

# Business Responsibility and Sustainability Report

## SECTION A: GENERAL DISCLOSURES

### I. DETAILS OF THE LISTED ENTITY

1	Corporate Identity Number ("CIN") of the Listed Entity	L55101MH1996PLC405715	
2	Name of the Listed Entity	Mahindra Holidays & Resorts India Limited ("MHRIL")	
3	Year of Incorporation	1996 (Date of Incorporation: 20-09-1996)	
4	Registered office address	Mahindra Towers, A-Wing, 1 <sup>st</sup> Floor, Dr. G.M. Bhosale Marg, P. K. Kurne Chowk, Worli, Mumbai - 400018	
5	Corporate address	Mahindra Towers, A-Wing, 1 <sup>st</sup> Floor, Dr. G.M. Bhosale Marg, P. K. Kurne Chowk, Worli, Mumbai - 400018	
6	E-mail	<a href="mailto:investors@mahindaholidays.com">investors@mahindaholidays.com</a>	
7	Telephone	+91 22 6918 4722	
8	Website	<a href="http://www.clubmahindra.com">www.clubmahindra.com</a>	
9	<b>Date of Start of Financial Year</b>	<b>Start Date</b>	<b>End Date</b>
	Financial Year	01-04-2023	31-03-2024
10	Name of the Stock Exchange(s) where shares are listed	BSE Limited and National Stock Exchange of India Limited	
11	Paid-up Capital	2,01,95,17,970 (As on March 31, 2024)	
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Burhanuddin S. Corporate Chief Engineer - Operations Contact Number- 022 6918 4722 E-mail ID: <a href="mailto:burhanuddin.s@mahindaholidays.com">burhanuddin.s@mahindaholidays.com</a>	
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken, together).	The Business Responsibility and Sustainability Report ("BRSR") is in conformance with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. Disclosures made in this report are on a standalone basis and pertains to the Company only. The reporting boundary for BRSR covers resorts under the Company's ownership and management.	
14	Name of assurance provider	Not Applicable as per the SEBI Circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated July 12, 2023	
15	Type of assurance obtained	Not Applicable	

### II. PRODUCTS/SERVICES

#### 16. Details of business activities (accounting for 90% of the Turnover):

S. No.	Description of main activity	Description of business activity	% of turnover
1	Vacation Ownership ("VO")	Vacation Ownership and Accommodation related services	100

#### 17. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

S. No.	Product/Service	NIC Code	% of Total Turnover Contributed
1	Vacation Ownership and Accommodation related services	55101	100

**III. OPERATIONS**
**18. Number of locations where resorts and/or operations/offices of the entity are situated:**

Location	Number of Resorts	Number of offices	Total
National*	46	-	46
International#	2	-	2

\* Owned and Managed resorts only.

# Owned through subsidiary of the Company.

**19. Markets served by the entity:**
**a. Number of locations**

As per Standalone reporting – covering Owned and Managed resorts:

Location	Number
National (No. of States)	11
International (No. of Countries)	2

Locations	Numbers
National	MHRIL has resorts in the following 11 States and 1 Union Territory: Goa, Himachal Pradesh, Kerala, Maharashtra, Rajasthan, Gujarat, Karnataka, Tamil Nadu, Uttarakhand, Sikkim, Madhya Pradesh and Puducherry.
International	MHRIL has resorts in the following 2 International locations: Thailand and Dubai.

**b. What is the contribution of exports as a percentage of the total turnover of the entity?**

Not applicable, since MHRIL is in the business of vacation ownership & providing accommodation related services.

a member base of over 3,50,000, including those from its European subsidiary, Holiday Club Resorts Oy in Finland.

Our primary customer base comprises members to whom we provide family vacations. Non-members can also access accommodations and other services, subject to availability.

**c. A brief on types of customers**

MHRIL has become India's largest vacation ownership company, leading the market with over 2,97,000 members. Globally, it ranks as the sixth largest outside the US, with

As a provider of vacation ownership and accommodation services, MHRIL encourages its members and guests to explore diverse family vacation experiences, including beaches, heritage sites, hills, wildlife and backwaters.

**IV. EMPLOYEES**
**20. Details as at the end of Financial Year:**
**a. Employees and workers (including differently abled):**

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
EMPLOYEES						
1.	Permanent (D)	4,339	3,717	86.00	622	14.00
2.	Other than Permanent (E)	818	621	76.00	197	24.00
3.	Total employees (D + E)	5,157	4,338	84.00	819	16.00

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
WORKERS						
4.	Permanent (F)	Not Applicable				
5.	Other than Permanent (G)					
6.	Total workers (F + G)					

**b. Differently abled Employees and workers:**

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	41	40	98.00	1	2.00
2.	Other than Permanent (E)	16	15	94.00	1	6.00
3.	Total differently abled employees (D + E)	57	55	96.00	2	4.00
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	Not Applicable				
5.	Other than Permanent (G)					
6.	Total differently abled workers (F + G)					

**21. Participation/Inclusion/Representation of women**

Category	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	9	1	11.11
Key Management Personnel	3	0	0.00

Note: Managing Director & CEO is considered under both Board of Directors and Key Management Personnel

**22. Turnover rate for permanent employees and workers**

(Disclose trends for the past 3 years)

Turnover rate is updated as percentage

Category	FY 2023-24				FY 2022-23				FY 2021-22			
	Male	Female	Others	Total	Male	Female	Others	Total	Male	Female	Others	Total
Permanent Employees	49	67	0	52	44	54	0	45	30	47	0	33
Permanent Workers	Not Applicable											

**V. HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)**
**23. (a) Names of holding / subsidiary / associate companies / joint ventures**

Sr No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding / subsidiary / associate / joint venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes / No)
1	Mahindra & Mahindra Limited	Holding	66.77	No
2	Mahindra Hotels and Residences India Limited	Subsidiary	100	No
3	Heritage Bird (M) Sdn Bhd	Subsidiary	100	No
4	Gables Promoters Private Limited	Subsidiary	100	No
5	Mahindra Holidays & Resorts Harihareshwar Limited	Subsidiary	100	No
6	Guestline Hospitality Management and Developement Services Limited	Subsidiary	98.98	No
7	MH Boutique Hospitality Limited	Subsidiary	49	No
8	Infinity Hospitality Group Company Limited	Subsidiary	74	No
9	MHR Holdings (Mauritius) Limited	Subsidiary	100	No
10	Covington S.à.r.l	Subsidiary	100	No
11	Holiday Club Resort Oy	Subsidiary	100	No
12	Holiday Club Sweden Ab Åre	Subsidiary	100	No
13	Ownership Services Sweden AB	Subsidiary	100	No
14	Åre Villa 3 AB	Subsidiary	100	No
15	Holiday Club Canarias Investments S.L.U.	Subsidiary	100	No
16	Holiday Club Canarias Sales & Marketing S.L.U.	Subsidiary	100	No
17	Holiday Club Canarias Resort Management S.L.U.	Subsidiary	100	No
18	Holiday Club Canarias Vacation Club S.L.U.	Subsidiary	100	No
19	Holiday Club Resorts Rus LLC	Subsidiary	100	No
20	Kiinteistö Oy Rauhan Liikekiinteistöt 1 (Formally known as "Supermarket Capri Oy")	Subsidiary	100	No
21	Holiday Club Sport and Spa hotels AB	Subsidiary	100	No
22	Kiinteistö Oy Seniori-Saimaa	Associate	31.15	No
23	Great Rocksport Private Limited	Associate	23.42	No
24	Tropiikin Rantasauna Oy	Joint Venture	50	No
25	Arabian Dreams Hotel Apartment L.L.C.	Joint Venture	49	No

## VI. CSR DETAILS

### 24. CSR Details

Whether CSR is applicable as per section 135 of Companies Act, 2013	Yes
Turnover (₹ in crores)	1,434.11
Net worth (₹ in crores) *	946.26
Total amount spent on CSR for FY 2022-23 (₹ in crores)	3.80

\*Including revaluation reserve & transition difference

## VII. TRANSPARENCY AND DISCLOSURES COMPLIANCES

### 25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)	if Yes, then provide web-link for grievance redress policy	FY 2023-24			FY 2022-23		
			Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	No	The Company has a platform for grievance reporting 1. <a href="https://www.clubmahindra.com/investors/investor-information">https://www.clubmahindra.com/investors/investor-information</a>	-	-	-	-	-	-
Investors (other than shareholders)	No		-	-	-	-	-	-
Shareholders	Yes	2. <a href="https://www.clubmahindra.com/grievance-redressal">https://www.clubmahindra.com/grievance-redressal</a> MHRIL has a whistle blower Policy which is available to all stakeholders on the link mentioned in point no. 1 above.	2	0	NA	0	0	NA
Employees and workers	Yes		142	0	NA	111	0	NA
Customers	Yes		1.8% of our member base	162	NA	1.5% of our member base	6	NA
Value Chain Partners	No		0	0	NA	0	0	NA

## 26. Overview of the entity's material responsible business conduct issues

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along with its financial implications, as per the following format;

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk /opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Talent Management and Retention	Risk	<ul style="list-style-type: none"> <li>- High attrition rate translates to higher cost for recruiting and training new Associates;</li> <li>- Decreased productivity and associate morale;</li> <li>- Losing talent to competitors / other industries;</li> <li>- Loss of Brand reputation;</li> <li>- Unsuitable / unprepared workforce for changing market demand and disruption;</li> <li>- Impact on Customer Experience : Employees who are dissatisfied are less likely to provide friendly, efficient and personalized service;</li> <li>- Non-compliance with labour laws and regulations leading to Financial implication and</li> <li>- Cost of Fine and Compensation.</li> </ul>	<ul style="list-style-type: none"> <li>- Regular Employee training on diverse topics;</li> <li>- Regular employee feedback - Quarterly PULSE surveys and annual M-CARES employee engagement survey;</li> <li>- Reward &amp; Recognition programs like MD's Club, CSO Club focusses on encouraging and rewarding the top performing sales team;</li> <li>- Safety, Health and Well-being programs for all workforce;</li> <li>- Skip level and Focus group discussion; and</li> <li>- Talent Management programs such as Igrow, Igrow plus, CMET, ACE for front line sales team and telemarketing executives, to provide them performance based growth and promotion opportunities.</li> </ul>	Negative
		Opportunity	<ul style="list-style-type: none"> <li>- Build human capital through trainings and skill upgradation; and</li> <li>- Attract talent.</li> </ul>		Positive

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk /opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
2	Economic Performance	Risk	<ul style="list-style-type: none"> <li>- Unavailability of the material as well as expertise.</li> </ul>	<ul style="list-style-type: none"> <li>- 100% green Portfolio - IGBC/ GRIHA certified products;</li> </ul>	Negative
		Opportunity	<ul style="list-style-type: none"> <li>- Changing Consumer preferences and lifestyle</li> <li>- Increased peer competition in emerging markets</li> <li>- Increased investor scrutiny on ESG parameters, etc.;</li> <li>- Leadership in green buildings; and</li> <li>- Differentiating factor and a competitive advantage due to green portfolio.</li> </ul>	<ul style="list-style-type: none"> <li>- Transparent and Complete public disclosures on ESG; and</li> <li>- Customer Value Proposition on the benefits of adopting green products.</li> </ul>	Positive
3	Supply chain Management	Risk	<ul style="list-style-type: none"> <li>- Environmental - Higher scope 3 emission - Disruption - Work stoppage due to unethical or illegal operation - Regulatory - Legal action due to child labour;</li> <li>- Inferior quality products;</li> <li>- Inexperienced contractors and subcontractors may cause hindrance to sustainable construction; and</li> <li>- Work Delay leading to untimely delivery and cost implication.</li> </ul>	<ul style="list-style-type: none"> <li>- Green Supply Chain Management ("GSCM") Policy;</li> <li>- Code of Conduct for suppliers and contractors;</li> <li>- Capacity Building / Training workshops;</li> <li>- Raising awareness on ESG and related implications; and</li> <li>- Partnership for sustainability integration in supply chain.</li> </ul>	Negative
		Opportunity	Align with company strategy and policies and with Science Based Targets - Reduce cost of construction.		Positive

