing. However, due to technical issues, the incineration plant without energy recovery was non-operational during FY 2021-22 and FY 2022-23.

#### Waste Recycled and Disposed (MT)

| Particulars                                                                                                | FY22               | FY23               | FY24               | FY25               | Target for FY25    |
|------------------------------------------------------------------------------------------------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| Total waste generated                                                                                      | 1,46,323.58        | 1,42,718.49        | 1,76,752.00        | 2,10,882.00        |                    |
| Total waste recycled/ reused                                                                               | 3,358.08           | 3,071.82           | 3,251.64           | 3,203.06           |                    |
| <b>Total waste disposed</b>                                                                                | <b>6,27,640.89</b> | <b>6,29,925.03</b> | <b>7,86,885.68</b> | <b>8,02,352.61</b> | <b>8,05,000.00</b> |
| • Waste landfilled                                                                                         | 5,82,428.47        | 5,51,298.58        | 6,91,680.88        | 7,20,073.75        |                    |
| • Incineration with energy recovery                                                                        | 20,258.46          | 18,026.34          | 15,616.60          | 7,935.71           |                    |
| • Incineration without energy recovery                                                                     | 0                  | 0                  | 18,014.82          | 17,143.20          |                    |
| • Waste otherwise disposed (including co-processing and disposal through third-party authorized recyclers) | 24,953.95          | 60,600.11          | 61,573.38          | 57,199.95          |                    |
| Data coverage (% of operations)                                                                            | 100                | 100                | 100                | 100                |                    |

The Company's data for FY 2024-25 has been third party verified. The Assurance Statement is available on page 60 of this Factbook.

## 2.4. Water

### 2.4.1. Water Efficiency Management Programs

Efficient water use and responsible wastewater management are integral to our environmental sustainability efforts. We have implemented comprehensive water efficiency programs across all our facilities, supported by regular water use assessments to identify opportunities for water efficiency improvement.

Our initiatives to enhance water use efficiency include the deployment of closed-loop water systems, the operation of Zero Liquid Discharge (ZLD) facilities, and the supply of treated sewage water to nearby industries, thereby reducing freshwater dependency and promoting circular water use.

Additionally, we have taken significant steps to enhance wastewater quality. Our approach includes the use of advanced treatment technologies such as Common Effluent Treatment Plants (CETPs), Sewage Treatment Plants (STPs), and Multiple Effect Evaporators (MEEs). The treated condensate is reused within our operations, further reinforcing our commitment to water stewardship and pollution prevention.

We have established quantified targets for water use reduction. We aim to reduce our freshwater consumption by 4% annually. To track our progress towards the target, we continuously monitor and track performance towards reducing our water consumption in line with our philosophy of resource efficiency.

Water recycling applications are an integral part of our operations. We prioritize the reuse of treated wastewater across various processes, reducing our dependence on freshwater sources. This approach not only conserves water but also supports our broader sustainability goals by minimizing environmental impact.

Awareness training is provided to employees on water efficiency management programs to promote a culture of resource efficiency and responsible behavior within our organization.

Target and baseline

| Target for FY30                                        | FY25 Baseline                                               |
|--------------------------------------------------------|-------------------------------------------------------------|
| 4%<br>Year-on-year reduction in freshwater consumption | 0.15 million cubic meters<br>Freshwater consumption in FY25 |

Please refer to our [Sustainability Report](#) on page 60 for more details.

### 2.4.2. Water Consumption

We operate common wastewater treatment and waste management facilities. While our own water consumption is minimal. We receive wastewater from our customers, which we treat and discharge in full compliance with applicable environmental standards.

Our facilities at Dahej, Ankleshwar, Coimbatore, Shivalik, and KEIL operate as ZLD units, reflecting our strong commitment to sustainable water management. At these sites, all

wastewater is treated, recovered, and reused within the premises, ensuring that no liquid effluent is released into the environment.

In FY 2023–24, 51% of our total water consumption was met through recycled water, which increased to 64% in FY 2024–25, reflecting a 25% year-on-year improvement. This shift significantly contributed to a 22.43% reduction in freshwater consumption compared to the previous year.

## 64%

Share of recycled water in total water consumption in FY25

We receive wastewater from customers for treatment and safe disposal. As such, our water discharge figures include both treated effluents from our own operations as well as the treated wastewater received from our customers, with operational discharges not monitored separately. Freshwater consumption figures are reported only for BEIL's own operational use.

Freshwater Withdrawal and Consumption (Million cubic meters)

| Particulars                      | FY22 | FY23 | FY24 | FY25 | Target for FY25 |
|----------------------------------|------|------|------|------|-----------------|
| Water withdrawal                 | 0.13 | 0.14 | 0.19 | 0.15 |                 |
| Water discharge                  | 8.41 | 8.30 | 8.13 | 8.70 |                 |
| Total net freshwater consumption | 0.13 | 0.14 | 0.19 | 0.15 | 0.16            |
| Data coverage (% of operations)  | 100  | 100  | 100  | 100  |                 |

The Company's data for FY 2024-25 has been third party verified. The Assurance Statement is available on page 60 of this Factbook.

## 2.5. Climate Strategy

At BEIL, we leverage our unique responsibility and opportunity to lead by example in addressing the climate crisis. Recognizing climate change as both a global challenge and a strategic priority, we actively mitigate GHG emissions through waste diversion, renewable energy, and circular resource strategies.

### 2.5.1. Direct Greenhouse Gas Emissions (Scope 1)

Scope 1 emissions represent direct GHG emissions from sources that are owned or controlled by our Company. These include emissions from fuel combustion from stationary equipment (such as boilers and generators), mobile sources (Company-owned vehicles), and other on-site processes. Monitoring and managing Scope 1 emissions is a key part of our operational sustainability efforts, enabling us to identify opportunities for energy efficiency and cleaner fuel alternatives.

In FY 2024-25, our Scope 1 emissions reduced by 19.03% as compared to last year. Emissions from the landfill have been included in the inventory starting FY 2023–24, resulting in an increase compared to FY 2022–23.

### Direct GHG Emissions (Scope 1) (tCO<sub>2</sub>e)

| Particulars                          | FY22   | FY23   | FY24     | FY25     | Target for FY25 |
|--------------------------------------|--------|--------|----------|----------|-----------------|
| Total direct GHG emissions (Scope 1) | 51,707 | 48,100 | 1,51,578 | 1,22,733 | 1,25,000        |

The Company's data for FY 2024-25 has been third party verified. The Assurance Statement is available on page 60 of this Factbook.

### 2.5.2. Indirect Greenhouse Gas Emissions (Scope 2)

Scope 2 emissions account for indirect GHG emissions resulting from the consumption of purchased electricity, steam, heating, or cooling. Although these emissions occur at the energy generation source, they are attributed to our operations due to our energy use. We are focused on improving energy efficiency across our facilities and increasing the share of renewable energy in our energy mix to reduce Scope 2 emissions over time. We only monitor our market-based Scope 2 emissions.

As a result of our energy efficiency programs and expansion of renewable energy use in our operations, we have reduced our Scope 2 emissions by 19.03% in FY 2024-25 from the previous year.

#### Indirect GHG emissions (Scope 2) – Market-based (tCO<sub>2</sub>e)

| Particulars                                                   | FY22   | FY23   | FY24   | FY25   | Target for FY25 |
|---------------------------------------------------------------|--------|--------|--------|--------|-----------------|
| <b>Market-based</b><br>Total indirect GHG emissions (Scope 2) | 11,987 | 13,120 | 16,599 | 15,752 | 16,000          |

The Company's data for FY 2024-25 has been third party verified. The Assurance Statement is available on page 60 of this Factbook.

### 2.5.3. Indirect Greenhouse Gas Emissions (Scope 3)

Scope 3 emissions encompass all other indirect emissions that occur across our value chain, both upstream and downstream. These include transportation and distribution and business travel.

Our Scope 3 emissions for FY 2024-25 have been calculated in alignment with the GHG Protocol Corporate Value Chain (Scope 3) Standard, applying methodologies based on data availability and quality. Category 1: Purchased Goods and Services, Category 2: Capital Goods and Category 7: Employee Commuting emissions were not calculated for FY2024-25 due to non-availability of specific spend or quantity data. These categories were excluded from Scope 3 emissions calculations to avoid misrepresentation of emissions. Given the broad scope and complexity of Scope 3, we are working to enhance data collection, engage with suppliers, and refine methodologies to better understand and manage these emissions as part of our holistic climate strategy, and to accurately calculate all applicable categories of Scope 3 emissions.

Since our Company is a waste management service provider, emissions resulting from waste generated in operations were included in Scope 1 emissions. As such, Category 5

emissions were not found to be material for our Company. Other categories of Scope 3 emissions are not applicable to our operations.

