

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

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.

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).

Health and Safety

General principles

- 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. Safety Culture: We will promote a safety-first culture by encouraging proactive hazard identification and taking appropriate measures to align with the health and safety laws
- c. Employees' participation & consultation:
 - a. Training and Awareness: In matters of HSE, we shall ensure a consultative & participative approach with all our employees. We will conduct relevant HSE trainings and awareness sessions of potential hazards and safe work practices for all our employees. We will include measures to promote physical and mental wellbeing of our employees through various health and wellness programs
 - b. Incident Reporting and Investigation: Any workplace incidents, accidents will be promptly reported, thoroughly investigated and measures will be taken to prevent recurrence by establishing prioritization & action plans.
- d. Regular review: We will conduct regular reviews of the HSE practices & initiatives implemented, legal & regulatory requirements, stakeholder needs & expectations
- e. Resources: We will ensure provision of adequate resources to implement HSE practices & initiatives

Workplace Safety

Employees shall follow established safe work practices and procedures to prevent injuries and accidents.

Emergency Preparedness: Emergency response plans and evacuation procedures will be established, communicated and practiced responding effectively to any potential emergencies.

Fire Emergency Evacuation Drill shall be conducted mandatorily atleast once every calendar year at all locations. After each drill, the Facilities and the Admin team, in collaboration with key site representatives, will conduct a debriefing session to evaluate the effectiveness of the emergency response program. Feedback from this debrief will be shared with site representatives to improve future emergency preparedness.

The Facility and the Admin department will be responsible for arranging and ensuring the maintenance of emergency equipment, which includes fire extinguishers, hose reels, fire and smoke alarms, emergency signage, lighting, and other specific emergency equipment. Marshals or wardens will be appointed at respective offices or branches and trained in emergency operations, fire safety, and first aid practices based on the staff strength and building structure.

The Facility and the Admin department will ensure that all emergency equipment, including fire safety equipment, remains in working condition at all times. Necessary actions will be taken to address any deficiencies or observations identified during annual maintenance exercises and mock drills. The department will submit a report on inspection and maintenance observations, along with the actions taken, to the CEO.

Emergency Procedures

Fire

- In the event of a fire, employees are required to:
- Assist any person in immediate danger, if safe to do so
- Close the door
- Notify marshals / wardens of the emergency
- Call the fire brigade
- Follow the marshals / wardens instruction to evacuate to the emergency assembly point identified refuge areas
- Remain at assembly points to ensure everyone is accounted for

Fire Safety: Fire prevention measures and fire-fighting equipment is provided and maintained to minimize fire-related risks.

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 electrical appliances
- Be aware of the locations of fire exits and firefighting equipment
- Familiarize themselves with evacuation assembly points
- Follow instructions from fire wardens during emergencies
- Fire planned preventive maintenance is carried out quarterly by the assigned vendor
- Form B with all declarations and annexures is submitted bi-annually

Medical Emergency

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

- Ambulance available 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

Environmental Protection

1. General principles

2. We will comply with all applicable environmental laws, regulations, and standards. We will strive to minimize our environmental impact and conserve resources. Green Building

Our Chennai office building is a green building compliant with Energy Conservation Building Code (ECBC) and has recently been inspected and audited for final IGBC & LEED certification. Wherever feasible we will ensure to operate out of green buildings.

3. Energy Efficiency

Energy conserving LED and sensor lighting and energy efficient BEE star-rated electronic appliances (split air-conditioners, refrigerators, etc.) have been installed in our offices. Wherever feasible we will ensure to purchase green power tariff.

4. 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.

5. Waste Management

E-waste: We will partner with E-Waste Recyclers to manage and dispose e-waste from all locations. The e-waste will be segregated into electronic components that can be reused, recycled, and remarketed. The hazardous part will be further safely stored in a warehouse and disposed off in an environmentally friendly manner.

Food Waste: We will ensure that there is negligible food waste in our offices by managing adequate quantity of food orders on a daily basis. Any food remaining will then be distributed amongst the house keeping staff or will be donated.

Paper Waste: We have installed energy efficient electric hand dryers near wash basins in washrooms and cafeteria to reduce usage of paper napkins.

Risk measurement

Risk assessment also includes regular evaluation of incidents that have occurred. Hazardous conditions present are identified and prioritized for elimination and control. Once the identified hierarchy of controls are implemented, the risk assessment is revisited to assess the residual risks.

Responsibilities/ Governance –

Vivriti's HSE program emphasizes a cooperative and consultative approach to health and safety, fostering continuous improvement. Creating a safe work environment requires all staff to prioritize their own well-being, including mental health, and ensure their actions don't harm others. Compliance with the company's health and safety procedures and instructions, including training, is essential.

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.

1. Management's Role:

Ensuring staff safety at the workplace is a fundamental principle of Vivriti. The HSE policy 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 care 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 will ensure proper management of workplace health and safety.

2. Employee 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 others.
- Follow reasonable instructions from the IBL (Institute/Business/Company) to adhere to fire and safety rules applicable to the jurisdiction.
- Cooperate with health and safety policies or procedures that have been communicated.

3. Third Party's Responsibilities:

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

Training and Awareness

- a. HSE Training: Comprehensive HSE training programs will be conducted for all employees in the induction outlining our work culture, safety features, employee wellbeing
- b. Awareness Campaigns: Regular communication and awareness campaigns will be conducted to reinforce HSE practices.

Performance Measurement and Reporting

- c. Regular HSE inspections for office safety will be conducted to identify areas for improvement.
- d. Appropriate actions will be taken to address identified HSE issues and prevent recurrence.
- e. Our environment and social initiatives along with the metrics will be measured and reported on an annual basis in the sustainability report.

Compliance and Consequences

Non-Compliance: Non-compliance with HSE policies and procedures will be subject to disciplinary action, up to and including termination.