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk /opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
4	Governance and Compliance	Risk	<ul style="list-style-type: none"> <li>- Lack of knowledge, skill or capability of governance team constrains ESG risk management;</li> <li>- Non-compliance to statutory requirements;</li> <li>- Non-compliance to green building commitments; and</li> <li>- Financial risk: Non-compliance related to product labelling: fines and penalties.</li> </ul>	<ul style="list-style-type: none"> <li>- ESG risk and mitigation integrated into Enterprise Risk Management ("ERM") Framework</li> <li>- Board and Leadership level overview of ESG risk and mitigation measures;</li> <li>- Policy advocacy through partnerships; and</li> <li>- Financial quantification of ESG Risk.</li> </ul>	Negative
		Opportunity	<ul style="list-style-type: none"> <li>- Improve current governance to Gold Standard;</li> <li>- Comply with the required rules and regulations; and</li> <li>- Strengthen supplier relations and collaboration for socially conscious value chain.</li> </ul>		Positive
5	Environmental well being	Risk	<ul style="list-style-type: none"> <li>- Regulatory Risk;</li> <li>- Dependence on non-renewable sources of energy;</li> <li>- Heavy Groundwater extraction;</li> <li>- Improper Waste Disposal;</li> <li>- Diversion to Landfill;</li> <li>- Increase cost if carbon tax is implemented;</li> <li>- Inefficient Energy Use; and</li> <li>- Carbon Price.</li> </ul>	<ul style="list-style-type: none"> <li>- 100% Green certified portfolio</li> <li>- Mahindra Holidays has committed and has detailed action plan to become Carbon Neutrality by 2040;</li> <li>- Approved Science Based Targets in line with 1.5-degree world;</li> <li>- All new developments to be Net Zero by 2030;</li> </ul>	Negative
		Opportunity	<ul style="list-style-type: none"> <li>- Improve environmental quality, and working conditions;</li> <li>- Innovation in operations and regional priority (using local products);</li> <li>- Ease of receiving consents; and</li> <li>- Reduce Cost of Construction and Operations.</li> </ul>	<ul style="list-style-type: none"> <li>- Zero Waste to Landfill for all our developments; and</li> <li>- Environmental Monitoring and Mitigation in place for all projects.</li> </ul>	Positive



S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk /opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6	Customer well being	Risk	<ul style="list-style-type: none"> <li>- Loss of Brand Reputation;</li> <li>- Risk to Customer health and safety (toxic elements present in the brownfield land);</li> <li>- Risk to business continuity;</li> <li>- Legal risk;</li> <li>- Customer Litigation for non-compliance to green building commitments;</li> <li>- Loss of business opportunity;</li> <li>- Delay in project execution; and</li> <li>- Deteriorating quality of buildings (unwanted chemical reaction due to presence of corrosive compounds).</li> </ul>	<ul style="list-style-type: none"> <li>- 100% Green certified products;</li> <li>- Customer outreach through newsletter / green events and Green tour in each project;</li> <li>- Behavioural Interventions;</li> <li>- Make the Switch Initiatives to help make the necessary switch to adopt sustainable lifestyle for our customers; and</li> <li>- Customer feedback throughout the journey.</li> </ul>	Negative
		Opportunity	<ul style="list-style-type: none"> <li>- Improve Customer Health and well-being; and</li> <li>- Grow Business.</li> </ul>		Positive
7	Community well being	Risk	<ul style="list-style-type: none"> <li>- Risk to Brand Image;</li> <li>- Social license to operate affected due to social impacts and/or community relations not well managed (e.g., air and water pollution);</li> <li>- Business continuity risk;</li> <li>- Prosecution due to non-compliance to Rehabilitation and Resettlement Act; and</li> <li>- Stoppage of work due to community unrest leading to revenue loss.</li> </ul>	CSR initiatives across projects: <ul style="list-style-type: none"> <li>- Nanhi Kali - Support in provision of primary education to underprivileged girl children in India;</li> <li>- Hunar - Skill development and women empowerment program; and</li> <li>- Hariyali - Tree Plantation Program.</li> </ul>	Negative
		Opportunity	<ul style="list-style-type: none"> <li>- Engage community;</li> <li>- Create healthy competition leading to innovation;</li> <li>- Gain peer consortium to augment benefit from Government organization for the sector; and</li> <li>- Create positive impact on climate change prevention.</li> </ul>		Positive

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

THIS SECTION IS AIMED AT HELPING BUSINESSES DEMONSTRATE THE STRUCTURES, POLICIES AND PROCESSES PUT IN PLACE TOWARDS ADOPTING THE NGRBC PRINCIPLES AND CORE ELEMENTS.

P1	Businesses should conduct and govern themselves with integrity in a manner that is ethical, transparent and accountable
P2	Businesses should provide goods and services in a manner that is sustainable and safe
P3	Businesses should respect and promote the well-being of all employees, including those in their value chains
P4	Businesses should respect the interests of and be responsive towards all its stakeholders
P5	Businesses should respect and promote human rights
P6	Businesses should respect, protect and make efforts to restore the environment
P7	Businesses when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
P8	Businesses should promote inclusive growth and equitable development
P9	Businesses should engage with and provide value to their consumers in a responsible manner

Disclosure Question	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>									
1 a. Whether your entity's policy / policies cover each principle and its core elements of the NGRBCs. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1 b. Has the policy been approved by the Board? (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1 c. Web Link of the Policies:	P1 to P9: <a href="https://www.clubmahindra.com/investors/investor-information">https://www.clubmahindra.com/investors/investor-information</a> P3: Additional HR Policies with detailed guidelines and processes for operations, marketing, admin etc. is available on Intranet portal.								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4. Name of the national and international codes / certifications / labels / standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	MHRIL has been always aimed to work in the framework of guidelines set by various codes / labels / standards for continual improvement and customer satisfaction. Inline of this, MHRIL has already earned certification like <b>ISO 45001:2018, ISO 22000:2018, Platinum and Gold rating certification by IGBC</b> for several of its resorts. MHRIL also has <b>ISO 27001:2013 Certification</b> .								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	<b>P2 &amp; P6-</b> RE100- by 2050, EP 100 by 2030, Carbon Neutrality by 2040, SBTi- 88.3% by 2031, Green building certification- 44 Resorts Target by FY 2025 and Zero Waste to Landfill ("ZWL") - 44 Target by FY 2025. <b>P1, P3, P4, P5, P7, P8 &amp; P9-</b> We are actively working and exploring opportunities to further enhance our practices and align them with industry best standards. We recognize the importance of continuous improvement and strive to evolve in other principles too and working on part of achievable deadline.								
6. Performance of the entity against the specific commitments, goals, and targets along with reasons in case the same are not met.	Steps towards achieving the specific commitments, goals and targets, set above have been already initiated. MHRIL has already received the highest certification from IGBC i.e., 'platinum' green building certification (IGBC-CII) of 17 of its resorts. MHRIL has done a considerable job in terms of GHG emission reduction with 31% reduction in Scope 1 & 2 emissions.								

## Governance, leadership and oversight

7.	<p>Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements.</p> <p>MHRIL firmly believes that the community is a vital stakeholder in our business, and thus we have embraced a responsible approach towards ESG (Environmental, Social and Governance) practices. At MHRIL, we incorporate social and environmental considerations into our core strategic business decisions. Our commitment to sustainability is integral to achieving our long-term goal of business continuity while ensuring the safety and growth of our stakeholders. Our efforts are driven by integrating best practices and making commitments to deliver sustainable value to our members, communities, employees, shareholders and the environment. We recognize that human resources are our greatest asset and we strive to maximize their potential.</p> <p>The challenges we faced, the targets we set and the achievements we accomplished related to the Business Responsibility and Sustainability Report ("BRSR") in the financial year 2023-2024 are:</p> <p>Challenges Faced:</p> <ul style="list-style-type: none"> <li>Regulatory compliances: Adapting to evolving regulations and ensuring compliance related to BRSR, with ESG standards emerged as an ongoing challenge. We worked diligently to stay updated and managed to align our operations accordingly.</li> <li>Value Chain Partner Orientation: One major challenge was aligning our value chain partners with BRSR compliance standards and achieving a unified goal of preparing for and complying with BRSR requirements.</li> <li>Data collection and compilation: Understanding BRSR requirements, collecting and compiling data and coordinating between the engineering and technical departments with finance, purchasing, contracts and other departments was challenging. Additionally, integrating this data into the required framework posed difficulties.</li> </ul> <p>The targets we have set are:</p> <ul style="list-style-type: none"> <li>RE100- by 2050- MHRIL aims to be run 100% on renewable energy by the year 2050. Progress is being made in this regard already.</li> <li>EP 100 by 2030- MHRIL targets to double their energy productivity and maximize the economic output from each unit of energy used.</li> <li>Carbon Neutrality by 2040.</li> <li>SBTi - 88.3% GHG reduction by 2031.</li> <li>Green building certification- 44 Resorts Target by FY 2025.</li> <li>ZWL - 44 resorts Target by FY 2025.</li> </ul> <p>Our objective is to foster the growth of our community, thereby placing a strong emphasis on Environmental, Social and Governance (ESG) factors.</p> <ul style="list-style-type: none"> <li>MHRIL has sponsored the education of 3,290 girls in FY 2023-24.</li> <li>MHRIL has undertaken the plantation of 24,382 saplings in the FY 2023-24, contributing to an impressive total of 5,39,610 trees planted since 2011.</li> <li>Aligned with our strategic business goals, we are proactively investing in the transformation of our resorts into sustainable practices. Our Virajpet resort in Coorg stands proudly as India's pioneering Zero Waste to Landfill resort, effectively showcasing our dedication to environmental responsibility while ensuring exceptional guest experiences.</li> </ul> <p>In this year, MHRIL has added Acacia, Assonora, Snowpeak &amp; White Meadows Manali, Poovar, Kensville, Naldhera, Kandaghat, Dharamshala, Hatgad, Emerald Palm, Ashtamudi, Virajpet, Varca, Mashobhra, Madikeri, Cherai, Arrokutty, Dwarka, Binsar, Gir, Jaipur &amp; Gangtok.</p> <ul style="list-style-type: none"> <li>Leveraging our extensive expertise and experience in sustainability, MHRIL is uniquely positioned to craft and execute effective strategies for long-term sustainability. We wish to continue to apply all our accumulated knowledge and skill in the sustainability paradigm which we believe, with all our conviction, to be the sole binding truth between commerce, society and the environment.</li> </ul>
8.	<p>Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).</p> <p>Name- Mr. Kavinder Singh (upto May 16, 2024)</p> <p style="padding-left: 40px;">Mr. Manoj Bhat (w.e.f. May 17, 2024)</p> <p>Designation-Managing Director &amp; CEO of the Company.</p>
9.	<p>Does the entity have a specified Committee of the Board / Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.</p> <p>Yes,</p> <p>Sustainability being a core value at MHRIL, we have a dedicated committee of expert members for CSR and Sustainability led by Managing Director &amp; CEO of the Company, who is on the Board and assesses the BR performance periodically.</p>

**10. Details of Review of NGRBCs by the Company:**

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee									Frequency (Annually / Half yearly/ Quarterly/ Any other - please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Yes, review was undertaken, for above policies and principles									Periodically								
Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances	All statutory requirements are being taken care by concerned heads and compliance ensured									Periodically								

- 11. Has the entity carried out independent assessment / evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.** No,  
Evaluation is a continuous process. All the processes are closely monitored and reviewed at required levels and by senior management.

