

ENVIRONMENT, HEALTH & SAFETY (EHS) POLICY (Version – 3)

OBJECTIVES OF EHS POLICY

Vision Rx Lab Pvt. Ltd. recognizes employees as its most important asset and is committed to provide healthy and safe work conditions to all employees for or on behalf of the Company to prevent occupational injuries and ill health to any employee or its stakeholders. It will also protect the environment by making, handling, using, transporting, selling or disposing of products in a safe and environmentally sound manner to prevent pollution and minimise Hazardous waste.

The policy aims to provide

- total respect of local regulations and corporate rules,
- respect of the health and physical integrity of the personnel,
- respect of the environment.

Vision Rx Lab will strategically adopt and imbibe Environmental, Health and Safety (EHS) principles in our way of business. This is consistent with Vision Rx Lab global business ethics, values and interests.

RESPONSIBILITY

The responsibility to uphold and incorporate the EHS principles in the daily methodologies of the Company is the responsibility of each and every individual employees of the organisation and stakeholders of our Company.

Management's Responsibility: The Management will ensure compliance with the EHS policies and related statutes and legislations. It will formulate all necessary strategies and help implementing them in the organisation. Periodic Review meetings will be held for identification of objectives and targets and review of implementation and performance. Proper documentations as per statutes will be maintained by concerned authority.

EHS COMMITTEE

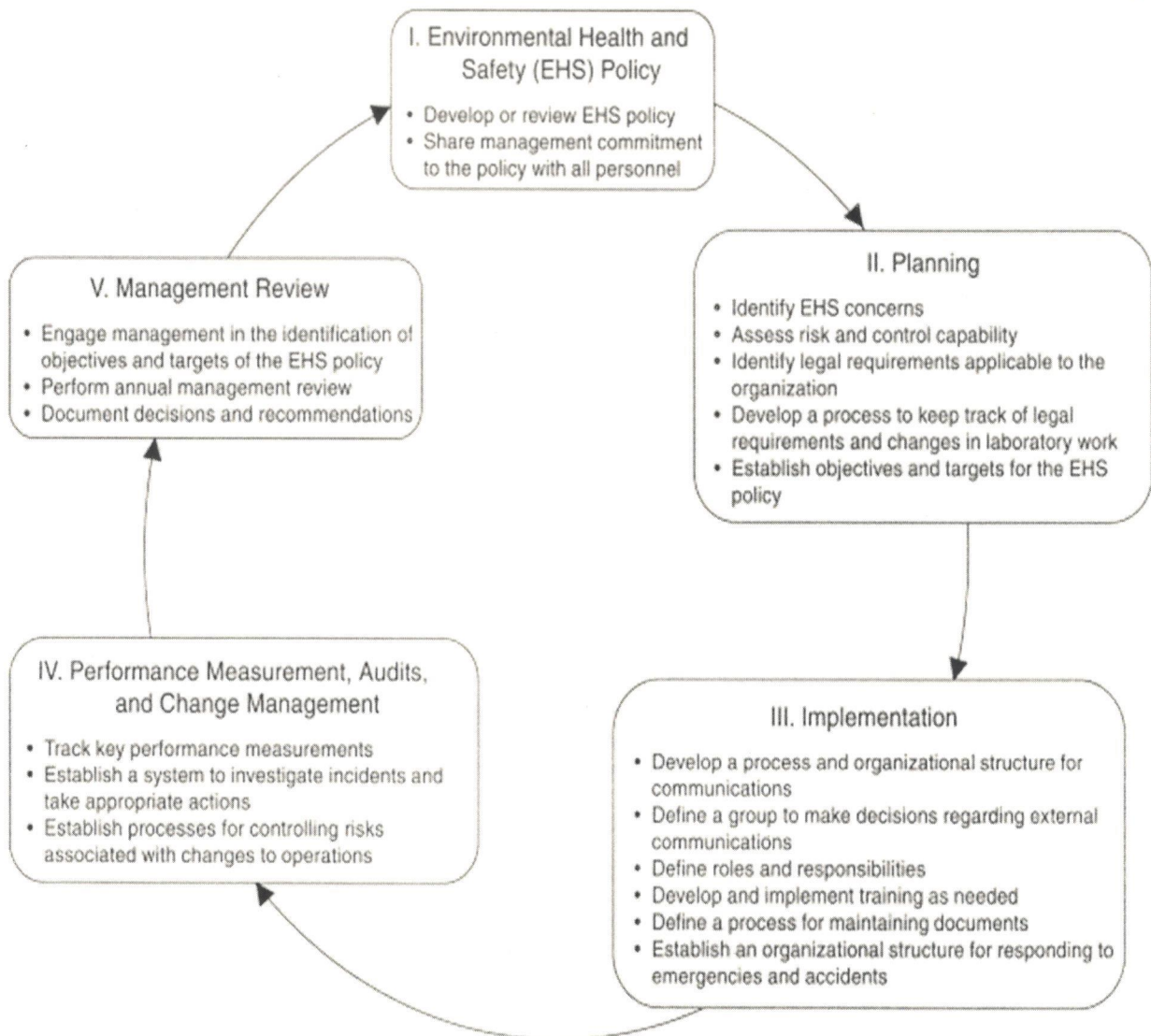
The EHS Committee is constituted with the employees of the Company as members including members from senior management. The EHS Committee shall be responsible for ensuring safe and healthy environment. They shall meet at regular intervals. The EHS

