BIODIVERSITY POLICY

OF

APOLLO PIPES LIMITED

Version	Revision Date	Approved by	Date of Approval
1st Version		Board of Directors	26.10.2023
2nd Version	05.11.2026	Board of Directors	05.11.2026

BIODIVERSITY POLICY

Introduction

Apollo Pipes Limited ('The Company') recognizes biodiversity as a critical component of environmental sustainability and long-term business resilience and its significance of conserving biodiversity for the mutual benefit of its business and the broader community. In line with this commitment, Apollo Pipes endeavors to identify and enact suitable measures throughout its operations and supply chains, fostering collaborative partnerships with stakeholders.

The Company is in its dedication to implementing a robust Biodiversity Management Framework that aligns with the principles set forth in the Convention on Biological Diversity (CBD, 1992). By adhering to this framework, the Company aims to play a role in preserving and sustainably managing biodiversity, demonstrating its environmental stewardship responsibility, and advocating for a harmonious co-existence with the natural world.

Scope

This Policy applies to:

• All manufacturing plants, warehouses, yards, and project locations.

• All employees, contractors, suppliers, and business partners.

• Activities involving land use, construction, expansion, material handling, and waste management.

Objectives

- Ensure strict compliance with biodiversity-related laws and regulations;
- Perform comprehensive assessments to identify and evaluate biodiversity risks and associated ecosystem services arising from current and future activities;
- Strive for no net loss of biodiversity in locations where biodiversity risks are present;
- Implement the mitigation hierarchy by avoiding, minimizing, restoring, and, when necessary, offsetting any remaining impacts on biodiversity;
- Refrain from operating in critical habitats and ecologically sensitive areas.
- Prohibit the introduction of potentially invasive, non-native species and actively work toward eradicating them within operational sites;

- Develop and execute Biodiversity Management Plans with clear targets and action plans to support the conservation of species, habitats, and ecosystems within operational areas;
- Organize Earth Day programs and encourage employees to plant saplings;
- Engage and collaborate with key biodiversity stakeholders to incorporate their knowledge, perspectives, and guidance for inclusive biodiversity management;
- Allocate appropriate resources to effectively manage biodiversity at the Company's sites; and
- Monitor, review, and assess biodiversity performance against measurable targets to drive continuous improvement and transparently communicate the outcomes.

Governance and Oversight

Biodiversity risk is treated as an environmental and ESG risk under the Company's sustainability and risk management framework.

- The Board / designated Board Committee provides oversight on environmental and biodiversity-related risks.
- Senior Management is responsible for ensuring effective implementation of this Policy.
- Site Heads and OHS teams are accountable for site-level biodiversity management.
- Periodic reviews of biodiversity risks and mitigation actions shall be undertaken and reported to management.

Roles & Responsibilities

The leadership at Apollo Pipes plays a pivotal role in the execution and supervision of the Biodiversity Policy. Their responsibilities encompass establishing unambiguous guidelines, resource allocation, and the enforcement of biodiversity laws. The management incorporates biodiversity factors into decision-making processes, establishes measurable objectives, and facilitates the formulation of Biodiversity Management Action Plans. They are committed to promoting awareness, engaging stakeholders, monitoring performance, and transparently reporting on these efforts. Furthermore, they ensure that the Company's operations do not encroach upon or operate in proximity to protected or reserved forests, reaffirming their dedication to biodiversity preservation.

Biodiversity Management Principles

The Company is committed to the following principles:

- Avoidance: Prevent biodiversity loss by avoiding operations in ecologically sensitive or protected areas where feasible.
- Minimisation: Reduce unavoidable impacts through design, technology, and operational controls.
- Restoration: Restore disturbed areas through progressive reclamation and rehabilitation.
- Conservation: Protect native flora and fauna and promote ecosystem resilience.

Biodiversity Assessment and Planning

Biodiversity assessments shall be conducted, where relevant, prior to new projects, expansions, or major land-use changes.

- Site-specific biodiversity management plans may be developed based on risk and ecological sensitivity.

- The Company shall strive to achieve a net positive impact on biodiversity by minimizing adverse impacts, restoring ecosystems where feasible, and supporting initiatives that contribute to measurable improvements in biodiversity outcomes.

Zero Deforestation and Responsible Land Use

The Company commits to a zero-deforestation approach.

- No operations shall knowingly contribute to forest clearing, habitat degradation, or conversion of high conservation value (HCV) or high biodiversity areas.
- Suppliers and contractors are expected to align with responsible land-use practices.

Protection of Flora, Fauna, and Ecosystems

Priority shall be given to conservation of native and indigenous species.

- Keystone species, protected species, and species of local community importance shall be safeguarded.
- Reclamation and greenbelt development shall preferentially use native plant species.
- The Company commits not to undertake operations, exploration, mining or drilling within UNESCO World Heritage Sites or protected areas classified under IUCN Protected Area Management Categories I-IV, subject to applicable law and recognised boundary information

Monitoring, Data, and Continuous Improvement

Biodiversity-related data and observations shall be monitored, documented, and reviewed periodically.

- The Company shall adopt appropriate technologies and global best practices to enhance biodiversity management.
- Collaboration with experts, local authorities, and community stakeholders may be undertaken to strengthen outcomes.

Supply Chain and Third party Expectations

Contractors and suppliers operating on Company premises must comply with this Policy.

• Biodiversity and environmental expectations may be incorporated into supplier agreements.
• Non-compliance may result in corrective action or disengagement.

Awareness, Training and Compliance

• Awareness on biodiversity protection shall be promoted among employees and contractors.
• All personnel are expected to comply with this Policy and site-level guidelines.
• Violations may attract disciplinary action as per Company policies.

Policy Review

This Policy shall be reviewed periodically or upon material changes in operations or regulations. Updates shall be approved by appropriate authority.