



# JOTINDRA STEEL & TUBES LIMITED: Environmental Policy

JOTINDRA STEEL & TUBES LIMITED is committed to conducting its business in accordance with all environmental and social laws, regulations, and recognised international standards, and in a way, that enhances our reputation in the market.

Where local legislation conflicts with the principles and processes described in this policy, Jotindra Steel & Tubes Limited will comply with the law, while also seeking ways to uphold environmental protection and human rights principles within its sphere of influence.

JSTL purpose is to “Empower people to innovate and invest for a better future” Its approach to environmental and social risk identification, assessment and management supports this purpose statement.

JSTL recognises the importance of identifying, assessing and managing material environmental and social risks as an integral part of conducting business.

Jotindra Steel & Tubes Limited Environmental and Social Risk Policy (ESR Policy) provides a robust framework for embedding environmental and social risk management into investment decision making. The policy is reviewed annually.

## **WHAT IS THE ESR POLICY?**

The ESR Policy establishes processes for identifying, assessing, managing, mitigating and reporting material environmental and social risks across the business..

Environmental and social risk areas covered by the ESR Policy include labour and employment practices, human rights, resource efficiency, pollution prevention, biodiversity and cultural heritage. The policy is based on international guidelines including the International Finance Corporation Performance Standards.

## **WE SUPPORT FUNDAMENTAL HUMAN RIGHTS:**

Jotindra Steel and Tubes Limited supports fundamental human rights as set out in the Universal Declaration of Human Rights and core International Labour Organisation Conventions. It recognises the duty of States to protect human rights and the responsibility of businesses to respect human rights. These include rights related to:

- Non-discrimination and equal opportunity
- Freedom from child labour, forced and compulsory labour
- Freedom of association and collective bargaining
- Community health, safety and security practices
- Indigenous peoples and cultural heritage



JSTL endeavours to identify and prevent or mitigate potential and actual adverse human rights impacts resulting from its business activities and the relationships connected to those activities through the application of the ESR Policy.

We manage environmental risk and seek to improve environmental performance:

JSTL applies a precautionary approach to environmental risk, and seeks to make a positive contribution to environmental performance, including considering our direct and indirect impacts on:

- Resource efficiency and pollution prevention
- Biodiversity and natural resource management
- Environmentally sensitive or protected areas
- Climate risk and energy transition

The requirements in the ESR Policy are designed to ensure consistent identification and responsible management of environmental and social risks in our business.

### **THE ESR POLICY REQUIREMENTS INCLUDE:**

- Screening new clients for material environmental and social risks
- Assessment, categorisation, mitigation and management of environmental and social risks in new transactions, investments and products
- Due diligence requirements guided by Environmental and Social Risk Assessment Tool, which may include environmental and social impact assessments, human rights impact assessments, action and management plans
- Escalated decision-making and approval processes, alongside the credit approval process, for material environmental and social risks.
- Identification and compliance with applicable environmental and social laws and regulations
- Monitoring and reporting requirements.

### **BUSINESS APPLICATION**

The ESR Policy is applicable to the Company. JSTL business are required to maintain business-specific due diligence and approval processes consistent with the ESR Policy.

Fund asset investments are reviewed for environmental and social risks as part of their investment process.

Businesses with direct and indirect equity interests in operating businesses are also required to have, at a minimum, a procedure to manage and report on environmental and social risks and escalate and report on environmental and social incidents.

### **GOVERNANCE AND REPORTING**

Aligned with JSTL's risk management approach, it provides oversight of ESR Policy operation and compliance. The Environmental and Social Risk Team provides specialist advice and support on the ESR Policy application and is responsible for reporting to the Board of Directors of Jotindra Steel and Tubes Limited.



A Whistle blower Policy enables staff and external parties, including suppliers, to confidentially report concerns about improper conduct to the management who oversees Whistle blower Policy. Improper conduct includes breaches of laws, breaches of internal policies including the ESR policy, as well as conduct that endangers (or may endanger) the health and safety of any persons (for example, any instance or suspicion of modern slavery or human trafficking).

We have set long term objectives to drive improvement over time and performance indicators to monitor our performance. Specifically, we will strive to:

- Ensure climate resilience in our portfolios. Understand the risks posed by changing climate patterns, such as catastrophe/disaster, adapt to, and mitigate their effects on our investment properties.
- Proactively deliver and evidence energy, GHG, water and waste efficiency at assets.
- Manage indoor environmental quality to protect and enhance occupier health & wellbeing.
- Procure or generate energy from renewable sources wherever possible.
- Reduce consumption of materials through re-use rather than disposal, wherever possible.
- Promote recycling and diversion of waste from landfill.
- Develop policies and practices, which raise awareness, encourage and enable our staff and occupiers to contribute towards achieving environmental improvement.
- Apply sustainable procurement principles in our supply chain. Encourage our suppliers of goods and services to minimise the impact of their operations on the environment through our procurement policies and practices.
- Work with our external property and facilities managers to drive environmental improvements through the day-to-day operation of our investment properties.
- Take account of environmental considerations as part of our investment process.
- Apply the principles of environmental best practice in the planning, development, refurbishment and decommissioning of our buildings, including consideration of material sourcing
- Protect and where possible enhance biodiversity and natural habitats.
- Implement our environmental investment principles to inform and guide investment strategy.

We will review this Policy on an annual basis to ensure that it remains relevant and appropriate and the same shall be placed before the Board of Directors for their approvals and will seek necessary instructions/ suggestions from the Board pertaining to the ESR Policy.