

An aerial photograph of a large industrial facility, likely a warehouse or distribution center. The building has a prominent orange corrugated metal roof. To the right of the building is a paved parking lot where several semi-trucks are parked in a row. The trucks have orange and white trailers. The image is used as a background for the report cover.

# Supply Chain Management Report

**BEIL Infrastructure Limited**

June 2026

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## Introduction

BEIL Infrastructure Limited (“**BEIL**” / “**Company**”) is committed to operating responsibly and sustainably, guided by the highest ethical and legal standards. The Company partners with suppliers who share these values, encouraging adherence to regulations on licensing and ESG factors such as energy efficiency, emissions management and fair working conditions. This report establishes a framework for evaluating suppliers on ESG material topics across different industries that helps BEIL and suppliers identify gaps and develop action plans for improvement, aligning them with the Company’s commitment to sustainability and ethical practices.

The supplier assessments focus on BEIL’s critical suppliers, ensuring compliance with regulatory standards and the BEIL’s Business Partner Code of Conduct. BEIL also supports suppliers through training and capacity building to overcome compliance barriers.

### Scope

This report covers the ESG assessment results of BEIL’s critical suppliers across all sites.

### Objectives

- Our mission is to produce and deliver high-quality services in an environmentally sustainable manner while ensuring safe and healthy working conditions.
- We are committed to promoting inclusive growth and safeguarding the fundamental rights of our workforce & suppliers by adhering to applicable national and local laws, the principles of the United Nations Global Compact (UNGC), the United Nations Guiding Principles on Business and Human Rights, and International Labour Organization (ILO) conventions.
- We are dedicated to integrating sustainability initiatives and corporate governance standards throughout our supply chain partners. We advocate for compliance with Social Accountability, Environmental, and Occupational Health & Safety management systems based on recognized standards such as SA 8000:2014, ISO 14001:2015, ISO 45001:2018, ISO 9001:2015, ISO 50001:2018, and EcoVadis.

## Key Drivers of ESG in BEIL's Supply Chain

### Circularity and waste treatment business

BEIL's core operations inherently position ESG as a strategic driver through its focus on circular economy principles. The Company enables recovery, recycling, and responsible disposal of waste streams, thereby reducing landfill dependency and promoting resource efficiency.

Key supply chain implications include:

- Partnering with vendors that support waste segregation, recycling, and recovery processes
- Prioritizing suppliers providing environmentally sustainable materials and technologies
- Strengthening reverse logistics to facilitate collection, reuse, and material reintegration

### Reporting

ESG reporting drives transparency and continuous improvement backed by data-driven decision-making within the supply chain.

- Regular tracking of supplier ESG performance metrics such as carbon footprint, waste diversion rates, and safety incidents
- Integration of supply chain data into company-wide sustainability reports (aligned with frameworks such as GRI, BRSR, or similar)
- Digital platforms for real-time monitoring of vendor compliance and performance

### Regulatory Disclosures

Compliance with evolving environmental and social regulations is a key ESG driver.

- Adherence to national and regional waste management laws, environmental standards, and pollution control norms
- Mandatory disclosures related to hazardous waste handling, emissions, and resource usage

Suppliers are required to provide accurate data and comply with regulatory obligations, ensuring end-to-end transparency and reducing compliance risks.

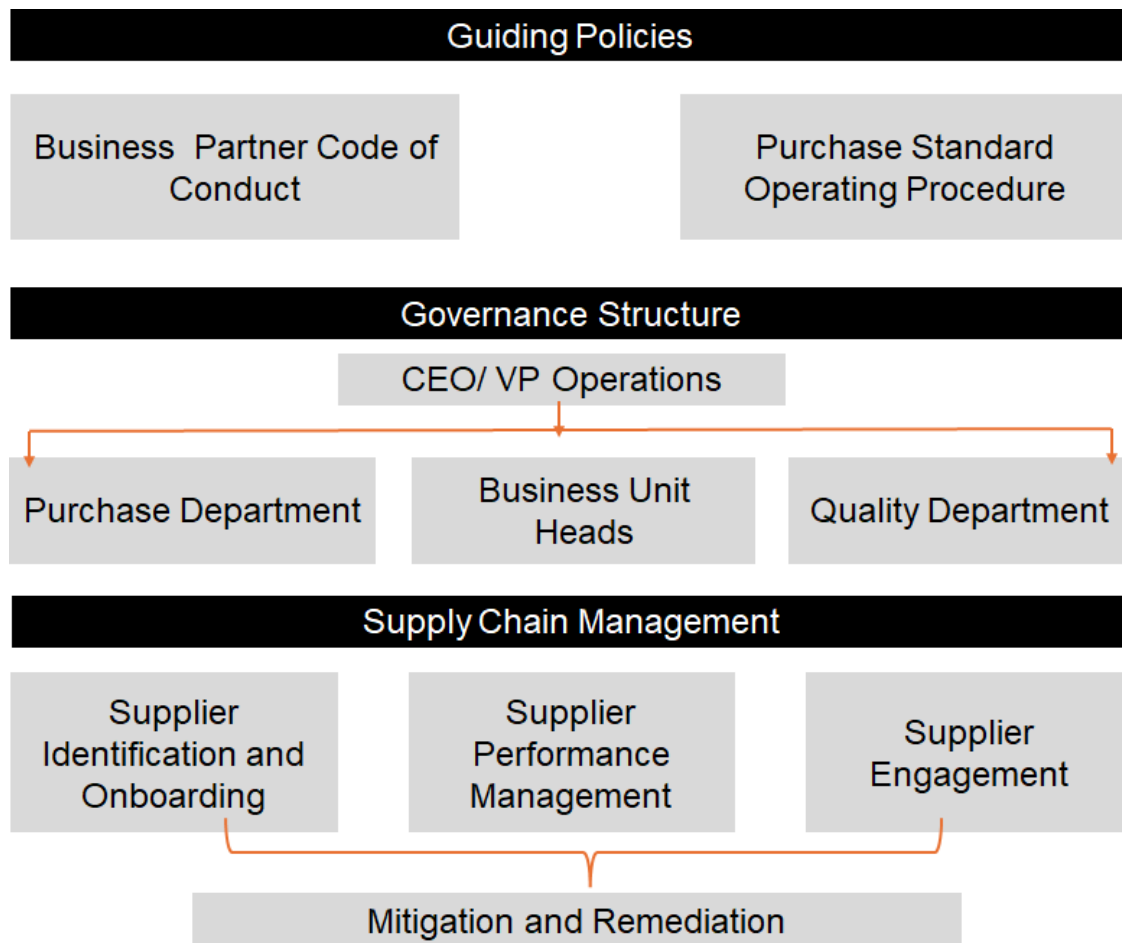
### Customers

Customer expectations increasingly influence ESG integration in the supply chain.

