

SUSTAINABILITY REPORT

FY 2021 -22



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LIST OF ABBREVIATIONS

AAI	Airports Authority of India	ESMP	Environmental and Social Management Plan
ABAC	Anti-Bribery and Corruption	ESMS	Environmental and Social Management System
AML	Anti-Money Laundering	GRI	Global Reporting Initiative
ATSL	Axis Trustee Services Limited	HIRA	Hazard Identification and Risk Assessment
BOT	Build Operate Transfer	HO	Head office
CFT	Combating the Financing of Terrorism	HR	Human Resource
CGWA	Central Ground Water Authority	HSMU	Highway Safety Management Unit
COC	Certificate of Compliance	HTMS	Highway Traffic Management Systems
CPCB	Central Pollution Control Board,	IFC	International Finance Corporation
CSR	Corporate Social Responsibility	IHMCL	Indian Highways Management Company Limited
DBFOT	Design, Build, Finance, Operate and Transfer	IM	Investment Manager
DG	Diesel Generator	IMS	Integrated Management System
ECKHPL	Etawah-Chakeri (Kanpur) Highway Private Limited	IRC	Indian Roads Congress
EHSS	Environmental Health Safety and Social	ISO	International Organization for Standardization
EPC	Engineering, Procurement and Construction	IUCN	International Union for Conservation of Nature
ERP	Emergency Response Plan	IWPA	Indian Wind Power Association
ESAP	Environment and Social Action Plan	KL	Kilo Liters
ESG	Environment Social Governance	KPI	Key Performance Indicator

LIST OF ABBREVIATIONS

KVA	Kilovolt-Ampere	OSEPL	Oriental Structural Engineers Private Limited
LAN	Local Area Network	OTPL	Oriental Tollways Private Limited
LSP	Livelihood Support Plan	POSH	Prevention of Sexual Harassment
MIS	Management Information System	PPE	Personal Protective Equipment
MoRTH	Ministry of Road Transport & Highway	PPP	Public Private Partnership
NBP	Nagpur Bypass Plaza	QEHS	Quality Environmental Health Safety and Social
NHAI	National Highways Authority of India	REIT	Real estate investment trust
NOC	No Objection Certificates	RWH	Rainwater Harvesting
NPCI	National Payments Corporation of India	SEBI	Securities and Exchange Board of India
OECP	Onsite Emergency Control Plan	SGWA	State Ground Water Authority
OHHHPL	OSE Hungund Hospet Highways Private Limited	SOP	Standard Operating Procedures
OHS	Occupational Health and Safety	SOS	Scope of Service
OIT	Oriental InfraTrust	SPCB	State Pollution Control Board
OITIML	OIT Infrastructure Management Limited	SPV	Special Purpose/Project Vehicle
ONBCPL	Oriental Nagpur Bypass Construction Private Limited	TMS	Toll Management System
ONBHL	Oriental Nagpur Betul Highway Limited	UN	United Nation
OPIPL	Oriental Pathways (Indore) Pvt. Ltd.	VPN	Virtual Private Network
OSE	Oriental Structural Engineers	WAN	Wide Area Network

MESSAGE FROM CEO

Dear Stakeholders,

Oriental InfraTrust (OIT) was registered on 26th March 2019 as an irrevocable trust set up under the Indian Trust Act, 1882 and is registered with the Securities and Exchange Board of India (SEBI) as an Infrastructure Investment Trust (InvIT) under the SEBI (Infrastructure Investment Trusts) Regulation, 2014. OIT is sponsored by Oriental Structural Engineers Private Ltd (OSE), which is one of the leading construction companies for the last 45 years, and its subsidiary Oriental Tollways Private Limited (OTPL) and has prominent global institutional investors. There are five operating toll roads comprising of more than 468 km of four-lane and 160km of six-lane NH stretches in the current portfolio of OIT InvIT. We are in the process of adding a few more road assets to expand our portfolio.



It is with great pleasure that I present to you our first sustainability report for the financial year 2021–22. Our corporate ethos and business strategy have always included a sustainability vision. We at OIT strongly believe that economic growth and resource efficiency are mutually reinforcing strategic priorities today. We are fully committed to running our business in a responsible way, especially in light of the growing global risks and environmental threats.

Due to the COVID-19 pandemic crisis, the global economic scenario continues to be fraught with challenges. Major economies witnessed slower growth, and the world was full of uncertainty. As we dwell upon last year, which was full of challenges for us as well, we appreciate the unwavering resiliency shown by people and businesses. I feel proud to highlight that we have performed well, with **revenues of INR 21,838.5 million** and a **net profit of INR 818.86 million**. We achieved this by combining the strength of our integrated business model with prudent management.

Since the inception of OIT, we have adopted an **Environment and Social Policy** that recognizes the significance of effective management of EHS issues in the success and sustenance of our business. We also have a comprehensive **Environment and Social Management System (ESMS)** in place that sets procedures and guidelines which meet requirements under IFC Performance Standards as well as relevant environmental and social legislation. The **Environment and Social Action Plans (ESAPs)** implemented by us at OIT cover water and energy conservation; management of waste; habitat and biodiversity protection; safety of road users' well-being and welfare of the community, among others. We at OIT have strengthened the management system by going through integrated ISO certification (**ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018**) for Quality, Environmental, Occupational Health, and Safety in Oct 2021. We have also adopted an **Occupational Health Safety Manual** in January 2022 to strengthen the operational control procedures to improve overall OHS performance.

In addition, we understand the relevance and need for businesses to contribute to 9 out of the 17 **Sustainable Development Goals (SDGs)** that reflect the most ambitious framework for sustainable development in the world. This framework provides us with tremendous potential to have a significant impact on the global discourse around the E, S, and G developmental priorities. It aids in illustrating the effect that business growth and collaboration with the communities we serve can have. We've commenced **mapping our initiatives to the SDGs** in this spirit.

OIT's ESG journey is built on four pillars, i.e., **Green, Clean, Safe, and Climate Resilience**. The Green Road pillar includes the plantation program within the Right of Way (RoW) of NH stretches, contributing to the local habitat and bio-diversity conservation in adjacent areas of its road corridors and providing the infrastructure support required for the transition to cleaner fuels. The Clean Road pillar will cover waste management and community wellbeing by ensuring that they experience world-class road infrastructure. The Safe Road pillar is aligned to the goals of the UN Decade of Action for

Road Safety 2021–2030 and is a coordinated effort to make its roads safer for workers, road users, and communities living adjacent to road corridors. The Resilient Road pillar will respond to the manifold challenges of climate change, which may include natural resource efficiency, GHG emissions and the use of sustainable materials.

In line with our ESG commitment, in the reporting year we have conducted a thorough **materiality assessment and an ESG risk evaluation** to identify our ESG priorities. We have also developed a **detailed ESG roadmap** that guides us in taking relevant ESG actions going forward, well in advance. As we continue to grow our business portfolio, we will continue to strive to achieve the highest sustainability standards in our operations.

Lastly, I would like to take this opportunity to thank all our stakeholders for their support and trust in us. We look forward to your comments and suggestions on this proactive initiative of ours.

Jitendra Kumar



MESSAGE FROM SPONSOR DIRECTOR

Dear Stakeholders,

As the lead sponsor, Oriental Structural Engineers (OSE) spearheaded the effort to establish Oriental Infra Trust (OIT) as an InvIT Fund in 2019. With decades of expertise in building high-quality infrastructure projects in India, OSE firmly believes that infrastructure is essential to India's goals of becoming a developed country. Highways and roads are long-term assets that are essential to promoting economic growth by improving access to civic services and employment opportunities for all. Roads and highways, being long-term assets need to be developed with the long-term agenda in mind and maintained in a sustainable manner involving various stakeholders.



OSE and OIT share a common vision of emerging as a business with the largest portfolio of sustainable infrastructure, primarily roads and highways. OIT has received investments from and effectively exceeded expectations (since 2019) of global private sector investors who are dedicated to funding ethical and sustainable enterprises. The COVID-19 pandemic in 2020-21 and the post-pandemic economic outlook for India as a growing economy with preferred investment destination is seen as a great opportunity by OIT for accelerating its growth.

The transport sector is one of the largest emitters of GHGs and air pollutants, therefore, OIT, as a responsible business dealing with a portfolio of road assets is mindful of its role in achieving the low carbon and sustainable future, in alignment with the Sustainable Development Goals (SDGs). To ensure that OIT executes these commitments, it has conceptualized its sustainability program that goes beyond legal compliance and the traditionally adopted impact mitigation hierarchies.

OIT's sustainability program has four sub-components. First, The Green Road Program aims to maintain our roads as green spaces and offer services that make travelling more soothing, even in hot and erratic weather caused by climate change. This program's ambitious and creative purpose is to promote progressive changes in storm water management by using bioswales and rainwater harvesting structures that can respond to extreme rainfall events. The green road initiative will eventually look into alternative nature-based solutions to enhance ecosystem services experienced by communities residing next to road corridors and, where feasible, extend climate change protection. Secondly, the Clean Road Program reflects OIT's vision on waste management and contribution to the circular economy. The program promotes re-use of materials by fostering innovative and creative thinking among employees of OIT.

Thirdly, the Safe Road Program is committed to avoid road accidents, a risk associated with road journey which is emerging as a grievous health issue and a growing concern across the country. The vision of this program is described succinctly in OIT's Commitment Statement on Road Safety which is aligned to UN's Global Plan for Road Safety.

Lastly, the Climate Resilience Program aims to reduce the GHG emissions and promote efficiency in use of natural resources. OIT has adopted a Commitment Statement on Climate Change which guides its actions against climate change. The key objective of the program is reducing OIT's environmental footprint beyond GHGs, including air emissions such as PM and VOCs, protecting the environment and its local communities. The program will expedite the low carbon transition in energy use and adopt renewable use where feasible. Similarly, OIT has a Commitment Statement on Biodiversity which commits to contribute through collaborative and collective actions to realize objectives covered in Convention on Biological Diversity (CBD) and UN Global Compact Framework for Corporate Action on Biodiversity and Ecosystem Services.

The rapid adoption of information technology in highway operations is emerging as a tech-frontier for toll operating teams to adapt and improve efficiency. Fast-tag usage has decreased cash transactions, and the related security arrangements have become obsolete. The emphasis of security has now changed from physical threats to potential data security and cyberthreats. The required actions in this regard are now being taken by OIT.

Furthermore, OIT values responsible business conduct including, but not limited to, the areas related to human and labour rights, environment and anti-bribery measures, promoting good labour conditions and safe and healthy working environments for workers, protecting the rights and interests of Indigenous Peoples. The leadership team at OIT is committed to maintain its progressive outlook and encourage all stakeholders to be part of this transformative process through mutually beneficial engagements.

Sanjit Bakshi



ABOUT THE REPORT

We, at Oriental InfraTrust, are pleased to present our Sustainability Report for FY 2021-22, prepared in accordance with the Global Reporting Initiative. This report offers both our financial and non-financial information in a more transparent and cohesive manner. The report further demonstrates how our business operations abide by sustainable development's best practices and commitments.

Frameworks referred

Our Sustainability Report FY 2021-22 is in alignment with the Global Reporting Initiative (GRI) Standards: Core option. The report also embeds disclosures on UN Sustainable Development Goals (UN SDGs).

Our approach to materiality

This report showcases our approach and performance on the issues that are material to Oriental InfraTrust and our stakeholders. OIT holds regular stakeholder interactions which provide guidance to arrive at a list of 'material topics' or focus areas. Material aspects are prioritized based on their impact on organizations' ability to create value over the short, medium, and long term. These 'material topics' define the contours of this report.

Report boundary

Unless otherwise stated, the information presented in this report pertains to the five business units and head office. The applicable national and local laws, rules and regulations have been considered for the calculation and disclosure of environmental, social and safety performance indicators. Throughout this report, data quality is maintained while ensuring accuracy, balance, clarity, comparability, reliability, and timeliness.

Responsibility statement

Our Board acknowledges accountability for the integrity and completeness of this report and its contents. We have also ensured collective responsibility for the report's preparation and presentation in accordance with Global Reporting Initiative (GRI) Framework.

Feedback

We welcome your feedback and comments on this report to enable us to enhance our future reporting initiatives. Your suggestions may be communicated to sumita.sahay@orientalindia.com

Forward-looking statements

This report contains forward-looking statements that reflect our assumptions and forecasts based on reasonable assumptions and historical performance. These are subject to change as the industry evolves, geographical market conditions change, government regulations and laws evolve, and other unforeseeable events occur. These statements should not be construed as assurances of future performance, as the underlying assumptions are subject to fundamental change.

Oriental InfraTrust

Head office

ONBHL

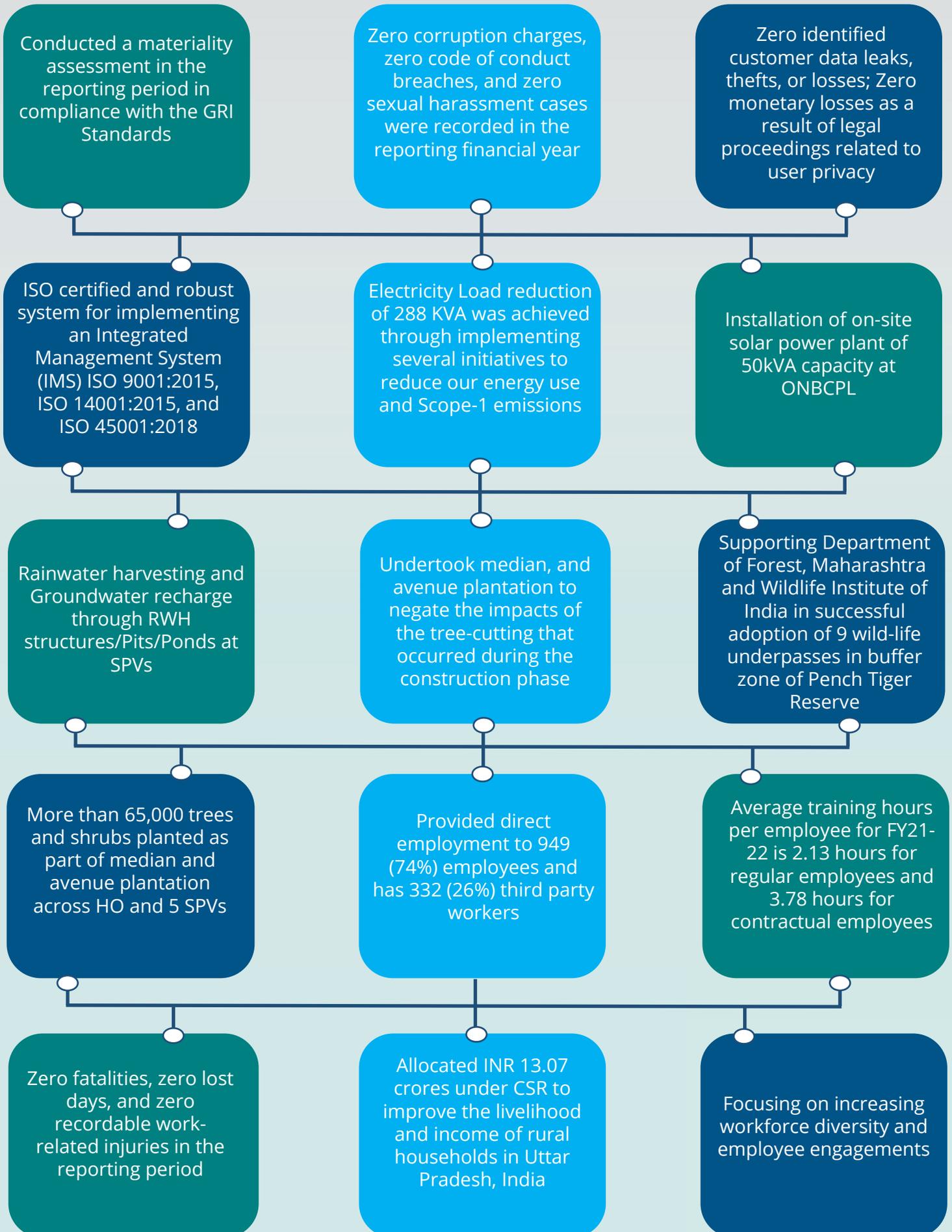
ONBCPL

OPIPL

ECKHPL

OHHHPL

Sustainability highlights 2021 - 22



ALIGNMENT WITH UN STANDARDS

As a responsible organization, we at OIT align our initiatives to the Sustainable Development Goals (SDGs) as outlined by the United Nations. Our contribution to the SDGs is based on our activities across operations, CSR activities and collaborations with our value chain partners. The following table outlines our alignment with and contribution to UN SDGs:



No Poverty

CSR program on Livelihood Skill trainings for rural households augment their household income and provide economic protection. Smooth operation of these important stretches of National Highways contribute to the local economy and poverty eradication.



Zero Hunger

Distribution of food to migrant workers ensured access to basic needs during unprecedented times (lock-down period).



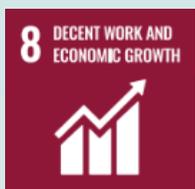
Quality Education

Skill Education is one of our key CSR offerings to our target beneficiaries. Through our CSR, we provide support to enhance existing skills and acquire new skills that helps in improving chances of employability.



Clean Water and Sanitation

We provide clean water and sanitation facilities to road users. We also conserve water and recharge ground water through rainwater harvesting structures where possible.



Decent Work and Economic Growth

OIT pays at par with industry standards to its direct employees and monitors its contractors to pay minimum wage. It ensures that its employees and workers are not harmed during their work hours and enjoys a range of employee welfare and benefits.



Responsible Consumption and Production

We reuse the scrap waste generated from our operations for constructing the yards and thereby reduce use of virgin materials.



Climate Action

Trees are a natural carbon sink and contribute immensely to the biodiversity. Increasing the green cover can safeguard our clean environment. Aligning with our commitment to reduce our carbon emissions we contributed through tree plantation activity.

ALIGNMENT WITH UN STANDARDS

15 LIFE ON LAND



Life on Land

A stretch of ONBCPL passes through buffer zone of Pench Tiger Reserve. In order to provide safe passage to wild animals, four minor bridges (MNBs) and five animal underpasses (AUPs) were constructed. These structures are located along a 16.1 km section of the highway that cuts across the tiger reserve and adjoining forests in 3 forest segments.

The use of animal underpasses are being monitored by the Wildlife Institute of India, Dehradun since March 2019 through camera trapping installed at these structures. These wild-life underpasses have helped protect the biodiversity and especially the mammals on land. Animal movement has increased and further, due to the development of mitigation structures, animals are able to cross the road without being harmed.

17 PARTNERSHIPS FOR THE GOALS



Partnerships for the Goals

The SPVs under OIT work in collaboration with Traffic Police and Hospitals to save lives in road traffic accidents. It also has an active partnership with Department of Forest for its plantation program and implementation of its Biodiversity Action Plan. It has partnered with local authorities for effective collection and disposal of wastes.



About Oriental InfraTrust

Oriental InfraTrust (OIT) was established on 15th June 2018 as an irrevocable trust under the provisions of Indian Trusts Act, 1882. On 26th March 2019, OIT was registered with SEBI as an infrastructure investment trust (InvIT) under the Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014.

The Trust is sponsored by Oriental Structural Engineers Private Limited (OSEPL) and Oriental Tollways Private Limited (OTPL). OSEPL acts as our project manager (PM) while OTPL is a subsidiary of OSEPL. In addition, Axis Trustee Services Limited has been appointed as our trustee and OIT Infrastructure Management Limited is our investment manager (IM).

