

NCC LIMITED

ESG Policy

Preamble:

Environmental, Social, and Governance (ESG) pertain to how businesses are evaluated based on their impact on society, the way they are operated, and the way they approach environmental sustainability. It is by developing an understanding of how a business views and manages these factors that investors, stakeholders, consumers, employees, and governments can determine their own interaction with that business.

E – Environmental

Interaction of Business with the environment is an increasingly important element and covers areas like:

- What impact do the organization’s processes and operations have on the environment?
- What actions are they taking to mitigate their impact, reduce consumption, and lessen their business carbon footprint?
- How an organization approaches environmental sustainability throughout its entire value chain, from carbon emissions and water consumption to waste and raw material usage.

S – Social

Businesses engage in activities that have an effect on the general public. From customers and employees to the surrounding local communities and beyond, businesses must have strong principles surrounding fair compensation, health and safety, inclusivity and equality, as well as less obvious principles regarding issues including corporate corruption, child labour and more. Furthermore, a focus on skill-building, education & health programs and other social initiatives provides organizations with the ability to make a positive social impact.

G – Governance

Operations of the organization at each level speak to its focus on developing a sustainable corporate structure. Policies, procedures, and decision-making processes shouldn’t be considered lightly, and the inclusion of governance as a key ESG factor promotes standardized protocols that can be adopted and emulated. This means including elements such as regulation and compliance, and expanding the practice of risk monitoring beyond traditional economic risk evaluation to protect both people and the planet.

Outgrowing the belief that business exists for the sole purpose of profits, NCC has embedded, in its culture, the concept of sustainability in all three perspectives. The company's goals are strategically aligned to ensure balanced growth by giving back to society.

Object

The object of this policy is to:

- (i) define NCC's position regarding ESG and
- (ii) provide our employees with guidelines related to ESG for our decision-making processes.

The policy will also be used as a tool to communicate to all the stakeholders how NCC integrates ESG considerations into business decision-making processes across all service offerings. As India's one of the leading construction and infrastructure company, we are committed to positively impact the environment, our customers, employees, and the community at large. At NCC, ESG initiatives and principles will be aligned to our strategic goals in terms of services we seek to offer to all our stakeholders. The ESG policy framework will serve as a guiding document for the other operational activities undertaken by us.

Guiding Principles

The National Guidelines on Responsible Business Conduct comprises nine pillars of business responsibility that are known as Principles. Relevant principles as explained below have been derived and made applicable holistically:

- NCC shall conduct and govern itself with integrity and in a manner that is ethical, transparent and accountable.
- NCC shall provide service in a manner that is sustainable and safe.
- NCC shall respect and promote the well-being of all employees, including those in their value chains.
- NCC shall respect the interests of and be responsive to all its stakeholders.
- NCC shall respect and promote human rights.
- NCC shall respect and make efforts to protect and restore the environment.

- NCC when engaging in influencing public and regulatory policy, shall do so in a manner that is responsible and transparent.
- NCC shall promote inclusive growth and equitable development.
- NCC shall engage with and provide value to its customers in a responsible manner.

Applicability, Disclosure and Review:

This policy applies to NCC, all employees and business partners of NCC. This policy will be available on the Company's website at www.ncclimited.com. The Company shall ensure that this policy is reviewed periodically and updated for applicability, relevance and effectiveness.

