

<b>Guideline / Policy</b>	Title	<b>Environment Health &amp; Safety Policy</b>
	Version	V3
	Issue Date	10/01/2019
	Revision Date	26/07/2024

**Document History**

Version	Date of Amendment	Author	Brief Description of Change	Reviewed By
1	10/01/2019	SHR	New Policy Implementation	EHS Head
2	26/02/2024	SHR	Review of Policy	Process Owners & Knowledge Partners
3	26/07/2024	SHR	Review of Policy	Process Owner

**I. Introduction to the Policy**

Trident Limited (the ‘Company’, ‘Trident’, ‘We’ or ‘Us’) is committed to providing a safe and healthy working environment to its employees, consultants, contractors, and customers. We are dedicated to complying with all regulations to preserve the environment in the territories we operate in. As a responsible corporate organization, we consider it our obligation to ensure that everyone associated with us works in a safe and healthy environment, free from occupational injuries and diseases.

The Company shall pursue high standards of safety, health and environmental management as an integral part of efficient management of the business ensuring that all business decisions are taken after considering the safety, health and environmental implications.

The Company is committed to complying with the Factories Act, 1948, as well as adhering to international standards such as the Occupational Safety and Health Convention, 1981 (No. 155). Additionally, the Company will align with the National Policy on Safety, Health, and Environment at the Workplace, 2009.

## **II. Applicability**

This Policy applies to all individuals working at all levels and cadres (whether permanent, fixed-term, or temporary), employees, workers, directors, retainers, consultants, contractors, trainees, casual workers, associated with us or any of our subsidiaries/associates in any other capacity (hereinafter collectively referred to as 'member'). We also expect that any supplier or vendor doing business with us shall adhere to this Policy.

## **III. Policy description**

The Management of Trident Limited is committed towards preventing occupational hazards, environment degradation and ensuring a healthy work environment. We have always recognized the importance of the collective effort of the top management as well as the shop-floor members. This helps us to drive new initiatives and foster EHS culture in the working location.

The Company is committed to enhance the standards of Health, Safety and Environment by:

- Consultation and participation of workers representatives and concerned members in identifying hazard and risk assessment.
- Encouraging members to participate and demonstrate good workplace health & safety practices through rewards and recognition.
- Conducting periodic audit to identify hazards & risks in the plant and adopting necessary corrective action to eliminate/reduce the risks.
- The health and safety of the plant and the members working therein shall be of top priority. Any decision, purchase of machinery, equipment, material/chemical or even selection of any personnel at any position shall be made keeping health and safety parameters in mind.
- Ensuring that adequate awareness and training is being imparted to enhance the skill and behaviour of the members towards safety and EHS Policy.
- Ensuring all possible efforts to keep the workplace free from any contagious disease and equip ourselves with updated information to tackle any such situation.
- Monitoring and measurement of environmental parameters for continual improvement and performance evaluation.
- Adherence to all applicable legal and other requirements related to Environment Health and safety, for ensuring healthy and safe working environment.
- Capturing the health and safety performance of the factory in its Annual Report

- Making the policy document available to all members by displaying the copies at conspicuous places; including local language
- Members entering our premises will be informed of their responsibilities regarding compliance under the policy and imparted with relevant trainings. Non-compliance with EHS requirements by members will result in appropriate disciplinary action, including termination of contracts or removal from the premises.

### **Implementing an Occupational Health and Safety Management System**

The following aspects are covered under the Occupational Health and Safety management system:

- Providing a framework, resources and commitment for setting objectives related to OHSMS & EMS
- Risk and hazards assessment to identify what could cause harm in the workplace.
- Prioritization and integration of action plans with quantified targets to address those risks.
- Integration of actions to prepare for and respond to emergency situations.
- Evaluation of progress in reducing/preventing health issues/risks against targets.

### **Ensuring good working conditions**

In order to ensure good working conditions, and to prevent incidents from occurring, the following measures are undertaken at all sites:

- Monitoring and measuring of work zone conditions including noise, air quality, illumination, and water for healthy work conditions and continual improvement.
- Appropriate practices for handling and storage of materials/chemicals to protect workers against the health and safety impacts.
- Structural safety measures and practices for a safe and healthy workplace environment
- Ensure electrical safety guidelines are maintained and followed at all sites.
- Relevant safety measures are in place for contractors, in order to ensure proper working conditions.
- Medical checkup before admitting any member and regular medical check-up after admission and maintenance of record thereof.
- Availability of First Aid Boxes in every department/section and maintenance thereof.
- Availability of equipped ambulance at all the times to shift the patient to the nearest hospitals/Occupational Health Centre.
- Availability of OHC/Hospital Services 24X7 hours a day with requisite staff, equipment & necessary medicines to handle any eventuality.
- Examination of equipment by competent persons at regular intervals in consultation

with internal EHS Committee and site-specific safety committee.

### **Accident Reporting**

- The company shall strive to achieve zero accidents and ill health and set targets and formulate a strategy to achieve the same.
- All accidents including but not limited to, near misses, ill health or occupational diseases and injuries are recorded. Effective counter measures shall be implemented in order to prevent recurrence and towards reducing the incident trend for continual improvement.

