HEALTH, SAFETY AND ENVIRONMENTAL (HSE) POLICY

Version	Approval Date	Approving Authority
Version V1	21st March 2022	Board of Directors - Approved at group level for both holding and subsidiary company
Version V2	4th and 5th August 2023	Board of Directors - Approved at group level for both holding and subsidiary company
Version V3	2nd November 2023	Board of Directors - Approved at group level for both holding and subsidiary company
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1. **Preamble**

Vivriti Capital Limited (VCL) ('the Company') is public limited company registered under Companies Act, 2013. VCL is also registered with the Reserve Bank of India as a Non-Deposit taking Systemically Important Non-Banking Finance Company (NBFCs-ND-SI) and its debt securities are listed with Bombay Stock Exchange.

Vivriti Asset Management Private Limited ("VAM"), is an investment manager to fixed-income Alternative Investment Funds registered with Securities and Exchange Board of India (both VCL & VAM hereinafter together shall be referred as "Vivriti").

Vivriti is committed to conduct their operations with the utmost regard for the health, safety, and environmental well-being of employees. This Health, Safety & Environmental (HSE) Policy reflects Vivriti's dedication to maintaining a safe and sustainable workplace while adhering to all applicable laws and regulations. Vivriti strives to foster a culture where HSE is integrated into the core values and every employee takes responsibility for their actions to ensure a healthy, safe and environmentally responsible organization.

2. **Scope**

This Policy applies to Vivriti's entire operations, full-time employees, contractual/temporary employees, and all individuals under Vivriti's supervision (including customers, clients, and other third parties).

3. **OHS Management System**

Adhering to good practices in alignment with national & international standard requirements (including ISO 45001) and applicable legal & regulatory requirements, Vivriti has developed an effective OHS Management System that encompasses – the Health, Safety & Environmental (HSE) Policy; implementation of HSE initiatives, prioritization and action plans; oversight of the assessment & management of HSE risks as a shared responsibility among the Facility & Administration Teams, the Human Resources Teams & the Sustainability & Impact Team; conducting required trainings and communication programs among others as stipulated below:

   a. **Compliance:** Vivriti complies with all relevant national & international health and safety laws, regulations and industry standards applicable to our business, and also ensures compliance with voluntary programs and/or collective agreements on Occupational Health & Safety.

   b. **Health & Safety Culture:** As a financial institution, Vivriti's business activities do not constitute exposure to health & safety related risks and hazards. However, Vivriti is committed to employee good health & wellbeing. A vigilant management team ensures the workplace has zero occurrence of any unsafe/high risk health & safety incidents, while also ensuring effective identification, management and immediate intervention/mitigation of health & safety risks.

   c. **Employees' participation & consultation:**
      i   Training and Awareness: Vivriti follows a consultative & participative approach through HSE trainings and awareness sessions for its employees around potential health & safety risks, safe work practices, health & wellbeing, etc. Vivriti adopts measures to promote physical & mental wellbeing of employees through various health and wellness programs. Regular fire safety mock drills are conducted, and health check-up sessions & yoga sessions organized for employees.

   d. **Regular review:** Vivriti is committed to the continuous improvement of its OHS management system through regular reviews and improvements of HSE practices & initiatives. This process

is based on the feedback received from employees, observations made by responsible teams, best practices, legal & regulatory requirements, and stakeholder needs & expectations.

e. **Resources:** Vivriti ensures provision of adequate resources to implement targeted HSE practices & initiatives.

4. Workplace Safety – Prioritization & Action Plan

Employees have to strictly adhere to established safe work practices and procedures to prevent safety risks (including injuries and accidents).

4.1 Emergency Preparedness

- As a financial institution, Vivriti's activities do not comprise of health & safety related risks and hazards. Fire risk is a potential/relevant safety risk, and Vivriti ensures its workplaces are equipped with required and mandatory fire safety measures. Emergency response plans and evacuation procedures have been established, communicated and practiced for pro-active addressal of any potential fire emergencies.