Committee may form various sub-committees for effective monitoring and observance of EHS principles. The EHS Committee shall inter-alia be responsible for following:

1. Compliance with all legislative requirements pertaining to EHS as minimum standard and where ever appropriate, institute additional measures for Environment, Health & Safety.
2. Framing of guidelines for EHS in sync with this policy. Review and Revision of guidelines for EHS, whenever required.
3. Dissemination of information regarding EHS amongst members and promoting awareness of EHS by periodic training sessions.
4. Observation of EHS in all projects/processes wherever they are carried out.
5. Implementation of guidelines laid down from time to time for safe & healthy environment.
6. Encouraging voluntary involvement of members by creating conducive environment.
7. Identifying the hazards and risk associated with activities, if any and take appropriate corrective measures to minimize the impact of same.
8. Promote and maintain open and constructive dialogue with all employees, local communities, regulatory agencies & other stakeholders.
9. A follow up should be done on a monthly/quarterly/half-yearly or yearly (as applicable) basis for at least 5 metrics:
 - i. Frequency rate for work-related injuries
 - ii. Severity rate for work-related injuries
 - iii. Water consumption rates
 - iv. Energy consumption rates
 - v. Waste generation rate
10. The officer of the entity is the sole responsible with regard to the entity's compliance with the local legislation.
11. **Training:** Members of EHS Committee or any designated official will impart periodic training to the employees to cultivate the principles of EHS policy among their day to day office duty hours. New employees will also be acquainted with the policy on their joining.



EHS Management System



Anurag Prasad

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EHS PRINCIPLES

A. ENVIRONMENT: Parameters include:-

- 1. Pollution: Air, Water, Soil, Noise and thermal pollution**
- 2. Renewable and Non-renewable resources**
- 3. Ecological Balance and Ecosystem.**
- 4. Recycle**

A.1. Pollution

| | |
|--------------------------|--|
| AIR POLLUTION | <ol style="list-style-type: none"> 1. Prevention of air pollution by controlling emission of green-house gasses and other harmful gasses from various machineries and electronics in factory and office premises like air-conditioners, refrigerators, generators, UPSs, etc. 2. Smoke, fumes, dust, particulate matter which could be pollutants needs to be treated in appropriate way and released in the environment. 3. Emission of harmful gases like oxides of carbon, sulphur, nitrogen, ozone and lead needs to be checked and controlled. |
| WATER POLLUTION | <ol style="list-style-type: none"> 4. Prevention of passage of water pollutants like harmful chemicals, solid waste, sludge etc. into the water bodies. 5. Any substances which are passed into the water bodies needs to be cleaned and treated so that it does not have any potential to destroy the flora the fauna of the water-bodies. 6. Company will try to reduce water consumption and recycle the waste water for different other purposes 7. Company will maintain and follow all rules and regulations pertaining to maintain Ground Water and Ground water level. |
| NOISE POLLUTION | <ol style="list-style-type: none"> 8. Low-noise tools and machinery should be chosen. 9. Machinery & equipment should be maintained and lubricated (e.g., oil bearings) 10. Noise source should be enclosed or isolated by placing barrier, walls curtains, soundproof infrastructure etc. to separate employees. 11. Noisy machines should be operated during shifts when fewer people are exposed. 12. Any work which can emit noise would be undertaken on weekends or beyond office timings. |
| THERMAL POLLUTION | <ol style="list-style-type: none"> 13. The temperature of the waste water, effluents, slurry should be cooled and then passed into the water bodies. 14. Hot fumes should be cooled and treated and then passed into the water bodies |

A.2. Renewable and Non-Renewable Resources

- a) The usage of non-renewable resources will be controlled
- b) Unnecessary usage of electricity and wastage will be proactively controlled.
- c) Company will strive to promote usage of renewable resources.



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A.3. Ecological Balance and Ecosystem

- a) Company will program environment friendly initiatives like preservation of neighbouring trees, planting saplings, etc.
- b) Beautification initiatives to ensure hygienic and healthy environment.

A.3. Recycle

- a) Company will recycle its wastes wherever possible.
- b) Treated waste water can be used inside the premises for cleaning and domestic uses.

B. HEALTH:

- a) Employees are requested to go provide Medical Fitness Certificate from a Registered Medical Practitioner before joining.
- b) Periodical medical check-up especially of employees of 40+ age/ vulnerable employees and maintenance of record thereof.
- c) Provision for Eye-testing of employees and making of complete spectacles and/or Rx sunglasses/ normal sunglasses at discounted price for all employees.
- d) Availability of dispensary each and every day to handle any eventuality.
- e) Availability of First-Aid Boxes in every department/section and maintenance thereof.
- f) Liaison/ tie-up with nearest hospitals to shift patients in case of emergency/ injuries etc.