#### Scope 3 Emissions (tCO<sub>2</sub>e)

| Particulars                            | FY22  | FY23  | FY24   | FY25   | Target for FY25 |
|----------------------------------------|-------|-------|--------|--------|-----------------|
| Total indirect GHG emissions (Scope 3) | 5,808 | 6,863 | 36,394 | 22,625 | 24,000          |

#### Scope 3 Emissions: Category-wise breakdown (tCO<sub>2</sub>e)

| Scope 3 Category                                              | FY25          | Emissions calculation methodology                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------------|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Category 4: Upstream transportation and distribution</b>   | 14,492        | Emissions have been calculated primarily using tonne-kilometer (tonne.km) data, which was the most reliable dataset provided by our logistics partners. Where tonne.km data was not available, calculations were supplemented using fuel consumption data or, where required, distance-based estimates. These emissions also include emissions from leased heavy machinery                                                   |
| <b>Category 6: Business travel</b>                            | 481           | Emissions were calculated using distance-based methodology derived from employee travel records. Standard emission factors were applied to account for different modes of transport (road, air, rail).                                                                                                                                                                                                                       |
| <b>Category 9: Downstream transportation and distribution</b> | 7,652         | Emissions have been calculated primarily using tonne-kilometer (tonne.km) data, which was the most reliable dataset provided by our logistics partners. Where tonne.km data was not available, calculations were supplemented using fuel consumption data or, where required, distance-based estimates. These emissions also include transport of processed materials such as compost, RDF fuel, and waste sent to landfill. |
| <b>Total Scope 3 emissions</b>                                | <b>22,625</b> |                                                                                                                                                                                                                                                                                                                                                                                                                              |

The Company's data for FY 2024-25 has been third party verified. The Assurance Statement is available on page 60 of this Factbook.

#### 2.5.4. Climate Governance

Our Company's Board of Directors holds overall oversight of climate-related issues. These matters are formally addressed at the Board level through the Risk Assessment Committee, which provides strategic guidance and includes climate-related topics in its scope. Climate-related issues are part of the formal agenda for the Board of Directors. These issues are addressed at least annually, ensuring strategic oversight and integration into the Company's governance framework.

As part of our commitment to strengthening environmental and climate governance, we are in the process of establishing an Environment Committee. This dedicated body will oversee the implementation of environmental strategies, monitor compliance with regulatory and voluntary standards, and guide our transition toward low-carbon and resource-efficient operations.

In addition to Board-level governance, the management responsibility for implementing environmental initiatives is delegated to designated management roles below the Executive level. This includes the position of General Manager - Environment, who co-ordinates the execution of climate-related actions across operational levels. This layered governance structure ensures that climate-related risks and opportunities are effectively integrated into both strategic decision-making and day-to-day operations

### 2.5.5. TCFD Disclosure

Our Company aims to integrate the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) within the coming years. We have initiated the process by scoping the requirements of the framework and assessing their applicability to our business model and operations. In parallel, we are building internal capabilities and strengthening data management systems to enable structured climate-related risk and opportunity disclosures.

As part of this journey, we are planning to identify climate-related risks and opportunities, including their potential financial implications. This will involve conducting scenario analyses to evaluate the impact of various climate futures and deriving appropriate mitigation and adaptation strategies, particularly for addressing physical climate risks.

### 2.5.7. Climate Risk Management

Climate-related risks and opportunities are integrated into our Company's multi-disciplinary, enterprise-wide risk management framework, which provides a documented and systematic approach to identifying, evaluating, and mitigating risks across all business functions. Through our Risk Assessment Committee, we ensure that climate change considerations are assessed alongside strategic, operational, and financial risks, thereby embedding climate resilience into our overall business strategy.

Our climate risk assessment encompasses a broad spectrum of risk types, including reputational risk, market risk, legal risk, technology risk, and risks arising from both current and emerging regulations. These are evaluated not only for their direct implications but also for their potential to influence our long-term growth and stakeholder trust.

The assessment currently covers our own operations across the value chain, enabling us to identify potential vulnerabilities and opportunities for adaptive action. By incorporating climate-related issues into our Company's centralized enterprise risk management program, we are able to proactively address potential disruptions, enhance our preparedness for regulatory and market transitions, and ensure that our environmental strategy remains aligned with long-term business continuity and resilience.

### 2.5.12. Emissions Reduction Targets

We have set corporate-level emissions reduction targets to progress towards a low-carbon economy. We consider our emissions reduction target to be science-based. Our approach is guided by recognized frameworks and is designed to ensure that our targets contribute meaningfully to limiting global warming.

The table below outlines our targets for emissions reduction:

| Target type and metric           | Scope covered by Target | Target Timeframe                     | Baseline year emissions covered and as a % of total base year emissions | % reduction target from base year |
|----------------------------------|-------------------------|--------------------------------------|-------------------------------------------------------------------------|-----------------------------------|
| <b>Target 1: Absolute Target</b> | Scope 1 (Stationary)    | Base year: 2025<br>Target year: 2030 | Base year emissions: 61,878.94 tCO <sub>2</sub> e stationary emissions  | 3%                                |

|                                      |                                                                                         |                                          |                                                                                                                         |    |
|--------------------------------------|-----------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|----|
|                                      |                                                                                         |                                          | % of total base year emissions:<br>50.42% of total Scope 1 emissions                                                    |    |
| <b>Target 2:<br/>Absolute Target</b> | Scope 2                                                                                 | Base year: 2025<br><br>Target year: 2030 | Base year emissions: 15,752.33 tCO <sub>2</sub> e<br><br>% of total base year emissions: 100%                           | 8% |
| <b>Target 3:<br/>Absolute Target</b> | Scope 3 (Category 4: Upstream transportation emissions and Category 6: Business travel) | Base year: 2025<br><br>Target year: 2030 | Base year emissions: 14.972 tCO <sub>2</sub> e<br><br>% of total base year emissions: 66.17% of total Scope 3 emissions | 3% |

#### 2.5.14. Net Zero Commitment

Recognizing climate change as a pressing global issue and a strategic priority, we have committed to achieving Net Zero emissions by 2070, in alignment with India's national Net Zero target. This commitment reflects our long-term dedication to environmental stewardship and sustainable development.

Our Company has embedded climate action into its operational and strategic framework, with clearly defined programs aimed at reducing emissions across Scope 1, 2, and 3. We have deployed clean and recovered energy solutions such as Waste Heat Recovery systems at key facilities, converting residual heat from incineration into usable steam. This not only reduces fossil fuel dependency but also lowers the carbon intensity of our waste treatment operations. Additionally, we have transitioned from biodiesel to biomass-based boilers, further advancing our shift toward renewable energy sources. These initiatives reflect our commitment to decarbonizing core operations while enhancing energy efficiency and resource utilization.

We continue to install solar plants to increase renewable energy in our energy mix and implement energy-efficient technologies, including LED lighting and upgraded equipment, to reduce electricity demand. Beyond our direct operations, we are actively working to reduce emissions across our broader value chain. Our logistics operations have been optimized with standardized waste transport routes to minimize fuel consumption and CO<sub>2</sub> emissions.

The table below outlines details of our Net Zero commitment:

| Target time frame | Target scope & related emission reduction target as a % of total base year emissions |
|-------------------|--------------------------------------------------------------------------------------|
| Base year: 2025   | Scope 1 & 2: 100%                                                                    |
| Target year: 2070 | Scope 3: 100%                                                                        |

## 2.6. Biodiversity

### 2.6.1. Biodiversity Risk Assessment

As part of the Environmental Impact Assessment (EIA) studies conducted for each of our sites, biodiversity assessments were carried out.

Our Company publicly reports on the process steps of its biodiversity risk assessment, which follow a structured approach:

- **Study Area:** Biodiversity assessment conducted within a 10 km aerial radius from the project site.
- **Sampling Approach:** Random sampling using point and plot methods tailored to species type.
- **Flora:**
  - **Trees & Shrubs:** Random sampling using 10-meter radius circular plots.
  - **Herbs:** Random sampling using 1m x 1m square plots.
- **Fauna:**
  - **Birds:**
    - Terrestrial: Point-centered quadrat method within a 10-meter radius.
    - Aquatic: Line sampling using total count and flock count methods.
  - **Herpetofauna:**
    - Terrestrial/Aquatic: Random point sampling using 10-meter radius circular plots.
    - Indirect Evidence: Village surveys using pictorial representations.
    - Direct Evidence: Random surveys and direct sightings.
  - **Mammals:**
    - Direct Count: Line transect method.
    - Indirect Evidence: Village surveys using pictorial representations.

The assessment also includes ecological impact evaluation through determination of activities affecting ecological components, scoring impact consequences, quantifying probability of occurrence, and calculating significance of the impacts.

The study employed a location-specific approach, covering a 10 km radius around project sites and including terrestrial and aquatic flora and fauna, with site-specific sampling methods such as circular plots and quadrats. In the assessment, we used established methodologies and frameworks, including the Central Pollution Control Board guidelines, the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, United States Environment Protection Agency (US EPA) SW-846 methods for chemical and ecological analysis.

Both dependency-related biodiversity risks, such as flora and fauna dependencies on land and water ecosystems, and impact-related risks, including scoring of ecological consequences and frequency of disturbances, were considered, with mitigation prioritization based on significance scores.

The scope of the biodiversity risk assessment included own operations as well as adjacent areas to operations up to 10 km radius around the industry project site. The EIA study identified the biodiversity risks associated with the lifecycle of our operations, as well as mitigation measures to be implemented. These risks and mitigation measures were integrated into our Company-wide management process.