- Clients demand traceability of waste management processes and environmentally responsible disposal
- Growing emphasis on carbon reduction, circularity, and sustainability certifications
- Requirement for detailed ESG performance data from suppliers to support customer reporting obligations

Meeting these expectations strengthens BEIL's competitive positioning and reinforces ESG adoption throughout the supply chain.

## Supply Chain Governance & Management



BEIL has established a structured and well-defined supply chain governance framework to ensure ethical, transparent, compliant, and efficient procurement practices across its operations. The governance framework is anchored in formalized policies, including the Purchase Standard Operating Procedure (SOP) and the Business Partner Code of Conduct (BPCoC), which together provide oversight across the complete procurement lifecycle, from supplier onboarding and sourcing to contracting, delivery, performance management, and payment.

The framework is designed to:

- Ensure procurement of materials and services of the right quality, quantity, and timeliness
- Promote regulatory compliance, ethical conduct, and risk mitigation
- Embed environmental, social, and governance (ESG) expectations within supplier relationships
- Maintain accountability through defined roles, responsibilities, approval matrices, and system controls

## **Procurement Governance Structure and Accountability**

Procurement governance at BEIL follows a standard operating procedure with decentralized execution model, ensuring consistency in controls while allowing operational flexibility across business units and locations.

Key governance roles include:

- User Departments – Initiate purchase requisitions, define technical specifications, and validate service or material acceptance.
- Purchase Department – Owns supplier onboarding, RFQs, evaluations, negotiations, purchase/work order issuance, and vendor performance oversight.
- Department Heads / Budget Owners – Provide approvals in line with the Delegation of Authority (DOA).
- DGM Commercial / VP Operations / CEO – Provide escalated approvals for high-value procurement and critical or exceptional cases.
- Quality Control (QC), Stores, and Accounts – Ensure material inspection, inward processing, invoice verification, and payment release.

All procurement activities (except for entities such as Gharpure Engineering) are executed through SAP S/4HANA, enabling system-driven approvals, audit trails, and traceability.

BEIL leverages SAP S/4HANA to strengthen procurement governance through system-based controls and end-to-end traceability. Key transaction steps such as PR creation and approval, PO/WO release, goods receipt posting (GRN), delivery follow-ups and delivery-date changes are recorded within SAP, creating an auditable trail of approvals, changes, and operational handoffs across functions. This system-led approach supports consistent application of authority limits, improves transparency in procurement decisions, and enables structured monitoring from requisition through payment.

## **Business Partner Code of Conduct**

BEIL's supply chain governance is reinforced through its Business Partner Code of Conduct, which applies to all suppliers, contractors, agents, and subcontractors.

The Code outlines expectations across:

- Legal and regulatory compliance
- Anti-bribery, anti-corruption, and fraud prevention
- Conflict of interest disclosure

- Fair competition and ethical business practices
- Data privacy and confidentiality
- Human rights, labour standards, and workplace safety
- Environmental responsibility, including conflict minerals and EHS compliance

Acceptance of the Code is mandatory during onboarding. Supplier compliance is monitored through BEIL's defined remediation and escalation mechanisms (outlined under "Monitoring, Non-compliance, and Remediation")

## **Supplier Identification & Onboarding**

- **Supplier Pre-qualification and Onboarding**

BEIL follows a structured vendor pre-qualification process to onboard new suppliers and service providers:

1. Completion of a Supplier Pre-qualification Questionnaire and Compliance Questionnaire
2. Mandatory acceptance of the BEIL Business Partner Code of Conduct
3. Submission of legal, financial, tax, and compliance documentation
4. Assessment of Environmental, Health and Safety (EHS) compliance
5. Site audits conducted, where required, using a standardized Supplier Audit Form

The Purchase Department reviews all submissions and evaluates any deviations, with exception approvals documented as per defined procedures.

- **Supplier Criticality Analysis**

Suppliers are categorized based on supplier dependency, annual spend, and country, sector, and commodity-specific ESG risks. These considerations help identify suppliers requiring enhanced due diligence and monitoring.

- **Low Risk** – Multiple suppliers available; low annual spend
- **High Risk** – Single-source suppliers, OEMs, or suppliers with high annual spend

High-risk suppliers are subject to enhanced due diligence, additional approvals, and closer monitoring. Supplier re-qualification is carried out at least once every three years. This risk-based supplier classification informs the level of due diligence and approvals applied across subsequent sourcing and contracting decisions, as described in the procurement controls section below.

## **Procurement Controls & Decision-Making Process**

BEIL has established robust procurement controls across the full sourcing and contracting lifecycle to ensure proper authorization, transparency, and compliance. All procurement activity is initiated only after Purchase Requisitions (PRs) are raised and approved through a system-based workflow, confirming the business need and ensuring appropriate approvals are in place before any purchasing action begins.

Competitive sourcing is the default approach, with Requests for Quotation (RFQs) issued to approved vendors to promote fair competition and value for money. Vendor selection is supported by Quotation Comparison Statements (QCS) and formal approval notes, which document the evaluation process, comparison outcomes, and selection rationale to maintain objectivity and a clear audit trail.

Where single-vendor sourcing is required, BEIL mandates documented justification along with senior management approval to ensure the exception is necessary and appropriately governed. Purchase Orders (POs) and Work Orders (WOs) are issued only after completing vendor due diligence and obtaining all required approvals, ensuring commitments are made only when governance requirements are met. Any deviations from standard procedures, including emergency purchases or other exceptional scenarios, are formally documented, justified, and approved in accordance with defined authority levels.

## **Supplier Contracting & Performance Management**

- **Contracting Delivery and Performance Oversight**

Post-contract award, BEIL ensures:

1. Regular delivery tracking and follow-ups through SAP
2. Application of penalty or liquidated damage clauses for delays or non-performance
3. Material receipt verification, including vehicle compliance checks
4. Quality inspections by QC or User Departments
5. Structured handling of rejections, returns, and excess supplies

All supplier interactions and corrective actions are recorded for auditability and continuous improvement.

