

Business Responsibility Report

Introduction:

At Reliance Industrial Infrastructure Limited (RIIL or the Company), sustainability is being viewed as being socially cognizant that delivers stakeholder expectations. This Business Responsibility Report is one of the avenues to communicate the Company's obligations and performance to all its stakeholders for Financial Year (FY) 2018-19. This Report conforms to the Business Responsibility Reporting requirement of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the 'National Voluntary Guidelines (NVG) on Social, Environmental and Economic Responsibilities of Business' released by the Ministry of Corporate Affairs, India. This report describes activities of the Company under each of the nine principles as outlined in the NVGs. The nine principles are as follows:

Principle 1 (P1) ETHICS, TRANSPARENCY AND ACCOUNTABILITY

Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

Principle 2 (P2) PRODUCT LIFE CYCLE SUSTAINABILITY

Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle

Principle 3 (P3) EMPLOYEES' WELL-BEING

Businesses should promote the well-being of all employees

Principle 4 (P4) STAKEHOLDER ENGAGEMENT

Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalised

Principle 5 (P5) HUMAN RIGHTS

Businesses should respect and promote human rights

Principle 6 (P6) ENVIRONMENT

Businesses should respect, protect, and make efforts to restore the environment

Principle 7 (P7) POLICY ADVOCACY

Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner

Principle 8 (P8) INCLUSIVE GROWTH

Businesses should support inclusive growth and equitable development

Principle 9 (P9) CUSTOMER VALUE

Businesses should engage with and provide value to their customers and consumers in a responsible manner

Section A: General Information about the Company

1. Corporate Identity Number (CIN) of the Company:

L60300MH1988PLC049019

2. Name of the Company: Reliance Industrial Infrastructure Limited

3. Registered Address:

NKM International House, 5th Floor, 178 Backbay Reclamation, Behind LIC Yogakshema Building, Babubhai Chinai Road, Mumbai - 400 020, India

4. Website: www.riil.in

5. E-mail id: investor_relations@riil.in

6. Financial Year Reported: 2018-19

7. Sector(s) that the Company is engaged in (industrial activity code-wise):

The Company is engaged in the business of providing infrastructural facilities and support services, namely, transportation of petroleum products and water through

pipelines, operating construction machinery on hire and other support services.

Industrial Group*	Description
493493049300	Product Transportation Services
439439043900	Hiring of Construction Machineries
6202620962099	IT Support Services

*As per National Industrial Classification – The Ministry of Statistics and Programme Implementation

8. List three key products / services that the Company manufactures / provides (as in balance sheet):

- Product Transportation Services
- Hiring of Construction Machineries
- IT Support Services

9. Total number of locations where business activity is undertaken by the Company:

- Number of international locations (provide details of major 5): Nil
- Number of national locations: 4 locations

10. Markets served by the Company – local/state/national:

The Company carried out business activities in four locations viz:

- a) In Maharashtra - Mumbai, Raigad (Patalganga)
- b) In Gujarat – Surat (Hazira), Jamnagar

Section B: Financial Details of the Company

- 1. **Paid-up capital (INR):** 1,510 lakh
- 2. **Total turnover (INR):** 9,909.38 lakh
- 3. **Total profit after taxes (INR):** 779.03 lakh
- 4. **Total spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%):** 6.42%
- 5. **List of activities in which the CSR expenditure have been incurred:**
Promoting health care including preventive healthcare.

Section C: Other Details

1. Subsidiary Company/ Companies

The Company does not have any subsidiary company.

2. Participation of subsidiary company / companies in the Business Responsibility (BR) Initiatives of the parent company

Not applicable

3. Participation and percentage of participation of other entity/entities (e.g. suppliers and distributors, among others) that the Company does business with, in the BR initiatives of the Company

The Company engages with several stakeholders like customers, suppliers, local communities, government and other entities in the value chain. The Company collaborates with all relevant stakeholders as part of its BR initiatives. Considering the spread of the Company's value chain, at present, the number of entities which directly participate in the BR initiatives would be more than 60%.