The table below outlines details of the biodiversity risks identified:

| Project phase | Impacting Activity                                           | Risk aspect identified                                                                 | Significance | Mitigation measures                                                                                                                                                           |
|---------------|--------------------------------------------------------------|----------------------------------------------------------------------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Design        | Selection of Technology                                      | Non-compliance of environmental standards                                              | Less         | Environment and safety standards will be kept under consideration while selecting technology and designing of plant components                                                |
|               | Designs of plant components                                  |                                                                                        |              |                                                                                                                                                                               |
| Construction  | Site clearance & preparation/<br>Change in topography        | Effects on terrestrial ecology/<br>land use                                            | Moderate     | Reclamation of site area with recommended tree species. Tree saplings and trees will be protected with mesh tree guards.                                                      |
|               | Burning of waste, refuse and cleared vegetation              | Effects on terrestrial ecology                                                         | Less         | Burning of waste, refuse and cleared vegetation will be avoided.                                                                                                              |
| Operation     | Transportation of waste to the facility from member industry | Effects on air<br><br>Dust generation and emission of hydrocarbons and carbon monoxide | Moderate     | Waste material will be transported in covered vehicles. Thick Green belt will be developed around project site                                                                |
|               |                                                              | Road and fire accidents                                                                | Moderate     | Waste material will be transported in covered vehicles. Fire protection equipment and other facilities as may be required shall be provided                                   |
|               | Temporary waste material storage stabilization & handling    | Effect on ecology                                                                      | Less         | Temporary waste material storage, stabilization & handling will be carried out with adequate safeguards at the site as per Central Pollution Control Board (CPCB) guidelines. |
| Landfill      | Transportation of waste to the facility from member industry | Road and fire accidents                                                                | Significant  | Waste material will be transported in covered vehicles. Fire protection equipment and other facilities as may be required shall be provided                                   |
|               | Storage of waste and stabilization                           | Fugitive emission                                                                      | Moderate     | Adequate safeguards will be implemented at the                                                                                                                                |
|               |                                                              | Fire Accidents                                                                         |              |                                                                                                                                                                               |

|                     |                                                       |                                                                          |          |                                                                                                                                                |
|---------------------|-------------------------------------------------------|--------------------------------------------------------------------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------|
|                     |                                                       |                                                                          |          | facility as per CPCB requirements.<br><br>Fire protection equipment and other facilities as may be required shall be provided.                 |
|                     | Waste material handling                               | Environmental Hazards in Air, Water, Soil & Noise                        | Moderate | Waste handling will be as per the Hazardous and Other Wastes (Management and Handling) Rules, 2016.                                            |
|                     |                                                       | Effects on Land use and quality                                          |          |                                                                                                                                                |
|                     | Hazardous waste disposal                              | Reduction of farmland productivity/ Effects on crops                     | Low      | Hazardous waste disposal will be as per Hazardous and Other Wastes (Management and Handling) Rules, 2016. Necessary precautions will be taken. |
|                     | Leachate storage & handling                           | Impact on underground soil                                               | Low      | Provisions for leachate storage and handling shall be made and will be handled in a closed system.                                             |
| General & Utilities | Landfill gas collection & management                  | Fire accidents                                                           | Moderate | Fire protection equipment and other facilities that may be required shall be provided.                                                         |
|                     | Overflow with contaminated water during rainy season. | Surface water contamination due to overflow of storm water drainage line | Moderate | Dyke wall with high capacity will be provided to ensure storm water is not contaminated. Proper arrangement for storm water flow will be made. |
|                     | Vehicular movement for transportation of materials    | Emission of hydrocarbons and carbon monoxide                             | Moderate | Thick green belt will be developed around project site to avoid depositions.                                                                   |

### 2.6.2. Biodiversity Commitment

As part of our broader commitment to environmental responsibility, we have embedded biodiversity protection into our Environment Policy, which is endorsed by our Executive Management. This Policy guides our efforts to minimize ecological impact and promote the conservation and restoration of natural ecosystems across our operations, suppliers and partners.

We are committed to enhancing green cover through afforestation and green belt development initiatives. Through the Policy, we actively pursue compensatory afforestation to support ecological balance and habitat restoration. Additionally, we are also committed to conducting biodiversity risk assessments for our new operations and

applying a mitigation hierarchy to help companies minimize negative impacts on biodiversity in the long-term. This approach prioritizes avoiding impacts wherever possible, followed by minimizing and restoring affected ecosystems, and, as a last resort, implementing offset measures to achieve no net loss or a net positive impact on biodiversity.

To ensure alignment with national and global biodiversity priorities, we expect our suppliers and value chain partners to comply with all applicable local and national biodiversity regulations and avoid operational activities near areas of national biodiversity importance. We actively engage with stakeholders, including employees, suppliers, and contractors, to foster collaboration on biodiversity-related matters.

Our green belt development approach is not limited to regulatory compliance but is a strategic initiative to create buffer zones that support local flora and fauna, contribute to carbon sequestration, and help mitigate air pollution and dust. These green spaces also serve as microhabitats for birds, insects, and small wildlife, especially in industrial regions.

Please refer to our Environment Policy [here](#).

#### **2.6.3. No Deforestation Commitment**

We commit to zero to minimum deforestation for new projects and expansion in our existing projects through our Environment Policy. In addition, we actively seek to compensate for environmental impact through reforestation initiatives across our sites, contributing to increased green cover and biodiversity enhancement.

This commitment extends across our own operations, as well as our suppliers and partners, reflecting a broader approach to responsible land use and ecosystem preservation. The Policy is endorsed by our Executive Management, reinforcing its strategic importance within our sustainability agenda.

Please refer to our Environment Policy [here](#).

## **2.7. Product Stewardship**

#### **2.7.1. Sustainable Revenues**

We provide a comprehensive range of sustainable services, including e-waste recycling, plastic waste recycling, material recovery facilities (for RDF, compost and metal recovery), co-processing, and third-party wastewater Treatment. These services support climate change mitigation, the transition to a circular economy, and pollution prevention and control.

By recovering resources, reducing landfill dependency, and promoting the safe disposal and recycling of hazardous and non-hazardous waste, our offerings fall under the following business categories:

- **Material recovery from non-hazardous waste:** Contributes to climate change mitigation

- **Construction, extension and operation of wastewater collection and treatment:** Contributes pollution prevention and control
- **Treatment of hazardous waste:** Contributes to circular economy, pollution prevention

Through these services, we ensure the safe and sustainable management of diverse waste streams.

#### Sustainable Revenues

| Particulars               | UOM        | FY22                  | FY23                  | FY24                  | FY25                  |
|---------------------------|------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Sustainable Revenue       | INR        | 1,52,72,03,000.00     | 1,78,40,89,000.00     | 1,71,06,68,000.00     | 1,63,44,95,000.00     |
| <b>Total revenues</b>     | <b>INR</b> | <b>4,42,96,12,000</b> | <b>4,74,10,56,000</b> | <b>5,98,51,22,000</b> | <b>7,90,72,20,000</b> |
| % of sustainable revenues | %          | 34.48                 | 37.63                 | 28.58                 | 20.67                 |

## 3. Social

### 3.1. Labor Practices

#### 3.1.1. Labor Practices Commitment

Our Company's human rights and labor practices are guided by our Code of Conduct, Human Rights Policy and our Compliance Policy. Our practices are aligned with the UN Guiding Principles on Business and Human Rights, ensuring respect for worker rights, ethical treatment, and responsible business conduct across our own operations, our contractors and our partners.

We are committed to paying a fair and living wage that exceeds the minimum wage prescribed under the Minimum Wages Act or as notified by the Central or State Government, whichever is higher. Our Company maintains a transparent wage structure to ensure that all permanent and contractual employees receive fair and competitive compensation.

In accordance with applicable laws such as the Factories Act, 1948 and the Shops and Establishments Act of the respective states of operations, we are dedicated to avoiding or reducing overtime or excessive working hours and to setting maximum working hours that promote employee well-being and productivity.

Our Equal Opportunity Policy guarantees equal remuneration for men and women. We ensure that employment decisions, including hiring, promotion, compensation, and other conditions, are based solely on merit and are free from discrimination on the basis of gender, race, sexual orientation, religion, age, or any other status.

We also comply with statutory provisions related to paid leave, including maintaining leave registers and adhering to the Maternity Benefit Act, 1961 and the Shops and Establishments Act. Through these measures, we ensure that we are consistently paying workers for annual leave as mandated by law.

Our Company adheres to the notice period requirements mandated under Indian labor laws, including provisions under the Industrial Disputes Act, 1947 and relevant state-specific regulations, which require advance notice or compensation before mass termination of employees. However, in the history of our Company, we have never undertaken mass termination, reflecting our commitment to responsible employment practices and workforce stability.

Please refer to our Code of Conduct [here](#), Human Rights Policy [here](#), Compliance Policy [here](#) and Equal Opportunity Policy [here](#).