- **Payment Governance & Financial Controls**

Payments to suppliers are governed through:

1. Verification of GRNs, service completion certificates, and invoices
2. Adherence to agreed commercial and payment terms
3. Processing through the Accounts Department with defined controls

This ensures timely payments while safeguarding against financial and compliance risks.

## **Monitoring, Non-compliance, and Remediation**

BEIL applies a structured response to supplier non-compliance, aligned to its Business Partner Code of Conduct. Where concerns or non-compliances are identified, BEIL follows a phased approach, raising the concern with the business partner, seeking explanation and supporting documentation, and requiring corrective actions within an agreed timeframe. If concerns remain unresolved or the corrective actions are deemed inadequate, BEIL may escalate actions including suspension of engagement, blacklisting/debarment, contract termination, and/or legal recourse depending on severity and context. In cases involving serious misconduct (e.g., fraud, corruption, collusive/coercive practices or other serious violations), BEIL may terminate the relationship and initiate legal action where required.

In addition, BEIL's procurement governance enables supplier governance actions such as blocking/blacklisting based on defined triggers, including contract violations, poor quality, ethical issues (fraud/corruption/labour violations), legal non-compliance, unprofessional behaviour, financial instability, negative reputation impacts, and repeated failure to deliver.

Suppliers and stakeholders are encouraged to raise concerns through BEIL's whistleblower mechanism, and BEIL commits to handling reports with confidentiality and protection against retaliation for good-faith reporting.

## Supply Chain Assessment

### Supplier Industry Identification

To enable a comprehensive ESG assessment of the supply chain, BEIL adopted a structured methodology to first map and classify its Tier 1 supplier base into relevant industries. This classification forms the foundation for identifying sector-specific ESG material topics.

All suppliers were systematically reviewed and categorized based on the nature of goods supplied and services rendered. The classification framework was aligned with the Dow Jones Sustainability Index (DJSI) industry categorization, ensuring consistency with globally recognized ESG benchmarking standards.

Based on this approach, BEIL's suppliers were grouped into the following broad sectors:

- Construction & Engineering
- Professional Services
- Transportation & Logistics
- Trading Companies & Distributors
- Machinery & Electrical Equipment
- Chemicals

### Supplier Criticality Analysis

To strengthen ESG risk management within the supply chain, BEIL conducted a structured Supplier Criticality Analysis across its Tier 1 supplier base. Each supplier was evaluated using a multi-criteria scoring framework, where defined parameters contribute to an overall criticality score. This approach ensures that both business dependency and ESG risk exposure are captured holistically. Below are the weights assigned for each of the criticality factors in consultation with internal stakeholders:

| Criticality Factor            | Weightage |
|-------------------------------|-----------|
| Industry Risk                 | 5%        |
| Company Type                  | 5%        |
| Vendor Substitutability       | 15%       |
| Vendor site proximity         | 15%       |
| Political Affiliation         | 20%       |
| Procurement Spend             | 25%       |
| Product / Service Criticality | 25%       |

## Development of ESG Questionnaire based on Material Topics

The development of the ESG questionnaire was centered on a materiality-driven, sector-specific approach to ensure relevance and alignment with leading global frameworks. Based on supplier segmentation and industry mapping, material ESG topics were identified for each sector. These topics were derived and validated using recognized frameworks such as DJSI (S&P Global Industry Classification and Weights).

The questionnaire was designed across Environmental, Social and Governance Pillars with a mix of qualitative and quantitative questions. Suppliers were evaluated out of a total of 100 marks, which were distributed across the identified ESG material topics according to their assigned weights. The questionnaire comprised 73 questions.

The questionnaire was based on the following material areas, as applicable to the industry of each supplier:

| Environment                         | Social            | Governance               |
|-------------------------------------|-------------------|--------------------------|
| Environmental Policy and Management | Health and Safety | Business ethics          |
| Climate Action                      | Human Rights      | Responsible Supply Chain |
| Waste Management                    |                   | Corporate Governance     |
| Water Management                    |                   |                          |
| Product Stewardship                 |                   |                          |
| Biodiversity                        |                   |                          |

## Supplier Assessment Criteria

To assess the efficacy of the ESG score, suppliers were ranked into four distinct categories: Novice, Beginner, Intermediate, and Advanced. These categories represented an ascending order of scores, with "Novice" indicating the most basic level and "Advanced" signifying the highest level of achievement.

| % Score Range | Maturity of Supplier | Expectations for Suppliers                                                                                       |
|---------------|----------------------|------------------------------------------------------------------------------------------------------------------|
| 0-25%         | Novice               | Establish policies, governance framework around ESG topics                                                       |
| 26-50%        | Beginner             | Establish ESG data monitoring and management processes                                                           |
| 51-75%        | Intermediate         | Undertake ESG targets and relevant initiatives to achieve the same                                               |
| 76-100%       | Advanced             | Extend ESG to value chain, monitor value chain ESG risks and initiate value chain engagements to mitigate risks. |

## Supplier Selection

A list of Tier 1 suppliers, representing 75% of the total procurement spend, was first compiled to establish the baseline. From this pool, suppliers contributing 2% or more of the procurement share were shortlisted for further review.

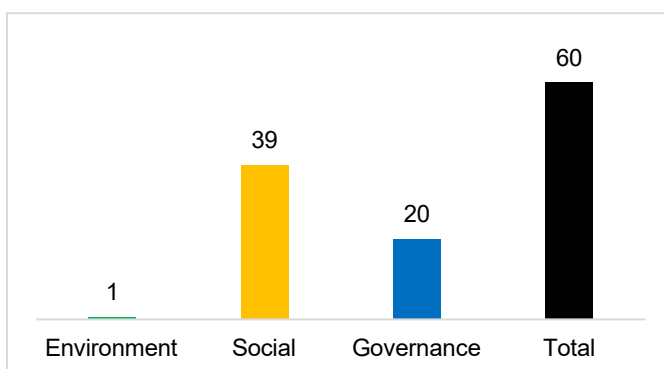
Following this, a criticality analysis was conducted in consultation with the Purchase and Supply Chain Department. Scores were assigned to each criticality factor, enabling systematic prioritization of suppliers based on their impact and importance. As a result of this process, 18 suppliers were identified as critical, and questionnaires were circulated to gather ESG and compliance-related information. Out of these, five suppliers responded, providing valuable insights into their practices. Majority of these suppliers belonged to Professional Services and Construction and Engineering sectors.

