

# ESG Incident Occurrences Policy

Version – 1.0



ESG INCIDENT  
OCCURRENCES  
POLICY





## ESG Incident Occurrences Policy

### 1. Purpose

To establish a comprehensive process for monitoring and managing controversies, misconduct, penalties, incidents, accidents, and breaches against the company's codes of conduct/ethics. This policy ensures that all such occurrences are identified, reported, investigated, and resolved in a timely and effective manner.

### 2. Scope

This policy applies to all employees, contractors, subcontractors, and stakeholders involved in the company's operations. It covers all types of ESG-related occurrences, including environmental, social, and governance issues.

### 3. Objectives

To identify and report ESG-related occurrences promptly.

To investigate and resolve these occurrences effectively.

To implement corrective and preventive measures to prevent recurrence.

To ensure compliance with regulatory requirements and industry best practices.

To promote transparency and accountability in ESG performance.

### 4. Definitions

**ESG Occurrence:** Any event, situation, or behaviour that negatively impacts the environment, social conditions, or governance practices, including controversies, misconduct, penalties, incidents, accidents, and breaches against codes of conduct/ethics.

**Incident Reporting System:** A system or platform used for reporting, tracking, and managing ESG occurrences.

### 5. Monitoring and Reporting

#### 5.1. Identification of Occurrences

##### Training and Awareness

Regularly train employees and contractors to recognize potential ESG occurrences, including controversies, misconduct, penalties, incidents, accidents, and breaches of codes of conduct/ethics.

**Vigilance:** Encourage proactive identification and reporting of potential ESG occurrences by all staff members.

## 5.2. Reporting Channels

**Multiple Channels:** Provide various channels for reporting ESG occurrences, including hotlines, online reporting platforms, and in-person reporting mechanisms.

**Anonymous Reporting:** Ensure the availability of anonymous reporting options to protect whistleblowers.

**Immediate Reporting:** Mandate immediate reporting of ESG occurrences upon discovery, regardless of perceived severity.

## 6. Incident Investigation

### 6.1. Initial Assessment

**Severity Assessment:** Conduct an initial assessment to evaluate the severity and potential impact of the occurrence.

**Stakeholder Notification:** Notify relevant stakeholders, including senior management and regulatory bodies, if required.

### 6.2. Investigation Process

**Investigation Team:** Form a team with appropriate expertise to investigate the occurrence thoroughly.

**Data Collection:** Collect all relevant information and evidence related to the occurrence.

**Root Cause Analysis:** Perform a root cause analysis to identify underlying issues that led to the occurrence.

### 6.3. Documentation

**Incident Report:** Prepare a comprehensive incident report detailing the findings, including the root cause, impact, and recommended corrective actions.

**Record Keeping:** Maintain detailed records of all occurrences and investigations for compliance and future reference.

## 7. Corrective and Preventive Actions

### 7.1. Immediate Response

**Mitigation Measures:** Implement immediate measures to mitigate the impact of the occurrence.

**Communication:** Communicate immediate actions to all relevant parties to prevent further damage.

### 7.2. Long-term Solutions

**Corrective Actions:** Develop and implement long-term corrective actions to address the root causes of the occurrence.

**Policy Updates:** Update policies and procedures as necessary to prevent recurrence.

### 7.3. Preventive Measures

**Training:** Conduct additional training to address gaps identified during the investigation.

**Monitoring and Auditing:** Enhance monitoring and auditing processes to detect potential issues early.

## 8. Communication and Reporting

### 8.1. Internal Communication

Regular Updates: Provide regular updates to management on the status and resolution of ESG occurrences.

Employee Briefings: Inform employees about the occurrence and the actions taken to address it, as appropriate.

### 8.2. External Communication

Regulatory Reporting: Report occurrences to relevant regulatory authorities as required by law.

Stakeholder Engagement: Communicate with external stakeholders, including customers, investors, and the community, about significant ESG occurrences and the actions taken to resolve them.

## 9. Roles and Responsibilities

### 9.1. Board of Directors

Provide oversight and ensure the effective implementation of the ESG Incident Occurrences Policy.

Review and approve significant incident reports and corrective actions.

### 9.2. Executive Management

Ensure resources are allocated for effective incident management and resolution.

Integrate ESG incident management into overall business strategy.

### 9.3. ESG Committee

Develop and implement policies and procedures for managing ESG occurrences.

Monitor incident reports and ensure timely and effective resolution.

### 9.4. Incident Response Team

Conduct investigations and develop corrective and preventive actions.

Prepare detailed reports and maintain comprehensive records.

### 9.5. Employees and Contractors

Report ESG occurrences promptly using the established channels.

Participate in training and comply with policies and procedures related to ESG occurrences.

## 10. Continuous Improvement

### 10.1. Lessons Learned

Regularly review occurrences and incorporate lessons learned into policies and procedures.

Share insights and best practices across the organization to prevent recurrence.

## 10.2. Feedback Mechanism

Establish a system for receiving feedback on the incident management process and making necessary improvements.

Encourage a culture of continuous improvement and learning.

## 10.3. Audits and Reviews

Conduct regular audits of the incident management process to ensure effectiveness and compliance.

Review and update the policy periodically to reflect changes in regulations, standards, and organizational practices.

## 11. Compliance and Enforcement

### 11.1. Regulatory Compliance

Ensure all incident management activities comply with applicable laws, regulations, and standards.

### 11.2. Internal Controls

Implement robust internal controls to safeguard the integrity of incident management processes.

### 11.3. Enforcement

Address non-compliance with the policy through corrective actions, which may include additional training or disciplinary measures.

## Conclusion

This ESG Incident Occurrences Policy is essential for managing ESG occurrences effectively, mitigating risks, and promoting a culture of transparency and accountability. By adhering to this policy, the company can enhance its ESG performance, ensure regulatory compliance, and build trust with stakeholders.