

# Housing and Urban Development Corporation Ltd. (A Govt. of India Enterprise)

ENVIRONMENTAL SOCIAL AND GOVERNANCE (ESG) POLICY\_



**July 2024** 

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#### 1. Introduction

#### 1.1 Brief History of the Company

Housing and Urban Development Corporation Ltd (HUDCO), a Premier National level Techno-Financial Organization, was set up in the year 1970, as a Government of India Central Public Sector Enterprise (CPSE). Its main thrust is on financing and undertaking Housing and Urban Development Projects, all over the country. The Company is committed to provide techno-financial services to promote Sustainable Habitat Development, working through proactive customer sensitive and risk responsive approach, to ensure 'Profitability with Social Justice'.

Since inception HUDCO has been predominantly focussing on development of sustainable & affordable housing, specifically targeting EWS/LIG & other vulnerable socio-economic groups of the society, facilitating over 2 crore houses. Further, HUDCO has been promoting innovative and cost-effective green construction technologies and building materials using locally available materials and industrial waste. Apart from housing, HUDCO also engages in techno-financing sustainable infrastructure projects, ranging from core urban infrastructure projects such as water supply, sanitation, solid waste management, urban transport to commercial infrastructure projects such as power and green energy sector for sustainable and inclusive infrastructure development across the country.

#### 1.2 Main Objects

The main objects of our Company are to provide long term finance for undertaking housing and urban development programmes in the country; funding the setting up of new or satellite towns, industrial enterprises of building material; to subscribe to the debentures and bonds issued for the purpose of financing housing by the State Housing Boards/ Development Authorities etc.; to provide consultancy services for Housing and Urban Development programmes; and to administer the money received, from time to time, from the Government as grants or otherwise for undertaking housing and urban development programmes.

The Corporation is headquartered in the National Capital, New Delhi and operates through a strong and multi-disciplinary work force placed over its nationwide network of 21 Regional and 11 Development Offices.

#### 1.3 Need for ESG Policy

In recent years, adapting to and mitigating change impact and transitioning to sustainable development have emerged as major focus globally. Further, global sustainability challenges such as climate change, flood risk and rising sea levels, privacy and data security, demographic shifts, and regulatory pressures, are introducing new risk factors for investors that may not have been seen previously. As companies face rising

complexity on a global scale, investors may reevaluate traditional investment approaches. Therefore, the concept of Environmental, Social and Governance (ESG) comprises the holistic approach for companies to remain responsible to its investors as well as stakeholders while complying with various environmental, social and governance regulatory risks. In this context, an ESG policy is a document that outlines an organization's approach towards ESG.

In the Indian context, there has been a growing recognition of the significant economic and financial impact of climate change and environmental, social and governance (ESG) risks. In the recent years, several ESG funds have been launched in India. As ESG investing becomes mainstream, companies have been urged by both investors and regulators to make ESG related disclosures to their stakeholders. In view of this, the Securities & Exchange Board of India (SEBI) has mandated the top 1,000 listed Companies (by market capitalization) to make ESG disclosures as per the Business Responsibility and Sustainability Reporting (BRSR) on a mandatory basis from FY 2022-23.

As it has always been, it is imperative that HUDCO also stays strong in its commitment to positively impact the environment, customers, employees, and the community at large and be sustainable towards the environment and society. HUDCO's ESG Policy is in line with its Vision and Mission statements which recognize the importance of sustainable development and responsible corporate citizenship.

#### Vision

"To be a leading Techno-financial Institution promoting sustainable habitat development for transforming the lives of people".

#### Mission

"To promote sustainable habitat development to enhance the quality of life"

This policy framework explicates HUDCO's approach to align its strategy, processes and disclosures with national and international ESG standards in discharge of its business roles & decision-making processes. It provides a framework for promoting sustainable development, fostering inclusive growth, and enhancing stakeholder value.

As a responsible Organisation, HUDCO recognizes its role in complementing India in achieving the 2030 agenda for sustainable development laid down by the United Nations in the form of Sustainable Development Goals (SDGs). Towards this end, HUDCO's ESG Policy is particularly aligned to goals related to: making cities and human settlements inclusive, safe, resilient and sustainable (SDG 11); ensuring availability and sustainable management of water and sanitation for all (SDG 6); ensuring access to affordable, reliable, sustainable and modern energy for all (SDG 7); promoting sustained, inclusive and sustainable economic growth, full and productive employment and decent

work for all (SDG 8); building resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation (SDG 9); and taking urgent action to combat climate change and its impacts (SDG 13).