### **IV. Training and awareness**

To ensure development of safety culture and adequate enforcement of safety rules, all members have to necessarily undergo safety trainings on relevant topics including company's EHS policy and various SOP's. Trident has best intentions of taking into account the health and safety performance of individuals at different levels while considering their career advancement.

Participation and involvement of members in promoting and organizing health and safety events like-the National Safety Day i.e. 4th day of March, National Fire Service Day i.e. 14th day of April, World Environment Day i.e. 5th day of June and Road Safety Week etc.

Details regarding training programs and capacity building are outlined in Trident's independent policy titled "Capacity and Capability Policy" and this policy must be read in conjunction with the same.

### **V. Governance**

The senior management is committed to providing the structure and resources to maintain the OHSMS and EMS framework for providing a safe workplace. EHS Committee will periodically review and monitor the safety performance, conduct meetings quarterly and minutes of the meetings shall be shared with all members and senior management.

- Trident management shall be responsible for the following-Compliance with all legislative requirements pertaining to EHS as minimum standard and wherever appropriate, institute additional measures for Environment, Health & Safety.
- Framing of guidelines for EHS in sync with this policy.
- Review and Revision of EHS Policy, whenever required.
- Setting periodic targets to reduce metrics such as Lost time injury (LTIFR), work-related ill-health and all forms of injuries. Formulate a strategy to effectively reduce the same and submit periodic reports to the EHS Committee and Board of Directors

- Formulate an Emergency Response Plan and conduct an annual review of the Emergency Response Plan.
- Observation of EHS in all projects/processes wherever they are carried out.
- Implementation of the provisions laid down in this Policy from time to time for safe & healthy environment.
- Incorporating EHS requirements with contractors and procurement-related activities.
- Identifying the hazards and risk associated with activities, if any and take appropriate corrective measures to minimize the impact of same.
- Promoting and maintaining an open and constructive dialogue with all employees, local communities, regulatory agencies and other stakeholders and ensure open dialogue regarding EHS between workers and senior management.
- Intention of taking into account the health and safety performance of individuals at different levels while considering their career advancement.

### Responsibility Matrix

1	Implementation/Execution	Factory Manager & safety Officer
2	Monitoring	EHS
3	Auditing	Risk Management
4	Ownership	EHS Head/ Plant Head

### Employer Rights:

- The employer has the right to make decisions, including those related to health, safety, and environmental matters, ensuring they align with legal requirements and corporate policies.
- The employer has the right to expect compliance from all the members with legal regulations and the company's policies.
- The employer has the right to take measures and make decisions to ensure a safe and healthy work environment as and when deemed necessary.
- The employer has the right to investigate work-related injuries, ill health, diseases, and incidents and also carry out internal inspections by site-specific committees.

### Employer Duties:

- The employer has the duty to ensure that the company complies with all legal requirements related to EHS, including the ILO Fundamental Principles and Rights at work.
- The employer has the duty to implement and maintain an Occupational Health and Safety Management System, as per ISO 45001 requirements.
- The employer must provide education and training to members to enhance their skills and

behavior toward safety.

- The employer should promote and maintain an open and constructive dialogue with employees, local communities, regulatory agencies, and other stakeholders regarding EHS matters.
- The employer must conduct periodic audits, risk assessments, and inspections to identify hazards and risks and take corrective actions to eliminate or reduce them.
- The employer must ensure an Emergency Response Team is available to manage emergency responses to disasters.
- The employer must ensure all possible efforts to keep the workplace free of any contagious disease and equip members with updated information to tackle any such situation.
- Periodic health checkups should be conducted for all the members.
- The employer is duty-bound to follow the guidelines mentioned in the company's "Broken Needle Policy" as well as "Chemical Management Policy."
- The employer must ensure effective waste management system and apply and follow the procedure on "Handling hazardous and non-hazardous waste SOP", "Waste carrying vehicle SOP".
- In case of accidents, the procedure outlined in "Accident/Incident Reporting SOP" should be followed by the employer.
- The employer has the duty to accept the grievance filed by any member and investigate in the matter.

#### **Member Rights:**

- Members have the right to a safe and healthy working environment free from occupational injury and disease.
- Members have the right to receive adequate training on safety-related rules, guidelines, and the company's EHS policy.
- Members have the right to report all accidents, incidents, or near misses immediately, irrespective of how trivial they may seem.
- Members have the right to know the hazards at work and how to control them.
- Members have the right to receive timely updates on any amendments made in the policy.
- Members have the right to know the discussion happened in the EHS committee.
- Members have the right to file any grievance observed/faced as per the norms outlined in "Grievance Handling Policy."

#### **Member Duties:**

- Members must comply with all company policies, including those related to EHS, and following safe work practices.
- Members have the duty to report accidents, incidents, or near misses immediately to supervisors or managers and cooperating with the investigation process.
- It is the duty of the members to actively participate in training programs related to safety

rules and guidelines organized by the company.

- It is the duty of members to cooperate during the investigation process or emergency response situations and following emergency plans.
- It is the duty of members to engage in an open and constructive dialogue on EHS matters with the employer and other stakeholders.
- It is the duty of members to report the violation of any rules or regulations outlined in the policy committed by any member to EHS committee.

For Trident Limited

Authorized Signatory