Axis Trustee Services Limited (ATSL) as Trustee

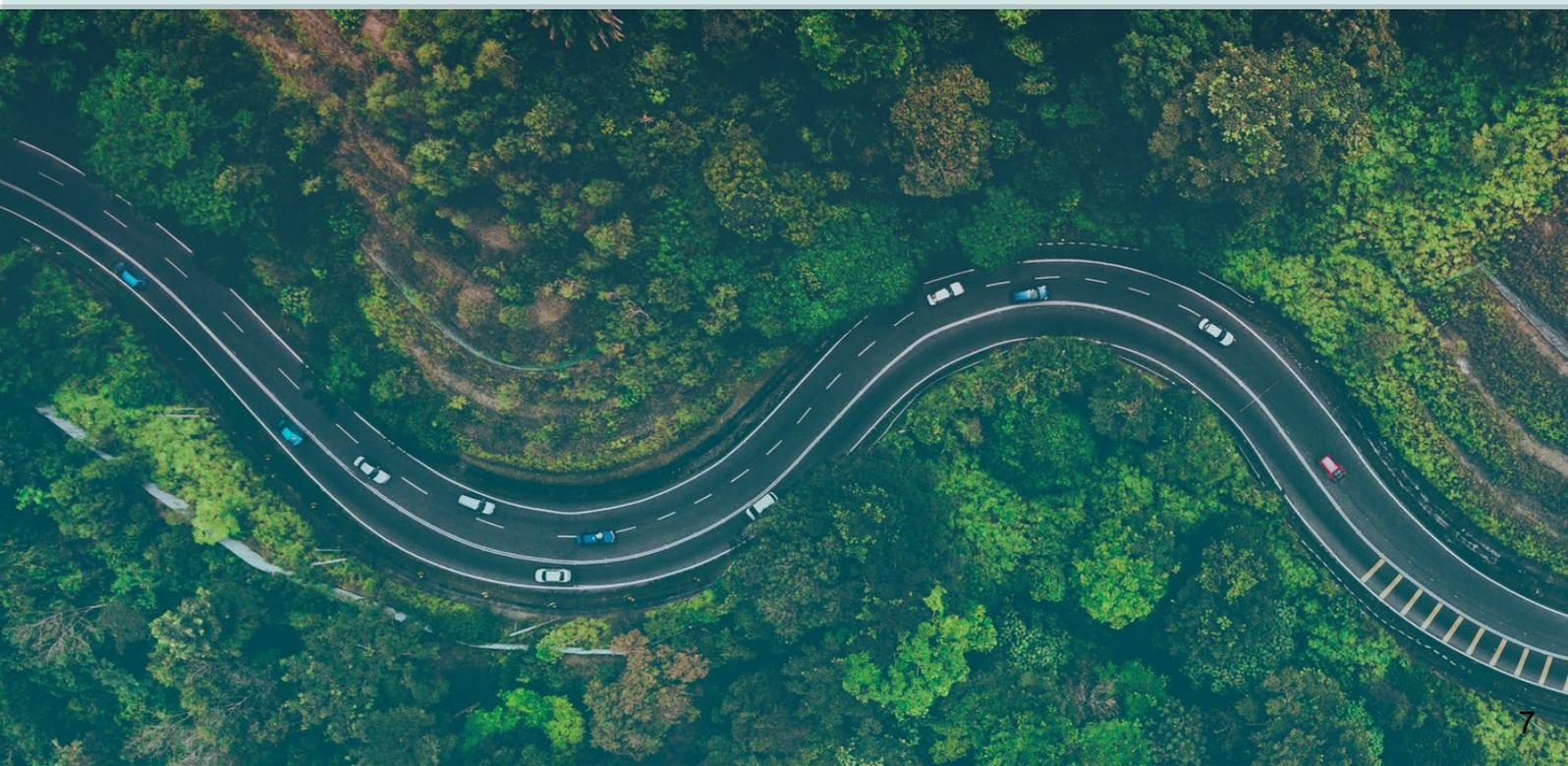
Registered with SEBI, Axis Trustee Services Limited is a debenture trustee. It is connected with India's first real estate investment trust (REIT) backed by Blackstone and Embassy Group. ATSL has a professionally qualified and dynamic team with legal expertise. The team has successfully managed diverse trusteeship activities such as security trustee and debenture trustee.

As a reliable trustee, ATSL's services to OIT ensure adherence to highest ethical guidelines and all legal requirements in corporate governance. The focus is on creating excellent understanding and rapport with investors, lenders by providing quality services within the quickest turnaround time possible.

Oriental Structural Engineers Private Limited (OSEPL) as Main Sponsor and Project Manager (PM)

OSEPL is one of India's leading infrastructure development and construction companies. It has extensive experience in construction of flexible and rigid pavements for roads, highways and airfields. This expertise further encompasses construction of flyovers, bridges and embankments with reinforced earth and earthwork. In the last four decades, OSEPL has been credited with successful completion of major projects associated with pavement works and national/state highways in India and overseas.

The company has a record of finishing large and difficult projects well within the committed timelines, and thus has received the bonus for early accomplishments. OSEPL has executed projects for a diverse range of clients such as the Ministry of Road Transport & Highway (MoRTH), the National



Highways Authority of India (NHAI), the Indian Air Force, Airports Authority of India (AAI) and the Govt. of Bangladesh. OSEPL as our project manager handles the responsibility of maintenance works for our road assets.

Oriental Tollways Private Limited (OTPL)

Incorporated in 2008, OTPL is a wholly owned subsidiary of OSEPL. Presently, OTPL has investment holding in special purpose vehicles (SPVs) who hold concession agreements with road owner (NHAI, MoRTH and State Government Roads and Highways Department). One of the major roles of the company is to manage tolling of all OIT's road assets.

OIT Infrastructure Management Limited (OITIML) as Investment Manager (IM)

OIT Infrastructure Management Limited is an advisory firm that performs the functions of an investment manager (IM) for OIT. It provides consultancy services in the infrastructure sector—conceptualization, completion, and operations & maintenance of a wide-ranging spectrum of projects. The firm is known for delivering quality and innovative solutions for the clients. It acts as a partner and a facilitator in managing major projects such as Build–operate–transfer (BOT) projects under the PPP umbrella and EPC projects. It is the investment manager of OIT and invests in projects through various financial instruments. As an IM it also ensures optimal returns and makes investment decisions to grow the assets of the trust further.

Objectives of the Trust (OIT)

Here is the list of our investment objectives:



- To continue with the InvIT activities as per the SEBI InvIT regulations
- To raise funds directly via the OIT or indirectly via the project entities (SPVs), in accordance with the SEBI rules regulations
- To invest as per the investment manager directions and OIT/InvIT documents and applicable laws
- To operate the road and highway projects under the OIT
- To perform other tasks required and favorable for attaining the objectives set out above

The National Footprint and Overview of Road Assets

Our corporate head office is located in New Delhi from where we lead our operations. OIT currently handles a portfolio of five fully operational road assets — four toll road asset projects and one annuity road asset. They are located in four states, viz. Madhya Pradesh, Maharashtra, Karnataka, and Uttar Pradesh.

Oriental Nagpur Betul Highway Limited (ONBHL): Nagpur-Betul (NH-69)

This project involved four-laning of the Nagpur-Betul section of NH-69 (now NH-47) in Maharashtra and Madhya Pradesh — from 3 km to 59 km in Nagpur, Maharashtra and from 137 km to 257 km in Betul, Madhya Pradesh. The construction work commenced on 20th January 2012 and was completed on 18th February 2015. This is a DBFOT Project under the annuity-based PPP model. The concession period of the project is 20 years. It was awarded by the NHAI on 30th August 2010 as the appointment date. There are 3 toll plazas, i.e., Milanpur and Khambahra in Madhya Pradesh and Patanswangi in Maharashtra and the toll collection is done under the supervision of NHAI by Third Party

Oriental Nagpur Bypass Construction Pvt. Ltd. (ONBCPL): Nagpur Bypass (NH-7)

The project encompassed developing and maintaining the four-lane Maharashtra-Madhya Pradesh border (Nagpur section) of NH-7. This also includes constructing the Kamptee-Kanhan and Nagpur bypass and maintaining the four-laned part of the Nagpur-Hyderabad section. This is a DBFOT-based PPP project with a combined length of 117.078 km. The construction work commenced on 3 April 2010

and got completed on 11th June 2012. The project has a concession period of 27 years. The toll plazas are at Borkhedi, Nagpur Bypass (NBP), Kamptee - Kanhan Bypass (KKBP), and Khumari.

Oriental Pathways (Indore) Pvt. Ltd. (OPIPL): Indore-Khalghat (NH-3)

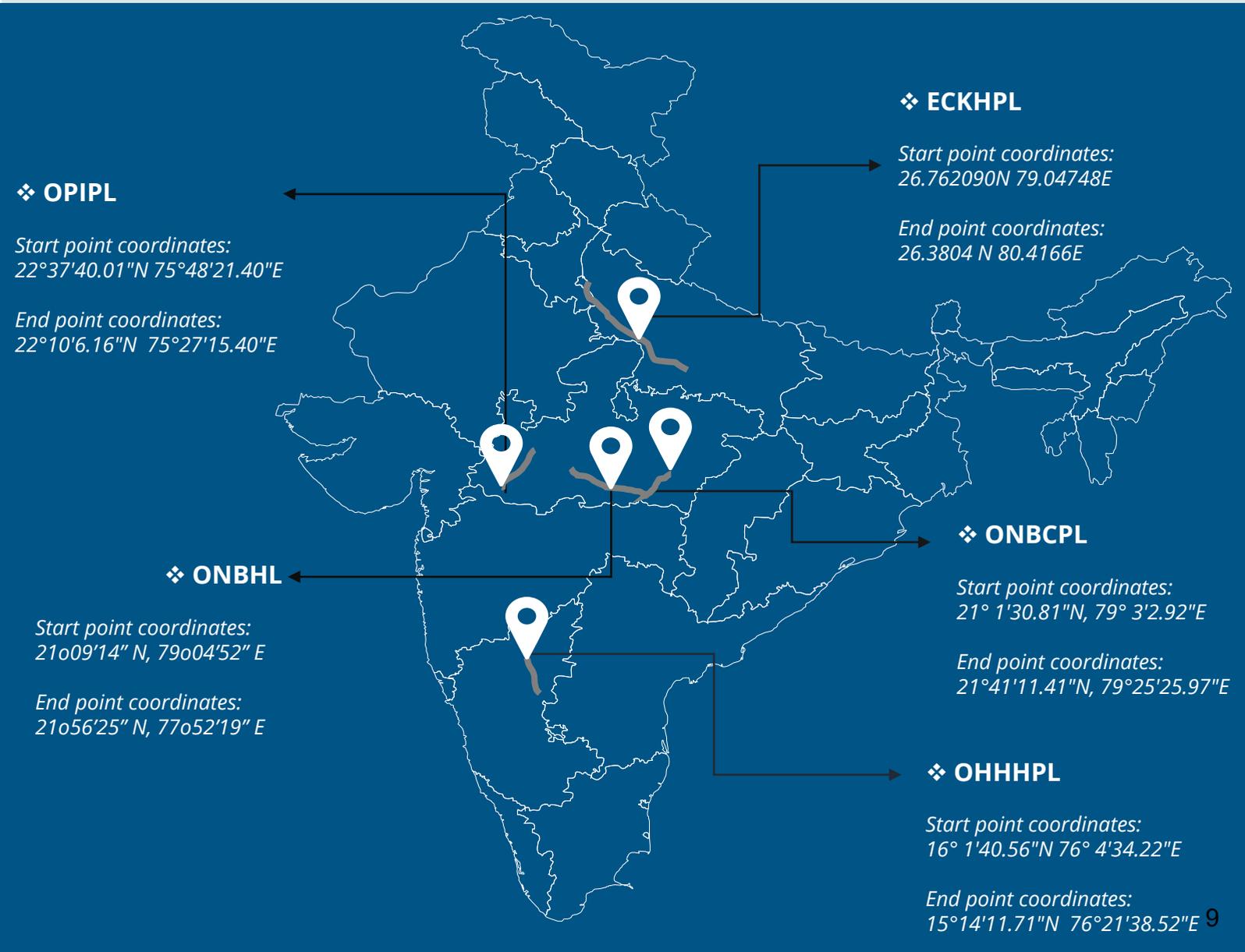
This is a BOT-based PPP project which was awarded by NHAI and commenced on 5th September 2006. The project involved development, operation and maintenance of Madhya Pradesh’s four-lane Indore-Khalghat section on NH-3 from 12.6 km to 84.7 km. The toll collection on this section was initiated on 20 August 2009 and the project has a concession period of 20 years. This project is a key link on NH 3 and connects Delhi with Mumbai. The toll plazas are at Sonway and Khalgat.

Etawah-Chakeri (Kanpur) Highway Private Limited: Etawah-Chakeri (NH-2)

The project was to widen and improve Uttar Pradesh’s Etawah-Chakeri (Kanpur) section of NH-2 from a four-lane section to a six-lane section. This is a DBFOT-based PPP project with a total length of 160.21 km. The highway forms an arm of Golden Quadrilateral and connects Delhi (North India) with Kolkata (East India). This project commenced the construction work on 13th March 2013 and was completed on 28th February 2017. The Concession end date of the project is 18th June 2030. The 2 toll plazas are at Anantram and Barajore.

OSE Hungund-Hospet Highways Private Limited (OHHHPL): Hungund-Hospet (NH-13)

The project involved four-laning of Karnataka’s Hungund-Hospet section of NH-13 which covers 99.054 km. The NHAI awarded this project for a 19-year concession period. The construction was started on 18th September 2010 and the toll collection on this section commenced on 14th May 2014. The 3 toll plazas are at Vanagrii, Shahapur, and Hitnal.



FINANCIAL PERFORMANCE

Oriental InfraTrust is committed to delivering robust economic performance and generating sustainable long-term financial value for its stakeholders and shareholders. Driven by profitable growth and responsible development, our financial management approach is determined by utilizing the capital inputs in the most favorable way and investing the operations surplus into appealing growth opportunities.

The Trust has a resilient financial planning process in place to evaluate and estimate the fund requirement for our business operations along with future investments. In FY 2021-22, we recorded a net profit of INR 338.79 crores. Further details on our economic performance are depicted in the table below:

Parameter	Unit	FY 2021 - 22
Economic value generated	Crore INR	2,183.85
Economic value distributed	Crore INR	1,845.06
Operating costs	Crore INR	979.97
Employee wages and benefits	Crore INR	24.20
Payments to providers of capital	Crore INR	765.21
Payments to government by country	Crore INR	69.60
Community investments	Crore INR	6.09
Economic value retained	Crore INR	338.79

During 2021-22, growth of the infrastructure sector stayed subdued accompanied by limited participation of the private sector in construction and low infrastructure spend. However, Oriental InfraTrust maintained its portfolio of five road assets — one annuity road asset and four toll road assets in Maharashtra, Uttar Pradesh, Madhya Pradesh, and Karnataka. We have collected all the tolls electronically in FY2021-22 on the Trust's project assets. With the market likely to stabilize in the next year, management will continue to give attention to lowering the cost of debt and improving efficiency.

The previous year also saw essential and crucial reforms, regulations and precautionary plans being set out by the regulatory bodies to ensure the economy does not get affected by the aftershocks of such dynamics. The Trust has established suitable financial controls to protect its assets, conduct business proficiently, confirm correctness and completeness of accounts, prepare reliable financial information, and block and detect errors and frauds. For more details of the financial performance, the detailed audited financial statements/ annual report 2020-21 can be referred.

Our economic contribution involves tax as an important element, which is not just restricted to the received corporate income tax we pay. We also pay considerable taxes to central and state governments — professional tax, goods and services tax, custom duties, and property tax.

Tax Strategy

The tax contribution provided by the OIT Group, is part of its core contribution to the sustainability of public finances and the development of the communities in which it operates. The tax strategy of OIT is aimed at the full and strict compliance with all appropriate tax laws and regulations in India where it conducts all its operations.

OIT strives to follow the best standards in the business community and aims to be recognized for its practices and programs on corporate and tax governance. Considering both the corporate interests of the Company and shareholders and the general interest, OIT's conduct in tax matters shall be governed by the following principles: -

- ☀ **Full compliance with the applicable tax regulations.** – OIT makes payment of all the taxes in accordance with the wording and the spirit of the Indian law, without incurring any tax inefficiencies and undue tax burdens.
- ☀ **Exclusion of the use of low or zero tax jurisdictions** – OIT does not use tax havens to channel artificially its operations to save taxes.
- ☀ **Implementation of an appropriate transfer pricing policy at the Group level** – OIT implements a transfer pricing policy resulting in a tax structure aligned with the business model, avoiding the erosion of tax bases by means of prices which are not arm's length.

OIT shall have adequate control mechanisms in place to ensure the fulfillment of its tax duties and observance of the above-mentioned principles and the necessary human and material resources to achieve this. The Company, to fulfill said objectives, shall also receive appropriate external advice.

With taxation being a critical aspect of our business, OIT also identifies risks associated with changes in tax benefits/ regimes in India:

- ☀ Changes in legislation or the rules relating to tax regimes.
- ☀ Some of our road assets enjoy certain benefits under Section 80-IA of the Income Tax Act
- ☀ Entities operating in India are subject to a variety of Government and State Government tax regimes and surcharges
- ☀ Investors may be subject to Indian taxes arising out of capital gains on the sale of Units.
- ☀ Tax laws are subject to changes and differing interpretations, which may materially and adversely affect our operations.

Political and Other Contributions

OIT makes contributions to provident funds and other employee welfare related schemes such as gratuity plan, contributions towards Employee State Insurance Corporation Fund as per mandate of Government of India. These contributions are recorded in the consolidated profit and loss statement which can be found in the Annual Report.



Our strong financial performance is embedded with an equally strong performance in non-financial or sustainability parameters. We treat this as an assurance for our long-term success.

Mr. Ashish Jasoria, CFO-OIT

STAKEHOLDER ENGAGEMENT AND MATERIALITY

Stakeholder engagement

We at OIT operate within the framework of sustainable development, realizing the critical significance of safeguarding the rights of our key stakeholders. We believe that it is absolutely crucial to communicate with stakeholders to better understand their interests and perspective. In addition, our Environment and Social Policy reinforces our commitment to safeguard the interests of stakeholders and affected communities-through periodic engagement, information disclosure and effective management of grievances resulting from operations as well as routine road maintenance activities. We have segregated our key stakeholders into five groups, which are as follows:

Key stakeholder groups, areas of interest, significance, and frequency of engagements

Stakeholder Group	Stakeholders	Engagement channels	Significance	Frequency	Key areas of interest
Government and Regulatory Authorities	<ul style="list-style-type: none"> NHAI SPCB Labour Commissioner 	<ul style="list-style-type: none"> Formal Correspondence One-on-one meeting 	Moderate	Regular	<ul style="list-style-type: none"> Ensuring proper and effective implementation of the project Ensuring compliances of applicable national and state legislations/regulatory requirements Providing necessary project licenses, permits, utility shifting etc. Ensuring safety during operation and maintenance of Toll activities Ensuring environmental and social compliances and protection during the execution/operation of the work
Financial Institutions	<ul style="list-style-type: none"> MBFS Unitholders Investors Banks 	<ul style="list-style-type: none"> Formal Correspondence One-on-one meeting 	High	Bi-annual/ Annual	<ul style="list-style-type: none"> Ensure project compliances to FIs requirements Ensure sustainable implementation of the project activities
Sub-Contractors	<ul style="list-style-type: none"> Suppliers of Goods and Services Consultants 	<ul style="list-style-type: none"> One-on-one meeting Formal Correspondence 	Moderate	Continuous	<ul style="list-style-type: none"> Implementation of good construction and O&M practices Maintaining good OH&S measures and environmental protection Quick intervention and elimination of consequences from adverse incidents Efficient and timely execution of project work
Road Users and Roadside Communities	<ul style="list-style-type: none"> Road Users Roadside communities Roadside Hospital and Educational Institutes 	<ul style="list-style-type: none"> Information Boards Public Meetings/ Events Focus Group Discussion 	High	Continuous	<ul style="list-style-type: none"> Opinions and suggestions for improvement of road operation and maintenance activities are considered Quick and effective resolution of the grievances received from them Quick and efficient response to road accidents and other emergencies
Other Interested Parties	<ul style="list-style-type: none"> Media NGOs Local Governance Bodies 	<ul style="list-style-type: none"> One-on-one Meeting Group Meeting/ workshop 	Low	As and when required	<ul style="list-style-type: none"> Responding to their concerns regarding the environmental and social issues linked to the road O&M Use of mass media (Newspaper, TV and, radio station, social media) to spread awareness on road and traffic safety issues

Stakeholder Engagement

Identify

- Identification of key stakeholders and their interest, influence, and their sensitivities
- Group them into categories based on the impact and/or interest

STEP
01

Analyse

- Analysis of risks and concerns through stakeholder feedback
- Determine the magnitude, likelihood and maturity of issues/concerns

STEP
02

Prioritize and Plan

- Prioritization is done based on magnitude and urgency
- Planning process identifies methods of engagements

STEP
03

Implement & Document

- Planned stakeholder engagement activities are implemented and documented

STEP
04

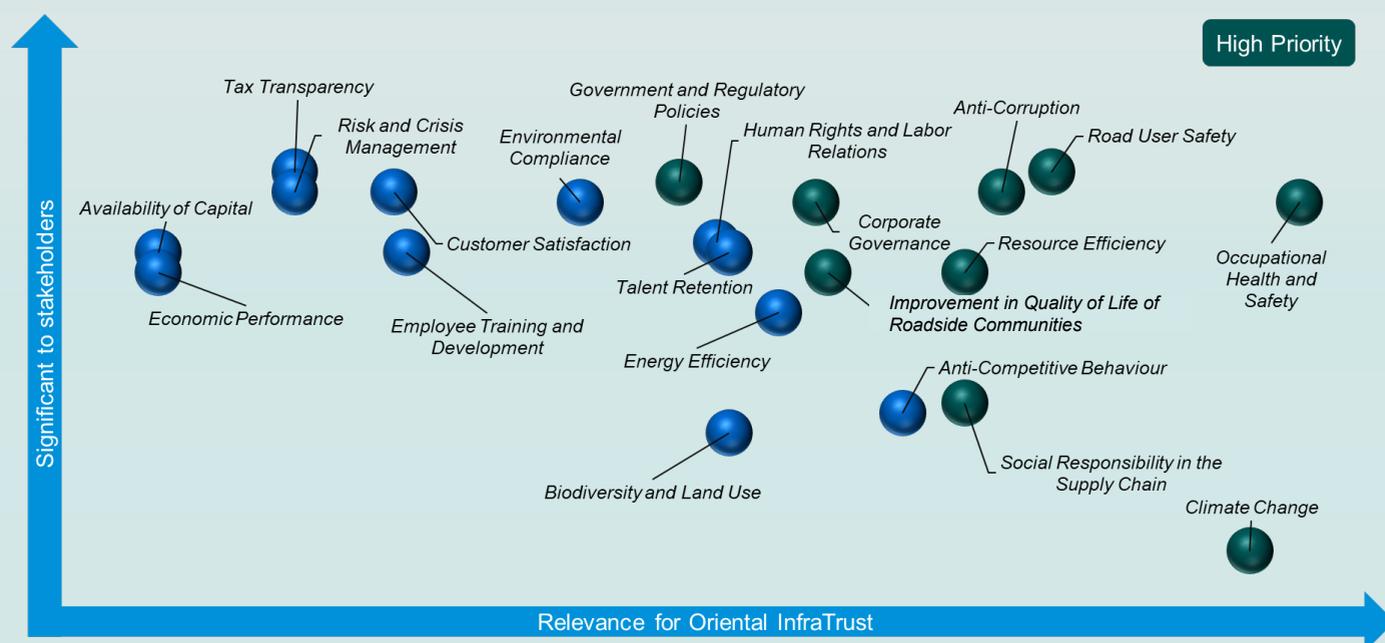
Aside from the stakeholders specified in the table above, we have been actively engaging with industry associations to bolster our competitive position in the market and help our business expand and operate more ethically.