4.1.1 Fire Emergency

- Evacuation Drills are conducted mandatorily atleast once every calendar year at all office locations. After each drill, the Facilities and the Admin team, in collaboration with key site representatives conducts a debriefing session to evaluate the effectiveness of the emergency response program. Feedback from this debrief are communicated across site representatives to improve future emergency preparedness.
- The Facility and the Admin Team is responsible for arranging and ensuring the maintenance of emergency equipment, which includes fire extinguishers, sprinklers, hose reels, fire and smoke alarms, emergency signage, lighting, and other specific emergency equipment. Marshals or wardens have been appointed at respective offices or branches and have been trained in emergency operations, fire safety, and first aid practices.
- The Facility and the Admin Team has to ensure that all emergency equipment, including fire safety equipment, is in working condition at all times. Necessary actions will be taken to address any misses or observations identified during annual maintenance exercises and mock drills. The Team also needs to submit a report to the Company's MD on inspection conducted and observations made, along with the remedial measures and actions taken.
- Vivriti ensures its offices are located in buildings that have been designed to prevent fire hazards with fire preventive measures: emergency exit corridors, stairwells, and our offices have also installed fire sprinklers, fire alarms and fire extinguishers.
- In the event of a fire, employees are required to:
  - Assist any person in immediate danger, if safe to do so
  - Notify marshals / wardens of the emergency
  - Call the fire brigade
  - Follow the marshals / wardens' evacuation instructions to assemble at points identified as refuge areas
  - Remain at assembly points to ensure everyone is accounted for
- Fire Prevention is the primary and most crucial approach. Employees are expected to:
  - Report any faulty electrical switches or exposed wiring promptly
  - Refrain from using faulty electronic appliances
  - Be aware of the locations of fire exits and placement of firefighting equipment
  - Familiarize themselves with evacuation assembly points
  - Follow instructions from fire wardens during emergencies

- o Fire preventive maintenance procedure is carried out quarterly by the assigned vendor
- o Form B with all declarations and annexures is submitted bi-annually

4.1.2 Weather Extremes & Climate Shocks

- Vivriti's office locations are not based in climate vulnerable regions, and hence not susceptible to frequent weather extremes/climate shocks. However, Vivriti is cognizant of the climate emergency, and importance of implementing climate adaptation & resilience measures. Detailed emergency preparedness plan & business continuity plan has been developed as part of Vivrit's Climate Adaptation Plan. Refer Vivriti's climate reports.

4.1.3 Public health emergency

- Vivriti will comply with mandatory national public health guidelines when such situation arises. The health & safety of employees is a top priority for Vivriti, and adequate measures & provisions will be implemented to support the health & wellbeing of employees:
  - o Work from home provisions
  - o Adoption of required quarantine measures
  - o Health insurance
  - o Disease free workplaces through effective hygiene & cleaning measures

5. Employee Health & Wellbeing – Prioritization & Action Plan

Vivriti has an active front desk that responds to health and safety emergencies, and Health and Safety officers who act promptly. Sick employees are encouraged to take sick leaves and recuperate. The HR, Admin & S&I Teams organize health and wellbeing programs for all employees. The Admin Team organises safety programs like fire safety mock drills and communicates relevant information on occupational health and safety through email communications.

5.1 Medical Emergency

In the event of a medical emergency, the Facility and Administration Team has to assist the employees with the below-

- Ambulance availability 24/7 at our Mumbai location (by the builder) and arrangements made for 'on call ambulance support' for Chennai location
- Assist with first aid procedure where required
- Assist the employee with emergency to the wellness room
- Do not attempt to move the person unless they are in immediate danger
- Provision of wheelchair is provided at all locations

6. Environmental Protection – Prioritization & Action Plan

Vivriti ensures compliance with all applicable environmental laws, regulations & standards, and strives to minimize its negative environmental impacts. Various environmental initiatives have been implemented as outlined below:

6.1.1 Renewable Energy

The Mumbai Office is powered by 100% renewable energy. Wherever feasible, green power tariff or renewable energy procurement will be adopted by Vivriti for its other offices.