# 2 ESG Policy Approach and Governance

Dissemination about ESG management and performance is important to bridge the information gaps existing among – companies, investors and stakeholders. This will enhance the ability of companies to access resources to adopt more sustainable business practices and to support the development of a resilient economy.

The policy framework articulates the Company's commitment to ESG and long-term value creation for internal and external stakeholders including customers, employees, investors, regulators, business partners and community members. HUDCO envisions becoming a leading catalyst in providing housing and for sustainable urban development in India, with its commitment focussed on:

- Environmental Sustainability: HUDCO aims to promote environmental sustainability by financing and supporting projects that mitigate climate change, enhance resource efficiency, and preserve natural ecosystems. HUDCO shall continue to involve itself in activities and ventures that promote green energy, environmental sustainability and mitigate environmental risks.
- Social Responsibility: HUDCO is committed to promote social inclusion and equitable development by prioritizing financing for affordable housing targeting marginalised and weaker sections of the society, sustainable infrastructure projects, and community development initiatives that uplift disadvantaged communities and enhance the quality of life of the communities.
- Governance Excellence: HUDCO strives to uphold the highest standards of corporate governance, transparency, and ethical conduct in all its operations, fostering trust among stakeholders and ensuring accountability for delivering positive social and environmental outcomes.

HUDCO has consistently prioritized adherence to ESG principles in all its activities like business operations, corporate governance, employee welfare, CSR endeavours etc. The ESG policy framework will serve as a guiding document for all ESG initiatives and activities undertaken by HUDCO.

In order to operationalise the policy, an Environmental, Social & Governance (ESG) Committee shall be constituted by CMD, HUDCO with representation of HoD of major divisions such as Operation, Administration, HR, CSR, IT, Resources, etc. The Committee shall be responsible for overall implementation of ESG policy framework and review ESG performance across functions and communicate the progress through periodical reports to the management. The overseeing of ESG policy shall be done by the Risk Management Committee.

ESG policies, and focus areas as mentioned in this framework document, may be subject to revision based on emerging risks and opportunities as deemed suitable. The policy framework shall be reviewed at the end of one year of implementation and thereof on need basis to ensure its continuing suitability, adequacy, and effectiveness.

# 3 Key Focus Areas

#### 3.1 Commitment to Environmental Goals

#### (i) Promote Green Energy and Energy Efficiency:

It is a matter of great pride that HUDCO's contribution as the premier techno-financial institution in the country is not limited to housing finance but includes various other pertinent initiatives to the cause of sustainable urban development and green building initiatives. HUDCO has long championed the cause of cost effective and energy efficient construction through appropriate design and materials. HUDCO is in the forefront for financing energy-efficient buildings, green infrastructure development, sustainable mobility infrastructure including metro rail, e-vehicles, solar parks, interventions for capacity building, advocacy and institution of awards to encourage innovations and initiatives that contribute to making our cites inclusive, liveable and environmentally sustainable, enhance energy security, and mitigate climate change.

HUDCO has aligned itself with the aspiring goals of the Government of India aiming to achieve non-fossil energy capacity to 500 GW by 2030 and to facilitate 50 percent of its energy requirements from renewable energy by 2030. HUDCO will endeavour to pursue this goal through its notable investments in various non-conventional and renewable energy projects. Further, HUDCO shall also undertake funding to state transport utilities for replacement of old fleets with energy efficient e-vehicles and/or procurement of new e-vehicles for promoting a greener environment.

As part of our strategy to combat climate change and further the cause of transitioning to a low carbon economy HUDCO shall strive to: -

- Ensure that all its owned premises are powered by clean renewable energy.
- Adopt energy efficient practices like conducting energy audits, utilization of natural lighting and adopting efficient lighting systems to reduce cost and energy consumption, installation of rooftop solar panel, where ever feasible, across all HUDCO offices.
- Incorporate energy efficient building designs in projects funded and/or constructed by HUDCO across the country.
- HUDCO will encourage its stakeholders to adopt energy efficient building practices and usage of green energy.
- Ensure all HVAC systems at HUDCO offices are maintained on a regular basis to reduce energy consumption.

- HUDCO will encourage its employees for purchase and use of e-vehicles through appropriate loans/advances packages.
- Conduct efficiency energy audit narrowing down on appliances that are high energy consuming in nature, retrofit these devices to enhance their performance while lowering their electricity consumption.

HUDCO shall insure incorporating these principles of efficient energy consumption and sustainable forms of operations in all projects that are financed by HUDCO as part of its terms & conditions while entering into agreements with its borrowers.