Materiality

OIT's strategy is driven by material ESG priorities that have the potential to have a lasting influence on the business' long-term performance. Materiality is an effective tool for introspection on our sustainable path to meet both shareholders' and stakeholders' expectations. We assess material issues on a regular basis with our E, S, and G factors in mind, and are continually try to improve and strengthen our materiality identification process.

We have conducted materiality assessment this financial year in compliance with the GRI Standards. We followed a step-by-step process to determine these material priorities that began with extensive desk research and supplemented by a thorough stakeholder engagement exercise. Desk research involved identifying sustainability challenges by gaining a better grasp of industry performance, the risk and opportunity landscape, and global megatrends. These issues were then ranked as material issues using a two-dimensional map to demonstrate their importance to stakeholders and the Company. This year we have validated our material priorities with senior leadership, middle management, and employees. The engagement strategy comprised one-on-one meetings, phone calls, online surveys, site visits, and emails with stakeholders.

Our material priorities for FY 2021-22:



Occupational health and safety, Road user safety, Corporate governance (includes Anti-corruption and Anti-competitive behavior), Climate change, Resource efficiency (energy, water, waste), Improvement in quality of life of roadside communities, Social responsibility in the supply chain, Labor management & relations, and Biodiversity and land-use.

The chapters further will elaborate more on the activities undertaken by us to address these issues.

“Our roads connect people, their homes, workplaces, villages and cities. They connect businesses with raw-materials, suppliers and customers. OIT’s vision is to be a trusted partner in achievement of aspirations of people and businesses in our road corridors and India as a whole. OIT is committed to building a New India, that is Green, Safe and Sustainable.”

Mr. Sanjit Bakshi, Director- OIT

CORPORATE GOVERNANCE

Effective corporate governance is pivotal to our long-term growth. Good governance develops a reliable, transparent, and ethical culture. We are committed to creating, implementing, and upholding the highest standards of corporate governance throughout our business operations. We are aware that to maintain our competitiveness, we must contribute positively to the country's economic and social prosperity. Our corporate governance practices reflect our value system, which incorporates our culture, policies, and relationships with stakeholders. Integrity is at the root of our value-driven governance culture, which allows us to earn and uphold our stakeholders' trust and respect.

At OIT, we have strong governance and leadership that empowers us to progress in our journey of sustained business growth. We ensure transparency, accountability, controls, and efficiency through a robust corporate governance system. We ensure that we also address the interests of our stakeholders through our governance strategy.

Board Structure

Oriental InfraTrust is managed by the Trustee in accordance with the Trust Deed and SEBI InvIT Regulations, 2014. Further, the Trustee in accordance with the Investment Management Agreement authorizes the IM to function on behalf of the Trust. Therefore, the Board of Directors of IM performs on behalf of the Trust. However, pursuant to the SEBI InvIT Regulations and applicable law, the IM Board shall consist of majority of Independent Directors, a Sponsor Director and an Investor Director appointed by the Investors holding more than 20% of the Unitholding.

In this regard, the IM Board consists of three Independent Directors, one Sponsor Director and one Investor Director. OIT is led by a highly experienced management team and professionals with profound knowledge of the infrastructure, investment and project management and a proven track record of performance. Our Board of Directors (BoD) has set high standards for the company's employees, officers, and departmental heads. Our Board of Directors oversee our business with the aim of enhancing shareholder value, periodically reviewing all compliance reports, which may relate to, but are not limited to energy efficiency, health and safety incidents, significant stakeholders' concerns, and proposed solutions.

The tenure of Independent Directors is for five years. The same is governed by the Companies Act, 2013 which regulates incorporation of a company, responsibilities of a company, directors, dissolution of a company. The Sponsor & Investor director's tenure is governed in accordance with the Trust Deed. During FY 2021-22, a total of 5 board meetings were held. Our board is fully briefed on all business-related matters, associated risks, and new initiatives of our company.

We have a Nomination and Remuneration policy which provides the selection process and qualification required for Directors. Performance assessment of Non-Independent Director is done as per the provisions of the Companies Act, 2013 by the Independent Director in their meeting which includes IM.

Roles and responsibilities of the Board

To reinforce the standard governance practices across our business operations we have clearly the specified roles and responsibilities of the IM Board. The roles and responsibilities increase alignment in management and increase efficiency.

- To act in accordance with the articles of the company
- To act in good faith to promote the objects of the company for the benefit of its members as a whole, and in the best interests of the company, its employees, the shareholders, the community and for the protection of environment.

Board of Directors of the Investment Manager



Sanjit Bakshi
Sponsor Director

Expertise:

Executive Leadership, Governance, Financial Acumen, Project Formulation And Management, EPC Projects, Coal Mining Business, BOT Model, BOT-PPP Model



Ranveer Sharma
Investor Director

Expertise:

Executive Leadership, Governance, Financial Acumen, Investment Management, Foreign Direct Investment, Logistics, Warehousing, Transportation, Strategy, Corporate Turnaround



Surinder Singh Kohli
Independent Director

Expertise:

Executive Leadership, Governance, Financial Acumen, Project Formulation And Management, Infrastructure Development, Project Finance



Deepak Dasgupta
Independent Director

Expertise:

Executive Leadership, Governance, Project Formulation and Management, Strategy, Risk Management



Ajit M Sharan
Independent Director

Expertise:

Executive Leadership, Governance, Financial Acumen, MSME Development, Power Management, Urban Development

Our board is supported by a competent management team comprised of three members



Jitendra Kumar
Chief Executive Officer

Expertise:

- Executive Leadership
- Governance
- Financial Acumen
- Project Formulation And Management
- Cost-Benefit Analysis
- Tendering



Ashish Jasoria
Chief Financial Officer

Expertise:

- Executive Leadership
- Governance
- Financial Consulting
- Business Strategy
- Capital Management
- Fund Raising
- Business Planning

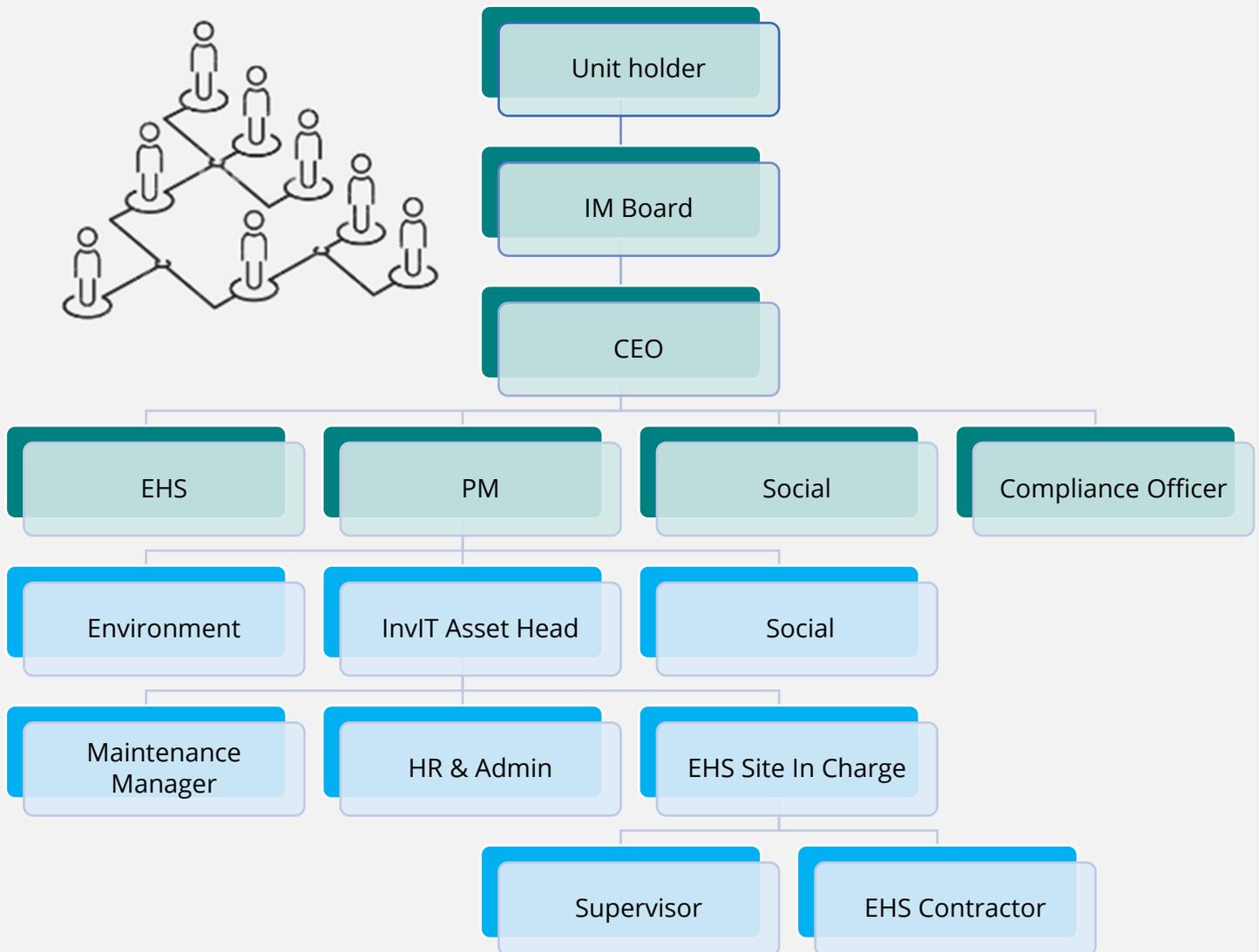


Gaurav Puri
Compliance Officer

Expertise:

- Executive Leadership
- Structural Fund Raising
- Due Diligence
- Shareholders' Agreements
- Bank Finance
- Foreign Investments
- Project Management

Our EHS team composition



- To exercise his duties with due and reasonable care, skill and diligence and shall exercise independent judgement
- To not involve in a situation in which he may have a direct or indirect interest that conflicts, or possibly may conflict, with the interest of the company
- To not achieve or attempt to achieve any undue gain or advantage either to himself or to his relatives, partners, or associates and if such director is found guilty of making any undue gain, he shall be liable to pay an amount equal to that gain to the company
- The Director shall not assign his office during the term of employment and any assignment shall be void

Committees of the Board

We have three board committees, i.e., the Audit Committee, the Investment & Finance Committee, and the Conflict Committee. These play an integral part in overall governance practice in our organization. All the directors are proactive members of all the committees.

Code of Conduct

At OIT, we have a very comprehensive Code of Business Conduct and Ethics that defines and clarifies the standards for conducting business and behavior required under applicable law, including the SEBI InvIT Regulations. The code of conduct includes the following:

- The Trust and the parties to the Trust shall make adequate, accurate, explicit, and timely disclosure of all relevant material information to all Unitholders, Stock Exchange(s) and SEBI, in accordance with the InvIT Documents, the SEBI InvIT Regulations and as maybe specified by the Stock Exchange(s) from time to time.
- The Trust and the Parties to the Trust shall try to avoid conflicts of interest in managing the affairs of the Trust and keep the interest of all the Unitholders paramount in all matters. In cases where the conflict of interest cannot be avoided appropriate disclosures are made to the Unitholders and the stock exchanges and unitholders are fairly treated.
- The investment manager shall carry out the business of the Trust in accordance with the InvIT documents and invest in accordance with the Investment Objective stated in the InvIT documents and take investment decisions solely in the interest of Unitholders.
- The Trust and the Parties to the Trust, and any Third party appointed by the investment manager shall not use any unethical means to sell, market or induce any person to buy Units of the Trust and where a Third party appointed by the Investment manager fails to comply with this condition, the Investment manager shall be liable for the same.
- The Trust and the parties to the Trust shall maintain high standards of integrity and fairness in all their dealings and in the conduct of their business.
- The Trust and the Parties to the Trust shall always render high standards of service, exercise due diligence, ensure proper care, and exercise independent professional judgment.
- The Investment manager shall not make any exaggerated statement, whether oral or written, either about their qualifications or capabilities or experience.

Our Policies

Our principles and policies reflect our dedication to our core values and govern our day-to-day operations. Respecting all the applicable rules and regulations while maintaining the highest levels of professional integrity is the foundation of our fundamental values.

OIT is committed to fostering a professional and respectful work environment that is inclusive and free from any discrimination. To ensure this, we have established policies that all employees must adhere to. These policies are developed to be best-in-class and exceed applicable governmental laws, rules, and regulations. The description of our policies is as follows:

Anti-Bribery and Corruption (“ABAC”) Policy & Procedures

Our ABAC policy is implemented by investment manager on its own behalf and on behalf of the Trust. It describes corrupt, fraudulent, coercive, collusive and obstructive practices with respect to OIT including polices but not limited to related to theft and misuse of resources.

Anti-Money Laundering/ Combating the Financing of Terrorism (CFT) Policy

Our AML/CFT policy oversees the framework for anti-money laundering and combating of terrorism related to operations of the Trust. The policy follows applicable national laws and regulations being consistent with international best practices. We develop and implement trainings to implement the policy.

Conflict of Interest Policy

Our policy gives information about dealing with related party transactions and conflict of interest situations in respect to Trust.

Corporate Governance Policy

Our policy sets out requirements with respect to additional units held by sponsor(s), voting rights of the sponsor(s), the conflicts committee and quorum requirements in relation to Unit holders.

Nomination and Remuneration Policy

Our policy sets out guidelines related to nomination, remuneration, and removal of the directors of the IM Board and KMT.

Prohibited Practices Policy

Our policy sets out the Prohibited Practices with respect to the Trust-financed projects and the process for enforcing these prohibitions through a sanctions process. The purpose of this policy is to ensure that the financial support provided by the Trust is used for the purposes for which it was granted.

Procurement Policy

Our policy provides a framework for selection, financing, and procurement of assets, in relation to the Trust.

Disclosure of Information Policy

Our policy sets out the process and procedure for determining materiality of information in relation to periodic disclosures to be made to the Stock Exchange(s) and Unitholders, in relation to the Trust and to ensure compliance with the disclosure requirements as required under the InvIT Documents and Applicable Laws.

We confidently report zero corruption charges, zero code of conduct breaches, zero sexual harassment cases in our company in the reporting financial year.

In OIT, there is coherence between business strategy and corporate governance. The active involvement of unitholders has helped in strengthening transparency and corporate governance practices.

Mr. Gaurav Puri, Compliance Officer- OIT

RISK MANAGEMENT

The risk associated to the construction of infrastructure project is well-known. As SPVs in OIT portfolio are operating toll roads, the risks are narrower and include operational, managerial and financial aspects. As a strategic and preventive measure, the leadership team does periodic monitoring and assess our preparedness to respond to any unforeseen operational disruptions. Our risk management practices are modelled on quality management requirements of ISO 9001:2015 standard.

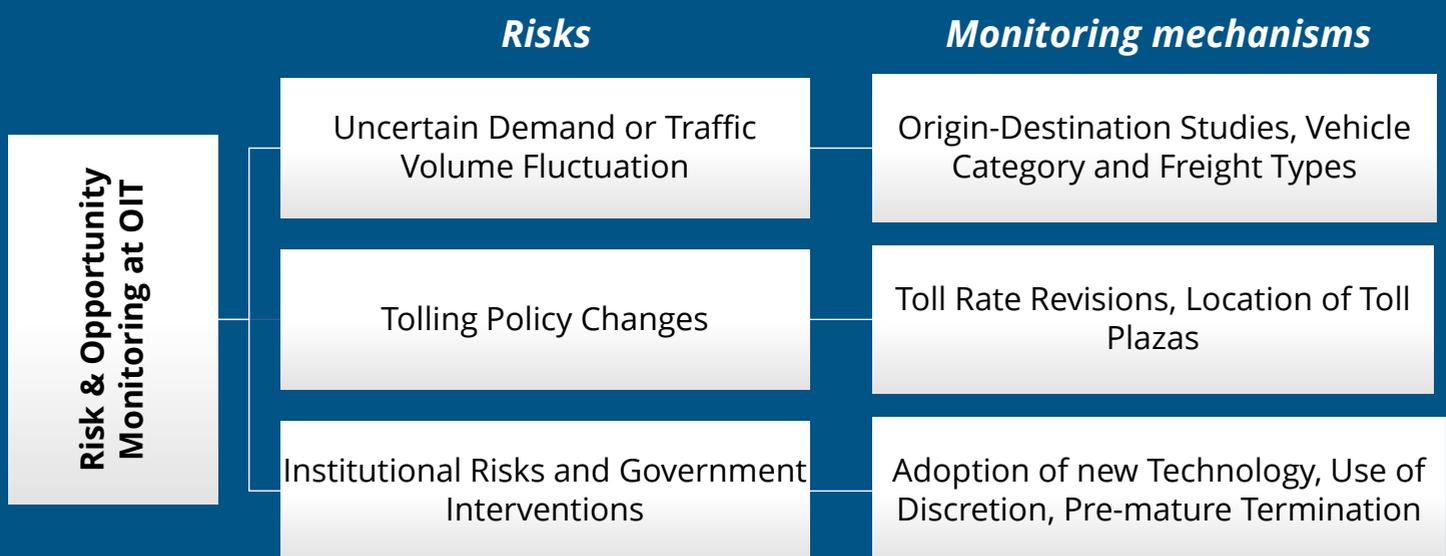
With regards to corporate governance, OIT mitigates identified risks through implementing policies and procedures developed in line with local regulations and industry best practices. Specifically, our training and leadership communication place additional emphasis on cultivating a risk-intelligent and risk-aware culture to safeguard our operations and better equip employees to manage crises.

As an ISO 9001 accredited company, OIT follows a risk-based thinking in managing its operations. For each material risk, there is a designated team/personnel dedicated to ensuring that effective control systems and protocols are in place. Toll road operation is exposed to a set of external risks which need to be constantly monitored. The material risks identified by OIT includes the following

- **Design Risk:** The design risk includes implications of inappropriate design choices on O&M efforts and costs.
- **Revenue Risk:** This is linked to uncertain future demand or traffic volumes. The traffic volume is sensitive to macro-economic factors such as income and economic growth.
- **Government Intervention and Institutional Risk:** The risk includes policy and strategic decisions by Governments by exercising their discretionary powers not protected by law.
- **Force Majeure Risk:** This includes any unforeseen natural and man-made events.

Some of these risks are covered either by covering them through insurance or sharing the risk with government. The remaining risks are reduced through mitigation or control measures. The leadership team periodically monitors the effectiveness of these risk mitigation and control measures.

OIT's risk-based thinking identifies the key factors affecting the risk and related stakeholders. The consequence of the risk is analyzed taking into consideration a range of factors including cost, functional performance and financial performance. OIT is also watchful of risks faced by other Toll operators and competitors. Its technical heads actively engage with key stakeholders to assess their expectations and influence on a range of contemporary and emerging issues. The broad coverage of the risk monitoring system is shown below.



