

Environmental, Social & Governance (ESG) Policy

Purpose of the Policy

Highway Infrastructure Trust (HIT) believes that Environmental, Social & Governance (ESG) aspects are fundamentals to its operations and will strive to adopt suitable ESG practices, establish specific goals and measure performance periodically. The purpose of this policy is to endorse HIT's commitments towards Environment, Social and Governance and ensure effective procedures for its implementation across the operations.

Scope & Applicability

This policy intends to define clear framework enabling HIT in considering ESG factors in their business. The policy will be applicable to HIT, its subsidiaries and all the Special Purpose Vehicles (SPVs / Projects) managed by HIT.

ESG Policy Objectives:

Environment:

- Ensuring compliance with all the applicable national Environmental regulations, and lenders' requirements.
- Actively seek to reduce Green House Gas (GHG) Emissions from Operations as per defined targets and establish a plan for achieving and measuring such reduction.
- Make efficient use of resources required for operations, ensuring proper disposal and recycling of waste from operations in a sustainable manner & use of renewable / sustainable sources of energy.
- Monitor Pollution (Air, Water, Noise) and any biodiversity related impact across the projects.
- Evaluate and Mitigate Climate Change Risks to our business operations.
- Increase awareness / engagement within organization about Sustainable Development & Environment Conservation.

Social:

- Adhere to all applicable statutory and regulatory requirements and good workplace practices for its own employees and contractor's workers across its operations.

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- Support the communities living along the corridor for betterment of their livelihood and safe use of roads.
- Promote and ensure safety, health and welfare of all personnel working at projects and visitors to the site with Zero Fatalities as a target.
- Provide health and safety training to all direct and indirect personnel so that circumstances which could lead to unsafe conditions and accidents are prevented as well as minimized.
- Provide safe working environment, proper facilities and appropriate tools so that the work is carried out in a safe and careful manner
- Follow labour laws including Strictly forbidding the use of any form of illegal labour practices such as child, forced or bonded labour within any of its operations (including by Contractors)
- Encourage Diversity & Inclusion in our business operations creating discrimination free work environment.
- Achieve high level of employee engagement to build a cohesive team.
- Establish transparent and clear grievance redressal mechanism.

Governance:

- Conduct business in a manner to ensure excellence in Corporate Governance along with compliance of all statutory & self-undertaken requirements.
- Robust decision making and governance structure through a balanced board of directors with independent directors and executive team.
- Board committees to review and have supervision on critical business and operation areas such as Remuneration, Audit and Risk & Ethics.
- Ensure adherence to all relevant laws, rules and regulations relating to the disclosure of information and transparency.
- Establish clear standard of business conduct with Zero Tolerance for corruption by following Anti Bribery & Anti-Corruption (ABAC) Policy.
- Establish robust whistle blower policy to have an efficient structure for reporting, investigating and addressing any concern raised by whistle blower.
- Data Privacy – We will maintain high standards within our Management System for data security to prevent any data leakage or data theft.

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- Create Standard Operating Procedures (SOPs) for all major business processes and ensure adherence of same.

An appropriate Board managed structure shall be put in place to operate and monitor this Policy.

Neeraj Sanghi
Chief Executive Officer
Highway Concessions One Pvt Ltd

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