6.1.2   Energy Efficiency

Energy conserving LED & sensor lighting, and energy efficient BEE star-rated electronic appliances (split air-conditioners, refrigerators, etc.) have been installed in all offices. The buildings in Chennai and Mumbai also have ETA-branded chiller systems and energy-efficient central air-cooling. The offices are located in buildings that are designed ergonomically with maximum usage of daylight and lesser dependence on artificial lighting. These measures help in minimizing energy consumption and indirect GHG emissions from Vivriti's operations.

6.1.3   Water Conservation

Sustainable water management practices have been deployed across offices to ensure water conservation and efficiency. Low flow fixtures with aerators are installed in the washrooms and cafeteria.

6.1.4   Waste Management

E-waste: Vivriti partners with e-waste recycling companies to manage and dispose e-waste collected from all offices. The recycling companies further segregate electronic components from the e-waste that can be reused, recycled, and remarketed. The hazardous part is safely stored, handled and disposed off in an environmentally friendly manner.

Food Waste: Vivriti ensures negligible food waste through adequate quantity of daily food orders that are supplied to the Chennai & Mumbai offices. Any food remaining is then distributed amongst the house keeping staff or donated.

Paper Waste: Energy efficient electric hand dryers have been installed near wash basins in washrooms and cafeteria to reduce usage of paper napkins. Also, Vivriti has transitioned to an all-digital documentation process, hence reducing paper consumption.

6.1.5   Green Building Occupancy

Vivriti's leased office headquarters in Chennai is in a LEED Gold certified green building that is compliant with the Energy Conservation Building Code (ECBC) and has mandatory health and safety features installed for the building occupants. The Chennai Office has also been certified as IGBC 'Green Interiors – Gold'. Wherever feasible, Vivriti will ensure to operate out of green buildings & green office spaces.

7.   Risk measurement – Prioritization & Action Plan

Incident Reporting and Investigation: Vivriti ensures active vigilance of HSE risks through the involvement of various departments to identify & address relevant risks:

i   All health & safety related risks are reported to & addressed by the Human Resources & Facility & Administration departments.

ii   All environmental related risks are reported to & addressed by the Sustainability & Impact department (including collaboration with the Facility & Administration department whenever required).

Cases involving high/severe HSE risks are thoroughly investigated & appropriate remedial measures applied through targeted Corrective Action Plans (CAPAs). Vivriti 'Incident Reporting Form' has been developed to record & investigate high HSE risk cases. Refer 'Incident Reporting Form' in Annexure-II.

8. **HSE Governance & Responsibilities**

The oversight of the assessment & management of HSE risks are a shared responsibility among the Facility & Administration Teams, the Human Resources Teams & the Sustainability & Impact Team.

Vivriti's HSE initiatives are developed around a cooperative and consultative approach, involving its employees and applying continuous improvement measures for the safety and wellbeing of its people and environment. Creating a safe & healthy work environment also requires all staff to prioritize their own well-being, including mental health, and ensure their actions don't harm others. Moreover, every employee has to adhere to mandatory compliance with the company's health & safety procedures and instructions (including trainings and workshops).

Vivriti shall ensure, as far as reasonably practicable:

- Adequate resources are allocated to support the implementation framework of the HSE Policy
- Clear and defined workplace health and safety responsibilities are communicated to relevant personnel
- Effective communication and consultation channels are established, fostering engagement with key stakeholders on safety matters
- Systems are in place to identify and address work health and safety issues promptly
- All measures leading to workplace safety as per this policy will be followed

8.1.1 Management's Role

The endorsement of the implementation of the HSE policy and practices will be overseen by HR, Facility & Admin teams, and S&I Team. The company is deeply committed to workplace health and safety, striving to provide adequate initiatives and facilities for employees. To achieve this, the company will engage in consultation, cooperation and coordination of activities to achieve the desired health and safety outcomes.

