

SUSTAINABLE PROCUREMENT POLICY



Sustainable Procurement Policy

Purpose: At Transrail Lighting Limited (TLL), we recognize that procurement plays a vital role in sustainability across our operations. This policy outlines our commitment to responsible sourcing by promoting ethical, environmental, socially & lawfully sound procurement practices throughout our supply chain.

Scope: This policy applies to all procurement and sourcing activities undertaken by TLL, including (but not limited to) those related to engineering, civil infrastructure, electrical systems, and manufacturing operations. It extends to all suppliers, contractors, subcontractors, and service providers (collectively referred as partners) engaged in our offices, plants, and projects across domestic and international locations.

Guiding Principles: TLL adopts the following principles to support sustainable procurement:

- **Environmental Responsibility:** TLL shall seeks to minimize environmental impacts by preferring materials, products, and services that support resource efficiency, waste reduction, emission control, and responsible material sourcing. TLL shall commit to encourage eco-friendly transportation packaging by using lightweight, recyclable or compostable materials during transit and requiring our suppliers to adopt returnable or reusable packaging wherever possible to minimize single-use waste and support circular logistics.
- **Social Responsibility:** TLL shall promotes fair labour practices, safe and healthy working conditions, diversity, inclusion, and respect for human rights across our supply chain.
- **Ethical Business Practices:** TLL shall engages with partners that uphold integrity, transparency, and legal compliance in their business operations, with zero tolerance for bribery, corruption, or fraud.
- **Whole-Life Value:** TLL shall consider the total cost and value of ownership, including quality, performance, sustainability, and long-term impacts during partner selection and evaluation.
- **Local and Inclusive Sourcing:** TLL shall encourage opportunities for local partners, micro and small enterprises, and socially inclusive businesses wherever practical and economically feasible.

Implementation Approach: TLL shall adopt a structured and progressive approach to sustainable procurement through the following steps:

- Integrate sustainability considerations into procurement planning, partners on boarding, and contract terms.

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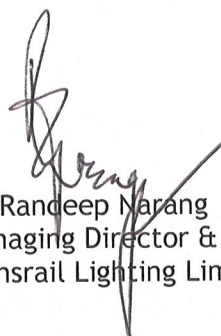
- Encourage and support partners to continuously improve their sustainability performance through engagement.
- Use sustainability criteria in partner assessments and selection processes.
- Regularly review procurement practices to align with emerging trends and stakeholder expectations.
- Progressively implement the use of e-procurement platforms with secure audit trails to enhance transparency, traceability, and accountability in procurement processes.
- Encourage and support partners to adopt internationally recognized management systems, such as:
 - **ISO 14001:** Environmental Management Systems
 - **ISO 45001:** Occupational Health & Safety
 - **ISO 9001:** Quality Management Systems
- TLL aims to strengthen its procurement framework by aligning with recognized regulatory and industry-leading sustainability standards

Monitoring and Improvement: To monitor progress and drive continuous improvement, TLL will define and track measurable KPIs, including but not limited to:

- % of procurement spend on local or MSME suppliers
- Frequency and score of third-party sustainability audits for critical suppliers

TLL expects all supply chain partners to work towards alignment with its principles. Self-assessments, due diligence checks, and performance reviews shall be used to support ongoing improvement and ensure consistency with this policy.

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