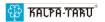


# KALPATARU PROJECTS INTERNATIONAL LIMITED (Formerly Kalpataru Power Transmission Limited)

# Environment, Occupational Health, Safety & Sustainability Policy

Document reference		KPIL/EHSS/Policy/02
Document Version		02
Proposed by		President, EHS & Chief Sustainability Officer
Approver		Managing Director and CEO
Date approved		01st June 2023
Amendment No.	Date	Approved by
01	27 <sup>th</sup> September 2024	Managing Director and CEO



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#### 1. INTRODUCTION

Kalpataru Projects International Limited (hereinafter referred to as "KPIL"/ "Company" / or "we" or "our") is committed to conducting our business in a manner that promotes environmental sustainability, prioritizes health and safety of our employees, associates, contractors, suppliers and vendors, and contributes positively to the communities in which we operate. As a leading Engineering, Procurement and Construction (EPC) company, we recognize our responsibility to minimize environmental footprint, protect well-being of our workforce, and uphold the highest standards of safety and sustainability in all aspects of our operations including our value chain. We are dedicated to conducting our business in an ethical manner, upholding the highest standards of corporate governance.

#### 2. OBJECTIVE

The objective of this Environment, Occupational Health, Safety & Sustainability (EHSS) Policy (Policy) is to ensure that we, at KPIL conduct our business operations in a manner that invests in environmental protection, safeguards the health and safety of our employees and stakeholders, and promotes sustainable practices throughout our operations our value The across chain. processes/systems/frameworks that are incorporated for implementation of this Policy are aligned with international standards such as ISO 14001 (Environmental Management Systems), ISO 45001 (Occupational Health and Safety Management Systems), and principles outlined by relevant regulatory bodies and industry best practices. By adhering to this Policy, we seek to minimize our environmental footprint, prevent workplace injuries and illnesses, foster a culture of safety and well-being, and contribute positively to the communities and environments in which we operate by being a catalyst for a more sustainable, innovative, inclusive, and low-carbon economy.



#### 3. **DEFINITIONS**

- i. EHSS (Environment, Occupational Health, Safety & Sustainability): This refers to the integrated approach adopted by Kalpataru Projects International Limited (KPIL) to prioritize environmental protection, occupational health, safety, and sustainability throughout our business operations.
- ii. **Stakeholders:** Stakeholders encompass all individuals or entities that have an interest or are affected by the activities of KPIL, including but not limited to employees, customers, suppliers, contractors, communities, regulatory bodies, and civil society organizations.
- iii. **Parties:** Parties refer to all suppliers, vendors, and contractors associated with KPIL.
- iv. **Value Chain**: Value chain refers to all the parties involves from the initial project conceptualization and design (upstream activities), through procurement and logistics management (midstream activities), to on-site construction, installation, and project handover (downstream activities).

#### 4. SCOPE

This Policy shall extend to all the employees of the Company, our subsidiaries and Joint Ventures, and parties of the Company. This shall include production operations, business facilities, products and services, logistics, due-diligence, mergers and acquisitions.



#### 5. EHSS COMMITMENT

At KPIL, we pledge to abide by the following EHSS commitments:

- i. Environmental Stewardship: We prioritize the protection of natural resources, reduction of environmental impact, and promotion of sustainable practices in our operations, including our value chains. This includes combating climate change, reducing greenhouse gas emissions, promoting circular economy, minimizing waste generation, conserving energy and water, and conserving biodiversity.
- ii. Occupational Health and Safety (OHS): We prioritize the health, safety, and well-being of our employees, parties and stakeholders. We maintain safe working conditions, provide necessary training and resources, and comply with relevant occupational health and safety regulations to prevent accidents and injuries.
- iii. **Sustainability**: We integrate sustainability into our business strategies, considering governance, social, and environmental aspects. This includes promoting sustainable procurement practices, supporting local communities, and contributing to the achievement of the United Nations Sustainable Development Goals (SDGs).

#### 6. POLICY PROVISIONS

At KPIL, we are committed towards ensuring the integration of best practices in environmental management, occupational health, safety, and sustainability across all aspects of our operations, aiming to achieve zero harm to people and the environment while promoting continuous improvement and sustainable development. We adhere to the following principles in our interactions with stakeholders throughout the value chain:



- i. Compliance with Laws and Regulations: KPIL commits to complying with all relevant environmental, health, safety, and sustainability laws, regulations, and standards in every location where we operate, including throughout our value chain.
- ii. Stakeholder Engagement and Collaboration: KPIL recognizes the importance of engaging with and collaborating with stakeholders, including employees, customers, suppliers, communities, and regulatory bodies, to address environmental, health, safety, and sustainability concerns effectively.
- iii. **Risk Assessment and Management**: KPIL conducts thorough risk assessments to identify and mitigate potential environmental, biodiversity, health, safety, and sustainability risks associated with our operations, products, and services, extending to our value chain.
- iv. **Climate Action**: The Company actively participates in global climate action by achieving ambitious emission reduction targets, effectively managing risks, and capitalizing on opportunities presented by the Climate Change Agenda, as outlined in The Paris Agreement on climate change, across our entire value chain.
- v. **Resource Efficiency and Conservation**: KPIL strives to optimize resource use, minimize waste generation, and promote the efficient use of energy, water, and raw materials throughout our operations and value chain.
- vi. **Pollution Prevention**: KPIL seeks to prevent pollution by implementing measures to minimize emissions, discharges, and waste generation, as well as by adopting cleaner production technologies and processes across our value chain.
- vii. **Biodiversity Conservation**: KPIL acknowledges the importance of biodiversity conservation and ecosystem protection, striving to minimize our impact on natural habitats and species diversity across our value chain. We will end all deforestation in our operations, conduct reforestation drives for promoting ecological preservation and development. We will proactively



engage with our value chain and public for fostering no net loss and biodiversity conservation through net positive impact (NPI).

- viii. **Employee Health and Safety**: KPIL prioritizes the health and safety of our employees, parties and all our stakeholders throughout our value chain by providing a safe working environment, implementing effective safety training programs, and promoting a culture of safety awareness and participation.
- ix. **Equality and Diversity**: KPIL fosters an inclusive workplace culture where every employee is valued and respected, ensuring equal opportunities and career advancement based solely on merit. KPIL promotes equality and diversity in our dealing with all our parties throughout our value chain.
- x. Human Rights: KPIL is committed to safeguarding human rights in all aspects of our business operations and collaborations with parties and stakeholders throughout our value chain. We uphold and respect human rights while actively contributing to their protection, in alignment with our Human Rights Policy.
- xi. Social Responsibility: We recognize our social responsibility to contribute positively to the communities in which we operate, including supporting local initiatives, respecting human rights, and promoting social welfare in line with our CSR Policy.
- xii. **Ethical Behavior:** Ethical conduct is paramount at KPIL, where we uphold the utmost standards of integrity and transparency throughout our value chain, maintaining a policy of "zero tolerance" towards any violation of existing laws. Regular assessments are conducted to ensure the efficacy of procedures and control systems designed to mitigate the risks of fraud and corruption in all our operations.
- xiii. **Continuous Improvement**: KPIL is dedicated to continually improving our environmental performance, occupational health and safety practices, and sustainability initiatives through taking targets and objectives, regular monitoring, measurement, evaluation, and implementation of best practices, extending this dedication to improvement throughout our value



chain. We continuously strive to improve our Environment and OHS management systems.

#### 7. COMPLIANCE AND ACCOUNTABILITY

In alignment with our dedication to environmental stewardship, occupational health, safety, and sustainability, we prioritize the integration of EHSS principles throughout every facet of our Company's operations. This includes the establishment of robust EHSS policies and contractual clauses, conducting thorough reviews and impact assessments to identify potential EHSS risks and opportunities, and evaluating supplier compliance with EHSS standards. By upholding transparency and ethical practices, we cultivate a culture that values EHSS considerations across our operations and supply chain.

#### i. Inclusion of EHSS Clauses:

We will make sure that Environment, Health and Safety, and Sustainability clauses and considerations are included in significant investment agreements and procurement contracts to ensure EHSS performance.

#### ii. EHSS Reviews and Impact Assessments:

We conduct periodic reviews or impact assessments of our operations to identify any environmental and biodiversity impacts, Health and Safety risks and violations. Necessary priorities are identified, corrective action plans are developed and improvement measures are taken promptly if threats or violations are identified.

#### iii. Supplier Evaluation and Compliance:

We periodically evaluate and assess both new and existing parties, ensuring compliance with legal, environmental, health, and safety (EHSS) standards and our Supplier Code of Conduct

#### 8. POLICY IMPLEMENTATION

KPIL's senior leadership will provide oversight, guidance, objectives, targets, and resource allocation to support the Company's Environment, Occupational Health,



Safety & Sustainability Policy, ensuring alignment with our values and goals while promoting EHSS principles across all levels of our Company. Furthermore, we have established strong EHSS review mechanism at site, BU and corporate level. An EHSS steering committee has been formulated at BU / RO / Site level to enable a robust and effective EHSS review mechanism. The committee regularly reviews with BU / RO EHS head the status of initiatives / ongoing EHS performance. The Environment, Health, Safety & Sustainability (EHSS) department will ensure effective implementation, monitoring, and enforcement of this Policy.

9. TRAINING

KPIL provides training and awareness programs to employees, parties, and other stakeholders to ensure understanding and compliance with this Policy. Training covers environmental management, occupational health and safety practices, and sustainable development principles.

**10. POLICY REVIEW AND UPDATE** 

The senior leadership of KPIL will review this Policy annually considering its suitability, adequacy and effectiveness, and update it basis any changes in relevant regulations of laws, internal provisions, mechanisms etc.

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Managing Director and CEO