BEIL remains committed to deepening supplier engagement, with a particular focus on those deemed most critical. The Company aims to expand the scope of assessments in the coming years, ensuring broader coverage and stronger alignment with its sustainability and governance objectives.

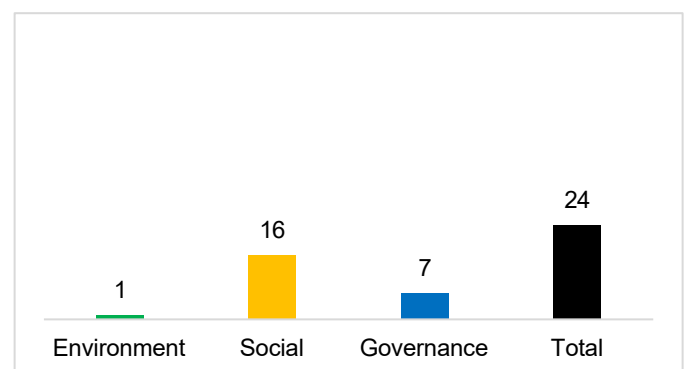
## Supplier Assessment Results

| Supplier Name                  | Environment | Social | Governance | Total Score |
|--------------------------------|-------------|--------|------------|-------------|
| Bayleaf HR Solutions Pvt Ltd   | 1           | 39     | 20         | 60          |
| Shree Sakthi Enterprise        | 1           | 16     | 7          | 24          |
| Maxtron Associates             | 0           | 18     | 8          | 26          |
| VC Shah Patel Services Pvt Ltd | 0           | 18     | 16         | 34          |
| Dalmia Cements                 | 27          | 23     | 19         | 70          |

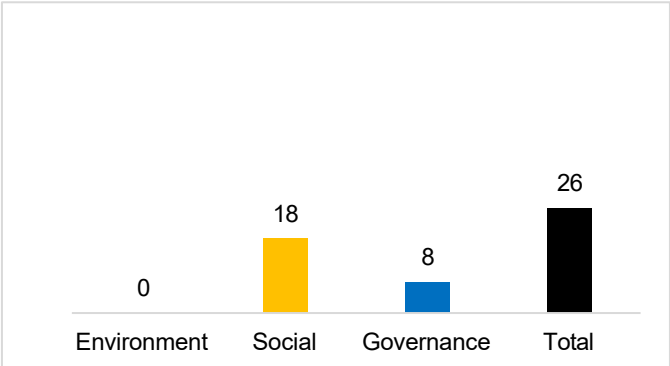
### 1. Bayleaf HR Solutions Pvt Ltd



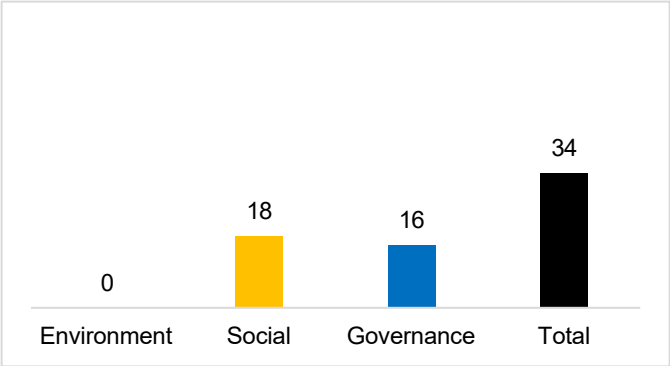
### 2. Shree Shakti Enterprise



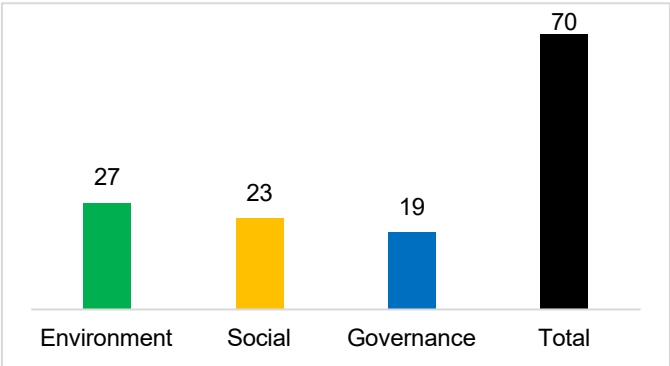
3. Maxtron Associates



4. VC Shah Patel Services Pvt Ltd



5. Dalmia Cements



The ESG assessment of key suppliers reveals significant variation in sustainability maturity, highlighting both strengths and critical gaps within the supply chain.

Dalmia emerges as the leading supplier, demonstrating a well-balanced and mature approach across Environmental, Social, and Governance pillars, particularly excelling in environmental practices. Bayleaf, follows as a strong performer, driven by robust social and governance frameworks, although its environmental performance remains minimal.

In contrast, VC Shah Patel, Maxtron, and Shree Shakti reflect developing ESG capabilities, with partial strengths in social and governance aspects but limited or negligible environmental initiatives.

A key observation is that the Environmental pillar is the weakest across the supplier base, with most suppliers lacking structured policies and measurable actions. This creates potential regulatory and reputational risks, as well as overreliance on a single supplier (Dalmia) for environmental compliance.

The Social dimension shows relatively stronger adoption, particularly in areas such as human rights, labour practices, and employee management, although performance remains inconsistent. Governance practices vary widely, with stronger performers demonstrating better business ethics, transparency, and risk management, while others exhibit critical gaps.

Overall, the findings indicate the absence of a standardized ESG framework across the supplier ecosystem, resulting in uneven performance and limited integration of sustainability into supply chain operations.

## Supplier Assessment Remediation & Mitigations

The remediation and mitigation plan has been developed to address the key concerns identified across the 5 suppliers. An alphanumeric code is assigned to each action plan across material topics. For e.g. EE1 indicates the action plan to be taken by a novice supplier against environmental policy and management. The first letter “E” indicates the pillar (environment, social or governance), the second letter “E” indicates the material topic, and the numerical value represents the level of supplier maturity (Novice =1, Beginner = 2, Intermediate = 3 and Advanced = 4).

