



SHREM INFRA INVESTMENT MANAGER PRIVATE LIMITED
(Formerly Known as Shrem Financial Private Limited)

ENVIRONMENT, SOCIAL AND GOVERNANCE POLICY

This Policy is approved by the Board of the Investment Manager with effect from 5th May 2025.

ENVIRONMENT, SOCIAL AND GOVERNANCE POLICY

A. Preamble: The board of directors of Shrem Infra Investment Manager Private Limited (“**Investment Manager**”) to the Shrem InvIT (“**Trust**”) has adopted the Environment Social and Governance Policy (“**ESG Policy**”) with respect to environment, social and governance. The ESG Policy has become effective from 5th May, 2025 in relation to the Investment Manager, the Trust and all assets of the Trust.

B. Objective:

The Investment Manager and its employees are committed to conserving the environment, fostering social well-being and ensuring strong governance across our project sites.

C. Key Principles:

The Environment:

To achieve the Trust’s objectives in connection with the environment, the Investment Manager shall:

- 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 maintain a register of these).
- Seek to identify, monitor and control environmental risks which arise in connection with its projects and operations, including in subcontracted works and take commensurate mitigation measures to minimize the adverse environmental impacts.

Social:

To achieve the Trust’s objectives in connection with the social, the Investment Manager shall:

- Adhere to all applicable statutory and regulatory requirements and good workplace practices for its own employees and contractor’s workers across its operations.
- Support the communities living along the corridors for betterment of their livelihood and safe use of roads.
- Promote and ensure safety, health and welfare of all personnel working at projects and visitors to the site with zero fatalities as a target.
- Provide health and safety training to all direct and indirect personnel so that circumstances which could lead to unsafe conditions and accidents are prevented as well as minimized.

- Provide safe working environment, proper facilities and appropriate tools so that the work is carried out in a safe and careful manner.
- Follow labour laws including strictly forbidding the use of any form of illegal labour practices such as child, forced or bonded labour within any of its operations.
- Encourage diversity and inclusion in our business operations creating discrimination free work environment.
- Achieve high level of employee engagement to build a cohesive team.
- Establish transparent and clear grievance redressal mechanism

Governance:

To achieve the Trust's objectives in connection with governance, the Investment Manager shall:

- Conduct business in a manner to ensure good corporate governance practices along with compliance of all statutory and self-undertaken requirements.
- Establish a robust decision making and governance structure through a balanced board of directors with independent directors and executive team.
- Form board committees to review and have supervision on critical business and operation areas such as remuneration, audit and risk and ethics.
- Ensure adherence to all relevant laws, rules and regulations relating to the disclosure of information and transparency.
- Establish clear standard of business conduct with zero tolerance for money laundering in accordance with the anti-money laundering policy of the Trust.
- Implement a vigil mechanism and whistle blower policy to have an efficient structure for reporting, investigating and addressing any genuine concerns.

D. Process for reporting possible violations of applicable law or this policy:

The Trust will promptly investigate reports of possible or suspected violations of applicable ESG laws or this policy in accordance with this policy. Employees or Intermediaries will not be demoted or suffer any other unfavorable 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 Trust losing business.

E. Management leadership, oversight, implementation, and review:

The Audit Committee, together with the 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 Audit Committee will oversee compliance with this policy. The Compliance Officer is responsible for its day-to-day implementation.

The Compliance Officer will communicate this policy to relevant internal and external stakeholders.

- F. Advice and Assistance:** Employees should contact the Compliance Officer for advice and assistance on any matters relating to this policy.
- G.** This policy will always be deemed to be amended to the extent of, and incorporate by reference, any change in applicable law, including any amendment to the InvIT Regulations, without the requirement of any action from the Investment Manager or approval of the Unitholders of the Trust.