Section D: BR Information

1. Details of Director/Directors responsible for BR

a) Details of the Director responsible for the implementation of the BR policy/policies

- **DIN Number:** 00011789
- **Name:** Shri Dilip V. Dherai
- **Designation:** Executive Director

b) Details of the BR head

Sl. No.	Particulars	Details
1	DIN Number (if applicable)	00011789
2	Name	Shri Dilip V. Dherai
3	Designation	Executive Director
4	Telephone Number	+91 22 4475 2310
5	Email id	dilip.dherai@riil.in

2. Principle-wise as per National Voluntary Guidelines (NVGs) BR Policy/Policies (Reply in Y/N)

Sl. No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have policy/policies for	Y	Y	Y	Y	Y	Y	Y	Y	Y
2	Has the policy been formulated in consultation with relevant stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
3	Does the policy conform to any national / international standards? If yes, specify. (The policies are based on NVG, in addition to conformance to the spirit of international standards like ISO 9000, ISO 14000, OHSAS 18000, UNGC guidelines and ILO principles)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4	Has the policy been approved by the Board? If yes, has it been signed by the MD/Owner/CEO/ appropriate Board Director?	Y	Y	Y	Y	Y	Y	Y	Y	Y
5	Does the Company have a specified committee of the Board/ Director/ Official to oversee the implementation of the policy?	Y	Y	Y	Y	Y	Y	Y	Y	Y
6	Indicate the link to view the policy online?	Please refer page no. 40 for links to these policies.								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	The Company has communicated its above referred policies to key internal stakeholders. Besides, the BR policies are also being communicated through this report. The above referred policies are also available on website of the Company.								
8	Does the Company have in-house structure to implement its policy/ policies?	Yes, the Board of Directors and its Committees are responsible for the implementation of BR policies of the Company.								
9	Does the Company have a grievance redressal mechanism related to the policy/policies to address stakeholders' grievances related to policy/ policies?	Yes, any grievance or feedback related to the policies can be sent to investor_relations@riil.in. The Board of Directors /the Committees is responsible for addressing stakeholder grievances related to BR policies.								
10	Has the Company carried out independent audit/ evaluation of the working of this policy by an internal or external agency?	The BR policy is evaluated internally. Policies pertaining to health, safety and environment have been audited by external agencies, viz. Petroleum and Natural Gas Regulatory Board approved agency, International Certification Services.								

Business Responsibility Report

Links

Corporate Social Responsibility Policy

http://www.riil.in/pdf/csr_policy.pdf

Code of Business Conduct and Ethics

http://www.riil.in/pdf/RIIL_CodeBusiness_Conduct.pdf

Code of Conduct and Ethics - Values and Behaviours

<http://www.riil.in/pdf/code-of-conduct-and-ethics-of-employee.pdf>

Vigil Mechanism and Whistle Blower Policy

<http://www.riil.in/pdf/whistle-blower-policy-oct2016.pdf>

Health, Safety and Environment Policy

<http://www.riil.in/pdf/health-safety-and-environment-policy.pdf>

3. Governance related to BR

a) Frequency with which the Board of Directors, Committee of the Board or CEO need to assess the BR performance of the Company

The Board of Directors assesses the Company's BR performance on an annual basis.

b) Publication of Business Responsibility Report; frequency and link for viewing this report

This is the Third Business Responsibility (BR Report published by the Company. The BR Report forms part of Annual Report of the Company and may also be accessed on the Company's website: http://www.riil.in/investor_relations_downloads.html

Section E: Principle-wise Performance

PRINCIPLE 1 – ETHICS, TRANSPARENCY AND ACCOUNTABILITY BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH ETHICS, TRANSPARENCY AND ACCOUNTABILITY

1. Coverage of Policy relating to Ethics, Bribery and Corruption (e.g. joint ventures, suppliers, contractors and NGOs, among others)

The Company has a defined Code of Business Conduct and Ethics. This Code covers the Company and is applicable to all Directors, Management Personnel and employees. The Code of Conduct serves as a roadmap to all Directors and employees of the Company across all levels and grades for conducting business in accordance with the highest standards of business ethics and complying with applicable laws, rules and regulations. The Company has adequate control measures in place to address the issues relating to ethics, bribery and corruption in the context of appropriate policy.

