

L & T Infrastructure Development Projects Limited

Group Employment, Safety, Environment and Governance (ESG) Policy

Our Objective

L & T Infrastructure Development Projects Limited , its subsidiaries and project companies (the **Group**) are committed to providing a safe and healthy workplace for their employees and stakeholders and to conserving the Environment.

Employment, Health and Safety (EHS)

To achieve our Objective in connection with EHS we:

- Promote a positive EHS culture.
- Comply with all statutory and other applicable legal and regulatory requirements with respect to EHS and seek to ensure our Intermediaries do the same.
- Incorporate EHS considerations in all business processes, including by ensuring appropriate health and safety measures are adopted, ensuring employees are provided with, and use, protective equipment when dealing with potential hazards, and by the provision of regular occupational health and safety training for employees.
- Identify, monitor and control EHS risks which arise in connection with our projects and operations, including in subcontracted works.
- Record and review all accidents, occupational health and safety related incidents and lost time days and investigate all serious occupational health and safety incidents, including in subcontracted works.
- Ensure that all of our workplaces which are exposed to high-risk hazards have appropriate emergency plans in place.
- Screen, evaluate and engage our Intermediaries based on their EHS management systems and practices.
- Encourage communication, consultation and collaboration with all employees and stakeholders.

Workers' Rights

To achieve our Objective in connection with Workers' Rights we:

- Respect the rights of our employees, including by providing fair and timely wages, supporting their work-life balance, providing safe working conditions, fostering worker engagement, including by the provision to employees of information on Workers' Rights and of mechanisms to raise employment-related grievances, and permitting freedom of association.
- Prohibit the use of any child or young workers and the use of any form of forced or compulsory labour in connection with our business.

- Prohibit all forms of discrimination and abuse in our work place.
- Comply with all statutory and other applicable legal and regulatory requirements with respect to Workers' Rights.
- Have in place policies governing the provision to our employees of overtime, vacation and public holidays and maternity, sickness and disability benefits.
- Protect the rights of migrant workers in accordance with applicable statutory and other legal requirements.
- Screen, evaluate and engage our Intermediaries based on their respect for Workers' Rights.
- Monitor compliance with and risks to Workers' Rights in connection with our Projects, including in subcontracted works.
- Encourage communication, consultation and collaboration with all employees and stakeholders.

The Environment

To achieve our Objective in connection with the Environment we:

- Seek to adopt sustainable and resource-efficient processes and to conserve natural resources, reduce adverse environmental impacts (such as waste and environmental emissions) and enhance energy efficiency.
- Comply with all statutory and other applicable legal and regulatory requirements with respect to the environment (including by seeking all required environmental clearances, permits, and licenses, and maintaining a register of these) and seek to ensure our Intermediaries do the same.
- Seek to identify, monitor and control environmental risks which arise in connection with our projects and operations, including in subcontracted works.

Dealing with Intermediaries

The term **Intermediaries** refers to a Group company's agents, representatives, vendors, contractors, sub-contractors, consultants, distributors and any other persons engaged by a Group company, or who are engaged to act for a Group company in its business dealings with any government or Official, or in obtaining governmental approvals

We have a Group Intermediary Appointment Policy (available with the Compliance Officer) which provides for ESG risk assessment and risk mitigation measures in relation to different types of Intermediaries and for standard ESG related contractual provisions for contracts with Intermediaries.

In general:

- We expect that Intermediaries with which we do business to either formally acknowledge and abide by relevant aspects of this Policy, or to have adequate ESG policies and procedures of their own in place.

- When engaging an Intermediary, a Group company should:
 - perform proportionate and risk-based due diligence checks on the Intermediary; and
 - consider and respond appropriately to the findings of that due diligence, particularly where areas of high concern are identified,

in accordance with the Group's Intermediary Appointment Policy.

Training

Group employees (including directors, officers and senior management) will receive training to ensure they understand applicable ESG law, are aware of and understand this Policy, are equipped to respond to specific risks which relate to their particular role and know what the Group expects of them.

Where appropriate, Intermediaries will also receive training appropriate to their role.

Process for reporting possible violations of applicable law or this Policy

We have established a Whistle Blower and Investigations Policy (available with the Compliance Officer) which provides a process for Group employees and Intermediaries to report possible or suspected violations of applicable ESG law or this Policy to the Compliance Officer, their Head of Department or to the Whistle Blowing and Investigations Committee. We will promptly investigate such reports in accordance with the Policy.

Employees or Intermediaries will not be demoted or suffer any other unfavourable treatment as a result of making a good faith report of a possible violation of applicable law or this Policy, even if it may result in the Group losing business.

If any Group employee violates this Policy or retaliates against another employee who has reported a possible violation of applicable law or this Policy then they will be subject to disciplinary action, which may include termination of employment.

Management leadership, oversight, implementation and review

The Company's Guidance Committee and Audit Committee, together with its Chief Executive Officer, Chief Financial Officer and Compliance Officer are responsible for providing leadership, resources and active support for the implementation of this Policy.

The Compliance Officer will communicate this Policy to the Group and relevant external parties at least annually, and at other appropriate times, such as when this Policy is amended or updated.

The Audit Committee will oversee compliance with this Policy. The Compliance Officer, under the supervision of the Guidance Committee, is responsible for its day to day implementation.

We have an annual ESG risk assessment and audit to assess the effectiveness of this Policy. The terms of reference of such audits are set annually by the Audit Committee, which will also oversee the annual audit. Where issues are identified, the Audit Committee will prescribe solutions to be implemented by the Group.

The Compliance Officer will report to the Guidance Committee on general compliance with this Policy and its effectiveness on a regular basis and to the Audit Committee annually in connection with the annual ESG risk assessment and audit.

The Compliance Officer will also notify the Audit Committee should they become aware of any non-compliance (or potential non-compliance) with applicable law or this Policy.

If an employee identifies a deficiency in this Policy they should report it to the Compliance Officer who will consult with the Guidance Committee on the appropriate action to be taken.

Advice and assistance

Employees should contact the Compliance Officer for advice and assistance on any matters relating to this Policy.