

Tata Realty and Infrastructure Limited

Environment Social and Governance Policy Guidance Document

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ESG Policy

TRIL approved an ESG policy dated 01st June 2022 with a set of E, S and G Commitments.

ESG Policy Guidance

This guidance document describes the set of actions under different aspects of E, S and G that shall be focussed and implemented to achieve the said commitments.

Different Aspects shall enable to fulfil commitments towards focus areas as well as align TRIL to the Tata Code of Conduct, Tata Sustainability Policy, requirements of Companies Act 2013, different frameworks and global disclosures like GRESB, DJSI, BRSR, and ISO 14001: 2015 and ISO 45001: 2018.

Environmental Aspects

TRIL is committed to meet the needs of customers and other stakeholders in an environmentally conscious manner, through continuous improvement in operations to reduce the impact on environment.

- **Water Stewardship:** TRIL's commitment to water stewardship includes a priority of protecting and conserving water resources through effective and advanced water management methods and governance structures. To this end TRIL shall
 - Minimize the use of freshwater across all operations
 - Ensure maximum recycling of water, increase water efficiency and reduce water footprint
 - Encourage use of rainwater harvesting equipment and water-saving fixtures and fittings across all sites
 - Ensure that all applicable legal requirements for wastewater discharge standards are met.

- **Waste Management:** TRIL acknowledges the significance and need of proper waste management to combat harms of waste related pollution. To this end TRIL shall:
 - Make best efforts to reduce waste generation at source
 - Work towards innovation and productive ways to promote circular economy by reutilization of waste
 - Ensure compliance with all applicable laws related to waste management in the countries we operate, as applicable
 - Manage and Control various type of waste (Dry and Wet/ Hazardous and Non-Hazardous) as per regulatory standards.

- **Pollution Prevention:** TRIL understands the importance of addressing pollution and its negative effects on the environment. TRIL aims to take timely and effective action to address the effects of pollution caused by its operations, which includes air, water, land, and noise pollution. To this end TRIL shall
 - Ensure Reduction of pollution at the source to minimize adverse impacts on air, water, noise, and land
 - Comply with all relevant legal pollution prevention and control requirements wherever it operates, as applicable, and monitor them periodically

- **Biodiversity Management:** TRIL identifies direct and indirect impacts of its business operations on biodiversity and the responsibility to protect, preserve and co-exist with the flora and fauna. To this end TRIL shall:
 - Ensure green landscaping in all our real estate developments
 - Make biodiversity enhancement a part of property management activities
 - Work towards greater participation and contribution to programs that promote biodiversity development

- **Energy and GHG Emission Management:** TRIL is mindful of the impact of real estate and thus its operations on the climate by means of its demands of energy and dependency on natural resources. To this end TRIL shall:
 - Adopt activities that foster energy conservation and efficiency
 - Ensure use of energy efficient fixtures in all our projects
 - Incorporate energy conservation measures in day-to-day activities
 - Maximize use of renewable energy wherever possible
 - Make efforts to maximize use of technologies that emit low levels of GHG
 - Maximize and facilitate reduction of carbon footprint through value chain
 - Monitor carbon footprint, report and adopt actions to regulate and minimize it

- **Climate Change Adaption:** TRIL understands that today globally every industry stands threats of climate change. To this end TRIL shall:
 - Work to improve our understanding of the climate risks and their implications for the portfolios we manage and construct
 - Identify the physical effects of climate change on their business operations and implement appropriate adaptation strategies
 - Work towards task Force on Climate Related Financial Disclosures (TCFD) alignment for climate risk management

- **Indoor Environmental Quality:** TRIL recognizes that health & well-being is a necessity for all human life. It shares the responsibility to build structures that provides a healthy space to work and stay. To this end TRIL shall:
 - Endeavor to maintain a high level of indoor environmental quality through the periodically reviewing and maintaining the indoor environment as per regulatory standards
 - Endeavor to maintain a high level of indoor environmental quality through use of products and materials that adds positively to indoor health of our assets
 - Ensure that all areas are clean, hygienic and prevent any adverse impact on the health of the people who occupy spaces within the assets
 - Take steps to train the employees in the maintenance of indoor environmental quality
 - Strive to Indoor Air Quality Certifications for our projects