### Action Plan for Suppliers: Environmental Factors

| Supplier Category         | Action Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1.</b>                 | <b>Environmental Policy and Management</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Novice (EE1)</b>       | <p>Environmental Policy: Draft an Environmental Policy</p> <p>Training &amp; Governance structure:</p> <ul style="list-style-type: none"> <li>Identify key managers, supervisors, and workers responsible for environmental management. Document and communicate their responsibilities clearly.</li> </ul> <p>Compliance with Laws:</p> <ul style="list-style-type: none"> <li>Comply with local, national, and international environmental laws.</li> </ul> <p>Track KPIs:</p> <ul style="list-style-type: none"> <li>Regularly collect data and report on environment KPIs internally to assess performance.</li> </ul> |
| <b>Beginner (EE2)</b>     | <p>Training:</p> <ul style="list-style-type: none"> <li>Develop a comprehensive environment training program for employees at all levels. Schedule regular training sessions and track attendance.</li> </ul> <p>Review and Disclosure:</p> <ul style="list-style-type: none"> <li>Report on environmental performance data in Annual/ESG Report.</li> </ul> <p>Target:</p> <ul style="list-style-type: none"> <li>Achieve at least 60% employee participation in Environment training programs.</li> </ul>                                                                                                                |
| <b>Intermediate (EE3)</b> | <p>Certifications:</p> <ul style="list-style-type: none"> <li>Pursue certification such as ISO 14001, ISO 50001 or other relevant Environmental Management System (EMS) certifications.</li> <li>Conduct regular audits to ensure ongoing compliance with standards.</li> </ul> <p>Target:</p> <ul style="list-style-type: none"> <li>Develop initiatives for improving environmental performance, such as waste reduction or energy efficiency improvements.</li> </ul>                                                                                                                                                   |

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| <b>Advanced (EE4)</b> | <p>Policy and KPI Tracking:</p> <ul style="list-style-type: none"> <li>• Extend the Environmental Policy to include value chain partners.</li> <li>• Appoint a leadership role/board committee for environmental aspects.</li> <li>• Develop a system to monitor third-party ESG activities.</li> </ul> <p>ESG Ratings:</p> <ul style="list-style-type: none"> <li>• Participate in ESG ratings and assessments by providers like DJSI, CDP, Ecovadis, Sustainalytics, MSCI, and Refinitiv.</li> </ul> |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| Supplier Category         | Action Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>2.</b>                 | <b>Climate Action</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Novice (EC1)</b>       | <p>Energy Management:</p> <ul style="list-style-type: none"> <li>• Monitor and track energy consumption of sites and offices regularly, distinguishing between renewable and non-renewable sources.</li> </ul> <p>Other Emissions Management:</p> <ul style="list-style-type: none"> <li>• Develop internal system to track Scope 1 &amp; 2 emissions</li> <li>• Identify fugitive emissions (SOx, NOx, PM, dust, other air emissions) and report on the same.</li> </ul> <p>Climate Risk Management:</p> <ul style="list-style-type: none"> <li>• Conduct climate risk assessment.</li> </ul>               |
| <b>Beginner (EC2)</b>     | <p>Energy Management:</p> <ul style="list-style-type: none"> <li>• Conduct energy audits at regular intervals for all sites to identify avenues for energy efficiency and cost reduction.</li> </ul> <p>Target:</p> <ul style="list-style-type: none"> <li>• Set specific environmental performance targets, such as reducing Scope 1 &amp; 2 by 10% over the next year and include these in the report.</li> </ul> <p>Scope Emissions Management:</p> <ul style="list-style-type: none"> <li>• Publicly disclose programs or activities to achieve the Scope 1, 2, 3 emission reduction targets.</li> </ul> |
| <b>Intermediate (EC3)</b> | <p>Energy Management:</p> <ul style="list-style-type: none"> <li>• Consider purchasing/on-site generation of renewable energy to reduce energy emissions.</li> <li>• Increase share of renewable energy on a year-on-year basis.</li> </ul> <p>Scope Emissions Management:</p> <ul style="list-style-type: none"> <li>• Conduct Scope 3 emissions inventorization</li> <li>• Evaluate green fuels and blend with existing fuel to reduce emissions.</li> </ul> <p>Climate Risk Management</p>                                                                                                                |

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       | <ul style="list-style-type: none"> <li>Consider TCFD (Task Force on Climate-related Financial Disclosures) disclosures for climate risk assessment.</li> </ul> <p>Certifications:</p> <ul style="list-style-type: none"> <li>Obtain energy management and environment management certifications for all sites.</li> </ul>                                                                                                                                                                                                                                                                                                                                  |
| <b>Advanced (EC4)</b> | <p>Target:</p> <ul style="list-style-type: none"> <li>Undertake Carbon Neutral or Net-Zero target</li> </ul> <p>Energy Management:</p> <ul style="list-style-type: none"> <li>Obtain third-party assurance of your environmental performance data</li> <li>Collect the Environmental KPIs of your value chain partners</li> </ul> <p>Scope Emissions Management:</p> <ul style="list-style-type: none"> <li>Consider aligning targets to the Science-based Targets Initiative and undertake certification.</li> <li>Initiate Internal Carbon Pricing (ICP) for the company and utilize the funds for emission reduction projects in the future.</li> </ul> |

| Supplier Category         | Action Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3.</b>                 | <b>Waste Management</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Novice (EW1)</b>       | <p>Waste Management Policy:</p> <ul style="list-style-type: none"> <li>Formalize a Waste Management Policy or incorporate it into the existing Environmental Policy.</li> </ul> <p>Waste Monitoring:</p> <ul style="list-style-type: none"> <li>Measure and publicly disclose the total quantity of waste generated, disposed, recycled, re-used and incineration distinguishing between hazardous and non-hazardous waste.</li> <li>Calculate waste intensity for every category and disclose them publicly.</li> </ul> |
| <b>Beginner (EW2)</b>     | <p>Waste Monitoring:</p> <ul style="list-style-type: none"> <li>Conduct waste generation, disposed audit to understand loopholes</li> </ul> <p>Waste Reduction:</p> <ul style="list-style-type: none"> <li>Define targets for reducing waste intensity on a year-on-year basis.</li> <li>Undertake specific waste reduction and recycling targets</li> </ul>                                                                                                                                                             |
| <b>Intermediate (EW3)</b> | <p>Waste Reduction:</p> <ul style="list-style-type: none"> <li>Undertake initiatives to increase waste recycling and re-use and meeting the waste reduction targets.</li> </ul>                                                                                                                                                                                                                                                                                                                                          |
| <b>Advanced (EW4)</b>     | <p>Waste Management Policy:</p> <ul style="list-style-type: none"> <li>Consider extending this policy to value chain partners.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                |

