



**HGIEL**  
*We Make People Move...*

Version 2.0

# Environment & Social Management Policy



Document Owner:  
EHS - Head


H.G. INFRA ENGINEERING LIMITED



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HGIEL/ESMP/05/22	V2	01.03.2024
<b>Environment &amp; Social Management Policy</b>		

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## 1. BACKGROUND

H.G. Infra Engineering Ltd. (hereafter addressed as ‘HGIEL’ or ‘the company’) constructs, builds, develops, maintain infra projects like roadways, highways, expressways, water & railway projects. These projects contribute to nations Social & Economic development however, the construction and operation of these projects can have potential negative environmental and social impacts.

HGIEL is committed to execute an effective environment & social management system aligned with ISO 14001 to ensure pollution prevention and minimum negative impact on the environment throughout the project lifecycle/across its project life cycle (planning, construction and operations, management, and closure/ transfer).


HGIEL acknowledge that nature is facing multiple crises including the climate and biodiversity crises and as a responsible organization it must consider and act to address these challenges. This policy is a high-level statement of the company’s environmental commitments and how the company systematically work to reduce potential negative impacts whilst maximizing positive impacts.

HGIEL’s operations and functions are based on Environment protection, and we are committed to ensure environment stewardship in our business planning and management systems. The company complies with the regulatory guidelines issued by the Central Pollution Control Board (CPCB) and State Pollution Control Board (SPCB) directives as per Air (Prevention and Control of Pollution) Act, Water Act, Waste Management Guidelines, as applicable as per relevant laws in force for environment management. The Company is committed to comply with the environmental norms by establishing the standard operating procedures and practices to monitor, remedy any non-compliance and manage the environment in areas it operates in subsequently in alignment with ISO 14001.

## 2. OBJECTIVE, SCOPE AND APPLICABILITY

This policy is part of HGIEL’s Environmental and Social Management System and it shall be communicated to all business partners. It includes our environmental standards as described below:

- We are committed to develop all our projects in accordance with the Equator Principles and IFC Performance Standards, with PS1, PS3 and PS6 being particularly applicable for this policy.
- We follow the precautionary principle and carry out studies such as Environmental and Social Impact Assessments (ESIA) for all projects, which may include assessing direct, indirect and cumulative impacts where relevant, to identify potential risks and mitigation measures before development.
- All the project we manage are in accordance with ISO 14001:2015, ISO 90001 and ISO 45001 which includes an environmental risk register and, if appropriate, an emergency plan.
- Each site has a designated resource responsible for maintaining the Environmental and Social Management System of the Company and ensuring its implementation.
- We measure and publicly report our environmental impacts and progress towards our targets on at least annual basis.

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We endeavour to adhere to the below principles in this regard:

### 2.1 Resource Efficiency and Circular Economy

HGIEL is committed:

- To follow the prescribed guidelines issued by the regulatory authorities on environment parameters for sourcing, transportation, and storage of materials.
- To ensure resource efficiency and promote circular economy in its operations by effective planning and management of input materials i.e., raw materials.
- To ensure compliance with the waste management guidelines with respect to the sustainable management (generation, storage, handling, transportation, and end of life management) of waste (hazardous, non-hazardous, plastic waste, construction and demolition waste, e-waste, and bio-medical waste etc.).

### 2.2 Energy Efficiency and Renewable Energy Use


- HGIEL will regularly monitor its energy management systems (Energy consumption, sources of energy generation, energy efficiency initiatives) to ensure energy efficiency throughout its operations.
- HGIEL will enhance its energy portfolio by exploring and adding renewable sources of energy by either installing renewable power capacity (solar rooftop, wind power etc.) OR by power purchase agreement on renewable energy as per the availability and business viability.
- HGIEL is committed to ensure adherence with the regulatory guidelines issued by the pollution control board on use of fossil fuel and alternative fuel.

### 2.3 Emissions Management (GHG and Air Emissions)

HGIEL is aware of climate change and its impact on businesses, society and planet. As a responsible business enterprise, we are committed to take the best possible measures and initiatives to reduce the negative impact of climate change.

HGIEL commits:

- To adhere to the regulatory guidelines on air emission monitoring and management (SOX, NOX, Suspended Particulate Matters, etc.). HGIEL is committed to ensure effective implementation of the dust suppression and noise control measures as per the prescribed regulatory guidelines and best practices.
- To reduce fugitive emissions during the handling / loading / unloading activities.
- To ensure adequate dust suppression along with limiting noise and vibration to ensure no harm to the commuters and the nearby communities
- To reduce its carbon footprint by adopting climate friendly technologies and solutions.
- To assess its carbon footprint in alignment with ISO 14064 and the Greenhouse Gas Accounting & Reporting Framework as well as implementation of the framework to measure and monitor and Scope 1 and Scope 2 emissions, identifying actions for emissions reduction.
- To ensure progressive transition to clean energy solutions to reduce the scope 1 and scope 2 emissions.
- To ensure progressive clean energy transition solutions for its employee commute, business travel, in-bound and out-bound logistics to minimize its scope 3 emissions.

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## 2.4 Water Stewardship

HGIEL recognizes water as a shared resource and a precious commodity. The company is not only committed to the judicious use of the water resources but also assuring the effective management of the water from water management activities (withdrawal, consumption, recycling, and minimum and compliant discharge of wastewater) as per the guidelines and standard practices.

HGIEL is committed:

- To conduct a water footprint assessment and identify measures to reduce water consumption.
- To ensure approvals and no objection certificates from the regulatory authorities for the water procurement.
- To ensure no negative impact on water bodies due to its business operations.
- To ensure efficient water management by ensuring optimum water use and gradually reducing its water intensity.