The Chief Human Resources Officer (CHRO) will be responsible for matters concerning employees' conduct and behavior related to health & safety; the Head of Facility and Admin for all HSE infrastructure upkeep, maintenance, and safety standards, and the Head of S&I for monitoring & reporting of HSE practices & cases. These designated individuals at the executive management level will be the highest endorsing decision-making body for all HSE matters, and they shall ensure proper management of the organization's health and safety practices.

8.1.2 Employees' Responsibilities

All employees are responsible for following HSE policies, procedures, and guidelines to ensure a safe and sustainable workplace.

- Exercise reasonable care for their own safety
- Ensure that their actions or omissions do not harm the health and safety of other
- Follow reasonable instructions from the IBL (Institute/Business/Company) to adhere to fire and safety rules applicable to the jurisdiction
- Adhere to the health and safety policies or procedures that have been implemented

8.1.3 Third Party's Responsibilities

All third parties are to comply with the HSE requirements stipulated in the Vendor Code of Conduct & Vendor Management Policy.

9. **Training and Awareness**
   - HSE Training: Employees are briefed on all comprehensive HSE practices during the induction trainings focusing on safe work culture, and practices & initiatives designed for employees' health, safety and wellbeing.
   - Awareness Campaigns: Regular communication and awareness campaigns on HSE matters and topics are conducted to reinforce the importance of HSE practices and commitment.

10. **Performance Measurement and Reporting**
    - Regular HSE inspections of existing health & safety practices will be conducted to identify areas for improvement.
    - Appropriate and immediate remedial actions will be taken to address identified high risk HSE issues, which will be frequently monitored to prevent its recurrence.
    - All HSE related measures and disclosures will be reported in Vivriti's sustainability reports – HSE initiatives, measurement & monitoring of HSE risks & issues, grievance redressal and remedial actions undertaken, etc.

    - HSE Targets:
      - Ensure 100% employee attendance in all fire mock drills/trainings that are conducted at the office premises
      - Ensure 100% employee participation in all health and wellness programs

11. **Non-Compliance and Consequences**

Non-Compliance: Non-compliance with HSE policies and procedures will be subject to strict disciplinary action.

Annexure-I: Reference Frameworks

➢ **ISO 45001**

ISO 45001 is an international standard for Occupational Health and Safety (OH&S) Management Systems (OHSMS), providing a framework for organizations to manage workplace risks and improve OH&S performance. It focuses on creating a safe and healthy work environment for employees and visitors by preventing work-related injuries and illnesses.

Key aspects of ISO 45001:

- Risk management:
  The standard requires organizations to identify, assess, and control occupational health and safety risks, including those related to hazards and their potential consequences.

- Legal compliance:
  ISO 45001 helps organizations meet legal and regulatory requirements related to occupational health and safety.

- Continuous improvement:
  The standard promotes a culture of continuous improvement in OH&S practices, encouraging organizations to regularly review and update their management systems.

- Leadership and worker participation:
  ISO 45001 emphasizes the importance of top management commitment and the active participation of workers in OH&S initiatives.

- Organizational context:
  The standard encourages organizations to understand their external and internal environment, including stakeholders, legal requirements, and organizational culture, to ensure their OH&S system is relevant and effective.

- Structured framework:
  ISO 45001 follows the Plan-Do-Check-Act (PDCA) cycle, providing a structured approach to implementing and improving an OHSMS.

- Alignment with other standards:
  The structure of ISO 45001 aligns with other ISO standards, such as ISO 9001 (quality management) and ISO 14001 (environmental management), making it easier for organizations to implement a combined management system.

Annexure-II: HSES Incident Reporting Form

To record and investigate accidents involving injury, damage, or environmental harm that have occurred either on company premises or during business activities.