|  |                                                                                                                                                                                                                                                                                                                                                                                    |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p>Waste Monitoring:</p> <ul style="list-style-type: none"> <li>• Conduct third-party verification for waste disposal data.</li> <li>• Collect the Waste KPIs of your value chain partners</li> </ul> <p>Waste Reduction:</p> <ul style="list-style-type: none"> <li>• Undertake a zero waste-to-landfill target for all plants/sites to increase reusability of waste.</li> </ul> |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| Supplier Category          | Action Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.</b>                  | <b>Water Management</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Novice (EWA1)</b>       | <p>Water Management Policy:</p> <ul style="list-style-type: none"> <li>• Formalize a Water Management Policy or incorporate it into the existing Environmental Policy.</li> </ul> <p>Wastewater Monitoring:</p> <ul style="list-style-type: none"> <li>• Measure and publicly disclose the total quantity of water withdrawal, total and net fresh-water consumption, water re-used and wastewater discharged.</li> <li>• Monitor the quality of wastewater discharged.</li> </ul>    |
| <b>Beginner (EWA2)</b>     | <p>Wastewater Monitoring:</p> <ul style="list-style-type: none"> <li>• Disclose harmful chemicals, processes, or products used that affect wastewater discharge quality and wastewater treatment methods.</li> </ul> <p>Wastewater Reduction:</p> <ul style="list-style-type: none"> <li>• Consider setting targets for reducing overall water consumption as well as freshwater withdrawal.</li> </ul>                                                                               |
| <b>Intermediate (EWA3)</b> | <p>Water Risk Assessment</p> <ul style="list-style-type: none"> <li>• Conduct a water risk assessment to understand water risks</li> <li>• Develop wastewater recycling initiatives to reduce water withdrawal and consumption.</li> </ul>                                                                                                                                                                                                                                            |
| <b>Advanced (EWA4)</b>     | <p>Water Management Policy:</p> <ul style="list-style-type: none"> <li>• Consider extending this policy to value chain partners.</li> </ul> <p>Wastewater Monitoring:</p> <ul style="list-style-type: none"> <li>• Conduct third-party verification for water-related data</li> <li>• Collect the Water KPIs of your value chain partners</li> </ul> <p>Wastewater Reduction:</p> <ul style="list-style-type: none"> <li>• Implement a Zero Liquid Discharge (ZLD) system.</li> </ul> |

| Supplier Category         | Action Plan                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.</b>                 | <b>Product Stewardship</b>                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Novice (EP1)</b>       | <p>Track KPIs</p> <ul style="list-style-type: none"> <li>Publicly disclose the number of product recalls due to safety or quality</li> <li>Have procedures in place to manage product recalls, if necessary.</li> <li>Assess Extended Producer Responsibility (EPR) obligations and meet annual statutory requirements.</li> </ul>                                                                         |
| <b>Beginner (EP2)</b>     | <p>Training and Disclosure:</p> <ul style="list-style-type: none"> <li>Train employees and workers on quality standards and best practices, providing details of the type of training and frequency</li> <li>Publicly disclose the percentage of employees and workers trained on product quality standards and best practices.</li> </ul>                                                                 |
| <b>Intermediate (EP3)</b> | <p>Certifications</p> <ul style="list-style-type: none"> <li>Obtain ISO 9001:2015 certification and any other relevant industry certifications like IATF 16949.</li> <li>Undertake certifications that are applicable to your business such as fair-trade certification (e.g., GreenCo Rating, Green Seal Certification, LEED, Energy STAR Certification, BEE Star Rating, BREEAM, EPEAT, etc.)</li> </ul> |
| <b>Advanced (EP4)</b>     | <p>Life Cycle Assessments:</p> <ul style="list-style-type: none"> <li>Conduct Life Cycle Assessment (LCA) for critical products to ascertain resource use and emissions throughout their life cycle.</li> </ul>                                                                                                                                                                                            |

| Supplier Category         | Action Plan                                                                                                                                                                                                                                                                                  |
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| <b>6.</b>                 | <b>Biodiversity</b>                                                                                                                                                                                                                                                                          |
| <b>Novice (EB1)</b>       | <p>Policy Development:</p> <ul style="list-style-type: none"> <li>Formalize a Biodiversity Policy or incorporate it into the existing Environmental Policy.</li> </ul>                                                                                                                       |
| <b>Beginner (EB2)</b>     | <p>Biodiversity Assessment:</p> <ul style="list-style-type: none"> <li>Risk Mapping and Assessment:</li> <li>Conduct a biodiversity risk assessment.</li> </ul> <p>Commitment:</p> <ul style="list-style-type: none"> <li>Take biodiversity protection and forestation commitment</li> </ul> |
| <b>Intermediate (EB3)</b> | <p>Risk Mapping and Assessment:</p> <ul style="list-style-type: none"> <li>Develop an action plan for identified biodiversity risks based on the biodiversity risk assessment.</li> </ul>                                                                                                    |

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|                       | <ul style="list-style-type: none"> <li>Integrate biodiversity risk in company's ERM risk framework</li> </ul> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>Undertake initiatives for biodiversity conservation.</li> </ul> |
| <b>Advanced (EB4)</b> | <p>Initiatives:</p> <ul style="list-style-type: none"> <li>Consider extending this policy to value chain partners.</li> <li>Forge partnerships with municipal corporations and NGOs to achieve them.</li> </ul>                          |