#### 3.1.2. Labor Practices Programs

Respecting and upholding labor rights across all operations is a fundamental commitment at BEIL, as guided by our Code of Conduct and Compliance Policy. We recognize that fair treatment, safe working conditions, and equitable compensation are foundational to a responsible and sustainable workplace.

We ensure the payment of adequate wages that exceeds statutory minimum level by maintaining a transparent wage structure, applicable to both permanent and contractual employees. We monitor working hours including overtime management in accordance with relevant labor laws such as the Factories Act, 1948 and the Shops and Establishments Act, ensuring that employees are not subjected to excessive working hours and that all overtime is tracked and compensated appropriately. We ensure employees are paid for overtime work through compliance mechanisms, including wage registers and monthly audits.

We routinely monitor the gender pay gap to promote equitable remuneration for men and women and ensures that employees fully utilize their paid annual leave entitlements, fostering a balanced and inclusive work environment.

We maintain fair wage policies that reflect living costs and provide additional social protection coverage beyond statutory requirements. We engage constructively with employee representatives to maintain a healthy dialogue on workplace matters.

Recognizing the evolving nature of the infrastructure and environmental services sector, we provide targeted training and reskilling programs focused on transition risks, including:

- Low-carbon technologies in waste management and treatment,
- Circular economy practices,
- Compliance with emerging environmental regulations

Please refer to our Code of Conduct [here](#) and Compliance Policy [here](#).

### **3.1.3. Discrimination & Harassment**

At BEIL, we strive to foster a diverse, inclusive, and respectful workplace. Our Human Rights Policy, Equal Opportunity Policy and Code of Conduct serve as the foundation for creating an environment where all individuals are treated with dignity and fairness, and where equal opportunity is provided to all, regardless of color, gender, sex, race, age, religion, nationality, social status, disability, ethnicity, sexual orientation, political opinion, or any other status.

We maintain a zero-tolerance policy for discrimination, and prohibit all forms of harassment, including both sexual and non-sexual harassment, abuse, bullying, and any behavior that may be considered threatening, humiliating, offensive, or intimidating. These principles are embedded in our Human Rights Policy and reinforced through our organizational culture.

To safeguard our employees and stakeholders, we have implemented robust mechanisms, such as our Policy on Prevention of Sexual Harassment of Women at Workplace (POSH Policy). This Policy applies to all women employees, workers, consultants, trainees, customers, clients, suppliers, and any individual with a business relationship with BEIL. It outlines clear procedures for reporting, investigating, and resolving complaints related to sexual harassment.

Our Whistleblower Policy provides a confidential and secure platform for employees, business partners, customers, and members of the public to raise concerns about any incidents of misconduct, including discrimination or harassment. Reports can be submitted openly, confidentially, or anonymously, and are handled with sensitivity and integrity.

Our Equal Opportunity Policy mandates training for all employees on identifying and preventing discrimination and harassment in the workplace. These training programs are designed to build awareness, promote respectful behavior, and ensure compliance with our Policies.

Our Code of Conduct, along with the POSH Policy, defines a clear escalation process for reporting incidents of discrimination and harassment. Our Code of Conduct also outlines the corrective and disciplinary actions, including termination of employment, that may be taken in response to verified misconduct, ensuring accountability at all levels of the organization.

Please refer to our Human Rights Policy [here](#), Equal Opportunity Policy [here](#), Code of Conduct [here](#) and POSH Policy [here](#).

#### 3.1.4. Workforce Breakdown: Gender

Our Company is committed to fostering a diverse and inclusive workplace, with a strong focus on gender equity across all levels of the organization. We adopt a gender-neutral approach in decision-making and strive to maintain a balanced male-to-female employee ratio. Special initiatives are in place to empower women employees, providing them with opportunities to grow, lead teams, and contribute meaningfully to the organization. We are committed to creating an environment where individuals of all genders have equal access to opportunities, resources, and career advancement. Our workforce reflects this commitment through balanced representation and ongoing efforts to promote gender equity across roles, functions, and leadership levels.

Workforce Breakdown by Gender (%)

| Diversity Indicator                                                                                          | UOM                                       | FY25  |
|--------------------------------------------------------------------------------------------------------------|-------------------------------------------|-------|
| Share of women in total workforce                                                                            | as % of total workforce                   | 11.37 |
| Share of women in all management positions, including junior, middle and top management                      | as % of total management positions        | 17.07 |
| Share of women in junior management positions, i.e. first level of management                                | as % of total junior management positions | 19.28 |
| Share of women in top management positions i.e. maximum two levels away from the CEO or comparable positions | as % of total top management positions    | 3.45  |
| Share of women in management positions in revenue generating functions                                       | as % of all such managers                 | 8.82  |
| Share of women in STEM-related positions                                                                     | as % of total STEM positions              | 26.49 |

#### 3.1.5. Workforce Breakdown: Race/ Ethnicity & Nationality

Cultivating a workplace that values racial and ethnic diversity is a core part of our inclusive culture at BEIL. We believe that individuals from all backgrounds should have equal access to opportunities, and we strive to ensure that our practices reflect this principle.

In India, caste and related social identifiers are considered sensitive personal information. In recognition of this, our Company does not disclose employee data based on caste or similar categories. Instead, we report diversity metrics based on nationality, ensuring transparency while respecting individual privacy and adhering to applicable legal and ethical standards.

#### Workforce Breakdown by Ethnicity (% of total workforce)

| Particulars | Share in total workforce | Share in all management positions, including junior, middle and senior management |
|-------------|--------------------------|-----------------------------------------------------------------------------------|
| Indian      | 100                      | 100                                                                               |
| Others      | 0                        | 0                                                                                 |

### 3.1.6. Gender Pay Indicators

Ensuring fair and equitable compensation for all employees regardless of gender is a key priority at BEIL. Our compensation practices are rooted in the principles of equal opportunity, meritocracy, and transparency. We continuously strive to identify and address any gender-based disparities, reinforcing our commitment to a workplace where everyone is valued and rewarded fairly for their contributions.

We are committed to identifying and addressing gender-based disparities across our workforce to ensure a fair and inclusive workplace. Monitoring gender gap indicators helps us uphold our principles of equal opportunity and merit-based advancement. These insights guide our efforts to create a more balanced and equitable environment for all employees, regardless of gender.

#### Gender Pay Indicators (INR)

| Employee Level                                         | Average Women Salary | Average Men Salary |
|--------------------------------------------------------|----------------------|--------------------|
| Executive level (base salary only)                     | 0                    | 87,32,864          |
| Executive level (base salary + other cash incentives)  | 0                    | 98,68,046          |
| Management level (base salary only)                    | 6,26,011             | 8,34,405           |
| Management level (base salary + other cash incentives) | 6,65,779             | 8,95,523           |
| Non-management level (base salary only)                | 0                    | 0                  |

#### Difference between men and women employees (%)

| Indicator             | Difference between men and women employees |
|-----------------------|--------------------------------------------|
| Mean gender pay gap   | 33.29                                      |
| Median gender pay gap | 24.51                                      |
| Mean bonus gap        | 53.69                                      |
| Median bonus gap      | 17.40                                      |

### 3.1.7. Freedom of Association

Our Company is committed to upholding and protecting the right to freedom of association as part of our commitment to human rights and ethical business practices. Our Human Rights Policy affirms that all employees have the right to form, join, or refrain from joining independent trade unions, labor unions, or collective bargaining agreements, without fear of retaliation or discrimination. We are committed to creating a workplace

where such rights are respected and protected. In line with this, our Company commits to engaging in constructive dialogue with recognized unions in good faith and is committed to honoring the terms of collective bargaining agreements. This approach reflects our dedication to building trust, promoting fair labor practices, and ensuring that employee voices are heard and valued.

We have an independent trade union present at our KEIL facility. In FY 2024-25, 26% of KEIL permanent employees were represented by independent trade unions. Together, these rights empower workers, enhance democratic participation in the workplace, and contribute to improved working conditions and labor relations.

### **1.63%**

Employees represented by an independent trade union or covered by collective bargaining agreements

Please refer to our Human Rights Policy [here](#).

## **3.2. Human Rights**

### **3.2.1. Human Rights Commitment**

Respect for fundamental human rights is embedded in our Human Rights Policy and upheld throughout BEIL's operations and business relationships. The Policy is aligned with internationally recognized standards, including the United Nations (UN) Universal Declaration of Human Rights, 1948, the UN Guiding Principles on Business and Human Rights and the UN Convention on the Rights of the Child.

Our Policy strictly prohibits all forms of forced labor, child labor, and human trafficking, affirming the right to live and work with dignity, free from discrimination, abuse, or harassment. Additionally, our Equal Opportunity Policy reinforces our commitment to protecting the rights to freedom of association and collective bargaining. We recognize and respect every employee's right to form, join, or refrain from joining independent trade unions or labor unions without fear of retaliation. Where employees are represented by legally recognized unions, we are committed to engaging in constructive dialogue in good faith and to honoring the terms of collective bargaining agreements.

Our commitment to preventing discrimination is operationalized through clear procedures outlined in our Code of Conduct and POSH Policy, which address misconduct such as sexual and non-sexual harassment, coercion, corruption, and abuse. These policies define structured escalation processes and corrective actions, ensuring accountability and redressal. We also conduct regular training programs to build awareness and ensure compliance across the organization.