2. Stakeholder complaints received in the past financial year and percentage of complaints satisfactorily resolved by the management

The Company received 06 investor complaints from its shareholders during FY 2018-19, which were promptly resolved. No complaint was outstanding as on 31st March, 2019. Save and except the above, no complaint was received from any other stakeholders.

PRINCIPLE 2 – PRODUCT LIFE CYCLE SUSTAINABILITY

BUSINESSES SHOULD PROVIDE GOODS AND SERVICES THAT ARE SAFE AND CONTRIBUTE TO SUSTAINABILITY THROUGHOUT THEIR LIFE CYCLE

1. List up to 3 products or services whose design has incorporated social or environmental concerns, risks and/or opportunities

The following are the services whose design have incorporated social and environmental concerns:

a) Product transportation through pipelines having Supervisory Control and Data Acquisition (SCADA) and Leak Detection system (LDS)

SCADA installed on pipeline, monitors the operation parameter with real time data, as well as ensures that all safety interlocks for pumps and valves as well as of pipelines operation are active all the time. In case of emergency, pipeline operating pumps will be stopped from Remote locations and affected pipeline section will be isolated, to ensure minimum product loss thus enhancing the safety in pipeline operation and minimum damage to environment.

LDS provide the comfort of online monitoring of any leak from pipeline as well as identifying the leak locations on real time basis. This will help to handle the emergency in shortest possible response.

b) Regular security surveillance to ensure safe operation and environment protection

Regular Security Surveillance with foot patrolling on pipeline route by Security and Surveillance team, ensures that no third party activities are carried out on pipeline right of use, which can result in pipeline damage. Guard Tracking system is installed to monitor the movement of guards on pipeline through GPS tracking, this ensures the fool proof surveillance of pipeline.

2. For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product (optional):

a) Reduction during sourcing/production/ distribution achieved since the previous year throughout the value chain?

b) Reduction during usage by consumers (energy, water) has been achieved since the previous year?

As an infrastructural facilities and support services provider, the operations of the Company require minimal energy consumption. Continuous efforts are being made to reduce the consumption of energy viz. use of low energy consuming LED lights being encouraged at workplace, upgradation of anode beds for reducing power requirement of Cathodic Protection system, conversion of Gas Operated Sectionalising valves to motor operated by installing smart actuators for better reliability, installation of online corrosion monitoring system on pipelines etc. New technology TR units replaced in CP stations to achieve the reduction in energy consumption by 20%.

3. Procedures in place for sustainable sourcing (including transportation)

The Company is in the business of providing infrastructural facilities and support services and as such does not source any materials from outside for carrying out its business activities.

4. Steps taken to procure goods and services from local and small producers, including communities and capability building initiatives, undertaken for local and small vendors

The Company is in the business of providing infrastructural facilities and support services which includes product transportation, hiring of construction machineries and IT support services. The Company strives to establish effective business relationship with local industry. The Company has deployed local vendors and contractors for maintenance of pipeline infrastructure, commutation, house-keeping and horticulture contracts.

5. Mechanism to recycle products and waste

The Company is in the business of providing infrastructural facilities and support services which does not generate any significant waste products.

**PRINCIPLE 3 – EMPLOYEES WELL-BEING
BUSINESSES SHOULD PROMOTE THE WELL-BEING OF ALL EMPLOYEES**

1. Total number of employees

Total number of employees is 100 as on 31st March, 2019.

2. Total number of employees hired on temporary/ contractual / casual basis

Considering nature of work, the Company hires employees / labourer on temporary / contractual / casual basis from time to time. As on March 31, 2019, there were no temporary / contractual / casual employees.