**12. If answer to question (1) above is "No" i.e., not all Principles are covered by a policy, reasons to be stated:**

Not Applicable.

Question	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the principles material to its business (Yes/No)	Not Applicable								
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

**Section C : PRINCIPLE WISE PERFORMANCE DISCLOSURE**
**PRINCIPLE 1**

**BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH INTEGRITY AND IN A MANNER THAT IS ETHICAL, TRANSPARENT AND ACCOUNTABLE.**

**ESSENTIAL INDICATORS**
**1. Percentage coverage by training and awareness programmes on any of the Principles during the financial year:**

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	% of persons in respective category covered by the awareness programmes
Board of Directors	2	Overview of business strategy, business model & way forward and Cyber Security & Data Privacy	100
Key Managerial Personnel	2 (excludes repetitions)	1. Code of Conduct 2. POSH	100 100
Employees other than BoD and KMPs	124	1. Code of Conduct 2. POSH	95 97
Workers	Not Applicable		

2. Details of fines / penalties / punishment / award / compounding fees / settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators / law enforcement agencies / judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and as disclosed on the entity's website):

Monetary					
Type	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (in ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	P4	Before Sole Arbitrator, Justice Sri. K. P. Sivasubramaniam (Retd.)	₹ 653.52 lakhs along with interest thereon at 9% p.a.	The Company engaged a building contractor for construction of a resort. As the construction did not proceed as per agreed timelines, the Company terminated the contract. The contractor has claimed ₹ 1,256.15 lakhs as damages for termination of the Contract. The Company has made a counter claim of ₹ 2,003.56 lakhs towards liquidated damages and other losses. The matter has been heard by the Arbitrator and is reserved for Orders.	Yes
	P6	Puducherry Ground Water Authority	₹ 5,000	The Company was levied penalty for non-submission of monthly reports, non-fixing of water meter and towards non-compliance of conditions stipulated in the Certificate of Registration for use of ground water in its Puducherry resort.	No
Settlement	NIL	NA	NA	NA	NA

Monetary					
Type	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (in ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Compounding fee	NIL	NA	NA	NA	NA

Non-Monetary				
Type	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	Nil	NA	NA	NA
Punishment	Nil	NA	NA	NA

3. **Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed.**

On February 10, 2024, the Company challenged the Award in the High Court of Madras by filing an Appeal under the provisions of the Arbitration and Conciliation Act, 1996.

4. **Does the entity have an anti-corruption or anti-bribery policy?**

Yes.

**If yes, provide details in brief:**

The Company has defined a Code of Conduct for Directors as well as all employees of the Company that covers issues, *inter alia*, related to ethics, bribery and corruption. It also covers all dealings with suppliers, customers, business partners and other stakeholders. The Code of Conduct for Senior Management and Employees forms an integral part of the induction of new employees.

**If available, provide a web-link to the policy.**

<https://www.clubmahindra.com/investors/investor-information>

5. **Number of Directors / KMPs / employees / workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery / corruption:**

Category	FY 2023-24	FY 2022-23
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	NA	

6. **Details of complaints with regard to conflict of interest:**

Particulars	FY 2023-24		FY 2022-23	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	NA	Nil	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	NA	Nil	NA

7. **Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators / law enforcement agencies / judicial institutions, on cases of corruption and conflicts of interest.**

There have been no instances of corruption, conflicts of interest, or related penalties imposed by regulators, law enforcement agencies, or judicial institutions on any of our Key Managerial Personnel ("KMPs") and Directors. To ensure strict compliance with our code of conduct, we provide training for new employees and refresher sessions for all staff, emphasizing the importance of adherence and the consequences of non-compliance.

**8. Number of days of accounts payables [(Accounts payable \*365) / Cost of goods/services procured] in the following format:**

Particulars	FY 2023-24	FY 2022-23
Number of days of accounts payable	82	116

**9. Open-ness of business**

**Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along with loans and advances & investments, with related parties, in the following format:**

Parameter	Metrics	FY 2023-24	FY 2022-23
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	0	0
	b. Number of trading houses where purchases are made from	0	0
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	0	0
Concentration of Sales	a. Sales to dealers /distributors as % of total sales	NA	NA
	b. Number of dealers/distributors to whom sales are made	NA	NA
	c. Sales to top 10 dealers/ distributors as % of total sales to dealers / distributors	NA	NA
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	8.21%	7.92%
	b. Sales (Sales to related parties / Total Sales)	0.16%	0.04%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	10.42%	35.69%
	d. Investments (Investments in related parties / Total Investments made)	2.82%	1.27%

**LEADERSHIP INDICATORS**

**1. Awareness programmes conducted for value chain partners on any of the Principles during the financial year:**

Total number of awareness programmes held	Topics / principles covered under the training	%of value chain partners covered (by value of business done with such partners) under the awareness programmes
234	Annual contract Negotiation / Sustainability / Quality / Safety / Ethics & Integrity	31.57

**2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If Yes, provide details of the same.**

MHRIL has established robust processes to manage and avoid conflict of interest involving members of the Board. The Company follows a comprehensive corporate governance framework that ensures transparency, accountability and integrity in its operations. Here are the key details of how MHRIL manages conflicts of interest:



## Internal Conflict of Interest Management

**Code of Conduct and Ethics:** MHRIL has a well-defined Code of Conduct and Ethics for its Board members and senior management. This code outlines the ethical standards and behaviors expected from them, including the need to avoid any situation that might lead to a conflict of interest. Board members are required to disclose any personal interest that might conflict with the interests of the Company.

**Disclosure Requirements:** Board members must disclose any material, financial or personal interest in matters that are brought before the Board. These disclosures are recorded and maintained to ensure transparency. Members must abstain from participating in discussions and voting on any matter in which they have a conflict of interest.

**Board Evaluation and Monitoring:** Regular evaluations of Board members are conducted to assess their adherence to the Code of Conduct. This evaluation includes monitoring potential conflict of interest and ensuring that any issues are addressed promptly and effectively.

**Training and Awareness Programs:** MHRIL conducts regular training and awareness programs for its Board members and senior management on corporate governance, ethical standards and conflict of interest management. This ensures that all members are well-informed about the company's policies and procedures.

## Conflict of Interest with Related Parties

**Related Party Transactions Policy:** MHRIL has a comprehensive policy for handling related party transactions. This policy ensures that any transactions with related parties are conducted on an arm's length basis and are in the best interest of the Company. All related party transactions are subject to prior approval from the Audit Committee and the Board.

**Independent Directors:** The presence of Independent Directors on the Board helps mitigate conflict of interest. These Directors provide an unbiased perspective and ensure that decisions are made in the best interest of the Company and its stakeholders.

**Audit Committee Oversight:** The Audit Committee plays a crucial role in overseeing related party transactions and ensuring compliance with regulatory requirements. The Committee reviews and approves all significant related party transactions, ensuring transparency and fairness.

**Regular Audits and Reviews:** MHRIL conducts regular internal and external audits to review related party transactions and conflict of interest management practices. These audits help identify any potential issues and recommend corrective actions.

By implementing these processes and policies, MHRIL effectively manages and avoids conflict of interest, ensuring that the Board operates with the highest levels of integrity and in the best interests of the Company and its stakeholders.

## PRINCIPLE 2

### BUSINESSES SHOULD PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE

#### ESSENTIAL INDICATORS

1. **Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.**

	FY 2023-24	FY 2022-23	Details of improvements in environmental and social impacts
R&D			Not Applicable
Capex	46%	44%	Solar Power & Battery backup system installation, BLDC Fans, Thermodynamic heating / heat pump occupancy sensors, EV etc.

2.
  - a. **Does the entity have procedures in place for sustainable sourcing? (Yes / No)**  
Yes.
  - b. **If yes, what percentage of inputs were sourced sustainably?**  
65% based on value of the products.
3. **Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for**

MHRIL has ZWL i.e. Zero Waste to landfill process for 24 of its resorts and it is certified by TUV.

- (a) **Plastics (including packaging)**

All plastic waste are being handed over to authorized third-party recyclers.



**(b) E-waste**

All E-waste are being handed over to authorized third-party recyclers.

**(c) Hazardous waste**

All Hazardous waste are being handed over to authorized third-party recyclers.

**(d) Other waste**

All food waste are recycled inhouse and handed over to authorized third-party recyclers.

**4. Whether Extended Producer Responsibility ("EPR") is applicable to the entity's activities (Yes / No).**

No.

**If not, provide steps taken to address the same.**

EPR clause is being added at the time of renewal of the contracts.

**LEADERSHIP INDICATORS**

**1. Has the entity conducted Life Cycle Perspective / Assessments ("LCA") for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?**

No, however, MHRIL intends to do LCA for its services in future.

**2. If there are any significant social or environmental concerns and / or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments ("LCA") or through any other means, briefly describe the same along with action taken to mitigate the same.**

Not Applicable.

**3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).**

Indicate input material	Recycled or re-used input material to total material	
	FY 2023-24	FY 2022-23
Sand (use of manufactured sand instead of river sand)	50%	48%
Cement (Use of alternate material in lieu of raw material)	26%	19%
Plywood (Importance to use of sustainable timber sourcing & use of waste wood in manufacturing)	30%	27%
Use of Recycled gypsum boards for Fall ceiling & others	25%	22%

**4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled and safely disposed, as per the following format:**

Particulars	FY 2023-24			FY 2022-23		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	0	42	0	0	45.9	0
E-waste + Battery waste	0	5.85	0	0	6.43	0
Hazardous waste	0	6.1	3.1	0	5.44	2.76
Other waste	742	320	3.1	705.20	292.83	2.76

MHRIL engages in the development, construction and operation of resort properties, so there is no packaging involved in delivering its services.

Waste generated during the construction phase is managed according to the Environmental Management Plan ("EMP"), emphasizing reuse, recycling and safe disposal by government-authorized waste handlers and recyclers. This process includes material suppliers taking back packaging materials such as cardboard, foam and plastic, which are then recycled through authorized vendors, ensuring circularity in the construction value chain.

During the operation and maintenance phase, MHRIL monitors and measures the waste produced and ensures its safe disposal through government-authorized waste handlers and recyclers, maintaining circularity within the eco-value chain.