- **Resilience to catastrophe/disaster:** TRIL recognizes the importance of building structures that are resilient to the impacts of disasters and catastrophic. To This end TRIL shall:
 - Develop mechanisms for teams to recognize the different types of risks and their consequences in all phases of its product development from construction to operation and handing over.
 - Enable teams to develop risk mitigation plans that cover identification, response, and rehabilitation from disasters

- Use scientific data (geological, topographical, analytical, and other forms of data) to determine the validity, impact, and consequence of probable risks.
 - Develop emergency preparedness plans covering all probable emergencies, their associated response and responsibilities, and determination of resources or infrastructure that is required to mitigate the risk.
 - Carry out periodic testing of the effectiveness of emergency preparedness plans.
 - Prepare guidelines for employees, tenants and customers on emergency preparedness
- **Sustainable Sourcing:** TRIL strives to ensure that all material sourcing and procurement is conducted sustainably while minimizing the impact on the environment. To this end TRIL Shall:
- Develop guidelines on material requirements that are more green and environmentally friendly
 - Follow the vendor procurement principles as outlined in the guidelines of TCoC Supplier code of conduct.
 - Recognize and Partner with suppliers who attach our sustainability principles, engage in sustainability initiatives and those outlined in the Supplier Code of Conduct
 - Promote practices that support engagement with our suppliers to improve their sustainability performance through monitoring and feedback
- **Portfolio Management:** TRIL is a leading brand name in real estate, and it has an important role in delivering sustainable future with whatever it builds. As a part of its various sustainable initiative, it strives to manage them in best capacity. To this end TRIL shall:
- Plan efficient environmental due diligence for each new property at the pre-purchase/acquisition/investment stage, based on a baseline environmental performance benchmark to make informed decisions.
 - Ensure that properties are developed and managed in accordance with local and national environmental regulations.
 - Create project management programs
 - Be competitive and up to date in terms of new developments and regulatory requirements

Social Aspects

TRIL is cognizant of our responsibilities towards our stakeholders. Health and Well being takes a centre stage in all our processes and operations. TRIL is non-compromising on safety. We work for an inclusive future that is equal for all without discrimination.

- **Employee Engagement:** TRIL recognizes importance of various employee engagement programs that may add to their development and business performance as well. To this end TRIL shall:
 - Conduct training and development programs for employees' skill enhancement and career growth
 - Engage by means of survey to comprehend Employee Satisfaction Net Promoter Score and work on gap areas
 - Allow employees to pursue a passion or community interest by providing employee volunteering paid leaves
 - Promote employee recognition programs
 - Settle grievances in a fair, equitable and timely manner

- **Employee health, safety and Well Being:** TRIL identifies both physical and mental health as important for all. It strives for a safe and conducive work environment. It is committed towards being injury free with Zero fatalities and accidents. To this end TRIL shall:
 - Train and Guide employees on occupational health and safety
 - Ensure appropriate PPE provisioning, healthcare benefits and medical cover for all the employees
 - Ensure regular health check-ups for all its employees
 - Ensure interactions with employees one on one to understand any concerns
 - Promote conduction and participation in training programs on mental health and stress management
 - Conduct activities, celebrate festivities, and promote cultural development as a means to enhance work life balance
 - Abide by EHS policy

- **Employee Remuneration:** TRIL is dedicated to creating an inclusive future with equal opportunities for all. It maintains a non-discriminatory and fair workplace environment. To this end TRIL shall
 - Constitute a Remuneration Committee
 - Develop framework around determination of required qualifications, experience, skills, and expertise to effectively discharge their duties and responsibilities
 - Ensure that level and components of remuneration is reasonable and sufficient to attract, retain and motivate employees
 - Follow provisions of law as applicable with regards to payment of remuneration
 - Set identified criteria but not limited to time devoted, results, company growth, value addition and map performance benchmarks while deciding remuneration and its increase.

- **Health and Safety of Contractors, Customers and Tenants:** TRIL upholds highest degree of trust with its external stakeholders and places their health and safety as equally important to

that of employees. Health and safety is core to our product's entire life cycle. To this end TRIL shall:

- Train and Guide contractors on occupational health and safety
 - Ensure appropriate PPE provisioning, healthcare benefits for the contractors
 - Ensure use of safe systems and equipment of work
 - Ensure a strong grievance and issue redressal in terms of product quality and business operations
 - Plan and conduct impact and risk assessments of activities and product
 - Ensure health and safety of products by adopting various applicable certifications and monitoring compliances to the same.
- **Social Enterprise Partnering:** TRIL is driving its sustainability agenda of its strategy that form a bedrock for laying future roadmap. TRIL looks forward to the success of the same by also partnering with social enterprises and creating greater positive impacts. To this end TRIL shall:
- Lay a plan to onboard and collaborate with social entrepreneurs/businesses
 - Work towards supporting social innovation programs and pilots
- **Human rights:** TRIL is committed to upholding fundamental rights in line with the legitimate role of business of all stakeholders. To this end, TRIL shall:
- Not employ children at all workplaces.
 - Ensure no form of forced labour.
 - Comply with all applicable laws and respect internationally recognized human rights
- **Community development:** TRIL understands the importance of sustainable community development to the Country's long-term strength and success. To this end, TRIL shall:
- Dedicate to excellent corporate responsibility and work to improve the quality of life of the people in the communities where we do business.
 - Work with the community and other stakeholders to reduce the negative impact of company operations on the local community and the environment.
 - Encourage employees to volunteer on projects that help the communities in which we work.
- **Customer satisfaction:** TRIL is committed to continuously meeting customer expectations. To this end, TRIL shall:
- Market products and services on their own merits and not make unfair or misleading statements about the products and services.
 - Provide world-class products and services that fulfil all applicable standards
 - Comply with applicable laws of marketing and labelling
 - Deal with customers in a professional, fair, and transparent manner.
- **Inclusion and diversity:** TRIL is committed to recruiting, retaining, and promoting highly talented individuals. To this end, TRIL shall:
- Provide an environment of equality and respect for all employees and contractors.
 - Not -discriminate based on race, caste, religion, colour, ancestry, status, gender, sexual orientation, age, nationality, ethnic origin, disability, or any other legally protected category.
 - Recruit and keep personnel from diverse backgrounds, as well as cultivate a warm, supportive atmosphere.

Governance Aspects

TRIL is devoted to acting professionally, fairly and with integrity in all its business dealings.

- **Anti-bribery and Anti-corruption:** TRIL shall prevent involvement of the company in corrupt practices even when it may be unintentional. To this end TRIL shall:
 - Act professionally, fairly and with integrity in all our business dealings.
 - Commit to prevent, deter, and detect bribery and other corrupt behaviours and be governed by TCoC on severe consequences of violations.
 - Ensure to comply with all local and national laws related to anti-bribery and anti-corruption wherever we operate.

- **Political Contributions:** TRIL as governed by TCoC is politically neutral and combats risks of corruption in any form. To this end TRIL shall:
 - Not provide political contributions to improperly influence a government official or in exchange for any unjust benefit or favour.
 - Not offer or give any company funds or property or other resources as donations to any specific political party, candidate or campaign.
 - Act in manners consistent with our code of conduct.

- **Anti-Fraud:** TRIL condemns misuse of any products and processes. To this end TRIL shall:
 - Use all tangible and intangible corporate assets, including computer and communication equipment, for the purpose for which they are granted and to run the business.
 - Undertake appropriate measures to urge employees to report fraud, suspected fraud, and fraud-prone locations without fear of being negatively impacted in any form.

- **Information Security and Data Privacy:** TRIL recognizes importance of ensuring security and confidentiality of Information be it official or personal. The company create, receive, process and store information of itself and customers. To this end TRIL shall:
 - Shall respect and protect all confidential information and intellectual property of the company or associated parties.
 - Shall report any information security incidents or suspicious activity as per the guidelines of TCoC.
 - Shall take steps to train and sensitize employees on information security and cybersecurity.

- **ESG and Executive Compensation:** TRIL has laid down a defined ESG strategy and roadmap paving way towards a sustainable future. The mounting pressures environmental and social challenges must be prioritised to be highly competitive. TRIL identifies different ESG metrics and its direct linkage to compensation structures as encouraging and motivating. To this end TRIL shall:
 - Shall identify ESG metrics as equally important to financial metrics in different roles and responsibilities
 - Plan to make bonuses variable basis progress on ESG targets
 - Shall be transparent in disclosures in executive compensation linked to ESG metrics
 - Sustainability KPIs shall form a part of performance review process

- **External Assurance and Disclosure:** TRIL strives to be transparent in its ESG progresses and disclosures. It identifies the significance of the same for its investors, shareholders and other stakeholders. To this end TRIL shall:
 - Participate in various ESG global ratings like GRESB, DJSI, CDP etc.
 - Report on ESG in alignment with various national and global frameworks like GRI, IIRC, IFC, TCFD etc.
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