DETAILS OF THE ACCIDENT OR INCIDENT	
Report no.	
Date & Time:	
Location of incident:	
Type of incident: *(Please specify the nature of incident whether its health and safety related, social related or environment related as per the reference table)*	• Health and safety related (Ref table 1.0) • Social related (Ref table 2.0) • Environment related (Ref table 3.0)
Description of the incident/ accident – (Attach photographs if necessary)	

1. **Health accidents and incidents**

Health related cases	Write 'Yes' where applicable	Health incidents	Write 'Yes' where applicable
Bone fracture		Contact with electricity	
Amputation of arm, hand, finger, thumb, leg, foot or toe or other body parts		Contact with machinery	
Blinding or permanent sight reduction		Lifting and handling injuries	
Serious burns		Exposed to fire	
Loss of consciousness caused by head injury or asphyxia		Exposed to explosion	
Injuries associated with working in an enclosed space leading to hypothermia or heat-induced illness, lack of breath		Exposed to a harmful substance (Radiation)	
Others (please specify): (Note: Refer the illustrative list of cases outlined in Appendix-I)		Slipped trip or fall on the same level	
Did the injured person:		Drowned	
i) become unconscious or needed only first aid?		Struck by an object	
ii) sustain an injury which required them being taken straight to hospital?		Struck by a moving vehicle by something moving, flying or falling	
iii) remain in hospital for 24 to 48 hours?		Trapped by something collapsing	
iv) due to the incident become unable to work for 3 -6 days		A dangerous occurrence (e.g. a near-miss) which could have been serious.	
v) due to the incident became unable to work for more than 7 days		An occupational disease arising out of the routine exposure to hazardous work (e.g. respiratory diseases, cancer, skin disease)	
Provide a detailed description of incident/s			

➢ **Details of any injured**

Relation to the organization: ▪ Staff (If staff specify Job Title)   ▪ Visitor   ▪ Contractor   ▪ Others (specify)
Incident details:

Was the injury covered under insurance?	
Details of expenses covered:	
Details of Witnesses:	

2. Social accidents and incidents

Social Cases	Write 'Yes' where applicable
Discrimination (DEI - Diversity, Equity, and Inclusion)	
Unfair employment practices - Unequal pay for equal work	
POSH - Prevention of Sexual Harassment, GBVH - Gender-Based Violence and Harassment or any form of harassment	
Human Rights Violations - Forced/bonded labour, child labour, rights of vulnerable groups	
Involuntary Resettlement issues (IR) Indigenous People/Communities affected (IP) -Forced displacement of individuals or communities due to company projects or operation	
Data security and privacy concerns - Security breaches	
Any other social related incidents (Note- Refer the illustrative list of cases outlined in appendix)	
Provide a detailed description of incident/s	

3. Environment accidents and incident

Environment cases	Write 'Yes' where applicable
Environmental Non-Compliance Environmental violations – land/soil, air, water, biodiversity/nature, etc.	
Others (Please specify) (Note - Refer the illustrative list of cases outlined in Appendix-I)	
Provide a detailed description of incident/s	

Appendix-I: Illustrative list of Health, Social and Environment (HSE) risks & incidents

Cases	High Risk (Activities that significantly disrupt or halt business operations)	Medium Risk (Activities that slow down or partially impact business operations)	Low Risk (Activities that have minimal or no impact on business operations)
Health related cases	Fatal injuries or deaths due to accidents (e.g., falls, machinery malfunction, explosions)	Injuries requiring hospitalization or prolonged medical treatment (e.g., fractures, burns).	Minor injuries requiring first aid (e.g., small cuts, bruises)
	Severe illnesses caused by exposure to toxic substances or hazardous environments	Non-life-threatening illnesses caused by workplace exposure (e.g., respiratory problems).	Temporary discomfort or minor illnesses (e.g., heat stress, mild allergic reactions)
Social related cases	Prolonged strikes, sit-ins, or walkouts disrupting operations	Severe cases involving criminal charges or reputational damage	Minor employee grievances resolved internally
	Significant data leaks impacting employees, customers, or stakeholders	Issues like wage delays, lack of benefits	
Environment related cases	Non-compliance with environmental regulations leading to legal actions or shutdowns	Improper waste disposal practices requiring regulatory fines or interventions	Temporary environmental impact such as noise pollution or dust from construction activities

*This is an indicative list and may vary depending on the industry and nature of operations.