## 5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
Not Applicable	Nil

### PRINCIPLE 3

**BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS**

### ESSENTIAL INDICATORS

#### 1 a. Details of measures for the well-being of employees:

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	3,717	3,717	100.00	3,717	100.00	-	-	-	-	0	0.00
Female	622	622	100.00	622	100.00	622	100.00	-	-	0	0.00
Total	4,339	4,339	100.00	4,339	100.00	622	14.00	0	0.00	0	0.00
Other than Permanent employees											
Male	621	621	100.00	621	100.00	-	-	-	-	0	0.00
Female	197	197	100.00	197	100.00	197	100.00	-	-	0	0.00
Total	818	818	100.00	818	100.00	197	24.00	0	0	0	0.00

#### b. Details of measures for the well-being of workers:

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent workers											
Male	Not Applicable										
Female											
Total											
Other than Permanent workers											
Male	Not Applicable										
Female											
Total											

- c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format:

Particulars	FY 2023-24	FY 2022-23
Cost incurred on well-being measures as a % of total revenue of the Company	0.21	0.24

2. Details of retirement benefits, for Current Financial Year and Previous Financial Year.

Benefits	FY 2023-24			FY 2022-23		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100	NA	Y	100	NA	Y
Gratuity	100	NA	Y	100	NA	Y
ESI*	-	NA	Y	-	NA	Y

\* As per the ESI regulation, 100% of the eligible employees are covered under the benefits

3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes.

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016?

Yes.

If so, provide a web-link to the policy.

[https://www.clubmahindra.com/storage/app/media/360%20videos/new/MHRIL%20Code%20of%20Conduct\\_Final\\_221021.pdf](https://www.clubmahindra.com/storage/app/media/360%20videos/new/MHRIL%20Code%20of%20Conduct_Final_221021.pdf)

5. Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	-	-	Not Applicable	
Female	100	100		
<b>Total</b>	<b>100</b>	<b>100</b>		

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker?

For Employees, Yes.

If yes, give details of the mechanism in brief.

Category	Yes/No (If Yes, then give details of the mechanism in brief)	Remark
Permanent Workers	Not Applicable	Not Applicable
Other than Permanent Workers		

Permanent Employees	Yes	MHRIL has an Ethics Helpline to provide a third-party enabled grievance redressal mechanism for employees. It has partnered with a third-party service provider to offer a secure and confidential platform to report issues related to Code of Conduct violations. Any unethical behavior or violations can be reported.
Other than Permanent Employees	Yes	<p>MHRIL also conducts skip-level meetings to seek additional insight into the workings of the organization by providing an open and non-threatening environment where employees can register their honest and sincere feedback / grievance. In a skip-level meeting, the leader bypasses first-level management and speaks directly to second-level managerial employees, or lower employees. The primary purpose of the skip-level meeting is to determine the organization's effectiveness, by getting an honest assessment from employees at all levels. These skip level meetings are recorded for further enhancement.</p> <p><b>We are Listening:</b></p> <p>MHRIL also has a WhatsApp number which is monitored by the CHRO. Employees are encouraged to reach out to the Company with ideas, suggestions, thoughts, queries and concerns. The CHRO shares messages with the appropriate stakeholders depending on the nature of the message. This initiative enables employees to share creative ideas, feedback, suggestions, regular enquiries, testimonials or just an appreciation for something. Posters displaying intent and construct of this program are displayed across branches, resorts and corporate.</p>

**7. Membership of employees and worker in association(s) or Unions recognised by the listed entity:**

Category	FY 2023-24			FY 2022-23		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees/ Workers in respective Category (C)	No. of employees / workers in respective category, who are part of association(s) or Union(D)	% (D / C)
<b>Permanent Employees</b>	<b>4,339</b>	<b>119</b>	<b>2.74</b>	<b>4,116</b>	<b>269</b>	<b>6.54</b>
Male	3,717	89	2.39	3,470	228	6.57
Female	622	30	4.82	646	41	6.35

**8. Details of training given to employees and workers:**

Category	FY 2023-24					FY 2022-23				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	4,338	4,109	94.72	1,566	36.10	4,361	2,042	46.82	2,049	46.98
Female	819	776	94.75	327	39.93	845	370	43.79	667	78.93
Others	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Total	5,157	4,885	94.73	1,893	36.71	5,206	2,412	46.33	2,716	52.17
Workers										
Male	Not Applicable									
Female										
Others										
Total										

9. Details of performance and career development reviews of employees and worker:

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
<b>Employees</b>						
Male	4,338	3,295	76.00	4,361	3,368	77.00
Female	819	582	71.00	845	680	80.00
Others	0	0	0.00	0	0	0.00
<b>Total</b>	<b>5,157</b>	<b>3,877</b>	<b>75.00</b>	<b>5,206</b>	<b>4,048</b>	<b>78.00</b>
<b>Workers</b>						
Male	Not Applicable					
Female						
Others						
<b>Total</b>						

10. Health and safety management system:

a. Whether an occupational health and safety management system has been implemented by the entity? (Yes / No).

Yes, MHRIL has implemented The Mahindra Safety Way ("TMSW") for managing workplace health and safety in accordance with the Mahindra Group's safety management framework. We have a clear policy and set of procedures for Occupational Health and Safety Management Systems ("OHSMS") to ensure the safety and well-being of all employees, members and visitors. The Company has always prioritized health and safety in all its resorts, offices and workplaces. One of our resorts located in Puducherry has the certification for ISO 45001:2018. MHRIL has highlighted the Business Risk Management framework as a crucial stage in the development of a solid safety management system. This framework includes a series of processes for continuous risk detection, assessment and mitigation, with active employee participation at each of its managed resorts. In this context, resort methods include hazard identification, recommendation systems, daily briefings and employee participation in periodic resort safety Committee meetings. In addition, all MHRIL-managed resorts undertake periodic operational and corporate OHSMS audits to ensure compliance with industry standards.

The establishment of a resort-specific safety committee and the monthly discussion of potential areas for improvement further enhances the OHSMS implementation. Annual events such as Mock Fire Drills, National Safety Month and Road Safety Awareness Programs are held at each resort. To strengthen its safety procedures, the Company continues to focus on theme-based safety subjects, such as behavior-based safety ("BBS") Level 2. These approaches have significantly

improved workplace safety and reduce likelihood of potential injuries, while enhancing the overall safety culture of the organization. In order to keep its safety rules and procedures effective and up to date, the organization conducts frequent reviews and revisions.

**If yes, the coverage of such system?**

In our managed resorts, we have implemented our safety management system, which is designed to detect and reduce risk, establish workplace safety standards, offer engagement opportunities for resort employees, provide pertinent safety training and meet legal requirements. MHRIL has developed a fundamental safety management system and risk management best practices to promote a secure work environment. They include, but are not limited to, hazard communication, FSSAI-compliant food safety and hygiene standards, safety training, accident reporting and investigation, hazard identification and control procedures, chemical safety and clearly defined managerial responsibilities and employee expectations. MHRIL works to guarantee that all of the resorts it operates adhere to OHS standards that exceed all applicable laws, regulations, standards and codes. Both internal Mahindra Group company standards and industry-wide best practices are compared to these standards. In order to certify compliance with TMSW process standards, all MHRIL resorts undergo periodic corporate and business occupational health and safety audits. Several Mahindra Rise awards and external certifications, such as ISO 22000:2018 acknowledge MHRIL's commitment and efforts to ensure a safe and healthy workplace for all employees and its members.

The OHSMS applies to all employees, contractors, visitors and club members, as well as any other stakeholders whose activities may be affected

by the organization's operations. The OHSMS includes identifying and assessing potential workplace hazards and risks, adopting appropriate controls and procedures to eliminate or minimize these risks and monitoring and reviewing the effectiveness of these controls over time. In addition, the OHSMS comprises incident reporting using a digital mobile app called as i2i App and investigation, emergency response planning, personnel training and awareness initiatives and ongoing improvement of the OHSMS.

**b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?**

As a part of OHSMS, MHRIL has a well-defined documented procedure Safe operating Procedure and Risk Assessment ("SOPRA") to carry out assessment of work-related hazards and risks for all routine and non-routine activities carried out at any location within the premises. Hazard and risk identification is carried out by the process owners in consultation with the safety experts. Every resort develops a risk register based on this assessment. The process owners are responsible to ensure adequate controls are identified and implemented to control the identified OHS risks.

Every SOPRA document is prepared by teams who are well qualified and competent for ongoing activities on ground. The SOPRA is updated based on learnings from good practices, incidents & accidents across resorts. Every staff member has the freedom to stop anyone if unsafe act is observed on the resort. This right to refuse or stop unsafe or unhealthy work is communicated through the safety briefings. We have well-defined Standard Operating Procedures ("SOPs") for reporting, investigating and analyzing incidents.

Some of the mitigation measures to prevent or mitigate significant occupational health & safety impacts include, utilize several processes to identify work-related hazards and assess risks on both routine and non-routine bases. These processes are essential in maintaining a safe and healthy work environment for our employees. Here are the key methods we employ:

Some of the mitigation measures to prevent or mitigate significant occupational health & safety impacts includes:

- (i) Provision and maintenance of fire detection, alarm and suppression systems;
- (ii) Regular site review, inspections and audits to assess safety preparedness;
- (iii) Regular mock drills for fire as well as medical emergencies;

- (iv) Wherever applicable, Provision of PPE, Work Permit, Lock out and Tag Out ("LOTO") and other administrative controls;
- (v) Electrical circuits of all the Rooms are protected by Earth Leakage Circuit Breaker ("ELCB") and proper grounding, insulation of all equipment is ensured;
- (vi) Regular training on occupational health & safety training to sensitize employees on OHS aspects to inculcate a culture of safety; and
- (vii) Employee engagement campaigns on health & safety topics such as fire safety, road safety, emergency evacuation and food safety among others.

MHRIL resort locations are subject to safety inspections and reviews periodically by internal health & safety team with the perspective of checking any health, hygiene and safety hazards and mitigating them. As a part of ISO 22000:2018 certification MHRIL resort locations undergo a site review and assessment to check deployment of operational controls.

There are several processes that are applied in MHRIL to identify work-related hazards and assess risks on a routine and non-routine basis. Here are some of them:

**Workplace inspections:** Regular inspections of the workplace help identify potential hazards and risks. Inspections are conducted by trained personnel who are familiar with the workplace and its operations.

**Job hazard analysis ("JHA") & Risk Assessments:** JHA involves breaking down a job into its component tasks and identifying potential hazards associated with each task. This helps to identify hazards that may not be apparent during a general workplace inspection. MHRIL followed a well-defined & MHRIL customized SOPRA procedure framework derived from Hazard Identification and Risk Assessment ("HIRA") process as defined by under Mahindra TMSW framework.

**Incident investigation:** Incidents such as first aid cases, near-misses and occupational illness provides valuable information about hazards and risks in the workplace. Investigating incidents helps to identify the root causes of the incident and any underlying hazards that may have contributed to it.

**Safety audits:** Safety audits are a systematic review of an organization's safety management system. They help to identify gaps and weaknesses in the system that may be contributing to hazards and risks in the workplace. MHRIL has appointed expert third party organizations such as Bureau Veritas, National safety Council for risk specific resort audits.



**Consultation with colleagues:** Resort staff are often the best source of information about hazards and risks in the workplace. Consulting with staff helps to identify hazards that may be overlooked by others and can also help to build a safety culture within the organization. In our i2i app anyone can report unsafe conditions, unsafe behaviors identified and actions taken for addressing those observations.