#### (ii) Environmental & Social Risk Management

Adopting an environmentally conscious approach is integral to corporate responsibility, stakeholder engagement, and the long-term sustainability of our operations. HUDCO integrates environmental impact assessments into operational, financial, and risk management decision-making processes.

HUDCO will mitigate its exposure to environmental, social, and governance related risks by incorporating ESG factors into its project and entity evaluation procedures. HUDCO is committed to ensuring the accountability, transparency, and effectiveness of governance within the borrowing entities. Relevant business divisions will develop an ESG checklist as part of the evaluation process.

HUDCO will endeavour to incorporate sustainability considerations into financing decisions to support the achievement of Sustainable Development Goals and relevant national and international frameworks.

HUDCO shall ensure that during the currency of its loan, the borrower shall comply with the Environmental, Health, Safety and Social (EHSS) norms. In order to ensure, HUDCO shall stipulate suitable conditions in the loan agreement/ sanctions for various facilities in clean energy financing.

In project funding, HUDCO shall ensure that prior to disbursement of facility, all provisions of applicable legislation and clearances as per the law of the land are obtained by the borrower.

#### (iii) Sustainable Waste Management

HUDCO has made significant contributions to waste management and its efficient disposal in the country through various initiatives. HUDCO has established a Waste Management Cell in 1994 to provide financial and technical assistance for integrated solid waste management systems. HUDCO has been and will continue to do handholding with its stakeholders in effective and scientific management of solid and liquid waste through its consultancy services and financing such projects with an aim to reduce, reuse, recycle waste for long term sustainability. This also includes the computation of vehicle capacity for waste collection and transportation, establishment of bio-methanation/RDF/

palletisation plants for energy recovery, and selection of composting plants for material recovery.

HUDCO has been extending soft loans / routing subsidies for waste to energy projects, including bagasse-based co-generation plants. These projects aim to minimize greenhouse gases and are funded under the initiative to achieve net zero carbon emissions. HUDCO shall continue to demonstrate its commitment to improving waste management practices and contributing to the overall sustainability and cleanliness of urban environments in India.

HUDCO is conscious of paper usage in its operation, transactions and communications. It shall continue to reduce paper consumption and push to go digital across services and product line through implementation of e-office system. Printing and photocopying operations by employees across offices shall also be regulated in order to achieve substantial reduction of paper usage.

Further HUDCO shall strive to reduce the use of all form of plastic in its office, branches as well as in its promotional, marketing and outreach events.

#### (iv) Green Financing mechanisms

With a view to promoting environmental sustainability and supporting renewable energy and climate-friendly initiatives, HUDCO envisages to mobilise resources, wherever required, through various green financing mechanisms such as Green Bonds, Green RIET, etc. The amount thus mobilised will be utilized for lending to green projects such as renewable energy, green building, water conservation and waste management, etc.

HUDCO also understands the potential of investment in green bonds thereby reflecting its commitment to the preservation of the environment, endorsing the use of renewable energy sources, and championing initiatives that are beneficial to the climate. Investing in green bonds will also allow HUDCO to diversify its investment portfolio and mitigate risks associated with climate change and environmental degradation. By supporting environmentally sustainable projects, HUDCO can reduce exposure to regulatory, reputational, and operational risks associated with unsustainable practices.

#### 3.2 Commitment to Social Goals

# (i) Sustainable, Inclusive and Affordable Social Housing:

As a premier techno-financing organisation, HUDCO's operations are guided by its Corporate Vision and Mission statements that highlight the organization's commitment to promote sustainable habitat development for enhancing the quality of life and transforming the lives of people.

HUDCO would continue to identify and support affordable (social) housing projects that would help to achieve environmental sustainability while improving the living conditions of the weaker sections of the community. The short term, long-term and supportive housing interventions, for homeless individuals and families, would have physical, social, and psychological benefits leading to greater empowerment and inclusion of the marginalized sections in society. HUDCO would also continue to be actively involved in the policy formulations and program implementation of the various action plan schemes of Government of India through the Ministry of Housing and Urban Affairs (MoHUA) through appraisal of the feasibility, viability, and sustainability of the projects and monitoring their progress and completion.

HUDCO has been conscious of its operations being sustainable in nature, ensuring that all housing projects financed or appraised by HUDCO are aligned with green features like energy efficiency, water conservation & waste management.