Our material risks and corresponding control measures is provided below. In addition to these business and operational risks described, we also assess and manage ESG risks as part of our commitment to sustainability and climate change challenge.

Risk Description	Control Measures
Decline in traffic volumes and revenue	Traffic Studies Analysis of vehicle category and freight types
Policy changes by governmental entities	Legal protection in Concession Agreement Stakeholder Engagement
Newly constructed roads or existing alternate routes competing with the road assets and resulting in a reduction in revenue.	Non-compete clause in Concession Agreement
Increases in costs, including operation and maintenance costs.	Toll-rate revision
Dependency on third parties to undertake certain activities in relation to the operation and maintenance of the Road Assets. Any delay, default or unsatisfactory performance by these third parties could materially and adversely affect our ability to effectively operate or maintain the Road Assets.	Limiting the number of third parties performance monitoring of third parties
Adverse effect during an economic downturn particularly sectors utilizing our roads for transportation of goods /materials / products.	Geographic spread and strategic location of SPVs
The cost of implementing new technologies and/or refurbishing existing equipment for operating, maintaining and monitoring our Projects.	Legal protection in Concession Agreement
Our performance is linked to the political situation in the particular State within whose jurisdiction the road asset is located.	Stakeholder Engagement
India is a vast country with climatic variation and is vulnerable to different natural disasters. Natural disasters could severely disrupt the normal operation of Project SPVs and influence O&M cost.	Robust O&M schedule and constant monitoring
An outbreak of an infectious disease or epidemic / pandemic or any other serious public health concerns in Asia or elsewhere could adversely affect the Business of the Trust	Protection against Force Majeure in Concession Agreement

IT AND CYBERSECURITY

In the recent years, the importance of IT and cyber security has steeply increased. Keeping information safe is a growing concern for the organizations. Thus, the companies are adopting various processes and tools to avoid any threats.

OIT has an IT security policy that is implemented for all the Special Purpose Vehicle (SPVs) of the organization and helps to manage the digital information. The IT system security policy is applicable for Toll Management System (TMS) / Highway Traffic Management Systems (HTMS) and Toll Plaza IT infrastructure. The governance structure includes senior general manager, senior manager, manager, and technical managers of the SPVs.

IT and Network Architecture

The information security architecture includes network and firewall as security systems. At OIT, we follow a cascade approach for network and IT infrastructure. Local Area Network (LAN) and Wide Area Network (WAN) help in providing controlled access to authorized users at site and beyond physical boundaries of site respectively, while Virtual Private Network (VPN) ensures safe data transfer.

LAN

- Only authorized users have access
- This includes upgrades and expansions

WAN

- Controlled access to just authorized users
- Record all occurrences of any prospective assaults or threats by unauthorized individuals

VPN

- Data transport is made secure by assessing security flaws
- Apply all security policies to the solution

Cyber security and data privacy governance

As per the OIT IT security policy the processes adopted uses network segregation, firewalls, antivirus, and regulation of access controls for different categories of users. The data-back-up is created and stored in secured place to prevent any data-loss. The policy also includes provisions of audits and periodic checks. In case of amendments in the policy, approvals are taken from the IT head and the head of the organization. The TMS/HTMS does not capture any personal information of the road users during toll collection process. Hence, there is no possibility of using personal data for behavioral advertising.

Compliances followed by OIT

TMS and HTMS system complies to the National Highways Authority of India (NHAI) requirements. As per the standard mechanism two regulatory bodies on behalf of the NHAI have limited access (to read only) to the server, i.e., National Payments Corporation of India (NPCI) and Indian Highways Management Company Limited (IHMCL).

The goal is to improve security measures and cut down on the amount of downtime, customer losses, breach of data that businesses must deal with. Our information technology policy serves as the cornerstone for our cyber security program, and OIT invests substantial resources in protecting and improving the security of existing systems.

Our dedication begins with the organization's top management and extends to every employee, and as such, we ensure that they are properly taught, informed, and aware of any cybersecurity dangers and how to respond to or report them. We conduct annual training for our employees on the IT security policy and the related process. New employee hires are also provided with a detailed training on IT security during their induction programme. Awareness sessions are conducted for employees regularly to ensure best practices are adopted and followed across the organization.

Road infrastructure is an important pillar to boost the country's economy. Further, fostered by digitization, new mobility needs are emerging. As innovative traffic management, mode of transport, and pricing models emerge, OIT is preparing itself to adopt new and smart technology. We at OIT have envisioned automated mobility and free flow mode of toll collection in the near future and we are prepared for a seamless process of adoption.

- **Zero complaints** received from outside parties and substantiated by the organization
- **Zero identified leaks, thefts, or losses of customer data**
- **Zero monetary losses** because of legal proceedings associated with user privacy



“India’s road and transport infrastructure sector is rapidly expanding and adopting best practices in IT based systems for toll collection. This envisages a marked change in the IT infrastructure and staff competencies. The newer tech-savvy generation of road users expect faster and efficient services in all spheres including traffic management, toll collection and grievance management.”

IT Department Head



ENVIRONMENTAL MANAGEMENT SYSTEM & RESPONSIBILITY

As an operator of road infrastructure, OIT is cognizant of its responsibility and commitment to ensure environmental sustainability in its operations, and routine road maintenance activities. OIT has adopted a prudent approach towards utilizing natural resources with the aim to minimize environmental impacts of its activities through effective implementation of mitigation measures. In addition to regulatory compliance on environment laws, OIT has adopted industrial best practices.

OIT has always taken a pragmatic approach to ensure the optimal utilization of critical natural resources such as water and energy. In terms of material procurement practice, OIT is cognizant of aspects such as reuse of materials, minimizing waste generation, ordering customized material as per project requirements, sourcing locally to the extent possible to decrease avoidable long-distance transport etc. At the SPV level, the site-level teams remain sensitive to the local ecology, landforms, and communities and take proactive initiatives to conserve the local environment.

At the center of our approach towards environment is the OIT's Corporate Quality Environmental Health Safety and Social (QEHSS) Policy. We have a dedicated team of EHS professionals at site and corporate level to implement the policy objectives. Robust Environmental Management Plans are prepared and implemented accounting for magnitude of the specific risks and impacts identified through comprehensive environmental risk assessment. The management board has an oversight on the environmental action plans and approves the same. The environment management system is deeply rooted in OIT's processes from the pre-acquisition to the completion of the project. In pre-acquisition stage, a project-specific Environment and Social Action Plan (ESAP) is prepared through a third-party environment and social due diligence process. The ESMP includes environmental compliances, risks, significant impacts of project activities, and cost to be incurred to mitigate the same. The ESMPs address multiple issues including resource conservation, waste management, energy consumption, tree plantation, and environment baseline (air, water and noise) monitoring. Implementation processes encompass intermittent inspections by site staff, biannual environment baseline monitoring, and annual internal and external audits which helps to check ESMP implementation's effectiveness at the site. The figure below outlines the building blocks of all our ESMP which take into account the context of the project requirements, site requirements etc.

OIT and its SPVs are ISO certified (by TUV SUD Asia Pvt Ltd) and have a robust system for implementing Integrated Management System (IMS) comprising ISO 9001:2015 (Quality Management), ISO 14001:2015 (Environment) and ISO: 45001:2018 (Occupational Health and Safety). For continual improvement in ESMS implementation, we conduct annual Internal and Third Party EHSS Compliance Audits.

Features of our environmental management systems

EHSS risk assessment for life cycle (Operation and routine maintenance, major maintenance, construction of change of scope items, if any) of its road assets

Risk management

Training on EHSS and ESAP

Contractor compliance management

Occupational Health and safety monitoring and enforcement

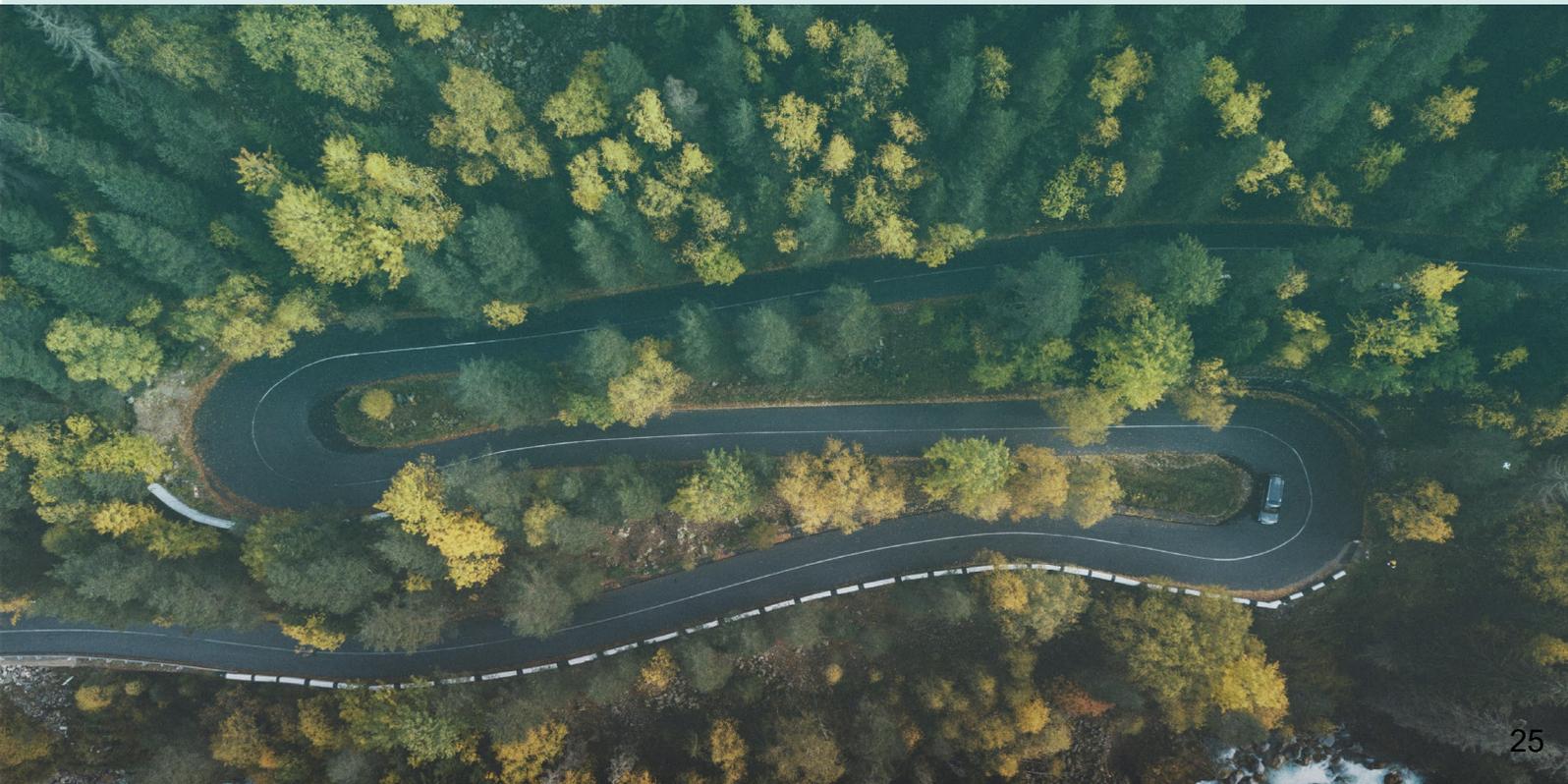
Community wellbeing and safety of road users

Emergency preparedness and response

Furthermore, we have a defined process to identify the risks pertaining to Environmental Health Safety and Social (EHSS) aspects. The following process is used to identify the EHSS risks in our operations:



A key part of the successful implementation of our EHSS objectives is alignment, awareness among the employees, and site leadership. Effective and relevant training sessions are conducted to ensure that employees, workers and contractors are aware of their roles and responsibilities as per the OIT's Corporate Quality Environmental Health Safety and Social (QEHSS) Policy. We expect our value chain partners to align with our sense of responsibility towards ensuring environmental sustainability. In this regard, we screen suppliers and contractors, including sub-contractors, keeping in view their ability to operate in an environmentally and socially responsible manner.



CLIMATE CHANGE AND EMISSIONS

Climate change is an alarming existential challenge for the entire world due to its effects such as increase in global average temperature, erratic and extreme weather and rainfall patterns, forest fires, heat waves, and the depletion of water bodies having harmful implications on everyone's life. Over time, changing climate and extreme weather events will substantially impact business performance of all sectors. Thus, there is a consensus among governments and infrastructure companies to implement effective, low-carbon policies and to adopt cost-effective solutions to decarbonize operations and making infrastructure resilient to effects of climate change. Being a responsible organization, we at OIT have been looking for new ways to reduce our carbon footprint. While designing our environmental protection initiatives we emphasize on reducing the use of natural resources, building efficient infrastructure, and reducing emissions.

We are cognizant that our sector is not averse to climate change risks. As a prominent global challenge, climate change can have implications for our business in the short, medium and long term. In the coming years, we are likely to undertake the physical risks (arising due to occurrence of climate related disasters) and transitional climate change risk (arising due to transition towards a decarbonized economy) assessment as part of our overall risk management processes and risk register.

We address climate change by reducing corporate carbon emissions and persuading stakeholders, such as clients and subcontractors, to minimize their emissions. The strategy we apply includes:



Reducing energy use by improving operational efficiency and digitalizing activities

Utilizing renewable energy wherever possible

Communicating our expectation to reduce carbon emissions among sub-contractors and suppliers

As a nation-wide initiative by NHAI, electronic mode of toll collection has done away with cash transactions and printing of receipts. This digitalization of toll collection has resulted in massive reduction of paper use in our operation. In addition to this, our climate change action plan is focused on achieving significant emission reductions from our operations across all our SPVs. We keep a track of our emissions and strive to reduce our year-on-year emissions.

- Our **scope 1 emissions**, or direct GHG emissions generated primarily by the fuel used in owned vehicles or in O&M activities, were **1,319.03 tCO₂ in FY 2021-22**.
- In FY 2021-22, our **scope 2 emissions**, which are indirect GHG emissions mostly caused by the energy we purchase for our operations, were **7,619.5 tCO₂**.



Entity/ SPV wise emissions are listed in the table below:

Entity	Scope 1 Emissions (Tons of CO ₂ equivalent)	Scope 2 Emissions (Tons of CO ₂ equivalent)
ECKHPL	209.4	2,913
OPIPL	90.1	399
OHHHPL	170.33	924
ONBCPL	135.74	554
ONBHL	708.42	2,826
HO	5.04	3.5
Total	1,319.03	7,619.5

We have implemented several initiatives to reduce our energy use and Scope-1 carbon footprint. A few of them are listed below:

- Replacement of old electrical equipment with new energy efficient equipment recommended by Bureau of Energy Efficiency
- Reducing use of DG sets
- Increasing awareness of staff to conserve energy to the extent possible

These initiatives have brought down our energy consumption significantly in two of our SPVs in this reporting period. As a consequence, a load reduction of 288 KVA was achieved.

In our operations, scope 2 emission (mostly attributed to the energy consumption from Grid) is higher than scope 1 emission. Hence, our action plan prioritizes to increase renewable energy as a power source and bring down our scope 2 emissions. Our interventions in increasing renewable energy included two activities, i.e., 1. increasing the inventory of solar streetlights, road signals and safety system, and 2. increasing the use of solar power through on-site solar power plants. The current inventory of solar streetlights, road signals and safety systems is provided below:

Table: Sanction Load reduction

SPV	Earlier Sanction Load	Current load	Load Reduction	% of Reduction
OPIPL	268 kVA	180 kVA	88 kVA	33%
ONBHL	500 kVA	300 kVA	200 kVA	40%

Table: Solar Street Light, Blinker and SOS at SPV Highway Stretch

SPV	Solar Street Light (Nos.)	Solar blinker	Solar SOS	Total capacity
ONBCPL	40 (24 Watt each capacity)	95 (20 Watt each capacity)	83 (10 Watt each capacity)	3,960 Watt
ONBHL	34 (24 Watt each capacity)	96 (20 Watt each capacity)	108 (10 Watt each capacity)	3,680 Watt
OHHHP L	-	90 (20 Watt each capacity)	25 (10 Watt each capacity)	2,050 Watt
OPIPL	-	23(30 Watt each capacity)	-	690 Watt
ECHKPL	-	-	-	-

ENERGY MANAGEMENT

As stated earlier the use of energy efficient equipment and change of employee behavior through awareness has reduced energy consumption. The next step in optimization is to minimize the use of fossil carbon fuels and transition to cleaner fuel and renewable energy sources. The table below provides our organization's energy consumption in the reporting period.

The initiation of the transition to renewable energy was started with installation of on-site solar power plant of 50kVA capacity at ONBCPL in this reporting period. There is a plan to expand on-site solar power plants to 3 more SPVs (ONBCPL, ONBHL, OHHHPL) and add 600 kVA in FY 22-23.

Parameters	Units	ECKHPL	OPIPL	OHHHPL	ONBCPL	ONBHL	HO	Total
Fuel consumption by DG set- Diesel	L	35,021	3,990	24,599	10,964	30,047	320	1,04,941
Fuel Consumption- Company Owned Vehicle –Diesel	L	42,763	29,475	38,665	38,731	2,33,077	1,549	3,84,260
Fuel Consumption- Petrol	L	0	0	0	858	0	0	858
Electricity Consumption (from state electricity board)	kWh	35,52,669	4,98,149	11,26,863	6,75,249	34,45,995	4,237	93,03,162

Moving Forward

We are moving ahead in our journey to become an organization that not only strategizes but implements through actions towards fighting climate change and keeping sustainability at the core of the way we operate. We look forward to increasing renewable energy in our energy mix and reducing our dependency on fossil-based fuels. As a responsible organization, we are well aligned with India's commitment to become carbon neutral by 2070.



WATER MANAGEMENT

Water is a critical domestic and commercial resource across all sectors. OIT adheres to the legal requirement for water usage and has obtained permits/No Objection certificates (NOC) from concerned departments like Central Ground Water Authority (CGWA) and State Ground Water Authority (SGWA) for ground water abstraction. As our toll plazas are located in places where municipal supply is not available, ground water is the only choice. Our EHSS policy drives our approach towards efficient water management. Our ground water usage is limited to domestic purpose only (drinking, sanitation and landscaping), as all of our highway's assets are in operation phase and minor road maintenance activities do not require any significant quantity of water. Although OIT's operations only need limited quantity of water, we are conscious about saving of water. OIT aspires to become a net positive water organization and we are aligning our efforts to achieve this goal. We take utmost care to ensure that quality standards are maintained as per the requirements of ISO 10500:2012 and as mandated by CPCB. All wastewater generated through domestic usage is disposed of through septic tank with a soak pit. We take utmost care to ensure that wastewater is not discharged into water bodies. In our efforts towards accurate monitoring of water consumption, we have installed water meters and monitor the consumption on a regular basis. The following table depicts our water consumption in this reporting period:

Our initiatives for conservation of water are as follows:

- **Capacity Building and Awareness Programme:** Training and awareness is regularly carried out to promote sound water management and conservation practices
- **Rainwater Harvesting:** Rainwater harvesting structures helps ground water rejuvenation

Table: Water usage across all assets of OIT for FY 2021-22

Entity	Water Consumption (in KL/Annum)
ECKHPL	4,677
OPIPL	4,475
OHHHPL	16,841
ONBCPL	5,499
ONBHL	12,521
HO	431
Total	44,444

The following rainwater harvesting structures have been developed either along the road corridors or at toll plazas

SPV	Number of RWH Structures
ECKHPL	Rooftop rainwater harvesting structures and ground water recharging system for both Barazone and Anantram Toll Plaza
ONBCPL	12 rainwater harvesting pits, 6 pits in Kamptee- Kanhan bypass and 6 pits in NH-7 Jabalpur- Road bypass are constructed.
ONBHL	Total 76 rainwater recharge pits, 18 in road stretch in Maharashtra and 56 pits in Madhya Pradesh stretch are constructed.





Rainwater harvesting structure (pond) at ONBCPL



Rainwater harvesting pit at Anantram Toll Plaza

Other initiatives that have been undertaken/ are being planned at the SPV level to ensure optimal water management include:

- At the site level, the toll plaza and highway stretch is designed and constructed as per the IRC recommendation considering the local topography and drainage pattern, to have minimum impact on local hydrology. Also, SPV's Operation and Maintenance plan has provision of preventive maintenance and cleaning of drains (pre- and post-monsoon).
- As part of internal and external audits, water management measures are reviewed in a periodic manner.
- Water related aspects have also been included in the environmental risk register and mitigation plans are recommended for implementation as part of the risk management exercise.
- Efficient and calibrated water meters have been included in the borewells to provide accurate data on our water consumption.



WASTE MANAGEMENT

OIT is committed to reducing and recycling its waste in line with its QEHSS Policy and the Environmental and Social Management System (ESMS). Waste disposal practices and regulations are linked to local governance bodies, and state level laws and regulations. We regularly monitor our compliance with these legal requirements and participate in government led initiatives. The objective at OIT is not just to reduce waste due to regulatory obligations, but to act as a responsible corporate so that the waste generated has minimal impact on the environment.