C. SAFETY:

The various aspects of Safety are as follows:-

1. **Accident, Injury, Illness and Near Miss**
2. **Fire Safety**
3. **Occupational Safety**
4. **Safety of Goods**

C.1. Accident, Injury, Illness and Near Miss

Any accident, however trivial it may be, injury, illness and near miss shall be reported. The EHS Committee or any person appointed thereof shall investigate and find out the probable cause and suggest preventive measures. The recommendations suggested by team shall be implemented. The company and its members shall strive to achieve zero accident on sustainable basis.



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C.2. Fire Safety

- a) Fire alarm:** When a fire alarm sounds in the facility, evacuate the floors immediately via the nearest exit/Emergency Exits marked as Evacuation Plan. Extinguish all burners and electronic gadgets. If the fire originates in your floors, follow all institutional policies regarding fire-fighting and suppression. Check restrooms and other areas with possible limited audio or visual notification of an alarm before exiting the facility. Where necessary, provide assistance to persons with disabilities to ensure they are able to exit the facility.
- b) Fire Extinguishers**
- i. Portable fire extinguishers of required type and capacity shall be installed at appropriate places. These extinguishers must be in sufficient number and adapted to the risks. They must be inspected annually and Test Card should be maintained and attached to each Extinguishers.
 - ii. Some of the employees (> 10%) will be trained to use extinguishers (first intervention team).
 - iii. Another team could be more specifically trained to fire fighting and to the measures to be taken to organize the arrival of the Fire brigade (second intervention team)
 - iv. If a fire extinguisher is activated for any reason, make an immediate report of the activity to the members of EHS Committee so that the fire extinguisher is replaced in a timely manner.
- c) Emergency Plan**
- i. Preparation of On-site emergency plans and evacuation program and keep the route map displayed at each floor.
 - ii. Communication of point/line of contact for reporting fires and incident reporting.
- d) Evacuation Program**
- i. The building will be equipped with an alarm system permitting the evacuation of the personnel.
 - ii. The evacuation must be well-organized using plans, signs, human organization, etc.
 - iii. Mark Emergency Exits and Assembly point; keep passage ways free from obstacles at all times,
 - iv. The personnel will be trained and a yearly exercise must be performed.
- e) Sprinklers:** Buildings with particular fire risks or containing high value fixed assets should be equipped with a sprinkler.



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f) **Safety showers and washing facility** (eye-wash units) should be available appropriately and abundantly and tested routinely.

g) **Fire-mock drills:** are extremely important to mitigate any fire emergency. The following training should be imparted:-

- i. Correct use of fire-extinguishers in respect of type of fire.
- ii. Correct way to use hose-pipes.
- iii. Usage of manual Fire-alarms.
- iv. Mock drill of all employees as per evacuation program.

h) **Storage of Flammable and Combustible Liquids:** Chemicals should properly segregate and stored with appropriate fire safety arrangement.

i) **First-aid** box, equipment and person appropriately trained for providing first-aid treatment for burnt cases should be present for all units.

C.3. Occupational Safety deals with the prevention of work-related injuries and diseases as well as the protection and promotion of the health of workers. It aims at the improvement of working conditions and environment. The workers are advised to wear Personnel Protection Equipment (PPE) like Head Gear, Caps, Ear Plug/Muff & Dust Mask, Gloves, Safety Belts, Gumboot, Apron and Goggles etc. However, it will be the responsibility of the members to use the safety gadgets while on duty.

C.4. Safety of goods

a) **Intrusion:** Facilities must be adequately protected against risks of intrusion. Security systems must be well-adapted to the risks and the goods to be protected. Measures can be either technical or organizational. The system must be well-designed and compliant with corporate rules and the agreement taken with our insurance company.

b) **Work Equipment compliance:** the equipment (computer, machinery, protective equipment, etc.) should be kept in compliance with the regulations and in safe condition.

- i. The facility must comply with the procedures relating to buying machinery.
- ii. Any modifications to machines must be carried out according to the corporate safety requirements as well as local regulations.

c) **Inventory/ Stock safety:**

- i. The physical safety of inventories must be properly insured against existing risks (theft risk, fire risk, risk of flooding or other natural damages, etc.) as well as against risks of storage temperature of chemicals.


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- ii. Stores must be designed according to the characteristics of the products and the legal and lawful provisions.
- iii. Packaging must be adapted to the products, the handling operations and the mode of shipping and transport.

Vision Rx Lab Pvt. Ltd. will adhere to high standards with regard to the implementation of this policy. The EHS Committee shall have overall responsibility for implementing this policy. It is important that any useful competence, information, incidents or useful question should be communicated to among all Departments. This feedback concerns positive actions as well as incidents or accidents that could happen again elsewhere or the solutions used to solve these problems. Vision Rx Lab will properly train its personnel concerning the risks they are exposed to and how to prevent those risks. This training session will concern the workstation as well as the whole facility. Our Company will promote continuous improvement in our operations and management systems to strive for excellence in environmental, health & safety performance.

Approved by



Arnab Biswas
Chief Human Resource Officer