#### (ii) Initiatives under CSR

HUDCO's CSR Policy promotes socio-economic growth, empowerment of communities, capacity building, environment protection, promotion of green & energy efficient technologies and development of backward regions with a special focus on projects that benefit the marginalized and under-privileged sections of the society.

As part of this ESG policy, HUDCO's CSR initiatives will continue to focus on improving basic infrastructure facilities to enhance the quality of life for citizens, especially the poor and marginalized, and promoting inclusive growth, empowerment of communities, and environment protection through the development of green and energy-efficient technologies. HUDCO shall ensure that all CSR initiatives are pursued with focus on socially beneficial projects to reach a wide spectrum of beneficiaries.

#### (iii) Skill Development Campaigns across the country

HUDCO has been at the forefront through its constant support in upskilling the marginalized communities by offering opportunities to improve their employability quotient by providing need-based training for persons of different socio-economic backgrounds.

- Gender Action Plan (GAP): Under the SANKALP program, HUDCO has developed a GAP to promote and improve the participation of women in skill training.
- Digital Skills Training: Digital technologies offer opportunities for the economic empowerment of women and girls and therefore, in collaboration with partners, HUDCO has focused on bridging the digital skill gap among women from marginalized communities. This includes training in technical courses like Cloud

- and Data Analytics, Blockchain, Machine Learning, and Artificial Intelligence, as well as non-technical courses for holistic development.
- Collaborative Initiatives: Through collaborative efforts with NGOs and other organizations, HUDCO has supported skill training programs, production centres, and retail outlets that empower women economically.
- HUDCO initiated Skill upgradation training for women workers in the construction industry which improved their confidence and ability to take up works and contracts independently and get better wages thereby enabling to bridge the gender divide.

HUDCO supported skill development training programmes for manual scavengers and their dependents to make them self-reliant and enable them to take up jobs in any income generating industry, encourage self-employment. In line with the focus of Govt. of India on Skill development initiatives such as Karmayogi programme, etc. HUDCO shall make different skill training and capacity development activities through its dedicated Research & Training Institution, i.e. Human Settlement Management Institute (HSMI) for all concerned stakeholders in the habitat sector.

#### (iv) Social Impact Bonds/Loans

Social Impact Bonds (SIB) are the type of bonds where the bond issuer raises funds for projects that have some socially beneficial implications. Eligible social projects for HUDCO include affordable housing projects that benefit EWS, LIG, SC/ST and other vulnerable segments of the society, core urban infrastructure such as water supply, sanitation, solid waste management, roads, transport, etc. and social infrastructure projects such as educational institutions, health care infrastructure, etc. In view of HUDCO's business portfolio, HUDCO would explore raising resources through Social Impact Bonds (SIBs) and/or Social Loans, which is now increasingly being explored by Indian Financing Companies to secure financing that can support lending to poor and underserved segments of the population.

HUDCO has truly embraced the principles of equality across the spectrum, to curb and break through any social barriers that may pose as obstacles in our journey ahead. HUDCO shall ensure to continue to serve the nation with its unwavering dedication to achieve sustainable habitat development and transforming people's lives.

#### 3.3 Procurement Practices

HUDCO recognizes the need to work closely with our suppliers to reduce waste, improve efficiency, reduce carbon footprint and engage with them to understand their commitment towards human rights and labour practices. HUDCO shall thus continue to work towards greater integration of environmental & social considerations in our procurement practices. HUDCO shall make efforts to procure products which are: Recycled; Environment friendly; Energy efficient; and Locally sourced.

HUDCO shall also set clear expectations with vendors and suppliers to abide by labour laws, human rights and regulations in their regions of business. They are expected to adhere to laws addressing child, forced or trafficked labour.

#### 3.4 Creating Empowered Workforce

#### (i) Non-discrimination & Equal Opportunities

HUDCO recognizes the value of diverse workforce and is committed to create an inclusive work place and work culture in which all employees are treated equally with respect and dignity. HUDCO's Equal Opportunity Policy provides equal employment opportunities without any discrimination on the grounds of disability, caste, tribe, race, region, religion, marital status, beliefs, colour or sex and strives to promote an equitable workplace environment and shall not tolerate any misconduct based on these grounds. HUDCO recognises the value of each employee and provides an inclusive and positive work environment which foster growth and efficiency within its workforce. The Company shall ensure diversity and equal opportunities in workplace and upholds that career advancement is based on talent and performance.

