

## ENVIRONMENTAL & SOCIAL (E&S) POLICY AND MANAGEMENT PLAN

TIEA Connectors Private Limited

Plot No:SPL-4, Kanakapura, Industrial Estate, Kanakapura, Karnataka 562117  
Ramanagara, Karnataka

Effective Date: 01-08-2025

Version: 1.0

Approved by: Board of Directors

### PART A – ENVIRONMENTAL & SOCIAL (E&S) POLICY

#### 1. Purpose

This Environmental and Social (E&S) Policy sets out TIEA Connectors Private Limited's commitment to sustainable and responsible manufacturing operations. It reflects our belief that environmental protection, occupational health & safety, and social responsibility are integral to achieving business excellence and long-term stakeholder value.

#### 2. Scope

This Policy applies to all business operations of TIEA Connectors Private Limited, including injection molding, high-speed stamping, machining, tool manufacturing, and assembly activities at the Ramanagara facility. It extends to employees, contract workers, visitors, and all third parties acting on behalf of TIEA.

#### 3. Guiding Principles and Compliance Framework

TIEA Connectors commits to operate in accordance with applicable national laws and international good practices, including but not limited to:

- Environmental Protection Act, 1986; Water and Air (Prevention & Control of Pollution) Acts;
- Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016;
- Factories Act, 1948, and Occupational Safety, Health & Working Conditions Code, 2020;



- IFC Performance Standards on Environmental and Social Sustainability (2012);
- World Bank Group Environmental, Health, and Safety (EHS) Guidelines for General and Metal/Plastic Manufacturing.

#### 4. Policy Objectives

1. Prevent, minimize, and control adverse environmental impacts arising from TIEA's activities.
2. Promote efficient use of resources including raw materials, water, and energy.
3. Protect employee health and safety through proactive risk management.
4. Foster fair labor practices, inclusion, and community well-being.
5. Ensure continuous improvement through monitoring, audits, and corrective actions.

#### 5. Environmental Policy Commitments

- **Pollution Prevention:** Implement process controls, ETP operation, and air emission control systems to meet statutory limits.
- **Resource Efficiency:** Continuously improve energy and water efficiency through audits and optimization of machinery and utilities.
- **Waste Management:** Segregate hazardous and non-hazardous wastes, ensure authorized disposal, and promote recycling of scrap metal and plastics.
- **Chemical Safety:** Maintain Material Safety Data Sheets (MSDS), provide appropriate PPE, and conduct regular chemical handling training.
- **Climate Impact Reduction:** Explore cleaner technologies, renewable energy adoption, and carbon footprint reduction measures.

#### 6. Social Policy Commitments

- **Occupational Health & Safety:** Maintain safe workplaces, conduct risk assessments, safety audits, and emergency drills in line with IFC EHS Guidelines.
- **Labor and Working Conditions:** Uphold freedom of association, prohibit child or forced labor, ensure fair wages, equal opportunity, and a non-discriminatory environment.
- **Grievance Mechanism:** Maintain a confidential grievance redressal system accessible to all employees and contractors.
- **Community Engagement:** Engage with surrounding communities on safety, employment, and social impact issues; contribute to community development initiatives.
- **Training and Capacity Building:** Provide E&S and safety awareness programs across all employee levels annually.



## 7. Governance and Responsibilities

- The **Managing Director** has overall accountability for E&S performance.
- The **E&S Officer** is responsible for implementation, reporting, and compliance with IFC and local standards.
- **Department Heads** ensure operational adherence and awareness among their teams.
- All employees share responsibility for adhering to this Policy.

## 8. Review and Disclosure

This Policy shall be reviewed annually or in response to significant regulatory or operational changes. A summary of E&S performance and key metrics will be disclosed to investors and stakeholders annually.

## PART B – ENVIRONMENTAL & SOCIAL MANAGEMENT PLAN (ESMP)

### 1. Purpose of the ESMP

The ESMP translates the E&S Policy into actionable programs to manage environmental and social risks, establish controls, assign responsibilities, and ensure continuous monitoring and improvement in line with IFC Performance Standards and World Bank EHS Guidelines.

### 2. E&S Risk Identification and Mitigation Framework

E&S Aspect / Risk	Potential Impact	Mitigation / Management Measures	Responsibility	Monitoring / Frequency
Air Emissions (DG sets, compressors)	Air pollution, GHG emissions	Ensure emission control devices, PUC certificates, quarterly stack monitoring	Maintenance Head / E&S Officer	Quarterly
Effluent / Wastewater	Soil and groundwater contamination	Maintain ETP, monitor pH and discharge quality, ensure zero untreated discharge	E&S Officer	Monthly



Hazardous Waste (oils, solvents, plating chemicals)	Soil/water contamination, worker exposure	Label, store, and dispose through KSPCB-authorized recyclers, maintain manifests	Stores Dept / E&S Officer	Monthly
Energy Consumption	High carbon footprint	Conduct annual energy audit, install efficient compressors, optimize lighting	Maintenance / E&S Officer	Annual
Water Consumption	Depletion of resource	Install meters, rainwater harvesting, leak prevention	Maintenance	Monthly
Occupational Health & Safety	Accidents, injuries	Regular risk assessments, PPE, first aid, emergency plans, mock drills	HR & EHS	Monthly
Fire & Emergency Preparedness	Injury, property loss	Maintain extinguishers, hydrant, signage, conduct quarterly drills	Admin Dept	Quarterly
Labor Practices	Unfair employment, grievances	Equal opportunity, anti-harassment policy, grievance committee	HR Dept	Annual
Community Relations	Complaints, social impact	Maintain grievance register,	Admin / HR	Biannual



proactive  
engagement

### **3. Monitoring and Reporting**

- Maintain a legal compliance register and E&S performance metrics dashboard.
- Conduct internal E&S audits twice a year and third-party audits annually.
- Submit quarterly compliance and monitoring reports to senior management.
- Report any major environmental or safety incidents to regulators within statutory timelines.

### **4. Training and Awareness**

All employees, contract workers, and supervisors will undergo EHS induction and refresher training annually. Toolbox talks shall be conducted weekly on waste handling, PPE, and safety protocols.

### **5. Emergency Preparedness and Response**

The Company shall maintain a documented Emergency Response Plan covering fire, chemical spills, accidents, and natural disasters, consistent with IFC and local EHS guidelines. Emergency contact lists, evacuation maps, and assembly points shall be prominently displayed.

### **6. Grievance Redressal Mechanism**

A formal grievance mechanism shall be available to employees, contractors, and community members. Complaints will be recorded, investigated, and resolved within 30 working days. Escalations shall be reviewed by the E&S Officer and reported to management.

### **7. Continuous Improvement and Review**

- Conduct annual management review of E&S performance indicators (energy, emissions, accidents, grievances).
- Benchmark against IFC Performance Standards and World Bank EHS indicators.
- Update ESMP annually or upon major process or regulatory change.