OIT Road assets is in its operation phase, therefore, waste generation is minimal from toll collection activity & O&M activity. It's business operation is service activity centric hence, raw material consumption is minimal.

Types of waste generated from our own operations and activities is mostly non-hazardous, though a small quantity of hazardous waste is generated. In terms of quantity, most prominent waste categories include Municipal Solid Waste (MSW), and Construction and Demolition (C&D) Waste. A limited quantity of E-waste and waste oil is also produced. OIT's ESMS has a Standard Operating Procedure (SOP) that provides guidance for disposal of all the waste generation sources, collection, storage, and disposal, which is compliant to the regulatory guidelines and industrial best practices.

- Waste from office area
- Metal scrap from maintenance work



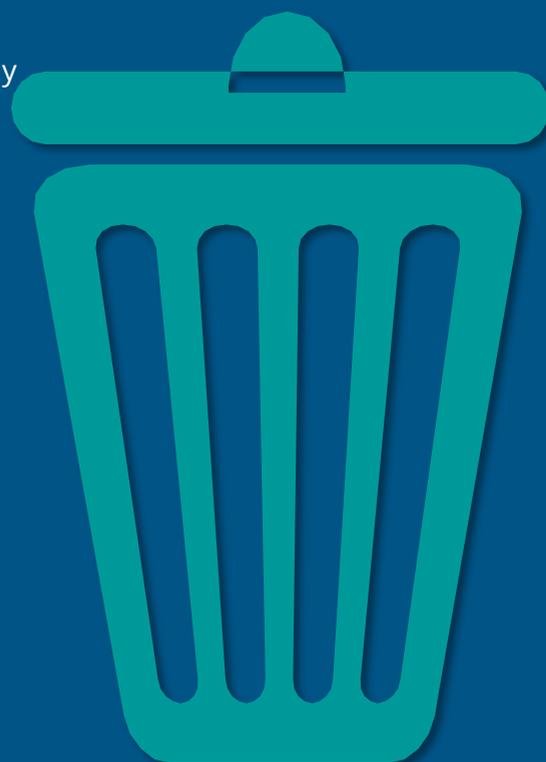
- Used oil from petrol vehicles, DG sets and cranes
- E-waste from IT operations

OIT has adopted and is guided by the overarching philosophy of the 4R (Reduce, Reuse, Recycle and Recover) strategy for effective waste management. Reduction in waste generation is a collective responsibility at OIT and every department has been making continual improvement.

The output of waste management efforts is visible in cleanliness of its premises. We ensure that not only our toll plaza areas, also the avenue and medians are cleaned regularly and the waste from drains are collected and disposed. Waste bins of different colors are placed at strategic locations at all toll plazas to ensure proper waste sorting and disposal. Regular removal of waste from roadsides also ensures that scavenging birds (vulture) and animals (stray dogs) who feed on it stay away from road and do not become victim of road accidents.

Basic principles of Waste Management-4Rs followed at OIT

- **Refuse:** Do not buy anything which we do not really need
- **Reuse:** Reuse everything to its maximum after properly cleaning it
- **Recycle:** Keep things which can be recycled
- **Reduce:** Reduce the amount of garbage generated





Different colored bins placed at strategic locations at toll plaza



Vermicomposting unit



Scrap of MS pipe, angles is used for barricading

Further, vermicomposting is done at all SPVs to produce quality compost. We have also installed a food waste composting machine at HO. The damaged concrete blocks and metal road furniture, PVC pipes are brought to scrap yard and stored separately. The EHS and O&M team jointly identify alternate use/re-use of these materials. The remaining scrap materials which cannot be used are handed over to the scrap dealer. ECKHPL has been utilizing scrap material for up-cycling at Site. These scrap materials are damaged furniture from road stretch & scrap that was generated during the construction phase of the project.

Hazardous waste and bio-medical waste are being disposed to authorized facilities as per valid permissions obtained from the State Pollution Control Board. E-waste such as discarded lights and batteries wastes are stored at designated locations and sent to authorized recyclers in line with E-Waste Management Rules, 2016 and Batteries Waste Management Rules, 2016.

HW has been managed as per the HW management rule 2016. All Sites of OIT have tied up with Authorized hazardous waste recyclers. Hazardous waste has been stored at a designated place having secondary containment system in place.

Entity*	Used Oil (L) Waste type- Liquid	E-waste# (Kg) Waste type- Solid
ECKHPL	20	20
OPIPL	45	185
OHHHPL	350	0
ONBCPL	100	80
ONBHL	30	80
HO	0	0

The amounts for waste generation and disposal are same. All the above reported numbers are for hazardous waste

#Includes discarded tube light and IT assets

[Non-hazardous waste data is not monitored at present]

We have also launched employee engagement initiatives on waste management to increase awareness and reduce the amount of waste being generated and to handle hazardous waste. We also ensure to raise awareness among our road users so that no littering or spillage occurs on the toll plazas and roads. Various signages have been placed regarding waste disposal and management on the roads.

We are striving towards reducing waste generation at our sites also reuse and recycle the waste that is generated. We are also committed towards reducing the use of virgin materials. We intend to raise awareness amongst the internal and external stakeholders to reduce the generation of waste and also dispose the waste in a responsible manner.

Mr. Manoj Sharma, ECKHPL- Toll Manager

Key initiatives taken by the OIT for waste management

How do we ensure proper Waste Management and training of employees?

- OIT has a contingency plan for accidental oil/chemical spillage on road
- OIT discourages burning of waste within RoW of the roads or within toll plaza premises
- OIT makes effort to avoid use of plastic barriers at toll plazas and use alternative materials
- Workers handling hazardous waste are provided PPEs and trained for handling the waste.
- 'Danger' or warning signages are placed at Hazardous or battery waste storage area MSDS and Hazardous material handling Training has been provided for safe handling of hazardous material.

How do we Reuse and Recycle our waste?

- Recycling of the scrap materials generated from the O&M activities
- The scrap poles damaged in road accidents are fabricated to be used as lane partitions at Toll Plazas
- The MS pipes/angles earlier used in signposts/illegal hoardings are used to fabricate cages to protect avenue plantation.
- Use of old concrete cement pipes to improve the natural drainage to avoid water logging and avoid impact on community health.
- The damaged rumble strips are used for slope protection and prevent soil erosion. The discarded PVC pipes are used for creating bird nests.
- C&D waste what cannot be re-used is collected by the municipal or local bodies for disposal at their disposal sites.
- Battery waste is also stored in a designated place and handed over to a recognized vendor for recycling.

How do we ensure to Reduce waste generation from our operations?

- Adoption of automatic toll collection & digitization has helped to reduce the paper consumption at toll plaza of all sites

How do Reduce waste generation and/or ensure responsible disposal?

- Solid waste collection bins have been placed at strategic locations at the toll plazas
- Waste from carriageway and median are also collected regularly and disposed off through local municipality.

Moving Forward

We acknowledge that we are in the early stages of our sustainability journey. By acting on our plans and commitments, we will advance on our sustainability path.

As a future action we will identify opportunities to divert waste from landfills and promote circularity in our O&M to recapture value where possible. We will also develop plans to collect data for the non-hazardous waste that is generated. OIT is committed towards its sustainability journey and for this we will also leverage on our relationship with the key stakeholders (road users, road-side communities, and local municipal bodies) to achieve our goals.

BIODIVERSITY AND ECOSYSTEM

Infrastructural development and transportation are an important metric of the economic growth of a country. In the last decade, India has recorded enormous increase in the expansion of the road and transport infrastructure. The speed of infrastructural advancement is expected to accelerate at a lightning pace in this decade.

The road and highways network pass through varied landscape and eco-system. The planning of fresh alignment of road and highways network in recent days avoids eco-sensitive zones. Similarly, the widening of the existing highways passing through any eco-sensitive zones is done with caution and only after taking adequate mitigation measures. Where any road in OIT's portfolio passes through eco-sensitive areas, it carries out an assessment to screen potential impacts on the biodiversity and adopts appropriate mitigation measures.

Commitment to conserve biodiversity is important for a sustainable future and it is regarded as a priority at OIT. Operating a road asset that pass through any eco-sensitive zone, biodiversity conservation is an ongoing process and road operations are carried out systematically to ensure there is no or minimal impact on biodiversity. We work in association with other stakeholders including NHAI, State Forest Departments, MoEFCC, and specialized agencies on wild-life conservation.

Biodiversity Risk Management Procedure at OIT

The process of screening and assessing impact of road operation and maintenance on the wild-life and ecosystem followed by OIT is depicted below.

Asset Identification and Critical Habitat Screening

- Asset is identified based on the IFC PS-6 and IFC Toll Road EHS Guidelines.
- OIT does an internal Screening of Eco-sensitive areas in the road corridor and if required engages an Ecologist/Biodiversity Expert to assess if the road corridor passes through any Critical Habitat as defined in IFC PS-6.
- If the Road passes through any Critical Habitat, Biodiversity Risk Assessment is initiated along with Environment and Social Due Diligence.

Environment & Social Due Diligence

- OIT hires a reputed external agency for a comprehensive Environment and Social Due Diligence (ESDD) based on IFC performance standard. (Biodiversity risk assessment is part of this Environment and Social Due Diligence)
- OIT invests only if the biodiversity risk is manageable as per the action plan provided by the external agency in the ESDD report.

Biodiversity Management Plan/Biodiversity Action Plan

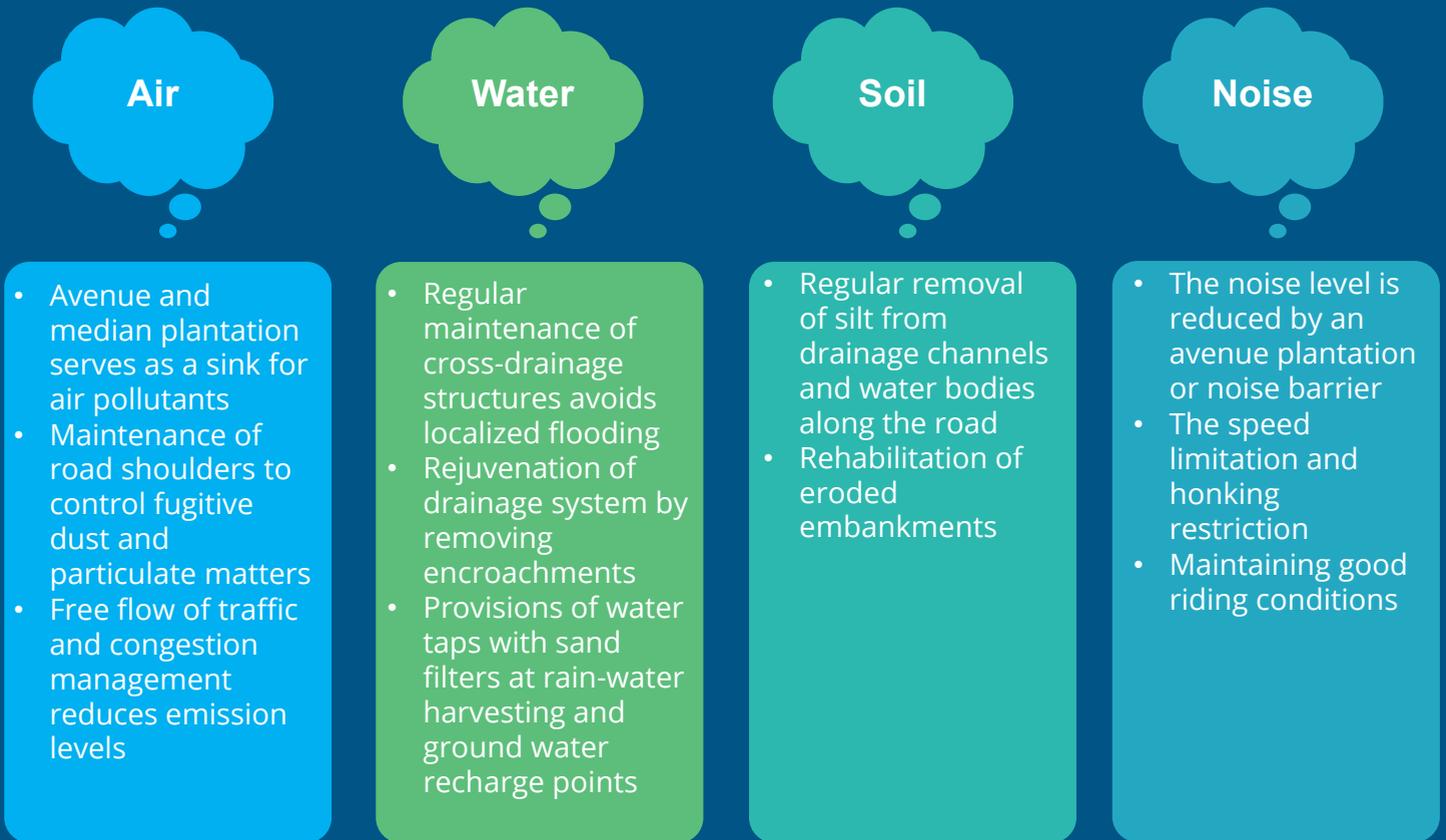
- A Comprehensive Biodiversity Action Plan is prepared and included in the Environmental and Social Action Plan (ESAP).
- Biodiversity Action Plan is implemented at the concerned Road Asset by the SPV.

Continual Monitoring

- OIT hires a competent external agency for monitoring of Biodiversity Action Plan implementation to check the efficacy of implementation measures.

General Practices in Biodiversity and Ecosystem Management

Among the five operating roads in OIT, four of them do not pass through any ecologically sensitive area or within 10Km radius of it. However, the ESDD process identifies impacts on living natural resources and the ecosystem. The impacts on biodiversity and ecosystem at the road corridors are experienced through four environment components, i.e., air, water, soil and noise. These risks in the road operation phase are screened in ESDD and mitigation measures are included in ESAP.



Pollution from accidental spillage can cause increase in volatile organic compounds or dust from movement of vehicles for short periods of time. Our emergency response plan (ERP) provides guidelines for the Highway Patrolling team on how to deal with such emergencies.

We ensure no invasive species, pests or pathogens are introduced at sites by procuring saplings from responsible sources such as forest department, government nurseries or local nurseries recognized by forest or horticulture departments.

Road operations have less likelihood to cause reduction of any species. However, there are few cases of accidents involving animals and they are registered in accident register. This helps to keep counts of animal victims of the road accidents, analyze the data and take actions to mitigate them.

OIT avoids use of surface water for sourcing the water required for its domestic use and watering median and avenue plantations. For groundwater abstraction, we take necessary consent from the groundwater board and monitor our water use to be well within the permissible limit. We also maintain road drainage network to avoid water logging and ensure the natural environment and the ecological process is not affected.

We regularly undertake median, and avenue plantation to negate impacts of the tree-cutting that occurred during construction phase and act as a sink for air pollutants as well as absorb noise. The details of the avenue and median plantation at different operating roads is provided below.

Figure: Overview of Median and Avenue Plantation

ONBCPL

In the non-forest section of the road, avenue plantation

16,905 Nos.

Species: Nerium oleander, Bougainvillea, Millettia pinnata

[Wild-life passes of various length (from 50m to 750m) with 5m vertical clearance

Elevated structures (2,205m in length) for wild-life to cross the road]

OPIPL

Shrub & Avenue Plantation along side of highway

10,557 Shrubs & 4,215 Avenue Plantation Nos.

Species: Nerium oleander, Bougainvillea, Millettia pinnata, Delonix regia, Dalbergia sissoo

Head Office

Peripheral plantation

551 Nos.

ECKHPL

Shrub & Avenue Plantation along side of highway

13,169 Nos.

Species : Nerium oleander, Bougainvillea, Millettia pinnata

ONBHL

Shrub & Avenue Plantation along side of highway

10,818 Nos.

Species: Nerium oleander, Bougainvillea, Millettia pinnata

OHHHPL

Shrub & Avenue Plantation along side of highway

9,715 Nos.

Species : Nerium oleander, Bougainvillea, Millettia pinnata

Impact on biodiversity	Units	ONBCPL
Number of species affected	No.	2 (Indian Tiger & Pangolin)
Extent of areas impacted	Km	26
Duration of impact		Continuous
Reversibility/ irreversibility of impact		Reversible

Implementation of Biodiversity Action Plan and Monitoring

The NH-7 (New NH-44) is critical for connecting the south to the north, as well as major urban and commercial centres along the north-south transportation corridor. However, many sections of the highway also cut through animal corridors, critical for connecting tigers, co-predators and their prey. In the central Indian tiger landscape, the highway intersected the Kanha-Pench and Pench-Navegaon-Nagzira corridors in different sections.

A stretch (~26Km) of ONBCPL (which is ~175 km stretch of an old national highway) passes through buffer zone of Pench Tiger Reserve which is a protected wild-life reserve under Wildlife Protection Act of India 1974. For this project, forest and wild-life clearance was obtained by NHAI. As per recommendations of regulatory bodies elevated roads and wild-life underpasses were constructed to minimize and mitigate potential impacts on wild-life.

As part of the structural provisions for wild-life passes, 9 structures were constructed along a 16.1 km section of the highway that cuts across adjoining in 3 forest segments in the buffer zone. These nine 'animal underpasses' were built between Kanha and Pench tiger reserves in Madhya Pradesh and Maharashtra, to prevent roadkill and reduce the 'barrier effect' that busy roads have on the movement of animals. These structures provide connectivity to the habitat on both side of the road and provide safe passage to wild animals. The structural interventions included animal under pass (AUP), Minor Bridges (MNB) that provide passage and approaches or guide walls that protects the wild-life from being spotted and give them a sense of safety while using these under passes.

Wild-life Passage Structures in NH-7 (New NH-44)

S. No.	Chainage	Type of Structure	Length (m)/ Span	Wildlife Access Status (Photo evidence)
1.	653+872	MNB	60 (3*20)	
		Guide wall	50+50	
2.	654+478	AUP	50 (2*25)	
		Approaches	300+300	
		Guide wall	50+50	
3.	656+340	AUP	750 (25*30)	
		Approaches	300+300	
		Guide wall	50+50	
4.	658+130	MNB	80 (4*20)	

S. No.	Chainage	Type of Structure	Length (m)/ Span	Wildlife Access Status (Photo evidence)
5.	659+710	AUP	300 (10*30)	
		Approaches	300+300	
		Guide wall	50+50	
6.	668+165	MNB	65	
		Guide wall	100+100	
7.	674+000	AUP	100 (5*20)	
		Approaches	300+300	
		Guide wall	50+50	
8.	675+800	AUP	750 (25*30)	
		Approaches	300+300	
		Guide wall	50+50	
9.	677+635	MNB	50 (2*25)	
		Guide wall	25+250	

In addition to these structures, the road has information and warning signage for road users about the wild-life corridor.

Figure: Signage board in Forest Section



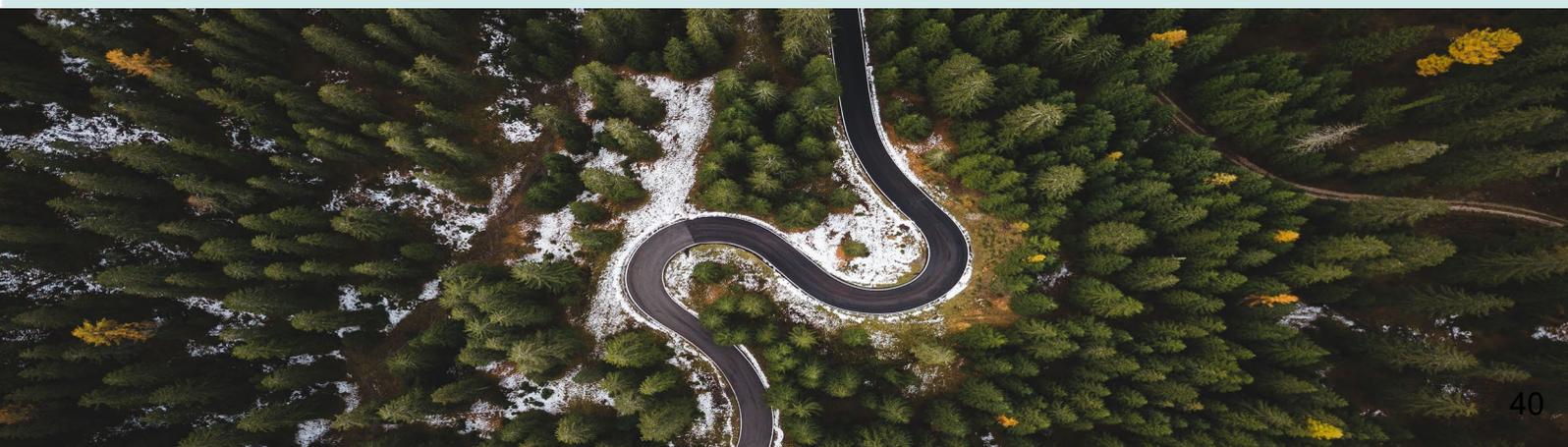
Monitoring of Use of Under Passes by Wildlife

The animal underpasses on the National Highway-44 passing through the Pench Tiger Reserve, Maharashtra, are being monitored by the Wildlife Institute of India (WII), Dehradun since March 2019. Camera trapping and continuous monitoring are carried out on four minor bridges (MNBs) and five animal underpasses (AUPs).