Our human rights commitment extends beyond our internal workforce to include our suppliers, partners, contractors, customers, and other business associates. We expect all stakeholders in our value chain to uphold these standards, comply with applicable labor laws, and respect the rights of individuals and communities impacted by their operations. As part of this commitment, suppliers and business partners are required to provide a

mandatory undertaking of the Business Partner Code of Conduct, which ensures adherence to the highest standards of ethical behavior, human rights and labor practices.

The oversight of our human rights commitments lies with the Compliance Officer, supported by Executive Management and the representatives of the departments concerned for the implementation. The Policy is periodically reviewed by the Executive Management to ensure it reflects continuous adherence with our commitments.

Please refer to our Human Rights Policy [here](#) and Code of Conduct [here](#) and POSH Policy [here](#).

**3.2.2. Human Rights Due Diligence Process**

Our Company has implemented a Company-wide human rights due diligence process to uphold ethical standards and prevent any violation of human rights, as guided by our Human Rights Policy. We focus on risk identification in our own operations as well as in our value chain and other activities related to our business, including regular monitoring of our joint ventures, clients, contractors, suppliers, and other business associates.

We conduct a periodic review of risk mapping to stay ahead of potential issues. Through this process, we identify actual or potential human rights issues such as forced labor, human trafficking, child labor, freedom of association, right to collective bargaining, and discrimination. Our Company covers several groups at risk for human rights violations, including our own employees, women, migrant workers, indigenous people (where present) and third-party employees.

As of FY 2024-25, no human rights issues have been identified in our operations and value chain. In case of any concern raised by stakeholders, we are committed to investigating, addressing, and taking appropriate corrective action to ensure accountability and continuous improvement.

Please refer to our Human Rights Policy [here](#).

**3.2.3. Human Rights Assessment**

Our Company conducts regular assessments of potential human rights issues in line with our Human Rights Policy. In our assessments, 100% of our own operations have been assessed, and no risks were identified during these assessments. In case any risks are identified, mitigation actions are implemented as outlined in our Human Rights Policy. The table below details the coverage of our human rights assessment.

| Category                  | % of total sites assessed in last three years | % of total sites assessed where risks have been identified | % of sites with risk with mitigation actions taken |
|---------------------------|-----------------------------------------------|------------------------------------------------------------|----------------------------------------------------|
| Own operations            | 100                                           | 0                                                          | 100                                                |
| Basis of reporting: Sites |                                               |                                                            |                                                    |

Please refer to our Human Rights Policy [here](#).

### 3.2.4. Human Rights Mitigation & Remediation

We are committed to identifying, preventing, and addressing human rights risks across our operations.

#### Processes implemented to mitigate human rights risks

Our Human Rights Policy describes several mitigation and remediation actions for human rights. These proactive measures include:

- **Legal Compliance:** Adherence to all relevant human rights laws and regulations, with contract clauses prohibiting child labor and forced labor.
- **Training and Awareness:** Conducting campaigns, workshops, seminars, and e-learning to educate stakeholders on human rights.
- **Zero Tolerance for Child and Forced Labor:** Strict prohibition of child labor, bonded labor, human trafficking, and modern slavery across all operations and contracts.
- **Diversity and Non-Discrimination:** Promotion of an inclusive work environment with equal opportunity and strict action against harassment or discrimination.
- **Freedom of Association and Collective Bargaining:** Respecting employees' rights to unionize and bargain collectively, with commitment to good faith negotiations.
- **Grievance Redressal Mechanism:** Accessible grievance cell for stakeholders to report concerns, with assurance of no reprisal and prompt corrective action.
- **Supplier and Community Engagement:** Requiring suppliers and contractors to follow labor laws and BEIL's Code of Conduct; supporting indigenous communities and local development.

#### Number of sites with mitigation plans

At present, since none of our operational sites have any identified human rights risks, we have not implemented mitigation plans at any of our sites.

#### Type of remediation actions taken

In the event of any human rights violations or stakeholder concerns, our Company has established a comprehensive remediation framework. A dedicated Grievance Redressal Mechanism is in place, allowing stakeholders to report issues via an accessible grievance cell. We ensure that no reprisal is taken against employees who raise concerns, and all reported matters are investigated, addressed, and resolved with appropriate corrective actions. Additionally, disciplinary action is enforced strictly against individuals found violating the Human Rights Policy, reinforcing our commitment to accountability and ethical conduct, in line with our Whistleblower Policy and Code of Conduct.

Please refer to our Human Rights Policy [here](#), Whistleblower Policy [here](#) and Please refer to our Code of Conduct [here](#).

## 3.3. Human Capital Management

### 3.3.1. Training & Development Inputs

We recognize that continuous learning and skill enhancement are essential to employee growth as well as organizational success. We invest in structured training and

development programs aimed at building technical competencies, leadership capabilities, and cross-functional skills. These inputs help us monitor the effectiveness of our learning initiatives and ensure alignment with strategic workforce goals.

To ensure inclusive and targeted learning opportunities, we track training and development indicators across key demographic and organizational categories. These insights enable us to tailor our learning strategies, promote equitable access to development opportunities, and support career progression for all employees.

#### Average hours and spend on FTE Training and Development

| Particulars                                              | UoM   | FY25     |
|----------------------------------------------------------|-------|----------|
| Average hours per FTE of training and development        | Hours | 37.80    |
| Average amount spent per FTE on training and development | INR   | 6,076.82 |

#### Average training hours breakdown (Hours)

| Category                | Particulars        | Average Training Hours in FY25 |
|-------------------------|--------------------|--------------------------------|
| <b>Gender</b>           | Male               | 311                            |
|                         | Female             | 64                             |
| <b>Management Level</b> | Junior             | 249                            |
|                         | Middle             | 97                             |
|                         | Senior             | 29                             |
| <b>Age Group</b>        | Under 30 years old | 99                             |
|                         | 30-50 years old    | 244                            |
|                         | Over 50 years old  | 32                             |

#### Total amount spent by type of training (INR)

| Type of Training  | Total Amount Spent |
|-------------------|--------------------|
| Technical         | 6,49,000           |
| Behavioral        | 12,42,356          |
| Ethics            | 1,68,376           |
| Health and Safety | 2,19,000           |

### 3.3.2. Employee Development Programs

Our Company places strong emphasis on employee development to build capabilities that support both individual growth and business performance. Our programs are designed to upgrade skills and strengthen leadership, while also contributing measurable business benefits. These initiatives are open to our employees, including contractual and full-time employees, ensuring inclusivity across our development programs.

We use a variety of learning methods, including coaching, mentorship, and fostering teams and networks, to foster collaborative learning and peer support. Our employee development programs aim to meet diverse needs, with programs focused on leadership development, cultural education, and digital transition. These programs are structured to deliver measurable outcomes through improved employee engagement, capability building, and overall productivity.

The table outlines our employee development programs:

| Particulars       | Program 1                                                                                                                                                                                                                                                                                                                                                                               | Program 2                                                                                                                                                                                                                                                                                                                                                            | Program 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Program 4                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of Program   | Education Assistance Policy                                                                                                                                                                                                                                                                                                                                                             | First Time Manager Program                                                                                                                                                                                                                                                                                                                                           | Training on the Code of Conduct                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Excel and Advanced Excel Program                                                                                                                                                                                                                                                                                                                                                                        |
| Type of Program   | Leadership Development Program                                                                                                                                                                                                                                                                                                                                                          | Leadership Development Program                                                                                                                                                                                                                                                                                                                                       | Cultural education                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Digital transition program                                                                                                                                                                                                                                                                                                                                                                              |
| Description       | The Education Assistance Policy is designed to support the professional development of our employees by providing financial and academic support for further education at UPL University of Sustainability Technology. The program aims to enhance employee skillsets, align learning with organizational goals, and foster long-term retention and growth.                             | The First Time Manager Program focuses on developing the mindset, skillsets, and toolsets required for newly appointed managers to drive high performance. It supports smooth leadership transitions, strengthens delegation and team performance, and contributes to succession planning.                                                                           | <p>The Company-wide training on the Code of Conduct &amp; Cultural is a foundational training program delivered to all employees to promote ethical behavior, mutual respect, and cultural sensitivity in the workplace.</p> <p>While reinforcing the Company's core values, the program also emphasizes the importance of understanding and respecting diverse cultural backgrounds, beliefs, and practices. It prepares employees to navigate multicultural work environments with empathy and inclusivity, enabling a cohesive and respectful organizational culture.</p> | The Excel and Advanced Excel Program equips employees with essential advanced Microsoft Excel skills, strengthening data handling, analysis, and reporting capabilities. By enhancing accuracy, productivity, and decision-making, the program supports cost savings and improves data quality.                                                                                                         |
| Business benefits | <p>The program delivers strategic value by investing in employee education, which directly contributes to organizational capability and talent retention.</p> <ul style="list-style-type: none"> <li>• Builds a more skilled and future-ready workforce aligned with sustainability and technical excellence.</li> <li>• Enhances employee motivation and engagement through</li> </ul> | <p>The Program builds leadership capacity early by equipping new managers with the skills to lead high-performing teams. This translates into strong business benefits.</p> <ul style="list-style-type: none"> <li>• Strengthens succession planning by preparing a pipeline of capable managers.</li> <li>• Improves delegation, communication, and team</li> </ul> | <p>This training strengthens both ethical compliance and cultural intelligence across the organization, leading to a more inclusive and high-performing workforce.</p> <ul style="list-style-type: none"> <li>• Promotes a respectful and inclusive workplace by increasing cultural awareness and sensitivity.</li> <li>• Reduces risks of discrimination, bias, and misconduct</li> </ul>                                                                                                                                                                                  | <p>The Program equips employees with advanced data handling, analysis, and reporting skills, enabling more effective business decision-making.</p> <ul style="list-style-type: none"> <li>• Strengthens employee capability in data-driven analysis and reporting.</li> <li>• Enhances accuracy and reliability of business reporting and dashboards.</li> <li>• Improves decision-making by</li> </ul> |