#### (ii) Employee Ethics and Code of Conduct

To foster best Corporate Governance practices, the Company has formulated a "Code of Business Conduct and Ethics" for its Board Members and Senior Management which seeks to bring high level of ethics and transparency in managing its business affairs. HUDCO's code of conduct emphasizes the promotion of good corporate governance, professional ethics and norms that all employees of HUDCO must abide by at all times. HUDCO has and shall continue to have an absolutely no tolerance policy with regards to any misconduct or unethical form of behaviour that any employee may indulge in.

#### (iii) Employee welfare and benefits

HUDCO has been instrumental in practicing good corporate governance through building a productive and methodical relationship with its employees. The company acknowledges that in order for a corporate body to envision success in its operations and endeavours, there must be implementation of incentives and benefits in place for its employees to maximise the performance of the corporate body as a whole.

# (iv) Career progression & Employee Benefit

The Company shall continue to create an inclusive culture to ensure representation across gender, caste, creed, religion, region, physical ability and military/ veteran status. To encourage career development, help employees upskill, and improve their talent pool's overall quality, the Company has performance appraisal system, promotion policy and job rotation policy. HUDCO strives to align its HR practices with the best industry practices and at par with other CPSEs, such as, leave(s), HR policies, employee reward

system etc. HUDCO provides its employees with incentives and benefits like advances of loans on home, car, welfare, etc at low interest rates.

# (v) Employee Health & Well-being

HUDCO also strives to ensure that all its employees have access to the best policies related to health safety and overall well-being available in the industry. HUDCO shall continue its practice of creating awareness among its employees regarding various terminal diseases and its prevention methods through conducting seminars at all regional offices. HUDCO shall ensure that all of its employees regardless of their age and gender would receive health check-ups to ensure their physical wellbeing, and shall have access to appropriate health care and medical coverage. HUDCO shall conduct various recreational and team strengthening activities to further bolster the foundation of the company and embracing the concept of unity and to function as a single unit.

#### (vi) Women Safety

HUDCO has a Zero tolerance Policy on Prevention of Sexual Harassment (POSH) to create awareness and to address any violations in this regard and an Internal Complaints Committee (ICC) that investigates cases of sexual misconduct, if any and investigates them through a fair and transparent process and take action against erring employees. HUDCO shall continue to promote and protect the well-being of all women employees, especially women who are required to work late due to business requirements.

#### (vii) Training & Development

HUDCO is committed to investing in human capital to support continuous skill upgradation and employee development. HUDCO shall continue to supports business relevant upskilling of the workforce through trainings. Employee career development will be supported with periodic industry relevant upskilling programmes and by providing support to employees to pursue relevant courses or programmes offered by external institutions, wherever applicable.

HUDCO shall be committed towards providing an environment that is conducive to and promotes training and development opportunities to all employees.

#### (viii) Grievance Redressal

To promote fair and equitable employment relationship, a scheme for Grievance Redressal of employees is also in place which ensures a time bound redressal of grievances.

#### 3.5 Enhancing Customer Experience

Customer centricity is at the core of HUDCO's business ethos and value creation proposition. The Company is a NBFC offering financial products, hence it is ensured that adequate disclosures are made to its borrowers through Lease/loan agreements and

documentation; and through the corporate website. HUDCO, being a Non-Banking Finance Company (NBFC), has formulated its guidelines on Fair Practice Code according to the Master Circular-Fair Practice code issued by Reserve Bank of India (RBI), which sets out the fair lending practices to be followed with borrower.

Further, HUDCO's transparent and accessible grievances redressal mechanisms ensure addressing customer concerns and feedback and shall continue to sensitise its employees on prevention of miscommunication, financial protection of customers and customer data privacy.

HUDCO shall strive to provide best in class customer experience to exceed the customers' expectations & competition. Towards this end, the business division of HUDCO shall device a customer feedback form and ensure that such feedback forms are obtained from all large borrower at regular intervals.

### 3.6 Transparency & Accountability to Stakeholders

HUDCO acknowledges its responsibility to ensure that interests of all stakeholders are taken into consideration while taking decisions. The Company is committed to develop systems, processes and mechanisms to understand stakeholder expectations and concerns, and redress their grievances in a fair and constructive manner.

By means of the Whistle Blower Policy, HUDCO shall continue to empower and encourage various stakeholders including employees, customers, suppliers, vendors, shareholders and other stakeholders to bring to the notice of the company, any issue involving compromise/violation of our code of conduct/ethical norms, legal or statutory provisions without fear of reprisal, retaliation, discrimination or harassment.