It is important to note that these processes are used in combination and are tailored to the specific needs and risks of the organization. Regular and ongoing hazard identification and risk assessment are essential to maintaining a safe and healthy workplace. We conduct in-depth analysis of any incidents that may occur at our sites, with learnings being communicated throughout resorts using existing mechanisms (safety alerts) for sharing information. This is done as an effort to ensuring that similar incidents do not repeat. The overall outcome of the efforts are zero reportable accidents, drop in first aid cases and suitable awareness among operatives at all levels paving the way for good safety culture in the organization.

- c. **Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes / No)**

Not Applicable.

- d. **Do the employees / worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)**

Yes,

It has always been MHRIL's priority that our employees stay fit, healthy and happy. To bring us a little closer to our goal prioritizing your well-being we have tied up with a third party Employee Wellness Partner.

Through this partnership, we provide our employees with the convenience of online consultations with top general physicians, completely free of charge. The user-friendly app offers unlimited consultations, free follow-ups for up to 5 days and consultations available in both English and Hindi. Beyond consultations, the partnership encompasses a range of medical benefits, including medicine delivery, at-home lab tests, personalized care programs and more. We are committed to our employees and their families' well-being and have arranged sessions with healthcare experts to further enhance their health journey. We strongly encourage our employees to take advantage of this valuable opportunity for themselves and their dependents, ensuring easy access to quality healthcare when they need it the most. Employee well-being and

health is our priority.

The wellness partner provides unlimited consultations with a General Physician for Club Mahindra Employees + 4 Family Members. It also provides our employees up to 10 Physical follow-ups based on doctor's advice within a period of the subscription year.

11. **Details of safety related incidents, in the following format:**

Safety Incident/ Number	Category	FY 2023-24	FY 2022-23
Lost Time Injury Frequency Rate ("LTIFR") (per one million-person hours worked)	Employees	0	0
Total recordable work-related injuries	Employees	0	0
No. of fatalities	Employees	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0

12. **Describe the measures taken by the entity to ensure a safe and healthy work place.**

MHRIL is committed to maintain best in class Occupational health & safety management practices through implementation of TMSW framework. MHRIL senior management reviews and monitors the safety, health and environmental policies and activities of the resort operations to ensure that it is in compliance with appropriate laws and legislation. Mahindra & Mahindra Limited ("M&M") Central Safety Council provides valuable direction and guidance to the management to ensure that occupational health and safety implications are duly addressed in strategic initiatives, budgets, audit actions and improvement plans.

To ensure steady improvement in the OHSMS performance, the Company is adopting TMSW process standards as well as voluntarily undertakes food safety certifications such as ISO 22000:2018 for its resorts. MHRIL's commitment to its safety management programs follows a top-down approach with the senior management persistently working towards establishing, demonstrating, sustaining and improving the safety culture and incorporating the Company's core value of safety in their daily responsibilities. MHRIL undertakes various measures to prevent or mitigate any significant negative health and safety impact directly linked with our operations and to ensure a safe and healthy

workplace of our employees. Here are some of the most common measures taken across all managed resorts:

- a) **Hazard identification and risk assessment:** MHRIL follows SOPRA framework to identify and assess workplace hazards and risks to determine the appropriate controls and measures to eliminate or mitigate them.
- b) **Implementation of safety policies and procedures:** MHRIL has established occupational health and safety policy and follow TMSW procedures that promote safe and healthy work practices and ensure compliance with applicable laws and regulations.
- c) **Training and education:** We provide employees with training and education on workplace safety, including hazard identification, risk assessment and safe work practices. In collaboration with the M&M Central Safety Council, RMs, Chief Engineers and HODs attended a cluster-level "Safety Conclave" to learn about safety standards and apply the transformed TMSW processes and safety culture. Participants were evaluated and awarded certificates after the conclave. Additional online Safety Learning Series lessons included PPE, Electrical Safety, Fire Safety, Incident Reporting and Mental Health.
- d) **Personal protective equipment ("PPE"):** We provide employees with appropriate PPE, such as safety helmet, gloves and other relevant PPEs to protect them from workplace hazards.
- e) **Health and wellness programs:** MHRIL provide employees with programs that promote health and wellness.
- f) **Incident reporting and investigation:** We have established a i2i app and procedures for employees to report incidents, accidents and near-misses and conduct investigations to determine the root causes and prevent recurrence.

- g) **Regular safety inspections and audits:** We conduct regular safety inspections and audits to identify hazards and ensure compliance with safety policies and procedures.
- h) **Employee involvement and participation:** We involve employees in resort safety committees, safety training and safety program development to ensure their active participation in promoting a safe and healthy workplace.
- i) **Safety Kaizens:** MHRIL encourages employees to report safety kaizens. These are appreciated for the best kaizen recognitions conferred to the individuals. The business excellence teams promote reporting of these kaizens to improve safety culture and continual improvements.
- j) **Mental health support:** The company has prioritized the mental well-being of employees by offering resources and support services and by a third-party managed calling system. This includes access to counseling services, promoting work-life balance and providing information on stress management techniques.
- k) **Communication and signage:** Clear communication channels have been established to keep employees informed about health and safety protocols, updates and any changes. Signage are being displayed prominently throughout the workplace wherever required, to remind employees of proper hygiene practices and physical distancing guidelines.
- l) **Documentation and checklist:** MHRIL has a culture of recording and maintaining the documentation and checklist related to all aspect and thus safe working environment and healthy work place to ensure every small activities and steps are being addressed.

## 13. Number of Complaints on the following made by employees and workers:

Particulars	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	Nil	Nil	Nil	Nil	Nil
Health & Safety	Nil	Nil	Nil	Nil	Nil	Nil



#### 14. Assessments for the year:

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	<ul style="list-style-type: none"> <li>- 100% Fire safety self-assessment of corporate, branch offices, Fire Life Safety compliant. (42 - Corporate + branch offices).</li> <li>- One resort located in Puducherry is also ISO 45001:2018 certified.</li> <li>- 70% of resorts are ISO 22000:2018 certified.</li> </ul>
Working Conditions	<p>100% managed resorts have performed TMSW-based safety self-assessments, including working conditions.</p> <p>The M&amp;M CSC team assessed 6 resorts for TMSW compliance, including working conditions.</p>

#### 15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

As per the M&M CSC office fire safety guidelines and self-assessment, a detailed review of the registered and branch offices was carried out to ensure that those offices meet the mandatory fire safety standards as per the recommendations.

In view of improving the near miss reporting, reporting of unsafe conditions and acts, as a proactive measure for safety culture, MHRIL has introduced safety reporting in its Making Magical app, a mobile digital application-based reporting. This reporting tool is available with all MHRIL employees across resorts and offices to report near miss and other incidents. It also has a provision for raising a notification to the leadership, CRO for any serious incident or accident reported from the app. This has helped to improve the near miss reporting from the resorts and proactively performing resort level corrective actions to avoid the incident or to reduce the potential risk.

Other safety initiatives are based on the Risk Management Committee's and the Corporate Safety Committee's recommendations. We initiated those efforts to proactively evaluate potential risks and mitigate potential safety concerns.

- Electrical Safety Assessments:** We have appointed an electrical safety expert consultant to conduct an annual electrical audit in the resorts, identify areas for improvement and suggest remedial actions. We have taken this proactive step to safeguard our resorts from potential electrical risks and safety concerns.
- Adventure sport audits:** Based on our internal assessments, we have identified twelve vendors who are providing rope course and soft adventure services in the resorts. We subjected these vendors to an independent, third-party safety assessment. We had appointed the National Safety Council

and Bureau Veritas to conduct a safety survey and assessment of these setups, as well as provide recommendations for improving the safety of adventure sports activities. We have pursued vendors to implement these recommended actions to further enhance the safety level of these soft adventure activities. An independent authority or structural expert is assessing all new adventure sports venues for structural stability and participant safety.

- Structural stability audits:** We conducted a structural stability audit of certain resort premises as a proactive step to identify structural improvement areas and conduct a conditional assessment of these resorts by a competent structural audit firm. MHRIL project and resort engineering teams have fully implemented the recommendations from these audits, as provided by the consultants.

#### LEADERSHIP INDICATORS

- Does the entity extend any life insurance or any compensatory package in the event of death of**

##### a. Employees (Y/N)

Yes.

##### b. Workers (Y/N).

Not Applicable.

- Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.**

Compliances such as Employees' State Insurance and Provident Fund are submitted online by our value chain partners through the state government portal, generating a document upon completion. We verify these compliances and upload them to our internal compliance portal (M-Compliance), which is reviewed quarterly.

3. Provide the number of employees / workers having suffered high consequence work-related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

Category	Total no. of affected employees / workers		No. of employees / workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-24	FY 2022-23	FY 2023-24	FY 2022-23
Employees	Nil	Nil	Nil	Nil
Workers	Not Applicable			

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes / No)

No, we do extensions but no transition assistance program.

5. Details on assessment of value chain partners:

Particulars	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	We do only internal assessment through Vendor site audits and we have not done it through external agencies. Vendor site audits are done for 76 vendors and 25% of the vendors covered.
Working Conditions	Nil

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

Nil.

#### PRINCIPLE 4

#### BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL ITS STAKEHOLDERS

##### ESSENTIAL INDICATORS

1. Describe the processes for identifying key stakeholder groups of the entity.

At MHRIL, we are committed to creating long-term value for our stakeholders through a customer-centric and people-first approach. Our stakeholders encompass customers, employees, vendors, shareholders, business partners, the communities we operate in and the broader society.

We identify stakeholders by evaluating how any individual, group or organization may be affected by or influence our business decisions, activities and outcomes. Specifically, stakeholders are identified based on their importance, ability to influence, physical proximity and dependency on the business.

The Company has also established mechanisms to facilitate effective dialogue with all stakeholders, identify significant concerns and resolve them in a fair and transparent manner. Responsibility for engaging with each stakeholder group is assigned to specific teams within the Company.

2. List of stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website, Other)	Frequency of engagement (Annually/ Half yearly / Quarterly / others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employee	No	Notice Board, Town halls, Training calendar, Daily meetings (briefings)	Ongoing	Share business updates, understand pulse of employees, Address Queries & Concerns, Drive creative restlessness.
Community	Yes	Community Meetings, CSR partnership	As and when required such as at the time of CSR activities / programs / events.	<p>The CSR policy states the commitment and approach taken towards Corporate Social Responsibility.</p> <p>The policy outlines the objectives, target areas, yearly plan and principles guiding the selection, execution and evaluation of CSR initiatives, as well as how stakeholders are engaged.</p> <p>Our CSR activities empower the local communities and ensure that our business has no negative impact on the environment.</p> <p>Through our CSR endeavors, we support and strengthen the surrounding communities while prioritizing environmental sustainability, preventing any detrimental effects from our business operations.</p>
Customers	No	Email, SMS, Newspaper, Pamphlets, Advertisement, Website	Ongoing	Active engagement with the customers helps MHRIL understand their expectations and experience with our services.
Shareholders	No	Quarterly investor calls, annual investor meets, Annual General Meeting, public and media announcements, press releases, Stock Exchange intimations, Company website, ongoing meetings / communication through electronic / social media	Quarterly & Annually	MHRIL maintains transparency with its shareholders and investors by publishing quarterly financial and business results on its website.

## LEADERSHIP INDICATORS

- 1. Provide the processes for consultation between stakeholders and the Board on economic, environmental and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.**

We consistently and proactively engage with our key stakeholders to effectively communicate our strategy and performance. Through ongoing communication and engagement, we ensure that expectations are aligned. The Board is regularly informed about various developments and their feedback is actively sought.