|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                 | <p>structured learning support.</p> <ul style="list-style-type: none"> <li>• Strengthens internal talent pipelines by encouraging upskilling and career progression.</li> <li>• Reduces external hiring costs by promoting internal mobility and succession readiness.</li> <li>• Improves retention through service agreements post-course completion.</li> <li>• Aligns employee development with business-critical domains like environmental compliance, automation, and process safety.</li> </ul> <p>Business benefits are tracked through employee retention, internal promotion rates, and post-training performance improvements.</p> | <p>management capabilities.</p> <ul style="list-style-type: none"> <li>• Enhances employee engagement and retention by ensuring effective leadership.</li> <li>• Reduces risks of transition challenges by supporting first-time managers with structured guidance.</li> <li>• Contributes to higher team productivity and collaboration with new managers.</li> <li>• Aligns leadership capabilities with business priorities for smoother operational performance.</li> </ul> <p>Business benefits are being tracked through team productivity, retention, and leadership effectiveness metrics.</p> | <p>through proactive education.</p> <ul style="list-style-type: none"> <li>• Enhances collaboration and communication across diverse teams.</li> <li>• Builds a unified organizational identity rooted in shared values and mutual respect.</li> <li>• Supports the Company's reputation as an ethical and inclusive employer.</li> <li>• Improved employee satisfaction and sense of belonging</li> </ul> <p>Business benefits are tracked through incident reporting trends, and diversity and inclusion metrics.</p> | <p>equipping employees with analytical tools and methods.</p> <ul style="list-style-type: none"> <li>• Contributes to operational efficiency by reducing manual data errors and rework.</li> <li>• Builds a sustainable foundation for digital transition initiatives within core functions.</li> <li>• Supports cost optimization through improved process efficiency and data-driven resource allocation.</li> </ul> <p>Business benefits are being tracked through improvements in data accuracy, decision quality, and process efficiency metrics.</p> |
| <b>Quantitative impact of business benefits</b> | <p>The program's effectiveness is measured through tangible outcomes linked to employee development and organizational performance.</p> <ul style="list-style-type: none"> <li>• Reduction in attrition rates among employees who received educational assistance.</li> <li>• Increase in internal promotions and reduced dependency on external hiring.</li> <li>• Cost savings from improved employee retention and reduced onboarding/training costs.</li> </ul>                                                                                                                                                                            | <p>The Program's impact is assessed through measurable outcomes linked to leadership transitions and team performance.</p> <ul style="list-style-type: none"> <li>• Reduction in attrition rates among teams led by trained first-time managers.</li> <li>• Improvements in team productivity and performance against business KPIs.</li> <li>• Cost savings from reducing inefficiencies caused by ineffective leadership transitions.</li> <li>• Measurable gains in</li> </ul>                                                                                                                      | <p>The program's effectiveness is measured through cultural and compliance indicators.</p> <ul style="list-style-type: none"> <li>• Reduction in workplace grievances and misconduct related to bias or discrimination</li> <li>• Increased reporting of ethical concerns, indicating trust in the system.</li> <li>• Enhanced team performance in cross-functional and multicultural settings.</li> </ul>                                                                                                              | <p>The Program's impact is assessed through measurable business outcomes linked to data management and decision-making efficiency.</p> <ul style="list-style-type: none"> <li>• Improvements in process efficiency through faster and more accurate reporting.</li> <li>• Reduction in data-related errors and rework costs.</li> <li>• Cost savings achieved by optimizing processes and eliminating inefficiencies.</li> <li>• Measurable productivity gains in</li> </ul>                                                                               |

|                                                                  |                                                                                                                               |                                                                                                                                                                                                                           |                                                                                                                         |                                                                                                                                                                                                               |
|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                  | <ul style="list-style-type: none"> <li>Measurable improvements in employee performance and technical competencies.</li> </ul> | leadership competency levels among newly appointed managers.<br><ul style="list-style-type: none"> <li>Strengthened succession pipeline as reflected in internal promotions and reduced external hiring costs.</li> </ul> |                                                                                                                         | employee output linked to advanced Excel skills.<br><ul style="list-style-type: none"> <li>Competency development in digital and analytical capabilities directly supporting business performance.</li> </ul> |
| <b>Number of employees participating in the programs in FY25</b> | 32                                                                                                                            | 22                                                                                                                                                                                                                        | 1,785<br><ul style="list-style-type: none"> <li>375 permanent employees</li> <li>1,410 contractual employees</li> </ul> | 25                                                                                                                                                                                                            |
| <b>% of employees participating in the programs in FY25</b>      | 8.53                                                                                                                          | 5.86                                                                                                                                                                                                                      | 100                                                                                                                     | 6.67                                                                                                                                                                                                          |

### 3.3.3. Human Capital Return on Investment

Investing in our people is central to BEIL's long-term business success. We monitor key indicators to evaluate the financial value generated through workforce-related expenditures, including salaries, benefits, and initiatives focused on training and development. This allows us to gain insights into how effectively our human capital contributes to productivity, innovation, and overall organizational performance.

#### Human Capital Return on Investment

| Particulars                                            | UoM    | FY22           | FY23           | FY24           | FY25           |
|--------------------------------------------------------|--------|----------------|----------------|----------------|----------------|
| Total Revenue                                          | INR    | 4,42,96,12,000 | 4,74,10,56,000 | 5,98,51,22,000 | 7,90,72,20,000 |
| Total Operating Expenses                               | INR    | 2,71,61,83,000 | 3,11,00,77,000 | 3,48,07,90,000 | 5,06,44,68,000 |
| Total Employees-related expenses (Salaries + Benefits) | INR    | 21,02,50,000   | 23,72,65,000   | 32,23,48,000   | 54,94,17,000   |
| Resulting HC ROI                                       | %      | 9.15           | 7.87           | 8.77           | 6.17           |
| Total FTEs                                             | Number | 355            | 371            | 378            | 375            |

### 3.3.4. Hiring

Hiring the right talent is essential to achieving BEIL's strategic goals and sustaining long-term growth. Our recruitment process is designed to be efficient, inclusive, and aligned with our core organizational values. Through thoughtful hiring practices, we aim to strengthen our workforce with individuals who bring the right skills, perspectives, and potential. These efforts help us evaluate the impact of our talent acquisition strategy and ensure it supports our broader workforce planning goals.

We are committed to maintaining a diverse and inclusive workplace that reflects a wide range of experiences, backgrounds, and perspectives. As part of this commitment, we track our hiring patterns across gender, age groups, and management levels.

### Hiring KPIs

| Particulars                                       | UoM    | FY22      | FY23     | FY24      | FY25     |
|---------------------------------------------------|--------|-----------|----------|-----------|----------|
| Total number of new employee hires                | Number | 70        | 83       | 82        | 54       |
| % of open positions filled by internal candidates | %      | 0         | 0        | 0         | 0        |
| Average hiring cost per FTE                       | INR    | 13,948.63 | 9,517.50 | 15,952.48 | 9,718.31 |

### New Hires Breakdown (Number)

| Category                | Particulars    | FY22 | FY23 | FY24 | FY25 |
|-------------------------|----------------|------|------|------|------|
| <b>Gender</b>           | Male           | 51   | 65   | 59   | 43   |
|                         | Female         | 19   | 18   | 23   | 11   |
| <b>Management Level</b> | Junior         | 55   | 74   | 64   | 47   |
|                         | Middle         | 14   | 8    | 17   | 7    |
|                         | Senior         | 1    | 1    | 1    | 0    |
| <b>Age Group</b>        | Under 30 years | 34   | 41   | 44   | 34   |
|                         | 30-50 years    | 34   | 42   | 36   | 19   |
|                         | Over 50 years  | 2    | 0    | 2    | 1    |

### 3.3.5. Employee Turnover Rate

We view employee retention as a key indicator of organizational health and employee engagement. Understanding turnover helps us assess how well we are supporting our people, both professionally and culturally. We strive to create an environment where employees feel valued, challenged, and connected to our mission. By monitoring turnover trends, we aim to strengthen our retention strategies and ensure long-term workforce stability.