3. Number of permanent women employees

Total number of permanent women employees is 03 as on 31st March, 2019.

4. Number of permanent employees with disabilities

Total number of permanent employees with disabilities is 01 as on 31st March, 2019.

5. Employee association that is recognized by management

The Company respects the right of employees to free association and union representation. During the year under review, there was no employee association in the Company.

6. Percentage of permanent employees that are members of recognized employee association

Not applicable

7. Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year

No case of child labour, forced labour, involuntary labour, sexual harassment and discriminatory employment was reported during the FY 2018-19. The Company has formed Internal Complaints Committee for various work places

to address complaints pertaining to sexual harassment in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013.

8. Percentage of permanent employees that were given safety and skill up-gradation training in the previous year

Safety is of paramount importance to the Company. The Company considers employee training and development as an essential element of people strategy. The Company's contractual employees receive mandatory safety training before entering the premises and also get on-the-job training through the contractor.

The employees receive training through classroom as well as web-based training (WBT) programmes.

The Training and Development Program undertaken by the Company during FY 2018-19 were as under:

- Safety Training: 24 hours/ Employee
- Skill upgradation: 12 hours (WBT)/ Employee
- Others: 16 hours (WBT)/ Employee
- Competency Assurance system completed for asset facing employees. (29 people)
- Safety Culture change training imparted
- Fire training: 8 hours

100% of Permanent employees were given the above training.

**PRINCIPLE 4 – STAKEHOLDER ENGAGEMENT
BUSINESSES SHOULD RESPECT THE INTERESTS OF, AND BE RESPONSIVE TOWARDS ALL STAKEHOLDERS, ESPECIALLY THOSE WHO ARE DISADVANTAGED, VULNERABLE AND MARGINALISED**

1. Internal and external stakeholders mapping

The Company has mapped its internal and external stakeholders. The key categories and their medium of engagement is as under:

Stakeholder	Medium of Engagement
Government and Regulatory/ Administrative Authorities	Industry Bodies, Forums, Associations
Directors	Meetings, Performance Evaluation, Familiarisation Programmes, Telephonic Interactions
Employees	Meetings, Employees Training and Development Program
Customers	Customer Meet, Customer Survey, Personal / Telephonic Interactions
Local community	Visits and Camps
Investors and Shareholders	Annual General Meeting and Annual Report
Suppliers	Site Visit and Personal / Telephonic Interactions
NGOs	Site Visit and Telephonic Discussions

Business Responsibility Report

The Company believes that stakeholder engagement process is necessary for achieving its sustainability goal. Stakeholder engagement helps in better understanding of the perspectives on key issues and builds a strong relationship with them. The Company seeks timely feedback and response through formal and informal channels of communication to ensure that the stakeholder information remains updated.

2. Identification of the disadvantaged, vulnerable and marginalised stakeholders

The Company has identified the disadvantaged, marginalized and vulnerable stakeholders, through the team which engages with the like-minded government and nongovernment stakeholders, including universities, research institutions, hospitals, government departments and banks, among others.

3. Special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof

The Company, through Reliance Foundation, has undertaken initiatives for promoting healthcare including preventive healthcare for the disadvantaged, vulnerable and marginalised stakeholders. For specific details, please refer to the Report on Corporate Social Responsibility activities for the FY 2018-19 annexed to the Board's Report.

PRINCIPLE 5 – HUMAN RIGHTS

BUSINESSES SHOULD RESPECT AND PROTECT HUMAN RIGHTS

1. Coverage of the Company's Policy on Human Rights to the Company and its extension to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others

The Company seeks to conduct business in a manner that respects the human rights and dignity of people. The Company's code of conduct demonstrates its commitment towards the preservation of human rights across the value chain. The Company believes that a sustainable organisation rests on ethics and respect for human rights. The Company promotes awareness of the importance of respecting human rights within its value chain and discourages instances of abuse. The Company has established a vigil mechanism for employees and directors to report concerns about unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct. The Vigil Mechanism is supervised by an 'Éthics & Compliance Task Force' comprising a member of the Board and senior executives as members. The Company has formed Internal Complaints Committee for various work places to address complaints pertaining to sexual harassment in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013.