- 2. Whether stakeholder consultation is used to support the identification and management of environmental and social topics (Yes / No).**

Yes.

**If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.**

Yes, stakeholder consultations assist in identifying and managing environmental and social aspects. MHRIL, in collaboration with IGBC, Climate Group and SBTi, has committed to decarbonizing its resort operations and engaging related stakeholders. MHRIL's priority actions, aligned with Net Zero goals, includes designing Net Zero buildings, adopting science-based Net Zero targets, improving operational efficiency, mainstreaming low-carbon materials, developing climate-aligned building codes and standards and enabling performance monitoring of Net Zero buildings. These commitments enhance our efforts to integrate sustainability into our value chain.

Our Green Supply Chain Management ("GSCM") policy, commitment to SBTi, Carbon Neutrality and development of Net Zero buildings align with our business charter commitments. For instance, stakeholder consultation led to MHRIL becoming a founding member of IGBC to build cleaner and greener resorts. Collaboration with the Indo-Swiss Building Energy Efficiency Project ("BEEP") has helped mainstream energy-efficient and thermally comfortable building designs for residential and commercial buildings, strengthening our Climate Responsive Design ("CRD") specifications and energy

demand reduction. Biodiversity preservation under the guidance of IBBI (Indian Business and Biodiversity Initiative) ensures eco-balanced resorts.

Regular consultations with contractors and suppliers have highlighted the need to support each other in integrating ESG aspects across the value chain. This process culminated in the creation of a Code of Conduct for our Suppliers and Contractors. Thus, stakeholder consultation has significantly helped MHRIL integrate sustainability and build a strong ESG foundation across the value chain.

- 3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable / marginalized stakeholder groups.**

The Company focuses on creating long-term benefits to the society through various CSR initiatives by identifying disadvantaged / underprivileged sections of the demography residing in the peripheral areas of the Company by conducting on-ground need assessments from time to time. The Corporate Social Responsibility ("CSR") Policy of the Company makes it a point to focus attention on the disadvantaged segments of the society and directs CSR efforts to uplift them. The Company's social development projects are aimed at empowering the underprivileged sections of the society such as children, women, youth, etc. The programmes implemented are aimed at improving living standards of the community and generating employment and livelihood opportunities. The Company addresses the concerns of vulnerable / marginalised stakeholder groups by rolling out interventions in the areas of –

- Environmental Sustainability;
- Women Empowerment; and
- Promoting Education.

For eg. the Company supports the education of girls from socially and economically marginalised families, support is provided to women by enhancing their skills to enable employment opportunities, encourage entrepreneurship and improve the financial independence of women in the community. The Company has also rolled out multiple programmes to protect the environment such as sustainable fuelwood management, solar electrification and tree plantation initiatives.

## PRINCIPLE 5

### BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

#### ESSENTIAL INDICATORS

1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. of employees/ workers covered (B)	% (B / A)	Total (C)	No. of employees/ workers covered (D)	% (D / C)
<b>Employees</b>						
Permanent	4,339	4,189	97.00	4,116	3,375	82.00
Other than permanent	818	713	87.00	1,090	912	84.00
<b>Total Employees</b>	<b>5,157</b>	<b>4,902</b>	<b>95.00</b>	<b>5,206</b>	<b>4,287</b>	<b>82.00</b>
<b>Workers</b>						
Permanent	Not Applicable					
Other than permanent						
<b>Total Workers</b>						

2. Details of minimum wages paid to employees and workers, in the following format:

Category	FY 2023-24					FY 2022-23				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Permanent	4,339	0	0.00	4,339	100.00	4,116	0	0.00	4,116	100.00
Male	3,717	0	0.00	3,717	100.00	3,470	0	0.00	3,470	100.00
Female	622	0	0.00	622	100.00	646	0	0.00	646	100.00
Others	0	0	0.00	0	0	0	0	0.00	0	0.00
Other than Permanent Employees										
Other than Permanent	818	0	0.00	818	100.00	1,090	0	0.00	1,090	100.00
Male	621	0	0.00	621	100.00	891	0	0.00	891	100.00
Female	197	0	0.00	197	100.00	199	0	0.00	199	100.00
Others	0	0	0.00	0	0	0	0	0.00	0	0.00
Workers										
Permanent	Not Applicable									
Male										
Female										
Others										
Other than permanent										
Male										
Female										
Others										

**3. Details of remuneration/salary/wages, in the following format:**
**a. Median remuneration / wages:**

Category	Male		Female	
	Number	Median remuneration / salary / wages of respective category	Number	Median remuneration / salary / wages of respective category
Board of Directors ("BoD")	6	34,90,000	1	31,60,000
Key Managerial Personnel ("KMP")	3	1,05,95,232	0	0
Employees other than BoD and KMP	4,254	3,38,934	820	3,07,890
Workers	Not Applicable			

**b. Gross wages paid to females as % of total wages paid by the entity, in the following format:**

Particulars	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages	13.48	13

**4. Do you have a focal point (Individual / Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes / No)**

Yes.

**5. Describe the internal mechanisms in place to redress grievances related to human rights issues.**

The Company's Business Responsibility (BR) Policy includes provisions for human rights. Human rights considerations are part of the supplier selection process and are incorporated into their contracts. The Company's Code of Conduct, Prevention of Sexual Harassment, and Whistleblower Policies, along with the BR Policy, address all human rights aspects and apply to all stakeholders. The Company upholds these human rights principles both internally and externally when interacting with various stakeholders. Additionally, the Company actively promotes awareness of human rights among its stakeholders and encourages respect for the human rights of local communities, particularly focusing on vulnerable and marginalized groups.

**6. Number of Complaints on the following made by employees and workers:**

Particulars	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	21	1	NA	1	0	All Resolved
Discrimination at workplace	Nil	Nil	NA	Nil	Nil	NA
Child Labour	Nil	Nil	NA	Nil	Nil	NA
Forced Labour/Involuntary Labour	Nil	Nil	NA	Nil	Nil	NA
Wages	Nil	Nil	NA	Nil	Nil	NA
Other human rights related issues	Nil	Nil	NA	Nil	Nil	NA

**7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:**

Particulars	FY 2023-24	FY 2022-23
Total Complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH")	21	1
Complaints on POSH as a % of female employees/workers	2.56	0.12
Complaints on POSH upheld	0	1

**8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.**

At MHRIL, we strive to maintain a workplace that is safe, transparent and welcoming. A core philosophy is understanding our employees and ensuring they feel confident that their work environment is fair, transparent and safe. To support this, we have implemented a Policy on Prevention of Sexual Harassment. MHRIL has a zero-tolerance stance towards any unacceptable behavior. We encourage reporting of any harassment concerns and promptly address complaints about harassment or other unwelcome conduct. Committees have been established at various locations to investigate sexual harassment complaints and recommend appropriate actions when necessary. Information about the sexual harassment complaints received and their resolution is disclosed in the Annual Report 2024. Regular awareness and training sessions are conducted to ensure employees are fully informed about sexual harassment and the redressal mechanisms available.

**9. Do human rights requirements form part of your business agreements and contracts? (Yes / No)**

Yes.

**10. Assessments for the year:**

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100
Forced / Involuntary labour	100
Sexual harassment	100
Discrimination at workplace	100
Wages for employees	100
Others - please specify	NA

**11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above.**

For FY 2023-24, MHRIL ensured 100% assessments across all operations for child labour, forced labour, sexual harassment, workplace discrimination, and employee wages. The risks were addressed by implementing strict compliance checks, conducting regular audits, enhancing training programs, and reinforcing policies to promote a safe, equitable, and compliant working environment.

**LEADERSHIP INDICATORS**

**1. Details of a business process being modified / introduced as a result of addressing human rights grievances / complaints.**

In addition to having an internal committee for addressing sexual harassment cases and a BEGC cell for resolving code of conduct violations, MHRIL has implemented an independent, third-party grievance reception and redressal mechanism called the 'Ethics Helpline'. This service is available to all employees to address any type of issue or violation.

**2. Details of the scope and coverage of any Human rights due diligence conducted.**

MHRIL addresses all aspects of human rights, including the right to life and liberty, freedom from slavery, freedom of opinion and expression, the right to work and education, equal opportunity, and the prevention of sexual harassment.

**3. Is the premise / office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?**

Yes, MHRIL office in Worli is accessible to differently-abled employees in accordance with the Rights of Persons with Disabilities Act, 2016, and it is IGBC Platinum certified. This means it meets and exceeds the requirements specified by the IGBC certification. At our resorts, MHRIL ensures accessibility for differently-abled individuals by providing ramps and specially designed washrooms.

**4. Details on assessment of value chain partners:**

Particulars	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	Nil
Discrimination at workplace	Nil
Child Labour	Nil
Forced Labour / Involuntary Labour	Nil
Wages	Nil
Others – please specify	Nil

**5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.**

Nil.



**PRINCIPLE 6**
**BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT**
**ESSENTIAL INDICATORS**
**1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:**

Parameter	FY 2023-24	FY 2022-23
<b>From renewable sources</b>		
Total electricity consumption (A)	18,953 (Solar)	15,543 (Solar)
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>18,953</b>	<b>15,543</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D)	1,30,523	1,31,721
Total fuel consumption (E)	6,663	5,983
Energy consumption through other sources (F)	-	-
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>1,37,186</b>	<b>1,37,704</b>
<b>Total energy consumed (A+B+C+D+E+F)</b>	<b>1,56,139</b>	<b>1,53,247</b>
<b>Energy intensity per rupee of turnover</b> (Total energy consumed /Revenue from operations) (GJ per crore INR)	108.87	117.37
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Energy consumed / revenue from operations adjusted for PPP) (GJ per crores INR adjusted for PPP)	2,438.80	2,629.29
Energy intensity in terms of Physical Output	-	-
Energy intensity (optional) - the relevant metric may be selected by the entity. (GJ per occupied room)	0.145	0.146

**Note:** The source for Purchasing Power Parity ("PPP") is International Monetary Fund ("IMF"). The PPP rates considered is 22.4 as per the 2024 update.

**Note:** Indicate if any independent assessment / evaluation / assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No.

**2. Does the entity have any sites / facilities identified as Designated Consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N)**

No.

**If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any**

Not Applicable.



3. Provide details of the following disclosures related to water, in the following format:

Parameter	Please specify unit	FY 2023-24	FY 2022-23
Water withdrawal by source (in kilolitres)			
(i) Surface water	Kilolitres	-	-
(ii) Groundwater	Kilolitres	4,94,132	6,15,523
(iii) Third party water (Tanker)	Kilolitres	1,49,121	1,20,556
(iv) Seawater / desalinated water	Kilolitres	-	-
(v) Others (Municipal)	kilolitres	2,34,880	3,87,834
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	Kilolitres	<b>8,78,133</b>	<b>11,23,913</b>
<b>Total volume of water consumption (in kilolitres)</b>	kilolitres	<b>8,78,133</b>	<b>11,23,913</b>
Water intensity per rupee of turnover (Total water consumption / revenue from operations)	kilolitres per crores (INR)	612.32	860.86
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/ Revenue from operations adjusted for PPP)	kilolitres per crores INR adjusted for PPP	13,715.94	19,283.26
Water intensity in terms of Physical output	-	-	-
Water intensity (optional) - the relevant metric may be selected by the entity	kilolitres per occupied room	0.82	0.94

**Note: Indicate if any independent assessment / evaluation / assurance has been carried out by an external agency? (Y/N)**

Yes.