According to the WII report titled 'Monitoring of Animal Underpasses on National Highway 44 Passing Through Pench Tiger Reserve, Maharashtra', 18 species used the underpasses between March and May. Notably, among the large carnivores, the most frequent one on camera was the tiger: 11 individual big cats used every one of the nine underpasses. As per WII report these underpasses witnessed over 5400 instances of wild animals using the crossing.

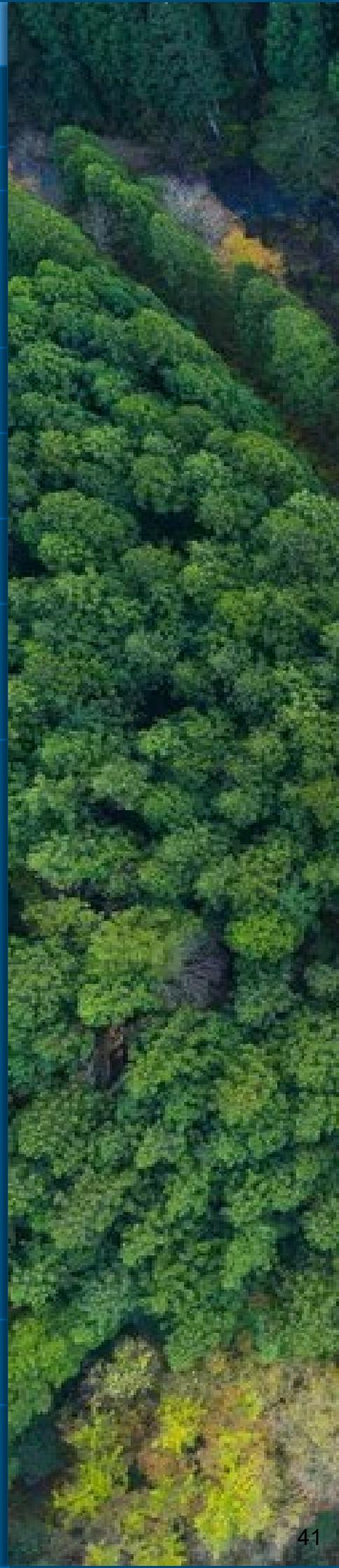
In addition to these 9 structures that provides safe passage to wild-life, 4 degraded forest patches within the buffer zone were selected for forestation. They were near the villages of Mangrod, Salebatti, Mandwa and Chikhaldhokra. The afforestation program included planting 17 species of local trees. Three times the species lost due to highway widening are being planted across these afforestation sites. Several community members were hired on a daily wage basis by the MFD to plant and maintain these trees. This has helped improving the wild-life habitat in the buffer zone. OIT with the help of an external consultant monitors the status of these forestation and periodically assess habitat improvements.

As per the BAP implementation monitoring report, there is no major impact on the species from the NH operations. There are several forest villages in this stretch and the communities living in these villages are dependent on the forest for a range of natural resources. The road also connects to the forest resorts managed by the government and holds economic and educational values.



Case Study: Inclusive infrastructure to tackle Wild-life Habitat fragmentation and Ensure their safe passage

Objective	To improve wild-life habitat connectivity in buffer zone of Pench Tiger Reserve and minimize impacts of highway operation on wild-life movements
Geography	117.078 Km of NH-7 (New NH-44)
Details of geography	<ul style="list-style-type: none"> The road is 24Km away (ariel distance) from the Pench Tiger reserve Core zone A stretch (37.45 Km) lies at the periphery of the buffer zone of Pench National Park and Tiger Reserve This area provides connectivity in different protected zones for tiger
Mitigation structures	<ul style="list-style-type: none"> Mitigation structures includes MNB, AUB, Approaches, Guide walls the height of which ranges between 2-5m and length 50-750m
Fauna in the reserve	Tiger, leopard, sloth bear, jungle cat, chital, sambar deer, gaur etc.
Details of Wild-life Passes	Significant crossings of several prey species such as Chital (<i>Axis axis</i>), Sambar (<i>Rusa unicolor</i>), Wild Boar (<i>Susscrofa</i>) and other ungulate species from the 9 underpasses
Trend in adoption of wild-life to use of wild-life passes	<ul style="list-style-type: none"> Animals are adapting to the underpasses to cross the highway from the Pench Tiger Reserve to habitats east of the highway which in part ensures that habitat fragmentation caused by the highway is reduced 193 % increase in underpass usage across 2019 to 2020
Biodiversity Mitigation Actions	<ul style="list-style-type: none"> Increase road-user awareness on wild-life presence through road signage. Promote wild-life friendly behavior among road-users and forest villages in road corridor. Policy on 'no poaching and no hunting for OIT staff and contractors Implement and restore biodiversity values with key stakeholders and local communities Clear construction waste (metallic and non-metallic) from the site Conduct underpass surveillance in technical collaboration with Department of Forest and Wildlife Institute of India to track Improvement in use of wild-life underpasses for movement of mammalian species (tiger, leopard, blackbuck, boar, jackal etc.) Some of these are IUCN threatened/ near threatened, critically endangered species Improve vegetation cover at entry and exit of underpass to ensure easy movement of wildlife and maintain wild-life underpasses Compensatory afforestation in 100ha of degraded forest land at 4 locations with mixed plantation for improvement in habitat connectivity
Scope of Policy	<ul style="list-style-type: none"> Development sites, operational sites, and maintenance sites. This is applicable across the project life cycle and for all OIT projects
Monitoring and Evaluation	<ul style="list-style-type: none"> The biodiversity action plan is reviewed on a regular basis Data collection and monitoring systems were established All staff and contractors are trained on the policy Inspect the flora and fauna regularly Signages for information and awareness are placed at strategic locations



SOCIAL RESPONSIBILITY

Employee and Workforce management

At OIT, we consider our people to be our greatest strength. We recognize employee satisfaction and equality translate into direct economic and social impacts for a company. Also, effective workforce management enhances employee retention, productivity, and overall engagement.

We believe that our committed workforce is the driving factor behind our continuous growth. We emphasize on talent and capability and are committed to sustaining a high-performance culture. Our beliefs and principles instill confidence in our employees and help them deliver the best of their capabilities.

We strive to improve and elevate our current culture to a level that is best in the industry. Through the unique and significant experiences of OIT workers, we are able to integrate the best practices of different departments, keep up with the newest trends and advances in our industry, and thus improve the human capital at OIT.

During the COVID-19 pandemic, our HR and Administration team provided the employees with additional support by carrying out random RTPCR tests, organizing vaccination camps etc.

OIT provides direct employment to 949 (74%) employees and has 336 (26%) third party workers. Out of this 1,285 of the total workforce, only 31 (2%) are located in its head office. The SPV wise break-up of the workforce is provided in table below.

Employee category	HO	ECKHPL	OHHHPL	OPIPL	ONBCPL	ONBHL	Total
Senior management	9	-	-	-	1	0	10
Middle management	14	7	12	16	19	9	77
Junior management	8	311	51	174	247	71	862
Third Party Workers		40	280	12		4	336

Out of the 1,285 total workforce, 1,259 (98%) are men the remaining 26 (2%) are women. The bulk of the workforce deployed in toll plazas work in locations which are away from the city and need to work in shifts. The everyday hooliganism reported in toll collection has been perceived as a deterrent in employment of women in these work profiles across the Toll Operation sector. However, NHAI has been promoting empowerment of women by employing local women for toll collection since 2018. There are isolated instances of good practices in some newly established toll plazas by deploying women exclusively or partially. OIT is conscious about this positive change in the industry and has been promoting women candidates during selection process.

Fair and equal opportunities for all

At OIT, we believe that inequalities can be primarily eliminated through parity in wage distribution. To remove any scope of bias and promote equality, the basic salary and remuneration ratio of women to men is 1:1.

- **No complaints regarding discrimination were received during FY 2021–22.**
- **No sexual harassment complaints were received during FY 2021–22.**
- **No child labor, forced or involuntary labor complaints were received during FY 2021–22.**
- **No complaints regarding human rights-related issues were received during FY 2021–22.**

We offer equal employment opportunities to all of our workers and to all qualified job seekers. We have Non-Discrimination policy of OIT which further ensures that there is no discrimination in hiring, compensation, training, and employee benefits based on caste, religion, disability, gender, sexual orientation, race, color, ancestry, marital status, or affiliation with a political, religious or majority/minority group.

We have a PoSH Policy in place that is aligned with the requirements of the Sexual Harassment of Women at the Workplace (Prevention, Prohibition & Redressal) Act, 2013. Any instances of such actions are reported to the concerned authorities (at SPV and HO) of OIT to redress complaints regarding sexual harassment. All female employees (permanent, contractual, temporary, and trainees) are covered under the said policy.

We endeavor to continuously strive to foster a conducive environment for our employees for their continual growth and development in the future as well.

Forced or Compulsory Labor& Child Labor

At OIT, we strictly prohibit any kind of child labor, forced or involuntary labor in our operations and value chains. We have a policy of preventing bonded or forced labor. Our principles extend to our suppliers, contractors, and service providers via an environmental and social code of conduct that is incorporated into their contract agreements and purchase orders. This motivates our suppliers to contribute to society and work in an ethical and responsible manner.

We also conduct regular internal audits to ensure the implementation of our policy of preventing bonded or forced labor.

Freedom of Association

We recognize that all workers and all employers have the right to form and join groups for the promotion and defend their rights at the workplace. We have a policy on freedom of association that is also applicable to our sub-contractors. Through HR Trainings (induction and annual refresher), we inform our employees and contract workers about the Freedom of Association Policy.

Employee Data Management and Benefits

For easy management of employee data including attendance, leave, performance appraisals, travel expenses and other employee-related processes, we maintain a standard MIS (Ascent), which offers the employees a hassle-free experience. At OIT, we aim to provide a conducive environment at the workplace for all our employees and ensure that they are compensated appropriately. In lieu of this, all our permanent employees receive additional benefits in terms of medical insurance, accident insurance and life insurance that are in line with government regulations. They include:

Also, other benefits such as parental leave, gratuity are provided in accordance with the regulatory requirements of the Government of India.



Diversity & Inclusion

At OIT, we aim to strengthen our commitment to diversity. As an equality opportunity provider, we recognize that the importance of diversity and inclusion in our workforce irrespective of gender, cultural background, religion, caste etc.

While challenges exist for sufficient gender representation in tolling operations, we are building one culture in which we care about one another and are solidifying a sense of belonging for all so that our different voices are heard to drive better business outcomes. Ultimately, we are creating opportunity and enabling advancement for all employees without any discrimination.

Policy

In our pursuit to create a work environment that respects the diversity of the workforce, OIT has developed a comprehensive policy framework for prevention, prohibition, and redressal of sexual harassment at workplace and gender-based violence in 2021. The focus on protecting and addressing grievance of diverse groups especially women have been included as part of the HR Manual. In addition, our HR Manual includes equal opportunity and non-discrimination policies. On the recruitment front, we encourage women applicants to apply for vacancies and carry out selection processes without any gender bias. Furthermore, the code of conduct, which is mandatorily applicable to all staff and workers, places emphasis on prevention of gender-based discrimination. In events of non-compliance, a well-defined employee grievance mechanism is in place for both our permanent employees and third-party workers of the SPVs and head office to address their concerns.

Monitoring our diversity indicators

In pursuit of our commitment towards promoting gender diversity, we monitor diversity of employees across gender and age groups. In 2021-22, we have 2 female members in our ONBHL entity as part of the governance bodies. The following table provides the details of representation across gender and age groups across head office and 5 project entities:

Percentage of individuals within the organization's governance bodies in each of the following diversity categories

Entity	Number of employees	Gender		Age Group		
		Male	Female	<30	30-50	>50
Head office	8	100%	0	-	37.5%	62.5%
OPIPL	2	100%	0	-	100%	-
OHHHPL	2	100%	0	100%	-	-
ECKHPL	2	100%	0	-	100%	-
ONBHL	8	75%	25%	-	62.5%	37.5%
ONBPCL	2	100%	0	-	100%	-

As per 2021-22 figures, female representation has been gaining prominence especially in the middle and junior management category of employees. Going forward, we shall aim to increase female representation across all management categories.

Percentage of employees per employee category in each of the following diversity categories

Entity	Number of employees	Gender		Age Group		
		Male	Female	<30	30-50	>50
Senior management						
Head office	9	29%	0	-	67%	33%
OPIPL	-	-	-	-	-	-
OHHHPL	-	-	-	-	-	-
ECKHPL	-	-	-	-	-	-
ONBHL	-	-	-	-	-	-
ONBPCL	1	0.37%	0	0	0	1
Middle management						
Head office	14	45%	50%	-	93%	7%
OPIPL	16	9%	0	-	94.1%	5.9%
OHHHPL	12	20%	0	-	67%	33%
ECKHPL	7	2.2%	0	-	1.57%	0.63%
ONBHL	9	11.25%	-	-	100%	-
ONBPCL	19	7.11%	0	0	94.7%	5.3%
Junior management						
Head office	8	25%	50%	33%	67%	-
OPIPL	174	91%	0%	14.9%	85.1%	-
OHHHPL	51	80%	37%	59%	4%	-
ECKHPL	311	97.8%	0	48.1%	46.5%	3.2%
ONBHL	71	88.75%	0	7%	88.7%	4.3%
ONBPCL	247	92.5%	7.5%	22.4%	70.6%	7%

Another important indicator for ensuring diversity and inclusion levels in the workforce is the equal pay for men and women. We monitor the ratio of basic salary and remuneration of women to men in the junior management level. The junior management witnessed a pay parity ratio of 0.27 for basic salary and 0.29 for remuneration.

Going forward, we shall extend this KPI to other management levels and continue to monitor the progress in this aspect to ensure that equal pay for equal work is achieved across all management categories.



Human Rights

As a responsible organization, we have the duty to respect human rights within our sphere of direct influence and to ensure that they are not compromised. Upholding human rights is important for us, and we also expect our value-chain partners to respect human rights.

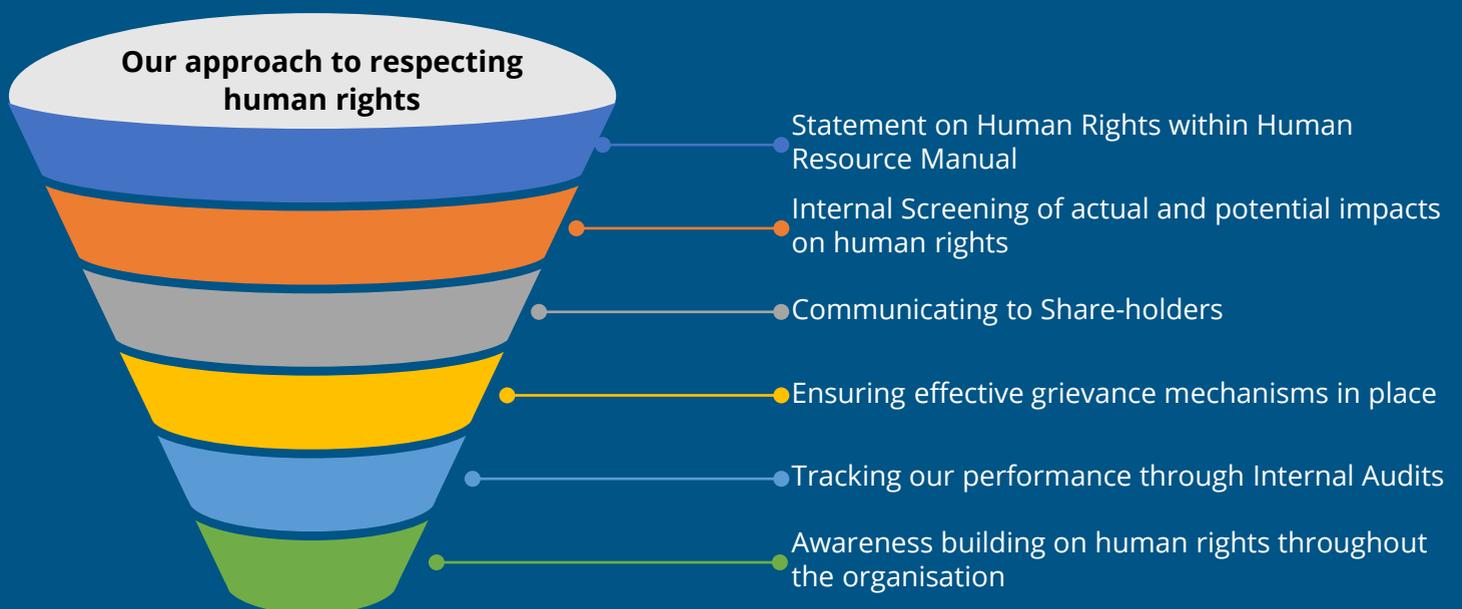
OIT does not have a standalone human rights policy, but has a statement on its position on human rights as part of HR Manual and includes a brief session covering human rights perspectives on its operations and its potential impacts during training on SOPs related to HR.

Human rights awareness is essential to establish a corporate culture that promotes values, beliefs and attitudes that encourage all individuals to uphold their own rights and those of others. Furthermore, it helps to raise awareness on areas of concern where people's rights may be put at risk. We regularly cover human rights issues in trainings carried out for our employees. The workers who interact with road-users such as patrolling, toll collectors, emergency and accident response team realize the importance of respecting human rights.

OIT has deployed security personnel through third party agencies in some of its road stretches. OIT ensures that these agencies have valid licenses as required under Private Security Agencies (Regulation) Act, 2005 and the security personnel have received trainings from the licensing authorities. OIT conducts supplementary awareness training on relevant human rights issues periodically. OIT has a grievance redress procedure which is sensitive to handling human rights issues. OIT covers human rights issues in internal monitoring process and shares information with its investors and shareholders.

Training on human rights for employees and security personnel

	OHHHPL	HO	ONBCPL	OPIPL	ECKHPL	ONBHL
Security personnel who have received supplementary human rights specific procedures	53 %	50%	67%	30 %	33%	No Security Agency
Employees trained during the reporting period in human rights	58 %	90 %	28%	38%	40%	27%
Number of hours during the reporting period devoted for training in human rights	100	196	78	76	83	88



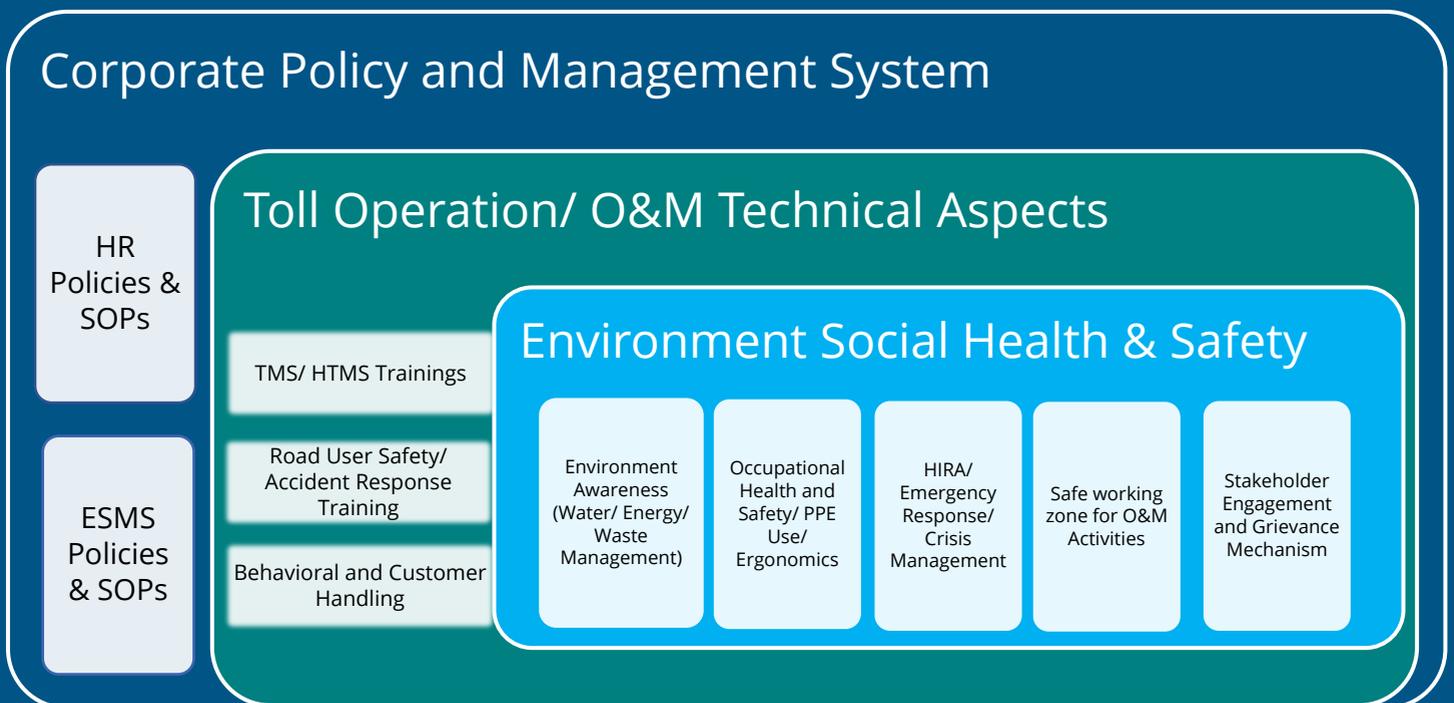
Talent and Skill Management

Learning and career development is a systematic process that enhances the employee's skills, knowledge and competency. At OIT, we facilitate employees by offering opportunities to learn and progress on their career path. Our workforce is diverse in terms of skills, experience and capabilities and demonstrate optimism and team spirit in most challenging times. Collaboration and peer to peer learning not only help them meet their career aspirations but also help building a team that is ready to take up challenges and deliver.