We strive to create a workplace where all employees feel supported and have equal opportunities to thrive. We analyze turnover patterns across gender and management levels. These insights help us identify disparities, understand the experiences of different employee segments, and take targeted actions to improve retention and inclusivity.

#### Employee Turnover Rate (%)

| Particulars                      | FY22  | FY23  | FY24  | FY25  |
|----------------------------------|-------|-------|-------|-------|
| Total Employee Turnover Rate     | 13.48 | 17.79 | 18.25 | 19.20 |
| Voluntary Employee Turnover Rate | 13.48 | 17.79 | 18.25 | 19.20 |

#### Turnover breakdown (%)

| Category                | Particulars    | FY22  | FY23  | FY24  | FY25  |
|-------------------------|----------------|-------|-------|-------|-------|
| <b>Gender</b>           | Male           | 14.19 | 14.65 | 16.56 | 17.04 |
|                         | Female         | 10.00 | 35.09 | 26.56 | 29.69 |
| <b>Management Level</b> | Junior         | 10.28 | 14.63 | 22.75 | 23.29 |
|                         | Middle         | 33.96 | 36.67 | 10.64 | 14.43 |
|                         | Senior         | 4.76  | 8.33  | 3.45  | 0.00  |
| <b>Age Group</b>        | Under 30 years | 20.00 | 24.69 | 38.30 | 33.02 |
|                         | 30-50 years    | 11.98 | 12.20 | 12.05 | 14.35 |
|                         | Over 50 years  | 10.26 | 13.89 | 8.57  | 9.38  |

### **3.3.7. Employee Support Programs**

#### **Employee Benefits**

Employee well-being is actively supported at BEIL through a variety of initiatives, including sports and health initiatives, cultural activities, and recognition efforts. Our wellness efforts include regular yoga sessions, participation in inter-company sports tournaments such as cricket and volleyball, and Emergency Response Team (ERT) competitions. A key highlight is our annual celebration of International Yoga Day, which encourages employees to embrace holistic wellness practices, promotes workplace stress management and fosters a sense of unity across the organization.

We also prioritize employee engagement through inclusive events such as town halls, festive celebrations, and Corporate Social Responsibility (CSR) activities. These initiatives not only strengthen internal collaboration but also cultivate a sense of purpose and societal awareness. Our employees regularly participate in plantation drives, donation campaigns, and other community-focused efforts, contributing to long-term value creation for both society and the environment.

#### **Work Conditions**

As part of our commitment to flexible work conditions, we offer working-from-home arrangements to support work-life balance and accommodate diverse employee needs.

#### **Family Benefits**

At BEIL, our family-friendly benefits are thoughtfully designed to support employees through various life stages and promote a healthy work-life balance. We provide childcare facilities to assist working parents in managing caregiving responsibilities. To support new mothers returning to work, we offer breastfeeding and lactation facilities. Additionally, we extend paid parental leave to the primary caregiver, with the majority of employees eligible for 26 weeks of paid leave, as guided by our Leave Policy. In FY 2024–25, two employees availed parental leave.

#### **26 weeks**

Paid parental leave for the primary caregiver

Please refer to our Leave Policy [here](#).

### **3.3.8. Type of Performance Appraisal**

Structured performance and career development reviews play a vital role in fostering employee growth, boosting engagement, and aligning individual aspirations with BEIL's strategic objectives. We aim to create a high-performance culture through a transparent and multidimensional performance appraisal that ensures every employee has a clear understanding of their role, impact, and path for growth. Our appraisal methodology is built on a foundation of proactive, continuous dialogue and structured evaluation. We follow a Management by Objectives approach, where employees collaborate with their line managers to set predefined, measurable goals that reflect both personal development and organizational priorities. In addition to our formal procedures for performance appraisal, we also foster agile conversations as the norm, cultivating a culture of continuous feedback.

These goals are reviewed at least annually, with regular follow-ups to assess progress, provide constructive feedback, and recalibrate objectives as needed. Our employee performance appraisal takes place at least yearly.

Our performance management system includes both individual and team-based appraisals, ensuring that contributions at all levels are acknowledged and aligned with broader business outcomes. This approach promotes accountability, encourages continuous improvement, and supports career advancement by identifying development opportunities and recognizing achievements.

#### **3.3.9. Trend of Employee Wellbeing**

Guided by our Code of Conduct and Human Rights Policy, we are committed to promoting work-life balance by providing a comprehensive range of employee benefits that foster motivation and engagement. In addition, we ensure that all employees and staff members work in environments that are safe, hygienic, humane, and conducive to their well-being. This commitment also extends to individuals residing near our project sites, reflecting our broader responsibility toward community welfare.

Please refer to our Code of Conduct [here](#) and Human Rights Policy [here](#).

### **3.4. Occupational Health and Safety (OHS)**

#### **3.4.1. OHS Policy**

The health and safety of all individuals impacted by our operations is a core priority at our Company. Our Occupational Health and Safety Policy (OHS Policy) reflects a strong commitment to safeguarding well-being across our Company, including all employees, contractors, suppliers, extended value chain partners and all individuals under our Company's supervision. This Policy is implemented in close partnership with these stakeholders to ensure consistent and responsible practices. The OHS Policy is endorsed by the Executive Management.

As an ISO 45001:2018 certified organization, we adhere to internationally recognized standards for OHS. Additionally, we are committed to complying with all applicable statutory requirements and relevant standards related to health, safety, and the environment.

Our approach emphasizes continuous improvement of the OHS management system through regular risk assessments. We actively promote consultation and participation of workers, including the involvement of workers' representatives in OHS matters. Employee health is monitored through pre-employment and periodic medical check-ups, and in the event of any incident, we conduct root cause analyses to prevent recurrence and share findings with relevant stakeholders.

We ensure that all employees, contractors, and associated parties receive appropriate information, education, training, and retraining on OHS objectives. OHS considerations are integrated into decision-making processes, including new projects, equipment purchases, material selection, and career advancement evaluations.

Through the Policy, we are committed to setting measurable targets for improving key metrics tracking OHS performance in our Company. Each Unit Head is responsible for annually reviewing OHS performance and monitoring measurable objectives and targets.

The Executive Management reviews the set targets and collaborates with Unit Heads to develop action plans that align with the overall objectives of the Company. Unit Heads are responsible for the implementation, prioritization, and performance monitoring of these action plans to ensure continuous improvement across operations.

Target and baseline

| Target for FY30                                                   | FY25 Baseline                          |
|-------------------------------------------------------------------|----------------------------------------|
| 12%<br>Year-on-year reduction in recordable work-related injuries | 18<br>Recordable work-related injuries |

Please refer to our OHS Policy [here](#).

3.4.2. OHS Programs

Ensuring the health, safety, and well-being of our employees is a top priority, especially given the nature of our operations involving hazardous waste. We have implemented a comprehensive OHS program that includes regular risk and hazard assessments to identify potential sources of harm in the workplace. Our preparedness for emergency situations is supported by practical training sessions, such as fire extinguisher and hose reel usage, and awareness programs like heat wave precaution training. Initiatives such as safety oath-taking ceremonies further reinforce our safety culture.

We conduct internal inspections to monitor compliance and identify areas for improvement. In addition, our OHS management system is independently verified through our certification under ISO 45001:2018, ensuring adherence to internationally recognized health and safety standards.

Procedures are in place to investigate work-related injuries, illnesses, and incidents, with a focus on root cause analysis and preventive action. We also provide targeted OHS training to employees and relevant external parties to raise awareness and reduce operational risks.

In line with our OHS Policy, our Company regularly evaluates progress in reducing and preventing health-related risks by monitoring measurable objectives and targets. Health monitoring of employees, including contractual staff, is carried out through pre-employment and regular medical check-ups.

Additionally, OHS criteria are integrated into our procurement and contractual requirements through our Business Partner Code of Conduct, ensuring that safety standards are upheld across our supply chain and contractor engagements.

### 3.4.3. Fatalities

Safety and well-being of our workforce is a top priority at our Company. We maintain rigorous safety protocols and conduct regular risk assessments to prevent workplace incidents. In the event of a fatality, we follow a structured investigation process to determine root causes, communicate findings transparently, and implement corrective actions to prevent recurrence. Fatality data is monitored closely as part of our broader OHS management system.

Fatalities (Number)

| Particulars                     | FY22 | FY23 | FY24 | FY25 |
|---------------------------------|------|------|------|------|
| Employees                       | 0    | 0    | 0    | 0    |
| Business Partners (Contractors) | 1    | 0    | 0    | 0    |

The Company's data for FY 2024-25 has been third party verified. The Assurance Statement is available on page 60 of this Factbook.

### 3.4.4. Lost-Time Injury Frequency Rate (LTIFR) – Employees

We track the LTIFR for employees as a key indicator of workplace safety to help us assess the effectiveness of our OHS management systems. Regular internal inspections, safety training, and emergency preparedness programs are conducted to reduce the risk of incidents and promote a culture of safety among our employees.