### Action Plan for Suppliers: Social Factors

| Supplier Category     | Action Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| <b>7.</b>             | <b>Health and Safety</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Novice (SH1)</b>   | <p>Policy Development:</p> <ul style="list-style-type: none"> <li>Formalize a Health and Safety Policy that includes all employees and workers, both permanent and contractual.</li> <li>Ensure the policy includes personal protective equipment, machine safety, emergency preparedness, incident and accident management, workplace ergonomics, handling of chemical and/or biological substances, and fire protection.</li> </ul> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>Conduct Occupational Health &amp; Safety Hazard Identification and Safety risk assessment and track relevant H&amp;S KPIs (Fatalities, LTIFR, Disabilities)</li> <li>Have safety signages available in manufacturing sites</li> <li>Provide Personal Protection Equipment (PPE) to employees</li> <li>Ensure compliance with local health and safety-related regulations.</li> <li>Have the sites equipped with fire alarms, fire extinguisher, fire sprinklers and emergency safety alarms</li> </ul> |
| <b>Beginner (SH2)</b> | <p>Initiatives:</p> <ul style="list-style-type: none"> <li>Conduct annual health checkups and maintain records pertaining to occupational health issues and diseases.</li> <li>Conduct emergency and safety drills</li> <li>Publicly disclose the expenditure on safety training.</li> <li>Communicate emergency response plan and fire evacuation to employees and workers in local languages</li> </ul> <p>Targets:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|                           | <ul style="list-style-type: none"> <li>• Set OHS targets for the entity</li> <li>• Set target for H&amp;S training to employees and workers</li> </ul> <p>Training and Development:</p> <ul style="list-style-type: none"> <li>• Conduct training for employees and workers on H&amp;S.</li> <li>• Include trainings on personal protective equipment, machine safety, emergency preparedness, incident and accident management, workplace ergonomics, handling of chemical, and fire protection.</li> </ul>                                                                           |
| <b>Intermediate (SH3)</b> | <p>Certifications:</p> <ul style="list-style-type: none"> <li>• Obtain ISO 45001:2018 certification for Occupational Health and Safety Management Systems.</li> <li>• Conduct audits related to health &amp; safety and fire safety.</li> </ul>                                                                                                                                                                                                                                                                                                                                        |
| <b>Advanced (SH4)</b>     | <p>Policy Development:</p> <ul style="list-style-type: none"> <li>• Consider extending the Health and Safety Policy to value chain partners.</li> </ul> <p>Monitoring</p> <ul style="list-style-type: none"> <li>• Conduct third-party verification for Health &amp; Safety data.</li> <li>• Collect the H&amp;S KPIs of your value chain partners</li> </ul> <p>Target</p> <ul style="list-style-type: none"> <li>• Set net-zero harm target</li> </ul> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• Design and implement safety kaizens in the workplace.</li> </ul> |

| Supplier Category    | Action Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>8.</b>            | <b>Human Rights</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Novice (SHR1)</b> | <p>Policy Development:</p> <ul style="list-style-type: none"> <li>• Include Child &amp; Forced labor, Freedom of association, right to collective bargaining, equal remuneration, discrimination, and trafficking in the Human Rights Policy.</li> </ul> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• Formalize a system for reporting human rights issues.</li> <li>• Ensure compliance with local labor laws, including prohibiting child labor, providing minimum wage, adhering to standard working hours, and ensuring freedom of association.</li> <li>• Ensure formal contracts with all employees and workers, both permanent and contractual.</li> </ul> |

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|                            | <ul style="list-style-type: none"> <li>• Provide sanitary facilities, including separate facilities for males, females, and persons with disabilities.</li> <li>• Provide benefits such as Provident Fund (PF), Gratuity, ESI/Insurance, Superannuation, and other relevant benefits.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Beginner (SHR2)</b>     | <p>Policy Development:</p> <ul style="list-style-type: none"> <li>• Consider creating a workforce diversity, equity &amp; inclusion (DEI) Policy.</li> </ul> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• Identify and address the needs of employees with disabilities.</li> <li>• Set process for internal and external stakeholders to raise grievances on human rights &amp; labor practices issues</li> </ul> <p>Targets:</p> <ul style="list-style-type: none"> <li>• Set targets for human rights Training and Development:</li> <li>• Organize human rights-related trainings for employees and workers.</li> <li>• Disclose information related to new hires and maintain records of hours spent on training.</li> <li>• Publicly disclose expenditure on training &amp; development.</li> </ul> |
| <b>Intermediate (SHR3)</b> | <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• Conduct Employee Satisfaction surveys and disclose results publicly.</li> <li>• Monitor and address instances of labor unrest or strikes, ensuring open channels for grievance redressal.</li> </ul> <p>Targets:</p> <ul style="list-style-type: none"> <li>• Set targets for employee satisfaction score</li> <li>• Set targets for increasing diversity across all tiers (senior management, middle management, and junior management).</li> </ul> <p>Customer Relations:</p> <ul style="list-style-type: none"> <li>• Conduct Customer Satisfaction surveys</li> </ul> <p>Assessment:</p> <ul style="list-style-type: none"> <li>• Conduct human rights due diligence.</li> </ul>                                                                         |
| <b>Advanced (SHR4)</b>     | <p>Policy Development:</p> <ul style="list-style-type: none"> <li>• Consider extending this policy to value chain partners.</li> </ul> <p>Monitoring:</p> <ul style="list-style-type: none"> <li>• Collect the Human Rights KPIs of your value chain partners</li> <li>• Conduct impact assessments of CSR projects.</li> <li>• Implement strategic initiatives in thematic areas like water conservation, livelihood enhancement, sanitation, and education for community development.</li> </ul>                                                                                                                                                                                                                                                                                                                        |

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|  | <ul style="list-style-type: none"> <li>Set targets for employees on minimum volunteering hours in CSR initiatives &amp; projects.</li> </ul> |
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#### Action Plan for Suppliers: Governance Factors