#### 3.7 Commitment to Corporate Governance

HUDCO believes that high standards of corporate governance combined with ethical and transparent business processes leads to greater effectiveness and efficiency, and superior business outcomes. Our commitment towards following good Corporate Governance practices is based upon transparency, fairness, conscience, teamwork, professionalism and accountability. This paves the way for following the best standards and building confidence among our stakeholders, which is necessary to achieve our objectives.

To foster best Corporate Governance practices, the Company has formulated a "Code of Business Conduct and Ethics" for its Board Members and Senior Management which seeks to bring high level of ethics and transparency in managing its business affairs.

HUDCO shall meet all mandatory requirements and strive to meet most of the voluntary requirements on Corporate Governance which are in its ambit, as prescribed under the Companies Act, 2013, SEBI LODR Regulations, 2015, Guidelines on Corporate Governance for CPSE, 2010 issued by DPE Guidelines on Corporate Governance and Secretarial Standards issued by the Institute of Company Secretaries of India.

HUDCO's Code(s) of Conduct form(s) the foundation of HUDCO's commitment towards entrenching transparency, responsibility and accountability in business processes. HUDCO ensures Conduct, Discipline and Appeal (CDA) Rules, which define code of conduct for all employees; and recognizes acts of bribery, corruption etc. as misconduct. HUDCO shall remain committed to institute ethically sound principles through its Code(s) of Conduct that cover inter-alia money laundering, conflict of interest, insider trading, corruption, bribery, discrimination, confidentiality of information, anti-competitive practices, whistleblowing, community development and environmental protection.

HUDCO has implemented appropriate policies and procedures to assure highest standards of Information Technology (IT) security, cybersecurity and data privacy and is committed to upgrading IT governance, infrastructure and control mechanisms to adapt to the evolving technology and regulatory landscape. This shall be backed with robust business continuity plans and incident response procedures.

HUDCO shall also be committed to a fair, uniform and universal disclosure and dissemination of unpublished price sensitive information in compliance with all applicable laws. Accordingly, the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ensures disclosure of events and occurrences that would impact price discovery in the market no sooner than credible and concrete information comes into being in order to make such information generally available.

HUDCO shall continue to adopt and adhere to the best recognized corporate governance practices. It shall adhere to ethical business practices and ensure compliance with all relevant laws, regulations and international standards. HUDCO shall implement robust risk management processes to identify, assess and mitigate all type of internal & external risks related to its business operations and regularly review and update its governance practices to ensure alignment with best practices and evolving regulatory requirements.

# 4 ESG Disclosures & Reports

The requisite disclosure and reporting as per Business Responsibility and Sustainability Reporting (BRSR) structure defined in SEBI circular dated 10 May 2021, or under various circulars/ guidelines/ directions issued by any governing body from time to time on a periodic basis, shall be ensured by the Company.

The policy framework will be reviewed on need basis to ensure its continuing suitability, adequacy, and effectiveness. The Chairman & Managing Director is authorized to approve minor modifications in this policy and such changes, as may be required in order to comply with the applicable / amended provisions of law or to comply with any direction, circular etc. issued by the Regulator(s); and to settle any issue with respect to interpretation of this policy.

The actions in respect of the above focus areas mentioned in this policy shall be coordinated by concerned Division as indicated at Annexure-I and will be reported to the management.

HUDCO shall be committed to embedding ESG principles into its corporate culture and business operations, and will work towards achievement of desired goals while adhering to this ESG policy and delivering value to its stakeholders and the nation.

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#### **Annexure -I**

# **Concerned Wings/Departments for reporting of ESG Policy**

Focus Areas	Concerned Wing
<ul> <li>3.1. Climate Change Strategy:</li> <li>Energy and Emissions</li> <li>Green Energy/Energy Efficiency Initiatives</li> <li>e-Waste</li> </ul>	Estate Management / Administration/ IT
3.2 Environmental & Social Risk Management	Operations
3.3 Procurement Practices	Administration
<ul> <li>3.4 Creating Empowered Workforce</li> <li>Non-Discrimination, Fair Treatment and Equal Opportunity</li> <li>Career Progression &amp; Employee Benefit</li> <li>Employee Health &amp; Well-being</li> <li>Employee Ethic &amp; Code of Code of Conduct</li> <li>Women Safety</li> <li>Training &amp; Development</li> <li>Grievance Redressal</li> </ul>	HR/HSMI
3.5 Enhanced Customer Experience	Operations
3.6 Community and Society	CSR
3.7 Transparency & Accountability to Stakeholders	Vigilance/Internal Audit/CS/Compliance /Risk Management
3.8 Corporate Governance	CS/IT