Lost-Time Injury Frequency Rate (LTIFR) for Employees (Rate)

| Particulars                                                    | FY22 | FY23 | FY24 | FY25 |
|----------------------------------------------------------------|------|------|------|------|
| Employees LTIFR (Lost time injuries / million manhours worked) | 0    | 0    | 0    | 0    |
| Data coverage (% of operations)                                | 100  | 100  | 100  | 100  |

The Company's data for FY 2024-25 has been third party verified. The Assurance Statement is available on page 60 of this Factbook.

### 3.4.5. Lost-Time Injury Frequency Rate (LTIFR) – Contractors

Contractor safety is integral to our operations, and we apply the same standards and expectations to contractors as we do to our employees. We monitor LTIFR for contractors to evaluate safety performance and ensure compliance with our OHS Policy. Contractors receive training and are included in audits and inspections to maintain a safe working environment across all operational sites.

Lost-Time Injury Frequency Rate (LTIFR) for Contractors (Rate)

| Particulars                                                     | FY22 | FY23 | FY24 | FY25 |
|-----------------------------------------------------------------|------|------|------|------|
| Contractor LTIFR (Lost time injuries / million manhours worked) | 0.43 | 0    | 0    | 0    |
| Data coverage (% of operations)                                 | 100  | 100  | 100  | 100  |

The Company's data for FY 2024-25 has been third party verified. The Assurance Statement is available on page 60 of this Factbook.

# Assurance Statement



## INDEPENDENT ASSURANCE OPINION STATEMENT

To Mr.Ashok Panjawani, Director, BEIL Infrastructure Limited & Group.

Holds Statement No.: **SPLIC 807709-2**

The British Standards Institution (**BSI**) has conducted a Limited level assurance engagement on the sustainability information (described in the "Scope") in the ESG Report for FY 2023-2024 & FY 2024-2025 of BEIL Infrastructure Limited & Group (hereafter referred to as BEIL in the statement).

### Scope

The scope of engagement agreed upon with **BEIL** includes the following:

The assurance covers the information of the following material topics (non-financial information) in the ESG report for two reporting periods of 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2025 (FY 2024-2025), "with reference to" the GRI universal standards 2021:

| Material Topic                                         | GRI Disclosure Reference                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Climate Action                                         | GRI 302: Energy 2016: GRI 302-1,3,4,5<br>GRI 305: Emissions 2016: GRI 305-1 to 7                                                                                                                                                                                                                                                                                                                            |
| Water & Waste Management                               | GRI 303: Water & Effluents 2018: GRI 303-1 to 5<br>GRI 306: Waste 2020: GRI 306-1 to 5                                                                                                                                                                                                                                                                                                                      |
| Supply Chain Management                                | GRI 204: Procurement Practices 2016: GRI 204-1                                                                                                                                                                                                                                                                                                                                                              |
| Occupational Health & Safety, Human Capital Management | GRI 401: Employment 2016: GRI 401-1 to 3<br>GRI 403: OHS 2018: GRI 403-1 to 10<br>GRI 404: Training & Education 2016: GRI 404-1 to 3<br>GRI 405: Diversity & Equal Opportunity: GRI 405-1<br>GRI 407: Freedom of association and collective bargaining 2016: GRI 407-1<br>GRI 408: Child Labor 2016: GRI 408-1<br>GRI 410: Security Practices 2016: GRI 410-1<br>GRI 413: Local Communities 2016: GRI 413-1 |

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|                                                      |                                                     |
|------------------------------------------------------|-----------------------------------------------------|
|                                                      | GRI 416: Customer health & safety 2016: GRI 416-1,2 |
| Biodiversity                                         | GRI 304: Biodiversity 2016: GRI 304-3               |
| Corporate Governance, Business Ethics & Transparency | GRI 205: Anti-Corruption 2016: GRI 205-1 to 3       |

The selected information's are reported "with reference to the GRI universal standards 2021".

For locations under assessment, please refer to Appendix A in this independent assurance opinion statement.

### Opinion Statement

We have conducted a limited level assurance engagement on the sustainability information described in the "Scope" above.

In our opinion, Based on the procedures we have performed and the evidence we have obtained , nothing has come to our attention that causes us to believe that the accompanying Sustainability Information is not prepared, in all material respects, & with reference to the GRI universal standards 2021 for the reporting period 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024 and for 1<sup>st</sup> April 2024 to 31<sup>st</sup> March 2025.

While assessing the information, the evidence were gathered at limited level assurance to ensure that the organization has practices and procedures in place to demonstrate the characteristics of relevance, completeness, reliability, neutrality and understandability in their data collection, consolidation and presentation in the annual ESG report.

### Methodology

Our assurance engagements were carried out in accordance with ISAE3000 (Revised) assurance standard following the principles of Integrity, Objectivity, Professional competence and due care, Confidentiality, and Professional behaviour. ISO 14064-3:2019 assurance standard is used for information related to GHG statement. Our work was designed to gather evidence on which to base our opinion conclusions.

We undertook the following activities:

- Assessment of organization's control over the data recording processes at various plants, checking the ESG software logs, approval levels and data management.
- Consolidation of ESG information: KPIs covered under material topics.
- Assessment of the organization's reporting and management processes concerning this reporting against the principles of relevance, completeness, reliability, neutrality, understandability.
- Data verification on limited level sampling.
- Interviews with staffs involved in sustainability management, ESG report preparation, Materiality analysis ,ESG data management and calculation of final numbers.
- Document review of relevant systems, policies, and procedures wherever available.
- Review of supporting evidence for claims made in the reports.
- Traceability of information from the origin and testing at site for measurement procedures.

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- Review of data pertaining to the sampled units of BEIL, to confirm the data collection processes, record management practices, and check ESG material KPI's physically and through virtual mode.

### Responsibility

BEIL Infrastructure Limited & Group(BEIL) is responsible for the preparation and fair presentation of the sustainability information in accordance with the agreed criteria. BSI is responsible for providing an independent assurance opinion statement to stakeholders giving our professional opinion based on the scope and methodology described.

### Independence, Quality Control and Competence

BSI is independent to BEIL Infrastructure Limited & Group(BEIL) and has no financial interest in the operation of BEIL Infrastructure Limited & Group(BEIL) other than for the assurance of the sustainability statements contained in the ESG report (non- financial KPIs covered under list of material topics).

This independent assurance opinion statement has been prepared for the stakeholders of BEIL Infrastructure Limited & Group(BEIL), only for the purposes of verifying its statements relating to its environmental, social and governance (ESG) KPI's as reported by the organization in its ESG report, more particularly described in the Scope above.

This independent assurance opinion statement is prepared on the basis of review of information provided to BSI by BEIL Infrastructure Limited & Group(BEIL). In making this independent assurance opinion statement, BSI has assumed that all information provided to it by BEIL Infrastructure Limited & Group(BEIL) is true, accurate and complete. BSI accepts no liability to any third party who places reliance on this statement.

BSI applies its own management standards and compliance policies for quality control, in accordance with ISO/IEC 17021-1:2015 and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

BSI is a leading global standards and assessment body founded in 1901. The BSI assurance team has extensive experience in conducting verification over environmental, social and governance (ESG), GRI Universal Standard 2021, AA1000AS & ISAE 3000(Revised), ISO10002, ISO 14001, ISO 45001, ISO 14064, ISO 14067, ISO 14068, ISO 50001, and ISO 9001, etc. The assurance is carried out in line with the BSI Fair Trading Code of Practice.

Issue Date: 18-09-2025

For and on behalf of BSI:

*Ishan Mehrotra*

Ishan Mehrotra, Lead Assurer

Theuns Kotze, Managing Director – IMETA Assurance

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**Appendix A: List of locations included in the assurance boundary:**

| Sr. No. | Unit Name                                                                 | Operation                                                                                                | Location & Address                               |
|---------|---------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| 1       | BEIL Infrastructure Limited (Ankleshwar)                                  | TSDF, Incineration, MEE, Drum decontamination, plastic waste recycling and E-Waste Recycling facilities. | GIDC Estate, Ankleshwar Dist. - Bharuch, Gujarat |
| 2       | BEIL Infrastructure Limited (Dahej)                                       | TSDF, Incineration, MEE & Drum decontamination facilities.                                               | GIDC Dahej, Gujarat                              |
| 3       | BEIL Infrastructure Limited (Baddi)                                       | Effluent Treatment plant                                                                                 | Baddi, Himanchal Pradesh                         |
| 4       | BEIL Infrastructure Limited (Ahmedabad)                                   | Municipal Solid Waste Management (Material Recover Facility)                                             | Ahmedabad, Gujarat                               |
| 5       | Enviro Technology Limited                                                 | Effluent Treatment plant                                                                                 | GIDC Ankleshwar, Gujarat                         |
| 6       | Kerala Enviro Infrastructure Limited                                      | TSDF, BMW, MEE and E-Waste Recycling facilities                                                          | Ambalamedu, Kochi, Kerala                        |
| 7       | Shivalik Solid Waste Management Limited                                   | TSDF, MEE, Drum decontamination and E-Waste Recycling facilities                                         | Nalagarh, District Solan, Himanchal Pradesh      |
| 8       | Coimbatore Integrated Waste Management Company Private Limited (CIWMCPL), | Municipal Solid Waste Management (Material Recover Facility)                                             | Coimbatore, Tamil Nadu                           |

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