

HEALTH, SAFETY AND ENVIRONMENTAL POLICY

Version	Approval Date	Approving Authority
Version V1	21 st March 2022	Board of Directors - Approved at group level for both holding and subsidiary company
Version V2	4 th and 5 th August 2023	Board of Directors - Approved at group level for both holding and subsidiary company
Version V3	2 nd November 2023	Board of Directors - Approved at group level for both holding and subsidiary company
Version V4	7 th February 2024	Board of Directors - Approved at group level for both holding and subsidiary company
Version V5	9 th May 2024	Board of Directors - Approved at group level for both holding and subsidiary company

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”), a subsidiary of VCL, 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”).

At Vivriti, we are committed to conduct our operations with the utmost regard for the health, safety, and environmental well-being of our employees. This Health, Safety & Environmental (HSE) Policy reflects our dedication to maintaining a safe and sustainable workplace while adhering to all applicable laws and regulations. We strive to foster a culture where HSE is integrated into our core values and every individual 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, 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:** We shall comply with all relevant national & international health and safety laws, regulations and industry standards applicable to our business, and also ensure compliance with voluntary programs and/or collective agreements on Occupational Health & Safety.
- b. **Health & Safety Culture:** As a financial institution, our business activities do not constitute exposure to health & safety related risks and hazards. However, we are committed to the good health & wellbeing of all our employees. We have a vigilant management team that ensures our workplace has zero occurrence of any unsafe practices, while also ensuring effective identification, management and immediate intervention/mitigation of health & safety risks.
- c. **Employees’ participation & consultation:**
 - i Training and Awareness: In matters of HSE, we have adopted a consultative & participative approach through trainings and awareness sessions. We conduct relevant HSE trainings and awareness sessions for all employees on potential health & safety risks, safe work practices, measures for improving health & wellbeing, etc. We have adopted measures to promote physical and mental wellbeing of our employees through various health and wellness programs.
 - ii Incident Reporting and Investigation: Active vigilance by the management team of the HSE risks, along with the various implemented health & safety measures ensure prompt reporting of workplace incidents & accidents (if any), and thorough investigation & application of remedial measures.

- d. **Regular review:** We are committed to the continuous improvement of our OHS management system through regular reviews and improvements of our 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:** We ensure provision of adequate resources to implement HSE practices & initiatives.

4. Workplace Safety – Prioritization & Action Plan

Employees shall follow established safe work practices and procedures to prevent safety risks (including injuries and accidents).

4.1 Emergency Preparedness: Our activities do not comprise of health & safety related risks and hazards. However, our workplaces are equipped with required and mandatory measures. Emergency response plans and evacuation procedures have been established, communicated and practiced for pro-active addressal of any potential 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.

Our 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.

4.1.2 Emergency Procedures

Fire

- 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 Safety: Our offices are located in buildings that have been designed to prevent fire hazards through fire preventive measures: emergency exit corridors, stairwells, and our offices have also installed fire sprinklers, fire alarms and fire extinguishers.

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

5. Employee Health & Wellbeing – Prioritization & Action Plan

We have 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

We ensure compliance with all applicable environmental laws, regulations & standards, and strive to minimize our negative environmental impacts. We have adopted various environmental initiatives as outlined below:

6.1.1 Renewable Energy

We purchase renewable energy tariff for our Mumbai Office, which is powered by 100% renewable energy. Wherever feasible we will ensure to purchase a green power tariff or procure renewable energy.

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 our offices. The buildings in Chennai and Mumbai also have ETA-branded chiller systems and energy-efficient central air-cooling. We ensure that our 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 our operations.

6.1.3 Water Conservation

We will implement water-saving measures and manage water resources responsibly. We deploy sustainable water management practices to ensure water conservation and efficiency in our offices. Low flow fixtures with aerators are installed in our washrooms and cafeteria that help in less water consumption.

6.1.4 Waste Management

E-waste: We partner with e-waste recycling companies to manage and dispose e-waste collected from all our 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: We ensure negligible food waste in our offices through adequate quantity of daily food orders that are supplied to our offices in Chennai & Mumbai. Any food remaining is then distributed amongst the house keeping staff or donated.

Paper Waste: We have installed energy efficient electric hand dryers near wash basins in washrooms and cafeteria to reduce usage of paper napkins. Also, we have transitioned to an all-digital documentation process as a substitute for paper documentations.

6.1.5 Green Building Occupancy

Our 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. Wherever feasible, we will ensure to operate out of green buildings.

7. Risk measurement – Prioritization & Action Plan

HSE risks are swiftly identified and managed through the stringent measures adopted in the workplace. The HSE risk measurement & management also includes regular evaluation of issues and risks identified which are then prioritized for remediation and control measures. Once the identified hierarchy of controls are implemented, it is followed by constant monitoring and remediation by the responsible teams.

8. Responsibilities/ Governance

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 HSE issues and prevent its recurrence
- All HSE related measures and disclosures will be reported in our sustainability reports – HSE initiatives, measurement & monitoring of HSE risks & issues, grievance redressal and remedial actions undertaken
- Targets: Ensure 100% employee attendance in all fire mock drills that are conducted at the office premises

11. Non-Compliance and Consequences

Non-Compliance: Non-compliance with HSE policies and procedures will be subject to strict disciplinary action, which may lead to even termination.