2. Receipt of Stakeholder complaints in the past financial year and what percentage was satisfactorily resolved by the management

There were no complaints reported from any stakeholders for breach of Human Rights during FY 2018-19.

PRINCIPLE 6 – ENVIRONMENT

BUSINESSES SHOULD RESPECT, PROTECT AND MAKE EFFORTS TO RESTORE THE ENVIRONMENT

1. Coverage of the policy related to Principle 6 to the Company and its extension to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others

The Company believes in safeguarding the environment while executing its operations. To this effect, it takes every effort towards environmental conservation. The Company's Health Safety and Environment Policy aims that protection of the environment is of paramount importance. The Company ensures to do business with minimal environmental impact that aims at the rational use of natural resources and reduced waste and emissions.

The Company also adheres to the Environmental Policy of Reliance Industries Limited, a major stakeholder, which addresses issues related to Group companies, Joint ventures, suppliers, contractors and customers.

2. The Company's strategies/initiatives to address global environmental issues, such as climate change, global warming and more

The Company adheres to all legal requirements and norms of energy conservation and other environmental conservation standards stipulated by the Government of India. The Company has implemented prescribed parameters pertaining to safety, environment and sustainability arising out of review of its pipeline performance carried out during the last financial year and the same was found satisfactory.

3. Identification and assessment of potential Environmental Risk

Regular assessment of the environmental risks and mitigation strategies are undertaken by the Company. The Company has systems in place that ensure continuous monitoring of potential environmental risks involved in its operations. Environmental audits are carried out regularly, which helped in identifying potential risks and necessary corrective actions are taken to mitigate the same. Periodic audits conducted as part of these management systems which helped the Company to identify potential risks at its locations.

4. Company's initiatives towards clean development mechanism

Keeping in view its nature of operations, the Company has not identified any project towards Clean Development Mechanism.

5. The Company's initiatives on – clean technology, energy efficiency and renewable energy, among others

The Company uses clean technology in an efficient manner for its business operations. Please refer Energy Conservation, Technology Absorption section of the Board's Report included in this Annual Report for further details.

6. Reporting on the emissions/waste generated by the Company as per the permissible limits given by CPCB/SPCB

There is no manufacturing process involved in Company's operational activities. Transportation of petroleum products and water through underground pipelines does not generate any hazardous waste or emission. However procedures are in place to mitigate the accidental release of the products and communication of all such incidences to the governing authorities. Efficient control equipment and robust procedures help the Company to meet the applicable environmental standards continuously. Half yearly compliance being submitted to local governing authorities and Ministry of Environment and Forest.

7. Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year

No show cause / legal notices received from CPCB/SPCB during FY 2018-19.

PRINCIPLE 7 – POLICY ADVOCACY

BUSINESSES, WHEN ENGAGED IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A RESPONSIBLE MANNER

1. Representation in any trade and chamber/association

The Company is a member of Jawaharlal Nehru Port Trust (JNPT) Liquid Chemical Berth Users Association, which is formed for the purpose of providing a platform to coordinate and represent the users with various authorities like JNPT and Tariff Advisory of Major Port.

2. Advocacy / Lobbying through above Associations for the advancement or improvement of public good

The Company has been active in the above named Association and advocates on various issues which affects the industry and consumers.

PRINCIPLE 8 – INCLUSIVE GROWTH

BUSINESSES SHOULD SUPPORT INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

1. Specified programmes/initiatives/projects by the Company in pursuit of the policy related to Principle 8

The Company's Corporate Social Responsibility (CSR) Policy is framed pursuant to Section 135 of the Companies Act, 2013. The Company's CSR objective is to promote a comprehensive

and integrated development through social and economic transformation. The Company has, *inter-alia*, identified following areas in which it may engage for its CSR activities:

- Addressing identified needs of the underprivileged through initiatives directed towards promoting health, including preventive health care;
- Environmental sustainability and ecological balance;
- Any other activity falling within the scope of Schedule VII to the Companies Act, 2013.