Thus, to ensure operational efficiency and optimal financial performance, we conduct a range of trainings for our employees at each project site. The trainings at OIT fall under 3 broad categories, i.e. corporate policies and management system, toll operation and O&M technical aspects, and environment social health and safety management. The senior and middle management of the corresponding subject areas at head office provides leadership for these trainings. The trainings are mostly conducted by in-house experts except a few where external experts conduct these trainings.

The senior management takes strategic decisions on training requirements keeping the industry trends and long-term organizational goals in mind. The Human Resource Department in discussion with the senior management and SPV heads develops an annual training calendar. and monitors their implementation on monthly basis. HR also ensures, that the employees complete the mandatory compliance training on COC, ABAC, and POSH as per the company HR policy and HR Manual. For new employees, as part of the induction process various briefing and training sessions are conducted to align them with the organizational vision, mission, and procedures.

The broad structural overview of training program at OIT



Technical and safety trainings are provided according to the employee category, expertise and responsibilities assigned. We are a forward-looking organization and make continuous efforts to identify areas of improvement by taking feedback on training programs, topics of trainings. We also conduct desk-based assessment of the peers of the sector to understand the learning and professional development programs conducted by them and the best practices that can be adopted.

Internal trainings conducted in FY 2021-22

Technical	HR and soft skills	Environmental health and safety	Information technology
<ul style="list-style-type: none"> Operational process Toll exemption Overload vehicle ETC vehicle 	<ul style="list-style-type: none"> Team building Customer handling Human resources Audit and reporting 	<ul style="list-style-type: none"> Environment awareness OHS, PPE use HIRA Ergonomics Emergency response Safe working zone Stakeholder engagement Grievance mechanism 	<ul style="list-style-type: none"> TMS HTMS

We believe in the investment of knowledge, and we ensure that the employees are imparted training and knowledge on various areas of their interest. We look forward to making our learning and development programs robust and more skill oriented.

Mr. Rajesh Yadav, ED-HR

Entity	Senior	Middle	Junior	Third Party Workers	Average training hours per employee
HO	6.47	6.74	6.71	-	Direct employees of OIT and SPVs 2.11 hours
OPIPL	-	2.0	2.0	2.0	
OHHHPL	-	3.85	3.68	3.77	
ECKHPL	-	11.43	0.76	8.85	Third Party workers 3.77 hours
ONBHL	-	2.29	2.44	2.35	
ONBPCL	1.0	1.1	0.874	-	

- Average training hours per employee for FY21-22 is **2.11 hours** for regular employees and **3.77 hours** for contractual employees.
- Average training hours per employee category were as follows:
 - ❖ Senior management: 4.02 hours
 - ❖ Middle management: 3.13 hours
 - ❖ Junior management: 1.92 hours
 - ❖ Third Party Workers: 3.77 hours



Talent acquisition and retention

To ensure OIT's long-term success, we strive to develop a high-performance, reward-driven culture. We recruit exceptional individuals from diverse functional and cultural backgrounds in order to develop a well-balanced, successful team of professionals. OIT hires the middle and senior positions through a rigorous process of interview. Our interview panel is conscious of diversity issues and conduct the recruitment process that helps to build a competent and diverse team. Additionally, we ensure an excellent hiring experience, which helps us further solidify our reputation as a great employer.

The recruitment for junior positions are held through pool interviews at nearest cities/towns to the Toll Plazas. The existing vacancies are filled up and a data-bank of the potential candidates are prepared. Whenever vacancies emerge, the candidates from this databank are contacted. The average period of service for direct employees in OIT and its SPVs is very high. This indicates the reputation of OIT and its SPVs as good employer. OIT provides good working conditions and treats all workers fairly and in accordance with the law.

Career development programme

At OIT, we have a comprehensive employee performance and appraisal plan, along with an enhanced system accessible channel to track the performance of employees. This ensures fair performance review and establishes a talent development strategy to unleash employee potential, enabling them to work towards their objectives and strive for greatness. The career development at OIT is done through a graded process of skill-mapping, mentoring, career planning for key employees and succession plan for key positions.

Skill Mapping and Mentoring	Career Planning	Succession Planning
<p>The appraisal process assesses following competencies:</p> <ul style="list-style-type: none">• initiative, leadership,• getting results and value addition,• teamwork and interpersonal relationship,• planning and organizing skill,• communication skill,• problem solving and decision making	<ul style="list-style-type: none">• To manage career and growth aspirations of employees.• Functional Heads identify potential candidates through performance appraisal and prepare career movement plan for next five years.• Create awareness of various career paths (lateral moves , cross functional exposure etc.)	<ul style="list-style-type: none">• To Ensure Replacement of Key job incumbents• Mentoring and Management Development Programs.• Development strategy for potential successors include coaching, additional responsibilities, formal leadership/ management or technical skill trainings, opportunities to work in similar roles etc.• If no successors, then specific recruitment strategy for external candidates

OIT and its SPVs carry out annual performance appraisal regularly. The HR department in close coordination with the SPV and Department Heads reviews the technical competencies and soft skills. The skill matrix is updated for each employee. The skill gaps identified through this process is bridged through trainings and mentoring process. The growth aspirations of high-performance employees are judged by respective Department Heads as well as HR Head. The appraisal process for middle management is used to create awareness on various career development paths and a career movement plan for next five years is prepared. The number of new joiners covered in induction trainings and employees assigned mentors during this reporting period is provided in table below.

The key job incumbents in senior management positions are included in the succession planning. OIT provides fair opportunity to internal candidates by adopting customized development strategy for such candidates.

Induction and career development program in OIT.

Induction and Career Planning Activity	ONBHL	OHHHPL	OPIPL	ECHKPL	ONBCPL
Induction Training for number of New Joinees	2	1	6	2	-
Mentoring Program covering number of high-performance Employees	1	2	2	1	-



Employee Engagement and Grievance Management

OIT and its SPVs offer its employees an environment where individual perspectives are welcome, and everyone feels a sense of inclusion and belonging. OIT's leadership believes in high performance culture and staying ahead of the competition.

We have a robust grievance redressal mechanism through which the employees can communicate their grievance and seek redressal. Each SPV has a grievance redressal committee which monitors the working of grievance redressal mechanism on a quarterly basis. The grievances mechanism has a defined process of escalation if it cannot be settled at the Department or at the SPV level. The decisions by senior management from HO is considered final. OIT has an employee separation policy to ensure release of the departing employee as per terms and conditions of this employment contract. The severance pay is provided to employees in accordance with legal provisions.

OIT is a vibrant place of work, where employees are encouraged to participate in team sports, maintain a healthy lifestyle and observe diverse cultural festivals. Yoga and meditation is promoted to improve physical and mental health of employees. The annual health check-up camps help in monitoring the health conditions and counselling them to adopt healthy life-style. The matrix below shows the SPVs where these specific activities were carried out during this reporting period.

Employees and workers at SPVs are also engaged through special events organized on EHS themes as part of national and international events calendar. These events help building awareness on these issues among our employees and workers as well as help show solidarity with national and international organizations supporting these causes. The matrix below shows the list of such special EHS events celebrated across different SPVs in OIT.

Table: Employee participation in EHS decision making

Participation of Employees	ONBHL	OHHHPL	OPIPL	ECHKPL	ONBCPL
Canteen Committee Meetings	6	8	4	7	2
Safety Committee Meetings	5	2	4	4	2
Total number of meetings	11	10	8	11	4



Theme	Engagement Activity	ONBHL	OHHHPL	OPIPL	ECHKPL	ONBCPL
Sports	Sports (Cricket/ Volleyball/ Football) Tournament			X	X	X
	Yoga and Meditation			X	X	X
	Annual Health check-up	X	X	X	X	X
Cultural	Religious Festival Celebration / National Holiday	X	X	X		X
Sports	Sports (Cricket/ Volleyball/ Football) Tournament			X	X	X

Cricket Tournament



Yoga Session



Cultural Celebrations



Employees and workers at SPVs are also engaged through special events organized on EHS themes as part of national and international events calendar. These events help building awareness on these issues among our employees and workers as well as occasions to show solidarity with national and international organizations supporting these causes. The matrix below shows the list of such special EHS events celebrated across different SPVs in OIT.

Celebration of EHS Special Events	ONBHL	OHHHPL	OPIPL	ECHKPL	ONBCPL
World Environment Day	X	X		X	
Tobacco Day				X	
National Cleanliness Day		X	X	X	
World Health Day				X	
Road Safety Day			X	X	X
National Safety Week	X	X	X	X	X
World Aids Day					X
Women's Day		X			

Health Check-up Camp



Environment Day Celebration



Tobacco Day Awareness



Cleanliness Campaign



World Aids Day Awareness Campaign



Women's Day Celebration



OCCUPATIONAL HEALTH, SAFETY AND WELLNESS

Overview of health and safety management system

Health and safety management constitute an integral part of our ESMS. OIT is committed to protect its employees from any harm to the employees and third-party workers in carrying out their duties and responsibilities. We have adopted a group wide Corporate Quality Environmental Health Safety and Social (QEHS) Policy that ensures roles and responsibilities of employees, workers, contractors. ESMS management system covers all OIT Employees, as well as all Subcontractor Employees. It covers activity related to toll road operation, O&M activity, Toll collection, & Route patrolling. The ESMS requirements and E&S procedures are based on E&S requirement of institutional investors (IFC Performance Standard) and applicable legal requirements. Further, the EHS Plans at each SPV are based on ISO 45001 (Occupational Health & Safety Standard) and requirements.

Components of Occupational Health & Safety Management

- Awareness and capacity building through regular EHSS training of employees and workers
- Preparation and regular updating of HIRA to capture activity risks & provide mitigation measures accordingly
- PPE (Personal Protective Equipment) requirement identification & PPE distribution among employees and workers
- Annual Health surveillance of employee and workers

Roles and responsibilities

EHS&S Team is responsible for the overall implementation and monitoring of the ESMS at HO and SPV level. At SPV locations, the responsibility of safeguarding safety of the employees and workers lies on the EHS Officer who reports to EHS&S Team at HO. The EHS&S Team reports to the top Management.

Workers to report 'Near Miss'

Regular EHSS training sessions.

Safety committee Meeting
(undertaken quarterly)

- **Safety Committee is chaired by SPV Head and include all department heads and EHs officer as members**
- **Committee members regularly participate in the meeting and discuss the EHS measures**
- **OIT follows SOP (OIT-P-07) for EHS which include purpose, scope, responsibility, meeting frequency, procedure, and meeting guidelines**
- **Feedback is taken from participants for the QEHS training sessions**

OIT believes participation and consultation is important for effective EHS management system. OIT has taken various steps to ensure participation and consultation.

Policy Communication

The QEHSS policy is communicated to all concerned in the organization via our internal communication channels, meetings, notice boards and is also displayed at all prominent places across all project sites.

OH&S Risk identification and minimization

OIT has adopted strategic approach to risk-based thinking as per ISO integrated management system. Risk criteria in HIRA is used to access existing control & additional control measures to have a minimum risk. Six monthly internal audits have been to measures the efficacy of management system and area of improvement.

List of work-related hazards that pose a risk of high-consequence injury	List of work-related hazards that pose a risk of ill health
<ul style="list-style-type: none"> • Vehicle collision • Work at Height • Electrical work • Highway recarpeting 	<ul style="list-style-type: none"> • Sitting posture • Ergonomic conditions • Prolonged exposure to noise • Insect/Snake bite

OIT and its SPVs investigate work related incidents as per ISO IMS (Integrated Management System), as per article 10.2 of ISO 45001:



Root cause analysis is based on iterative interrogative technique- 5-Whys principle. The goal is repeating the question why, to reach the root cause. All our safety statistics include contractual workers, contractor's labors along with own staff. All Employees and workers participate in regular safety briefings, toolbox meetings, emergency drills, and trainings. We have taken multiple measures in line with our commitment towards ensuring employee well-being. For instance, we provide medical insurance to all employees and their close family members.

We also assess exogenous health risk factors which are not directly related to work and develop strategies to respond and reduce their impact on our employees and workers. This FY we focused on employee wellbeing from a different lens after the COVID outbreak. Sport is a good way to reduce work stress and build a team spirit within the employees, which further improves the productivity.

OH&S services and worker participation

OIT considers its employees as an asset, and we have developed comprehensive programs to focus on employee health and wellness and for their overall safety. The top management endeavors to integrate safety and employee wellbeing in all our work operations. Annual health checkup and internal medical health checkup before deployment at a project site is followed at OIT. Complaint Boxes have been provided at all sites, where workers can secretly post their concern related to H&S. Apart from it, employees and workers are encouraged to report a near miss. Also, Quarterly EHS committee meetings were conducted to discuss, and monitor OHS matters.

Safety practices, trainings for employees and key statistics

OIT believe that efficacy of EHS management system can significantly improve by establishing a behavior-based safety culture. A major component of our health and safety management is training the staff and workers for raising their awareness. Every SPV follows a 'Training Calendar' to organize H&S trainings and records are maintained.

Further, continual training on various EHS aspects have played a major role in creating / enhancing Safety awareness. Mock Drills at regular intervals, are some of the best practices followed across OIT group.

At OIT we foster a culture and environment where we put health, safety, and wellbeing first, and we are continually looking at ways in which we can strengthen our existing processes and training programs. The compliance is monitored through half-yearly internal monitoring and an annual external audit.

Manhours worked	ECKHPL	OPIPL	OHHHPL	ONBHL	ONBCPL	HO	Total
Manhours worked (employees)	8,28,320	4,61,400	1,68,824	1,92,336	6,79,440	64,640	23,30,320
Manhours worked (contractors)	3,69,616	41,120	7,04,640	2,16,760	0	0	13,32,136
Total	11,97,936	5,02,520	8,73,464	4,09,096	6,79,440	0	36,62,456



- Total safe man hours: **23,30,320 hours for regular employees and 1332136 hours for contractual employees.**
- Fatalities (as a result of work-related injury): **0**
- High-consequence work-related injuries (excluding fatalities): **0**
- Recordable work-related injuries: **0**
- Lost days: **0**
- Absent rate: **0**
- Fatalities (as a result of work-related ill health): **0**
- Recordable work-related ill health: **0**

CSR AND COMMUNITY ENGAGEMENT

We, at OIT, value our people and communities and nurture them with the utmost care and responsibility. We have been engaging in several social development activities in local areas for the upliftment of underprivileged groups in the society. We aim to work with local groups and associations to develop focused programmes aimed at promoting excellent health, quality and uninterrupted education, sustainable livelihoods, reducing inequality, and increasing employment in the community. We firmly believe that economic and social development go hand in hand, investing in community wellbeing will make OIT successful in the long term. We make positive contributions to the world through the projects we undertake as part of our community engagement initiatives.

Corporate Social Responsibility

OIT believes that it is imperative for an organization to give back a humble part of what it takes from society. We continuously strive to be an organization that is socially committed by bringing together all our processes under the ambit of Corporate Social Responsibility through proactive initiatives. We value employee volunteering and participation as key elements of our CSR vision. We contribute to the solution of social issues and pursue the realization of a prosperous society.

There are total of five SPVs under OIT, of which three SPVs are under legal obligations (as per section 135 of the Company's Act 2013 and Companies (Corporate Social Responsibility) Rules, 2014) to practice CSR. These SPVs are required to spend 2% of their average net profit for the previous financial year.

CSR Thrust Areas

We have strategically identified four thrust areas where we believe we can create the maximum impact considering our operations and presence. The details of our CSR thrust areas are as follows:

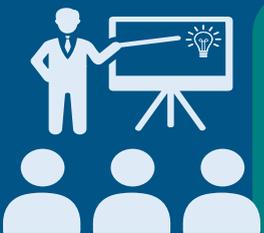


Education

- Skill development, adult literacy and awareness of impact of education
- Scholarships for meritorious students belonging to financially distressed families, preferably girl students at the schools

Environment Sustainability

- Undertaking projects for improvement of environment using methods such as green belt development, plantation of saplings, restoration of mined out lands, afforestation, social forestry, check dams, parks, etc.



Rural Development

- Trainings on welding, fabrication, and working with electronic appliance, develop farming, medicinal plants, and cash crops, Infrastructure development for water conservation and electricity access
- Health awareness camps on AIDS, TB, Leprosy, blood donation camps, diabetics detection camps, hypertension relief camps

Rural Sports

- Conducting tournaments and providing sports materials to villagers
- We aspire to provide facilities for people with special to promote overall wellbeing through sports and physical activities



Our CSR Governance Structure and Responsibilities:

To have a board level oversight on CSR activities, we have CSR committees (one for each SPV) which are responsible to review and implement all the initiatives undertaken by OIT. Each of the three SPVs has a CSR Committee at the board level. The committee reports to our Board of Directors.

CSR Committee of ONBHL	CSR Committee of ONBPCPL	CSR Committee of OPIPL
<ul style="list-style-type: none"> Mr. Deepak Kukreja, Chairman Ms. Monika Kohli, Member Mr. Nikhil Dhingra, Member Mr. Ranveer Sharma, Member 	<ul style="list-style-type: none"> Mr. Nikhil Dhingra, Chairman Mr. Ranveer Sharma, Member 	<ul style="list-style-type: none"> Mr. Nikhil Dhingra, Chairman Mr. Ranveer Sharma, Member

Our CSR Committees constituted in pursuance of Section 135 of the Companies Act, 2013 shall be required to carry out the following activities:

- Formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII
- Recommend the amount of expenditure to be incurred on the activities referred to in clause (a)
- Monitor the Corporate Social Responsibility Policy of the company from time to time.

Ongoing CSR Program: Implementation of Livelihood Support Plan in Etawah-Chakeri (Nagpur) Road, Uttar Pradesh

During the COVID-19 pandemic, considering the circumstances, our CSR committee decided to support implementation of the **Livelihood Support Plan (LSP) prepared for the Etawah-Chakeri (Nagpur)** road corridor under CSR. Due to some operational challenges, we could not undertake a third party need assessment, but a careful consideration was made internally before undertaking this project.

We have executed this project through an implementation partner. A thorough analysis and stakeholder consultations were done to identify Sansthanam Abhaya Danam, a reputed NGO, to act as the LSP Implementation Coordination Agency. We signed a MoU in February 2021 for the LSP implementation. Subsequently, we issued the work order to the NGO to initiate the implementation of LSP in March 2021 and to complete the implementation of the project by March 2024. Our CSR Committees pooled their CSR funds of Rs 13.07 crores towards implementation of this LSP as a CSR program that aims at improving the livelihood and income of ~7,500 households spread across more than a hundred villages in four districts along the Etawah-Chakeri road corridor.

An overview of the coverage of the LSP program in terms of villages and the number of target beneficiaries is provided in the table below:

District	No of Villages	Approximate Number of Target Beneficiaries under LSP
Etawah	24	2,000
Auraiya	42	2,500
Kanpur Dehat	42	2,500
Kanpur Nagar	7	500
Total	115	7,500

The identified implementation coordination agency, i.e., Shaksham Bharti, is an NGO with a track record of conducting income-generating skill training to establish three training centres in the project area. The three training centres lie in villages in Kanpur, Auraiya, and Etawah districts respectively. The options for livelihood support activities are planned to include a range of additional skill-based and agriculture (and allied)-based activities in the future.