**If yes, name of the external agency.**

GRI/KPMG as part of group Sustainability Review.

4. Provide the following details related to water discharge:

Parameter	FY 2023-24	FY 2022-23
<b>Water Discharge by destination and level of treatment (in Kiloliters)</b>		
(i) To Surface water		
- No treatment	0	0
- With treatment – Please Specify level of treatment	0	0
(ii) To Groundwater		
- No treatment	0	0
- With treatment – Please Specify level of treatment	0	0
(iii) To Seawater		
- No treatment	0	0
- With treatment – Please Specify level of treatment	0	0
(iv) Sent to third parties		
- No treatment	0	0
- With treatment – Please Specify level of treatment	0	0
(v) Others		
- No treatment	0	0
- With treatment – Please Specify level of treatment	0	0
<b>Total water discharged (in kiloliters)</b>	<b>0</b>	<b>0</b>

**Note: Indicate if any independent assessment / evaluation / assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

No.

**5. Has the entity implemented a mechanism for Zero Liquid Discharge?**

Yes.

**If yes, provide details of its coverage and implementation.**

Recycled water is used in gardening, flushing, cooling towers, washing of floors.

**6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:**

Parameter	Please specify unit	FY 2023-24	FY 2022-23
NO <sub>x</sub>	Âµg/m <sup>3</sup>	0.095	0.096
SO <sub>x</sub>	Âµg/m <sup>3</sup>	0.052	0.054
Particulate matter ("PM")	Âµg/m <sup>3</sup>	0.036	0.038
Others – please specify	-	0	0

**Note: Indicate if any independent assessment / evaluation / assurance has been carried out by an external agency? (Y/N)**

Yes.

**If yes, name of the external agency.**

State Pollution Control Board

**7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:**

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 1 emissions ( Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	5,667	5,907
Total Scope 2 emissions ( Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	30,092	28,876
Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	tCO <sub>2</sub> e/ crores INR	24.93	26.64
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity ("PPP") (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	tCO <sub>2</sub> e / crores INR adjusted for PPP	558.53	596.78
Total Scope 1 and Scope 2 emission intensity in terms of physical output	-	-	-
Total Scope 1 and Scope 2 emission intensity (optional) - the relevant metric may be selected by the entity (per occupied room night)	tCO <sub>2</sub> e/ occupied room night	0.033	0.033

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)**

Yes.

**If yes, name of the external agency.**

GRI/SBTi (Science Based Target Initiative).

**8. Does the entity have any project related to reducing Green House Gas emission?**

Yes.

**If Yes, then provide details.**

MHRIL is dedicated to embracing innovative technologies in renewable energy to both generate electricity and decrease greenhouse gas emissions. Our focus is on achieving specified targets for electricity generation and greenhouse gas reduction through various means such as Solar Power & Battery backup system installation, BLDC Fans, Thermodynamic heating/heat pump occupancy sensors, and more. Internally, we are promoting the use of Electric vehicles among our employees by installing EV charging points as part of our broader strategy to increase renewable energy production and reduce emissions. The installation of EV charging points has been positively received by our customers at our resorts. We are committed to implementing these technologies and systems across all our resorts soon to contribute significantly to the overall reduction of greenhouse gas emissions in the region.

**9. Provide details related to waste management by the entity, in the following format:**

Parameter	Unit	FY 2023-24	FY 2022-23
Total Waste generated (in metric tonnes)			
Plastic waste (A)	metric tonnes	36	46
E-waste (B)	metric tonnes	3	5
Bio-medical waste (C)	metric tonnes	2	3
Construction and demolition waste (D)	metric tonnes	0	0
Battery waste (E)	metric tonnes	2	2
Radioactive waste (F)	metric tonnes	0	0
Other Hazardous waste. Please specify, if any. (G)	metric tonnes	6	5
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	metric tonnes	1,013	940
<b>Total (A+B + C + D + E + F + G + H)</b>	metric tonnes	<b>1,062</b>	<b>1,001</b>
<b>Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)</b>	metric tonnes/ crores INR	0.73	0.76
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Waste generated/ revenue from operations adjusted for PPP)</b>	metric tonnes / crores INR adjusted for PPP	16.57	17.17
<b>Waste intensity in terms of physical output</b>			
<b>Waste intensity (optional) – the relevant metric may be selected by the entity</b>	metric tonnes / occupied room night	<b>0.00098</b>	<b>0.00095</b>
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)			
Category of waste			
(i) Recycled	metric tonnes	320	293
(ii) Re-used	metric tonnes	742	705
(iii) Other recovery operations	metric tonnes	-	-
<b>Total</b>	metric tonnes	<b>1,062</b>	<b>998</b>
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)			
Category of waste			
(i) Incineration	metric tonnes	2	3
(ii) Landfilling	metric tonnes	0	0
((iii) Other disposal operations	metric tonnes	0	0
<b>Total</b>	metric tonnes	<b>2</b>	<b>3</b>

**Note: Indicate if any independent assessment / evaluation / assurance has been carried out by an external agency? (Y/N)**

Yes.

**If yes, name of the external agency.**

GRI/TUV (Technischer Überwachungs Verein).

**10 Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.**

We recognize the importance of using alternative construction materials to reduce reliance on virgin resources, thereby decreasing our environmental footprint related to energy consumption, pollution and waste disposal. To mitigate the impact of these materials, we have integrated circularity principles into our operations and aligned our material procurement strategy with Green Supply Chain Management.

MHRIL employs innovative techniques to manage waste generated during the design, construction and occupancy stages of a project. We minimize waste production by reusing, recycling and ensuring safe disposal at designated sites. As part of our commitment to sustainability, all our projects are 100% green-certified, and we develop detailed waste management plans from the design stage through the construction and use phases. These plans are meticulously executed on-site.

Our resorts feature 100% on-site composting of organic waste and treatment of recyclables and other waste through partnerships with authorized vendors. Each project includes a resource recovery center ("RRC") for secondary waste segregation, adding value by deriving resources from waste. During construction, most construction and demolition waste, such as waste blocks and tiles, is repurposed within the project, for example, in roof tiling and kitchen block work, which reduces landfill diversion and costs. Scrap materials like steel, iron and aluminum are sold to authorized handlers for recycling.

Our primary goal is to avoid wastage and reuse materials through innovative interventions. We have on-site composting and organic waste treatment mechanisms, such as utilizing food waste in biogas plants at various resorts. We have also eliminated single-use plastic in our resorts. All other waste is recycled with the help of authorized vendors and our waste data is reported on the GRI portal with third-party audits to ensure zero waste to landfill. MHRIL is committed to having all resorts certified as Zero Waste to landfill by FY 2025.

**11. If the entity has operations / offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:**

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N)	If no, the reasons there of and corrective action taken, if any.
All our resorts have environmental approvals / clearances as per requirements				

MHRIL has resorts across 11 Indian states. None of the projects are in ecologically sensitive areas. Our land selection process ensures screening out of areas near ecologically sensitive zones.

We do undertake environmental clearances for our projects aligned with the regulatory requirements. Though none of our projects are in sensitive zones, we do undertake biodiversity studies through external partners for projects rich in biodiversity and conserve the natural ecosystem (during construction too through our sustainable construction practices and regular biodiversity assessment for such areas). In FY 2024, we did a biodiversity study for our Treehouse Resort, Kensville and Netrang, and conservation of the same is part of our customer value proposition which will be maintained through our sustainable construction practices and design interventions.

**12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:**

Environmental Impact Assessment ("EIA") is conducted for our resorts. We do conduct hydrology and hydrogeological studies, soil testing and other environmental tests for projects based on preliminary due diligence and make necessary interventions aligned with our sustainability commitments (on Net Zero Water, Net Zero Energy, etc.). In our locations either developed or currently under development, EIA were conducted before the commencement of development.

**13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N).**

Yes.

## LEADERSHIP INDICATORS

### 1. Water withdrawal, consumption, and discharge in areas of water stress (in kilolitres):

For each facility / plant located in areas of water stress, provide the following information:

- (i) **Name of the area:** Naldehra and Kandaghat
- (ii) **Nature of operations:** Use of water for domestic, landscaping and drinking purpose.
- (iii) **Water withdrawal, consumption, and discharge in the following format:**

Parameter	FY 2023-24	FY 2022-23
Water Withdrawal by source (in Kiloliters)		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	34,901	40,584
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
<b>Total volume of water withdrawal (in kilolitres)</b>	<b>34,901</b>	<b>40,584</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>34,901</b>	<b>40,584</b>
<b>Water intensity per rupee of turnover (Water consumed / turnover) (kiloliters per crores INR)</b>	24.33	31.08
<b>Water intensity (optional) – the relevant metric may be selected by the entity (kiloliters per occupied room)</b>	0.032	0.038
<b>Water Discharge by destination and level of treatment (in Kiloliters)</b>		
(i) To Surface water		
- No treatment	0	0
- With treatment – Please Specify level of treatment	0	0
(ii) To Groundwater		
- No treatment	0	0
- With treatment – Please Specify level of treatment	0	0
(iii) To Seawater		
- No treatment	0	0
- With treatment – Please Specify level of treatment	0	0
(iv) Sent to third parties		
- No treatment	0	0
- With treatment – Please Specify level of treatment	0	0
(v) Others		
- No treatment	0	0
- With treatment – Please Specify level of treatment	0	0
<b>Total water discharged (in kiloliters)</b>	<b>0</b>	<b>0</b>

**Note:** Indicate if any independent assessment / evaluation / assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No.

### 2. Please provide details of total Scope 3 emissions & its intensity, in the following format: Not Available

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 3 emissions ( Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	-	-
Total Scope 3 emissions per rupee of turnover	tCO <sub>2</sub> e/rupees crores	-	-
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	tCO <sub>2</sub> e /occupied room night	-	-

**Note:** Indicate if any independent assessment / evaluation / assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No.

**3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along with prevention and remediation activities.**

MHRIL's operations in ecologically sensitive areas can have both direct and indirect impacts on biodiversity. Direct impacts may include habitat destruction, fragmentation and disturbance due to construction activities or resource extraction. Indirect impacts could stem from increased human activity leading to pollution, invasive species introduction, or altered ecological dynamics.

To mitigate these impacts, MHRIL implements various prevention and remediation measures. This includes conducting thorough environmental impact assessments before initiating projects to minimize disruption to habitats. Additionally, they employ sustainable construction practices, such as using eco-friendly materials and minimizing land clearing.

MHRIL also actively engages in biodiversity conservation efforts, including habitat restoration and protection initiatives within and around their properties. They collaborate with local communities and conservation organizations to implement biodiversity monitoring programs and undertake measures to restore degraded ecosystems.

Through these proactive measures, MHRIL aims to minimize its ecological footprint in sensitive areas while contributing to biodiversity conservation and environmental stewardship.