## 2.5 Biodiversity

HGIEL is committed:

- To create a positive impact on biodiversity, by ensuring its protection as per the provisions of the agreement with Client, during all the stages of its business operations.
- To adhere to provisions of the agreement with Client for tree plantation across its manufacturing facilities and operations. The Company is committed to ensure environment friendly project design and development with minimum negative impact on the environment.
- To ensure adequate provisions for safe wildlife movement around its highway infrastructure as per the provisions of the agreement with Client.
- To ensure revival of the natural landscape and local biodiversity by accommodating eco-restoration and tree transplantation, around the project areas as per the provisions of the agreement with Client.

## 3. MONITORING


HGIEL will conduct regular monitoring and reporting of its environmental and social performance on material, energy, emissions, water, waste (hazardous, non-hazardous and other waste categories), and biodiversity through periodical Management Information System (MIS) to drive continuous improvement and set objectives.

HGIEL will keep a track of existing consents issued by the Pollution Control Board (PCB) and keep a track of updated guidelines on environment parameters.

HGIEL is committed to ensure the regular due diligence / audit with respect to the environment clauses of the Consent-To-Establish (CTE), Consent-To-Operate (CTO) and NHAI Environment Management Framework.

The company provide appropriate environmental training to all the internal stakeholders (Board of Directors, Key Management Personnel, Employees and Workers) and related awareness to value chain partners.




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## 4. MATERIAL TOPICS

Material topics are topics that represent an organization's most significant impacts on the economy, environment, and people, including impacts on their human rights.

### 4.1 Environment

- i. Efficient use of land resources
  - a. As we develop new projects, we are aware of the impact of our activities on the land resources and biodiversity of the area. We aim to minimise our footprint and use the land resources efficiently.
  - b. Water Management
    - Availability of water is key for sustaining any business activity globally and our projects & operations depends on managing water resources efficiently to ensure efficient water usage; and water conservation is important to communities dependent on watersheds where we operate.
  - c. Waste Management (Aggregates, Grizzly Waste, Ash, Coal Tar, demolition waste, Hazardous and Non-hazardous waste)
    - We would strive for managing and utilization of waste generated during project activities will be priority for our business. This mainly includes:
      - Boulders
      - Aggregates,
      - Grizzly Waste,
      - Ash,
      - Coal Tar,
      - Construction & Demolition Waste
    - This will also include managing other forms of hazardous and non-hazardous wastes, ensuring compliance and waste minimization is important for our unhindered operations and resource efficiency, respectively.
  - d. Emissions (Air and GHG) [Climate change mitigation and adaptation] Air Emissions Management
    - GHG emissions and other air emissions such as SO<sub>x</sub>, NO<sub>x</sub> and particulate matter are the major forms of air pollutants associated with operations of DG Sets / Crushers & mining equipment at our project sites. Minimising GHG emissions is essential for climate change mitigation and also for our long-term sustainability and business continuity.
    - Managing other forms of air emissions is also important for minimising our ecological impact and resource efficiency
  - e. Biodiversity, Land Availability and Indigenous Rights
    - As part of project planning as well as operations management, we constantly strive to minimise our impacts on the floral and faunal

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biodiversity of the region. Conserving biodiversity and minimising its impacts is of prime importance not just for compliance, but for ensuring long-term co-existence within our surroundings.

## 4.2 Social

- i. Occupational Health and Safety
  - a. Workers' safety is the key to unhindered operations and productivity. Our employees are the invaluable assets that our business is immensely dependent upon.
  - b. Ensuring that our workforce is proudly and happily engaged with AAPL results in higher productivity and business continuity. Providing the best-in-class employment opportunities to our workforce, along with harmonious engagement between management and workers, is extremely important for the business operations
- ii. Human Rights - forced labour, child labour and working conditions
  - a. We ensure that all our operations and our value chain partners abide by the applicable regulations protecting human rights.
  - b. As part of our focus on human rights, we believe cultural and heritage conservation and the rights of the indigenous communities directly or indirectly impacted by our business is important.
- iii. Competent Manpower
  - a. Focusing on learning and development of our own people is extremely important for making sure that we have a world-class talent pool as we grow and transition to more modern technologies
- iv. Community Engagement and Development
  - a. Harmonious co-existence with all our stakeholders, especially our communities, is essential for our uninterrupted operations
- v. Employment and Industrial Relations
  - a. We strive to be the best employer and create a happy, healthy and safe work environment for all our workers and employees

## 4.3 Governance

- i. EHS Compliance
  - a. Compliance with all the EHS regulations applicable to our business operations cannot be compromised with for business continuity.
- ii. Business Continuity
  - a. Business continuity is dependent on many operational and strategic risks, both short and long term in nature. We need to be prepared for our long-term sustainability and resilience against any such adverse situations, including unforeseen global events such as the COVID-19 pandemic, price escalation due to international war, etc.

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#### 4.4 Economic

##### i. Economic Performance

- a. With infra development being our priority, we believe healthy financial growth of the Company will have positive implications on the economy in which we thrive. Hence, we believe in value creation and equitable distribution.

#### 5. REVIEW

EHS - Head will be responsible to review this policy on periodic basis. However, HGIEL reserves rights to the amendment of this code.

#### 6. QUERIES

All are encouraged to raise any concerns or grievances or any questions about the provisions detailed in this document, please contact:

##### **EHS - Head**

H.G. Infra Engineering Limited

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Approved by the Board of Directors

(Amended w.e.f. March 01, 2024)