During FY 2018-19, the Company's initiatives were focused towards promoting health care including preventive health care, through Reliance Foundation, the Implementing Agency.

2. Modes through which programmes/ projects undertaken (through in-house team/ own foundation/ external NGO/ Government Structures/ any other organisation)

The Company has been carrying on its CSR programs / activities through Reliance Foundation since past five years. In this connection, the contributions made by the Company to Reliance Foundation have been utilized for promoting health care including preventive health care. The Company's initiative has good coverage, both in terms of scale as well as impact. The focus is on enhancing outreach to the Society's marginalised and underprivileged sections.

For specific details, please refer to the Report on Corporate Social Responsibility activities annexed to the Board's Report.

3. Impact assessment of initiative

There is an internal process to periodically monitor and evaluate the impact of CSR programs of the Company. The internal monitoring process deals with each specific program as and when the program is identified.

The outcome of such monitoring and evaluation processes are used for making informed decisions. The progress on the Company's CSR initiatives is periodically reviewed by the CSR Committee of Directors and the Company's Board of Directors. The Company continuously endeavours to enhance its existing systems and processes to assess the impact (social/ economic and developmental) through its various initiatives.

4. Company's direct contribution to community development projects

During FY 2018-19, the Company has spent ₹ 50.00 lakh on community development initiatives i.e. Promoting Health Care including preventive health care.

5. Steps undertaken to ensure that community development initiatives are successfully adopted by the Community

Engagement with the community helps in identifying needs of the stakeholders and leads to greater sense of ownership among the people, ensuring sustained outcomes. Their

Business Responsibility Report

capacities are built through multiple training programmes to make them self-sufficient and capable of managing the programme even in the absence of a third party. The Company continues to support initiatives to provide medical care needs necessary for the community. Multiple interactions are held with communities through meetings, meetings with local administration and officials from the line departments to understand the primary necessities. The Company encourages regular feedback from the beneficiaries to continuously improve facilities and specialised services in locations where there is a demand.

PRINCIPLE 9 – CUSTOMER VALUE

BUSINESSES SHOULD ENGAGE WITH, AND PROVIDE VALUE TO THEIR CUSTOMERS AND CONSUMERS IN A RESPONSIBLE MANNER

1. Percentage of customer complaints/consumer cases pending as on the end of financial year

The Company's main customers are Reliance Industries Limited and its group companies. The Company proactively interacts with its customers to understand their requirements and concerns and find ways and means to address their concerns, requirements and improve their satisfaction level.

During FY 2018-19, no complaint was received from any of the customers.

2. Product information and product labelling

The Company is into the business of providing infrastructural facilities and support services viz. transportation of petroleum products and water through its underground pipelines, hiring

of construction machineries and providing IT support services and as such does not require to display any such information. The petroleum transportation pipelines are marked with all the details of contact address and telephone number. This supports in passing the information in case of any problem to the pipeline.

3. Case filed by any stakeholder against the Company regarding Unfair Trade Practices, irresponsible advertising and/or Anti-Competitive behaviour during the last five years and pending as on end of the financial year

No such case has been filed against the Company.

4. Consumer survey/consumer satisfaction trends carried out by the Company

As mentioned hereinabove, Reliance Industries Limited and its group companies are the main customers of the Company. Customer satisfaction is significant for the Company as it ensures the Company's overall reputation in the geographies it operates in.

To understand its customers better, the Company follows several modes of engagement. Such modes include customer audits, customer surveys, direct feedback taken by visiting managers/plant personnel and site visits organised for customers. These modes help the Company to understand customer requirements, satisfaction levels and customer behaviour. The Company also conducts one-to-one meetings with its customers to enable efficient communication and resolve specific needs/concerns.