**4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:**

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along with summary)	Outcome of the initiative
1.	Creating a green team, encouraging guests to be green, starting composting, saving water, planting through Hariyali initiative, supporting local, sustainable businesses, implementing alternative energy sources	MHRIL has already received the highest certification from IGBC i.e., platinum' green building certification (IGBC-CII) of 17 of its resorts. MHRIL has done a considerable job in terms of GHG emission reduction with 31% reduction in Scope 1 & 2 emissions.	The outcome of such initiatives is that it reduces the environmental impact by MHRIL. For example, exploring and installing energy-saving technologies reduced energy consumption. Creating a green team helped promoting environmental awareness and encourage employees to take action. Encouraging guests to be green helped to reduce waste and promote sustainable practices. Starting composting helped to reduce food waste and create nutrient-rich soil. Saving water helped to conserve this precious resource. Planting a garden helped to provide fresh produce for guests and employees. Supporting local, sustainable businesses helped to reduce the carbon footprint of MHRIL. Implementing alternative energy sources helped to reduce reliance on fossil fuels and promote and adopt renewable energy in MHRIL

**5. Does the entity have a business continuity and disaster management plan?**

**Give details in 100 words / web link.**

MHRIL maintains a business continuity plan designed to safeguard essential business functions and processes during and after a disaster. Additionally, the Company has a disaster recovery plan in place to facilitate the restoration of operations following a significant disruption. Adhering to the standards outlined in ISO 22301:2019, the international benchmark for business continuity management, MHRIL incorporates the following elements into its plan:

1. Conducting a business impact analysis;
2. Performing risk assessments;
3. Formulating business continuity strategies;
4. Implementing emergency response and operations procedures;
5. Developing and updating the plan as needed; and
6. Providing awareness and training programs for employees.

**6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.**

Due to our strong commitment to environmental responsibility, our value chain has no adverse impact on the environment. However, controlling scope 3 emissions remains challenging. Therefore, we prioritize reducing emissions within our value chain over actions or investments aimed at mitigating emissions outside of it to achieve net-zero emissions. Among our initiatives at MHRIL are water conservation and reuse efforts, participation in EP100 and RE100 initiatives, reducing material consumption, implementing solid waste mitigation strategies such as Zero Waste to landfill, eliminating single-use plastics and food waste and setting Science Based Targets (both long-term and short-term), among others.

**7. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.**

MHRIL trained and evaluated 355 of 741 key vendors (above 48% of them) for environmental impact during FY 2023–2024.

**PRINCIPLE 7**

**BUSINESSES, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT**

**ESSENTIAL INDICATORS**

**1. a. Number of affiliations with trade and industry chambers / associations.**

MHRIL has affiliations with two trade and industry chambers / associations.

**b. List the top 10 trade and industry chambers / associations (determined based on the total members of such body) the entity is a member of/ affiliated to.**

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Bombay Chamber of Commerce and Industry (BCCI)	State
2	All India Resort Development Association (AIRDA)	National

**2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.**

Not Applicable.

**LEADERSHIP INDICATORS**

**1. Details of public policy positions advocated by the entity:**

MHRIL does not engage in direct public advocacy.



## PRINCIPLE 8

### BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

#### ESSENTIAL INDICATORS

1. Details of Social Impact Assessments ("SIA") of projects undertaken by the entity based on applicable laws, in the current financial year.

Name and brief details of project	SIA notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web Link
Not Applicable					

As per applicable laws, SIA is not applicable for any of the projects undertaken by the Company.

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement ("R&R") is being undertaken by your entity, in the following format:

Since MHRIL deals with the development and operations of a holiday resort in remote, tourist destinations and unexplored areas, rehabilitation and resettlement of communities are not applicable to our business model.

3. Describe the mechanisms to receive and redress grievances of the community.

The Company has established mechanisms to enable effective communication with all stakeholders, identify key concerns and provide equitable and transparent resolutions. Specific teams within our Company are responsible for engaging with each stakeholder group. In community-based CSR projects, a Company representative at each location facilitates interactions with beneficiary groups to address and resolve any issues.

The process is as follows: stakeholders contact the local management to share their concerns, which are then reviewed to assess the need and desired outcome. An implementing agency with expertise in the relevant area and location is selected for the project. Regular interactions with the community are conducted through physical visits, feedback reviews and evaluations of outcomes, including photos. If a grievance arises that the Company can address, necessary approvals are obtained and action is taken to resolve the issue.

4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

	FY 2023-24	FY 2022-23
Directly sourced from MSMEs/ small producers	22.5	19
Directly from within India	22.5	52

MHRIL integrates sustainability in all processes including the supply chain driven by the Green Supply Chain Management ("GSCM") policy which ensures minimal / zero environmental and social impacts on its products. MHRIL gives priority to the purchase of locally available material to minimize environmental impact and gives preference to green-certified products. Most of the day-to-day operating item is procured from local vendors as aligned with our GSCM Policy.

5. Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost

Location	FY 2023-24	FY 2022-23
Rural	4.09	6.12
Semi-urban	11.56	12.39
Urban	14.14	17.31
Metropolitan	70.21	64.18

(Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)

#### LEADERSHIP INDICATORS

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Not applicable.



2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

S. No.	State	Aspirational District	Amount spent (in ₹)
1	Rajasthan	Jaisalmer	60,273.38

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized / vulnerable groups? (Yes / No)

Yes.

- (b) From which marginalized / vulnerable groups do you procure?

Small time Vendors from Local Village & Female Vendors.

- (c) What percentage of total procurement (by value) does it constitute?

1.55%.

We speak to all vendors and inform them to promote employment of atleast 25% of their workforce to be women, we also promote to buying items from women entrepreneurs. We ensure we buy most of our operational items from local villages.

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

Nil.

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Not applicable.

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Nanhi Kalli - Provide all round support in education to underprivileged girl children in India	3,290	100
2	Smokeless Stoves - promoting sustainable and cleaner form of cooking with Sarala cookstoves.	3,635	100
3	Access to potable water in communities	36,880	100
4	Solar Lantern Distribution	400	100
5	Saksham-Skill Building for Women and Entrepreneurship for women	85	100
6	Building Livelihoods of Women Artisans	75	100
7	Project Udaan: Enhancing livelihood opportunities for women	100	70
8	Sustainable Fuelwood management: Distribution of energy efficient cookstoves	9	70
9	Imparting employability / livelihood skills to the family members of head loaders community.	500	100

## PRINCIPLE 9

### BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER

#### ESSENTIAL INDICATORS

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

To ensure the timely and effective resolution of customer grievances, MHRIL has adopted a grievance redressal policy that prioritizes customer satisfaction and values their feedback. Our organization has a robust system in place to address

customer complaints and collect feedback, acknowledging the importance of such input in delivering exceptional services. We engage with customers through various channels, including voice calls, emails, our website, mobile app, social media, and more, to actively listen to their feedback and concerns. Additionally, we organize member engagement meetings in various cities to facilitate face-to-face interactions with our customers. These regular interactions provide platforms for discussing issue resolutions and implementing improvement measures.

Customer feedback generally falls into two categories: Service requests and complaints. Service requests are instances where customers seek a specific service, while complaints arise when customers express dissatisfaction with a provided service. To handle complaints efficiently, we follow structured Standard Operating Procedures (SOPs) within defined timelines and offer multiple levels of escalation, if the initial resolution is unsatisfactory. This structured approach not only helps us address customer concerns effectively but also provides opportunities to enhance our processes and leverage new technologies, ultimately leading to greater customer satisfaction.

**2. Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:**

Particulars	As a percentage to total turnover
Environmental and social parameters relevant to the product	100
Safe and responsible usage	100
Recycling and / or safe disposal	We at MHRIL are committed to achieve the 100% target under the head of recycling and of safe disposal by 2025.

**3. Number of consumer complaints in respect of the following:**

Particulars	FY 2023-24		Remarks	FY 2022-23		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	There have been no consumer complaints received in respect of these practices.					
Advertising						
Cyber-security						
Delivery of essential services						
Restrictive Trade Practices						
Unfair Trade Practices						
Other	1.8% of our member base	162	NA	1.5% of our member base	6	NA

**4. Details of instances of product recalls on account of safety issues:**

Not applicable, since MHRIL does not have any products that can entail safety issues, as it is a vacation ownership and accommodation related services.

**5. Does the entity have a framework / Details policy on cyber security and risks related to data privacy? (Yes/No)**

Yes.

**If available, provide a web-link of the policy.**

MHRIL's Policies related to cyber security and data privacy are publicly available on the website.

Weblink for the policy: <https://www.clubmahindra.com/privacy-policy>

In additions to this, the employees at MHRIL are being made aware about the importance of data security & risk related data privacy through various internal policies and awareness program.

**6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.**

Not applicable, as no issues have been raised at MHRIL related to advertising, and delivery of essential services; cyber security, and data privacy of customers; re-occurrence of instances of product recalls; penalty/ action taken by regulatory authorities on safety of products / services.

**7. Provide the following information relating to data breaches:**

**a. Number of instances of data breaches**

None.

**b. Percentage of data breaches involving personally identifiable information of customers**

In FY 2024, the Company has maintained a strong track record of data security with zero instances of data breaches. This accomplishment is attributed to the robust cyber security policy and processes implemented to effectively address and mitigate any potential security incidents.

**c. Impact, if any, of the data breaches**

Not Applicable.

**LEADERSHIP INDICATORS**

**1. Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).**

The website offers comprehensive access to all details concerning MHRIL services. This includes an array of information such as resort details, the latest schemes and offers, communications and more—all readily available in the public domain.

Link to access the website <https://www.clubmahindra.com/>

**2. Steps taken to inform and educate consumers about safe and responsible usage of products and / or services.**

At MHRIL, we prioritize ensuring that our customers are well-informed about the safe and responsible use of our services. We achieve this goal by offering comprehensive information on our website and through regular communications. Our dedicated team members at branches and resorts also play a crucial role in educating our valued members about these practices, ensuring they can enjoy our services safely. Additionally, we reinforce the message of safe and responsible service usage through strategically placed signage at our resorts. Moreover, digital signages and fire emergency exit instructions are prominently displayed in key areas like lobbies, elevators or common areas to inform guests about any potential disruptions. These displays offer real-time updates and can be easily adjusted as the situation changes.

**3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.**

Our comprehensive resort management involves overseeing all aspects of maintenance, including daily upkeep and housekeeping tasks, as well as addressing resident concerns and grievances. We ensure effective communication about any resort disruptions, closures or access restrictions well in advance through various proactive channels. Additionally, our dedicated resort staff promptly informs all resident members about any disruptions in essential services on the property. By prioritizing staff training, we ensure that our team can effectively notify customers about potential service disruptions based on their geographical location. This allows staff members to confidently provide accurate and timely information, ensuring guests are fully informed and can make the necessary arrangements for a seamless stay experience.

**4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes / No / Not applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes / No)**

MHRIL's Prospect & Member Website and Mobile app provide a comprehensive platform for accessing all necessary resort and booking information. During the onboarding process for new members, we thoroughly explain important details, including holiday guidelines, product / membership specifics and the terms and conditions associated with our membership.

The Company engages in consumer research involving both members and prospects to gain insights into their travel aspirations, identify areas for improvement and understand the motivations behind their travel choices. This allows the brand to align with the evolving needs of consumers. Additionally, the Company periodically conducts Brand Track studies with customers to measure the efficiency, effectiveness and awareness of our brand campaigns. At the resort level, we conduct a comprehensive Post-Holiday Feedback Survey, which includes Net Promoter Score ("NPS") and Customer Satisfaction ("CSAT") surveys, after members check out. This survey captures the overall experience from check-in to check-out, covering aspects such as accommodations, dining experiences and unique offerings at the Happy Hub and Spa.