| Supplier Category         | Action Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>9.</b>                 | <b>Business Ethics</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Novice (GB1)</b>       | Policy Implementation: <ul style="list-style-type: none"> <li>Develop Code of Conduct covering fundamental areas like anti-corruption, anti-bribery, and fair competition, conflicts of interest and whistleblower protection, intellectual property and counterfeit.</li> </ul>                                                                                                                                                                                                                                                                                          |
| <b>Beginner (GB2)</b>     | Training: <ul style="list-style-type: none"> <li>Organize Code of Conduct training sessions for employees.</li> </ul> Initiatives: <ul style="list-style-type: none"> <li>Develop a foundational business continuity plan.</li> <li>Monitor and record any Code of Conduct violations within the company.</li> </ul> Risk Management: <ul style="list-style-type: none"> <li>Establish a formal grievance mechanism for internal stakeholders.</li> </ul>                                                                                                                 |
| <b>Intermediate (GB3)</b> | Training: <ul style="list-style-type: none"> <li>Publicly disclose the percentage coverage of Code of Conduct trainings for employees, board, and management.</li> </ul> Risk Management: <ul style="list-style-type: none"> <li>Identify and assess potential Governance risks.</li> </ul>                                                                                                                                                                                                                                                                               |
| <b>Advanced (GB4)</b>     | Policy Implementation: <ul style="list-style-type: none"> <li>Consider extending the Code of Conduct policy to value chain partners.</li> </ul> Initiatives: <ul style="list-style-type: none"> <li>Establish an advanced business continuity plan that ensures seamless operation during crises.</li> </ul> Risk Management: <ul style="list-style-type: none"> <li>Form a dedicated committee for risk management.</li> <li>Implement a risk management process that includes continuous monitoring for operational, financial, reputational, and ESG risks.</li> </ul> |
| <b>Supplier Category</b>  | <b>Action Plan</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>10.</b>                | <b>Responsible Supply Chain</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Novice (GR1)</b>       | Policy Development:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|                           | <ul style="list-style-type: none"> <li>• Draft basic Supplier Code of Conduct (SCoC) that outlines fundamental expectations for suppliers.</li> <li>• Create a Sustainable Sourcing Policy that outlines the company's commitment to sustainable procurement practices.</li> </ul>                                                                                                                                                                                          |
| <b>Beginner (GR2)</b>     | <p>Training:</p> <ul style="list-style-type: none"> <li>• Provide ESG training programs for suppliers</li> <li>• Initiate ESG assessments for a select group of suppliers.</li> </ul> <p>Sourcing:</p> <ul style="list-style-type: none"> <li>• Begin sourcing a percentage of materials from MSMEs/small producers and track this percentage.</li> </ul> <p>Target:</p> <ul style="list-style-type: none"> <li>• Undertake ESG assessment targets for suppliers</li> </ul> |
| <b>Intermediate (GR3)</b> | <p>Policy:</p> <ul style="list-style-type: none"> <li>• Ensure that the Supplier Code of Conduct is binding for all suppliers by incorporating it into supplier contracts.</li> </ul> <p>Target:</p> <ul style="list-style-type: none"> <li>• Conduct structured ESG assessments for 50% of suppliers and use findings to develop improvement plans.</li> </ul>                                                                                                             |
| <b>Advanced (GR4)</b>     | <p>Supplier Engagement:</p> <ul style="list-style-type: none"> <li>• Establish a supplier engagement program that includes regular audits, feedback sessions, and collaborative sustainability projects.</li> <li>• Secure third-party assurance for ESG KPIs of the suppliers • Achieve 100% integration of SCoC into all supplier contracts.</li> </ul>                                                                                                                   |

| Supplier Category     | Action Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| <b>11.</b>            | <b>Corporate Governance</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Novice (GC1)</b>   | <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• Ensure the board is diverse in terms of gender, ethnicity, experience, and expertise to provide a wide range of perspectives on ESG issues.</li> <li>• Include board members with specific expertise in ESG matters to enhance understanding and oversight of sustainability issues</li> <li>• Conduct materiality assessment</li> </ul> <p>Training:</p> <ul style="list-style-type: none"> <li>• Begin basic ESG training for employees.</li> </ul> |
| <b>Beginner (GC2)</b> | Initiatives:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|                           | <ul style="list-style-type: none"> <li>Develop robust ESG reporting mechanisms to provide stakeholders with clear, accurate, and comprehensive information about the company's ESG performance.</li> <li>Engage with stakeholders, including investors, customers, employees, and communities, to understand their ESG concerns and expectations.</li> </ul> |
| <b>Intermediate (GC3)</b> | Initiatives: <ul style="list-style-type: none"> <li>Conduct regular ESG audits and reviews to ensure compliance with relevant laws, regulations, and standards Certifications</li> <li>Incorporate ESG risks into strategy; obtain ISO certifications; engage with ESG ratings.</li> </ul>                                                                   |
| <b>Advanced (GC4)</b>     | Initiatives: <ul style="list-style-type: none"> <li>Incorporate ESG risks into the company's overall risk management framework</li> </ul>                                                                                                                                                                                                                    |

### Action areas for suppliers across ESG Pillars

| Supplier                              | Environment | Social | Governance | Action Area                                             |
|---------------------------------------|-------------|--------|------------|---------------------------------------------------------|
| <b>Bayleaf HR Solutions Pvt Ltd</b>   | 8%          | 83%    | 46%        | EE1, EC1, EP1, SH4, SHR4, GB2, GR2, GC2                 |
| <b>Shree Sakthi Enterprise</b>        | 33%         | 45%    | 19%        | EE2, EC2, EP2, SH2, SHR2, GB1, GR2, GC2                 |
| <b>Maxtron Associates</b>             | 0%          | 40%    | 33%        | EE1, EC1, EP1, SH2, SHR2, GB1, GR2, GC2                 |
| <b>VC Shah Patel Services Pvt Ltd</b> | 0%          | 31%    | 40%        | EE1, EC1, EP1, SH2, SHR2, GB1, GR2, GC2                 |
| <b>Dalmia Cements</b>                 | 75%         | 62%    | 62%        | EE4, EC4, EW4, EWA4, EP4, EB4, SH4, SHR4, GB4, GR4, GC4 |

## Conclusion

BEIL Infrastructure Limited remains steadfast in its commitment to responsible and sustainable supply chain governance. Through a structured evaluation process, beginning with supplier spend analysis, criticality scoring, and targeted assessments, the Company has laid the foundation for a transparent and accountable procurement ecosystem. While the initial exercise engaged 18 critical suppliers and yielded responses from five, this marks only the beginning of a broader journey.

Looking ahead, BEIL will continue to expand supplier participation, strengthen ESG compliance, and build capacity across its value chain. By deepening engagement with critical partners and progressively widening the scope of assessments, BEIL aims to foster a resilient, ethical, and sustainable supply chain that reflects its long-term vision and corporate responsibility.

# BEIL Infrastructure Limited

9701-9716, GIDC Estate, Ankleshwar 393002,  
Dist. - Bharuch, Gujarat, India  
<https://www.beil.co.in/>