Rural land-based livelihood promotion

- Quality Seeds Growing
- Vermicompost Production
- Backyard Poultry Rearing
- Preservation of Fruits and Vegetables
- Gardening and Nursery
- Goat Rearing
- Enhancing Production level of Crops

Skill trainings for job and self-employment

- Computer Training (Basic and Advance)
- Stitching, Tailoring and Dress Making
- Hardware Diagnostic and repair
- Certified Beauty Culture Course



Community Engagement

The health and wellbeing of truck drivers is always a concern as they are the backbone of Indian road transportation. Truck drivers suffer from the lack of healthcare facilities and awareness. The effects of long commutes, subpar diets, and air pollution are causing detrimental effects on the health of truck drivers. To better appreciate the necessity of check-ups and contribute to good health and wellbeing, we initiated a free health check-up for truck drivers and road users.





Tree Plantation

Trees are a natural carbon sink and contribute immensely to the biodiversity. Increasing the green cover is an effective solution to safeguard our clean environment. Aligning with our commitment to reduce our carbon emissions we contributed through tree plantation activity. Every part of the society is important to us, and we value them by planting more trees and restoring the balance of nature and society we live in.



Blood donation camp

Access and availability to right blood type is of cardinal importance in case of accidents with blood loss. We create awareness about this social cause and give an opportunity to people to become life saviours. We do understand the value of blood donation and thus regularly organize blood donation camps at our sites.





Road Safety Awareness at School

Car and road accidents are one of the leading causes of deaths (especially among the young population) globally. Imparting education on road safety to school children is very impactful and reduces incidents to a large extent. It is very important to us that our road users are safe and abide by all road safety principles. To ingrain these responsibilities for road safety, we conducted seminars on road safety for school children who will soon be riding and driving on roads. In our seminars, we discussed traffic safety, precautions to take, rules and measures to follow while driving, pedestrian safety, and all kinds of other important things in life.



External Grievance Management

We have an efficient grievance mechanism in place for monitoring all types of grievances from our stakeholders. We follow the same approach at all our SPVs to track the grievances to take appropriate resolution measures.

SPV Name	Grievance type						
	Toll /Fast Tag	Road Condition	Facilities	Staff Behavior	Streetlight	Other Services	Total
ONBHL	219	6	9	16	17	20	287
ONBCPL	79	12	4	5	3	4	107
OPIPL	93	0	4	3	0	1	101
OHHHPL	11	3	6	5	0	9	34
ECKHPL	9	26	2	10	44	21	112
Total	411	47	25	39	64	55	641

Toll/Fast Tag	Grievances related to Toll Payments Errors
Road Condition	Grievances on road condition
Facilities	Grievances about inadequate facilities such as Toilet, Bus Stops, Waste Bins, etc.
Staff behavior	Toll collector and lane assistant behavior
Street Lighting	Malfunions in street lighting
Other Services	Miscellaneous



We are proud to have been contributing to community welfare through our programs, and we are excited to add value even further. Through our initiatives, we will contribute to the progress of UN Sustainable Development Goals. We will keep enhancing positive impact in our thrust areas.

Mr. Sanjit Bakshi, Director- OIT



ROAD USER SAFETY

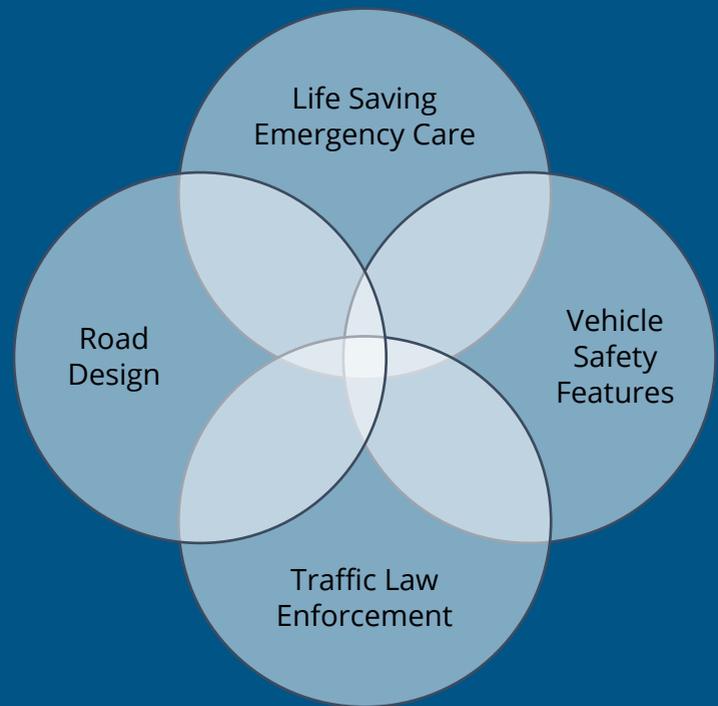
UN General Assembly in 2020 declared the 2021-2030 as the Decade of Action for Road Safety. OIT, as a Toll Road operator endorses this global cause of improving road safety and preventing the devastation due to injury and loss of life. OIT approaches the road user safety with a sense of responsibility and compassion. The SPVs under OIT are on the forefront of providing a professional service to their road-user for a safe travel experience.

The SOP on Emergency Response provides a prominent place to the road user safety. It recognizes situation as 'emergency' which may lead to or cause large scale damage or destruction of life, property or environment within or outside the office. Onsite Emergency Control Plan (OECPP) explains the code of conduct of all personnel along with the actions to be taken in the event of an emergency. It not only defines responsibilities but also informs about prompt rescue operations, co-ordination and communication.

OIT believes road user safety is best ensured when coordinated efforts are made by concerned stakeholders to make continual improvements in the design of roads; enhancement of motor vehicle and traffic laws and enforcement; and provision of timely life-saving emergency care for the road accident victims. Hence, road safety is a shared responsibility by NHAI, Traffic Police, Health Services and Toll Road operator. The OIT as a toll road operator plays a leading role in providing life-saving emergency care to road accident victims and extend cooperation to other stakeholders as and when necessary. As mobility and transport technologies and options for road users are constantly evolving, improving road user safety is an on-going process and OIT is fully committed to do its best.

The SPVs as Concessionaire have obligation under their Concession Agreement (Schedule-L) to discharge responsibility towards safety of road users. It includes establishing a Highway Safety Management Unit (HSMU) which responds immediately in case of emergency situations. OIT provides training to the concerned staff in HSMU in road safety and emergency procedures. Such continuous enhancement in emergency preparedness helps to minimize the human suffering and economic losses due to road accidents. The Emergency Response Team at HSMU works in coordination with Highway Patrol, Tow-truck and Crane Operator, Fire-tender, and Rescue and Medical Aid/Ambulance teams.

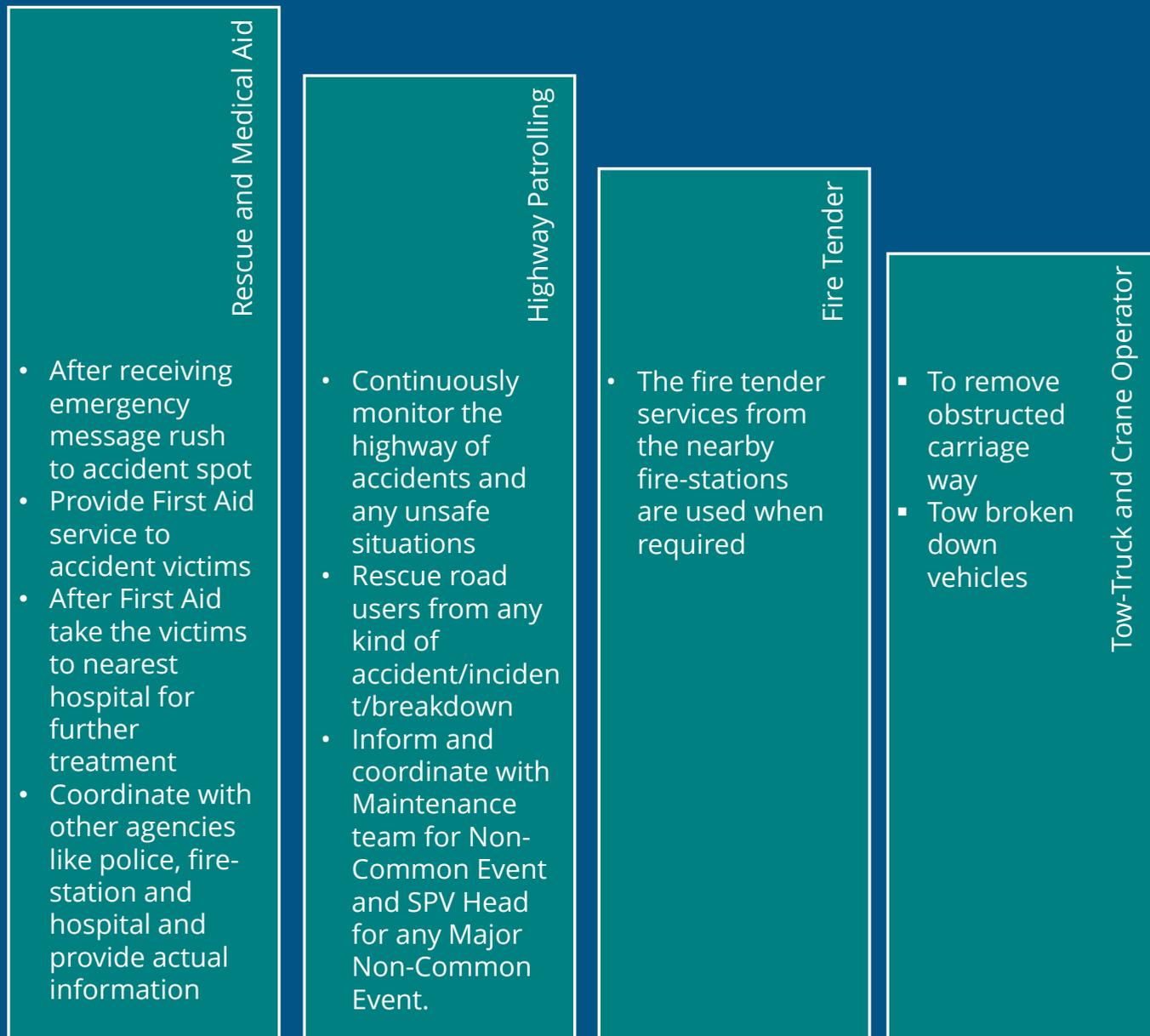
Building Blocks of Road User Safety



- Rescue and Medical Aid Team
- Highway Patrolling
- Fire Tender Services
- Tow-Truck and Crane Operator

The Emergency Response Officer/Executive holds a pivotal position in the emergency response mechanism. The highway patrolling team and the ERP executive at control room work as a team to respond immediately to any emergency. The tasks of the ERP team are:

- Inform and co-ordinate with emergency and rescue services like police, hospital, ambulance, fire, crane etc.
- Take precautionary measures to guide and regulate safe traffic movement.
- Initiate measures to assure safety of other road users and public due to effects of toxic and inflammable materials, if any.
- Take precautionary measures to safeguard third party properties.
- Co-ordinate with various agencies to clear the road of debris and resume normal operations at the earliest possible.
- Report and exchange information among various team members for information and decision making.



The ERP team maintains a record of all emergency events and their interventions. The emergency response protocol divides the emergency events into three levels. The common events are handled by the HSMU, in case of Non-Common Events the SPV Head is informed and involved. In rare instances of major non-common events, information is provided to NHAI and District Administration and instruction from these authorities are followed.

Common Event

- Traffic accident with or without fatality
- Prolong closure of one lane after an event
- Specialist or heavy machinery arrival for removal of obstructing source
- Recovery time to normalize road condition
- Unscheduled works for treatment of road

Non-Common Event

- Event that obstructs and requires the closure of one carriageway
- Event affecting two consecutive sections that needs to be resolved
- Event involving VIPs
- Event involving Concessionnaire staff
- Major accident that may attract media attention
- Traffic Jam/ pile up at toll plaza or main carriageway

Major Non-Common Event

- Closure of Project Highway due to major accident, flooding or other natural disaster, and accident involving hazardous material
- Event involving two regions/ boundaries
- Accident involving dignitaries/ VVIPs.

In this reporting period, there were 1,281 road accidents involving 2,496 persons. Our emergency response team was prompt to respond on these occasions and helped 1,850 accident victims to reach nearest hospital in time. The remaining accident victims were provided first-aid services and did not require further medical services. The consistent good work by the emergency response team at ONBCPL received public recognition and a news report to this effect was published on 21st March 2022. The SPV wise break-up of the type of accident, total number of accident victims and persons admitted in hospital is provided below.

SL. No	SPV Name	Total Number of Accidents	Total Persons Affected	No of persons admitted in Hospital
1	ECKHPL	340	1,003	681
2	OHHHPL	82	137	58
3	ONBCPL	151	220	227
4	ONBHL	215	298	203
5	OPIPL	493	838	681
	Total	1,281	2,496	1,850

मानवी जीवरक्षणासाठी ओरिएंटलचे देवदूत अहोरात्र सेवारत

पुण्य नगरी / रमण राखडे

बुटीबोरी : बुद्धिमत्ता, विचारशक्ती, भावना या मनुष्यप्राण्याला मिळालेल्या देणूक आहे. त्यांचा वापर त्याने योग्य तऱ्हेने, योग्य वेळी, योग्य ठिकाणी करणे अपेक्षित आहे. नाहीतर इतर प्राणिमात्र आणि मनुष्यात फरक राहणार नाही. रस्त्यावर एखादा अपघात घडला, तर तिकडं दुर्लक्ष करून निघून जाण्याची सामाजिक वृत्ती अतिशय घातक, अमानुष आणि संवेदनाशून्य आहे. कायद्याचं अज्ञान, पोलिसांची भीती यामुळे अशी पळपुटी वृत्ती वाढते. शिवाय आपल्याला काय करायचंय, अशा विचारसरणीमुळे संवेदनाहीनतेच्या दिशेनं घडणारी वाटचाल माणुसकीला बट्टा लावणारी आहे. या मनोवृत्तीला दूर सारून आजही काही देवदूत कर्तव्य पणाला लावून मानवी जीवरक्षणासाठी अहोरात्र सेवा देत आहेत.



आमच्या कार्यक्षेत्रात अपघात नियंत्रण, पोलीस प्रशासनाकडून मिळालेल्या सूचनांचे पालन, अपघात संभाव्य ठिकाणांवर योग्य त्या उपाययोजनांना प्राथमिकता देणे आमचे कर्तव्य आहे. जबाबदारी म्हणून अपघातपीडितांना कसे हाताळावे यासाठी आमच्याकडून मेडिकल टीमला प्रशिक्षण दिले आहे. आमचे कर्तव्य प्रसिद्धीसाठी नाही. मात्र नागरिकांकडून सहकार्य अपेक्षित आहे.

प्रशांत बर्गी, प्रोजेक्ट इंजार्ज, ओरिएंटल टोलव्यवस्थापक

मदतनीस मनीष पांडे हे अपघातपीडितांच्या मदतीला चोवीस तास सज्ज राहून मदत करताहेत. या देवदूतांनी आजवर जखमींना केलेल्या मदतीमुळे शेकडोंचे प्राण वाचविले. यामुळे अपघातांनंतर जखमींना वैद्यकीय उपचार मिळत असल्याने महामार्गावरील अपघातांमधील मृतसंख्या नियंत्रित करण्यात यश मिळविले आहे. राष्ट्रीय महामार्गावरील रस्ते अपघातांमध्ये दरवर्षी दीड लाख

ओरिएंटल टोलप्लाझाच्या मेडिकल टीमचे कार्य कौतुकार्ह आहे. त्यांचे पोलिसांना सहकार्य मिळते. अपघातपीडितांचा जीव वाचविणे प्राथमिक जबाबदारी आहे. ती हे पथक प्रामाणिकपणे पार पाडत आहे.

श्रीमाजी पाटील, पोलीस निरीक्षक, बुटीबोरी

नागरिकांचा मृत्यू होतो. यात वेळेवर उपचार न मिळाल्याने मृत्यू होणाऱ्यांची संख्या सर्वाधिक असते. महामार्गाचा आवाका पाहता पोलिसांची संख्या तुटपुंजी असल्याने जखमींना मदत पुरविताना अनेक अडचणी येतात. यासाठी शासकीय यंत्रणेने १०८ क्रमांकाची रुग्णवाहिका नियुक्त केली. मात्र या रुग्णवाहिकेच्याही एक पाऊल पुढे ओरिएंटलचे हे देवदूत कर्तव्य पणाला लावून अपघातातील जखमींच्या मदतीला धावून जात असल्याने शेकडो कुटुंबांच्या चेहऱ्यावरचे दुःखाचे सावट दूर झाले आहे. त्यामुळे हे देवदूत सत्काराचे

Smart Nagpur
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'१०८'च्या एक पाऊल पुढे, मृतसंख्या नियंत्रित सत्कारास पात्र

दहा वर्षांत ९७० लोकांना जीवदान : नागपूर-हैदराबाद या राष्ट्रीय महामार्गावर ओरिएंटल नागपूर बायपास कन्स्ट्रक्शन प्रा.लि. हे टोलव्यवस्थापन २०१२ पासून कार्यशील आहे. यांच्या कार्यक्षेत्रात बेलतरोडी, हिंगणा व बुटीबोरी पोलीस हद्द येते. हिंगणा आणि बुटीबोरी पोलीस हद्दीत दहा वर्षांत झालेल्या हैदराबाद मार्गावरील अपघातातील ९७० लोकांना या पथकाने मदत देऊन जीवदान दिले. अनेक अपघातांत पोलीस हद्दीचा वाद पुढे येत असल्याने त्यांना अनेक अडचणींना सामोरे जावे लागते. मात्र तमा न वाळगता जखमींना उपचार मिळावे यासाठी ते कर्तव्य प्रामाणिकपणे हाताळण्याचे धाडस करतात. त्यांच्या या धाडसी वृत्तीकरिता पोलीस प्रशासन योग्य ते सहकार्य करतात.

कोरोनाकाळात जपली माणुसकी : कोरोनाकाळात सर्व नागरिक चरी वसून होते. दुसरीकडे ओरिएंटल टोल व्यवस्थापनातील सर्व पदाधिकारी व कर्मचारी स्थानिक प्रशासनाच्या खांद्याला खांदा लावून वाटसरूंना मदत करीत होते. बोरखेडी (रे) तसेच बायपास टोलप्लाझावर हजारो वाटसरूंना भोजनदान करून दिलासा देण्याची माणुसकी जपली.

'घास' नाही, 'कर्तव्य' महत्त्वाचे : सामाजिक बांधिलकी म्हणून या पथकाशी वातचीत केली. अपघातप्रसंगी त्यांना आलेले अनुभव बोलून दाखविले. अशा कित्येक अपघाताची माहिती आम्हांला मिळते तेव्हा आमच्या हातात अन्नाचा घास असतो. अशा प्रसंगी आम्ही घासाला महत्त्व देत नाही. आपल्या हाताने होणाऱ्या कर्तव्याला प्राथमिकता देतो. जेणेकरून अपघातपीडितांना मदत करून त्यांचा जीव वाचविण्याचे सत्कार्य आमच्या हातून घडायला हवे, असा आमचा मानस आहे. अशा विचारांच्या या देवदूतांना मानाचा मुजरा !

खरे धनी असूनसुद्धा त्यांच्या पाठीवर कुणीही आजवर साथी कौतुकाची थाप दिली असेल, असे ऐकायला मिळत नाही. याची खंत समाजमनातून व्यक्त होत आहे. रस्ता सुरक्षा मोहिमेत हे पथक

सामाजिक बांधिलकी जपून कर्तव्य पार पाडत आहे. ही खरंच अभिमानार्ह बाब आहे. शासनाचे वा सामाजिक संघटनांनी दखल घेऊन त्यांच्या कर्तव्यप्रीती प्रोत्साहन देणे गरजेचे आहे.



Road safety awareness

The number of accidents in ECKHPL and OPIPL are higher in comparison to other road stretches. In these two road stretches, black spots are identified, and immediate remedial measures were implemented. The remedial measures included:

- Improving road signage and warning about accident-prone spots;
- Regulating speed of vehicles in these stretches;
- Providing temporary lane segregations;
- Deployment of Crane and Ambulance teams closer to these accident spots.

In addition to these immediate steps, OIT has hired specialized agencies to carry out a detailed road safety audits for these two roads and is committed to undertake remedial measures after due consultation with NHAI.

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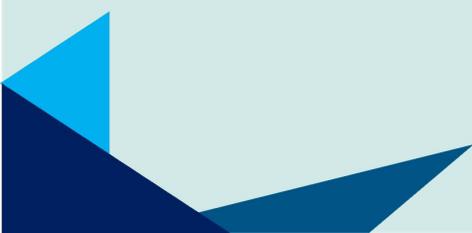
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Oriental InfraTrust

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