

## Policy on Environment, Health, Safety and Security

Effective Date	Responsible Dept.	Approved by	Version	Approval Date
05.08.2023	EHS	Board of Directors	1	05.08.2023
			2	02.08.2025

Epigral, maintains a steadfast dedication to Environment, Health, Safety and Security (EHSS) principles and practices, in accordance with the Epigral Code of Ethics and Conduct and this Policy. These guiding principles set clear expectations for all our employees.

Acknowledging our duty to society and the environment, Epigral places paramount importance on fostering safe, secure, and healthy workplaces. We aim to cultivate an environment where our employees can thrive and effectively contribute to our mission while safeguarding their well-being.

Our commitment to sustainability is woven into the fabric of our mission and pledges. With a profound understanding of our responsibility to the environment, we actively strive to reduce our ecological footprint. Through sustainable practices and product offerings, we endeavour to make a positive impact on the communities we serve and the planet we share.

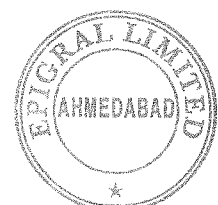
Furthermore, we place significant emphasis on nurturing a clean environment, both within our operations and beyond. By enforcing rigorous environmental standards and practising responsible waste management, we aspire to contribute to a healthier and cleaner world.

As an integral part of our core values, we consistently work towards aligning our actions with our commitment to EHSS principles. We firmly believe that by upholding these principles, we can forge a positive and enduring influence on the well-being of our employees, the communities we engage with, and the global environment.

### **Mission**

In our pursuit of excellence, we remain committed to conducting our operations in a responsible and ethical manner. We understand the significance of our role in the chemical industry and, therefore, place great emphasis on upholding the highest standards of integrity and professionalism.

As a socially responsible organization, we firmly believe in sustainable development. Our actions are guided by a deep respect for the needs of individuals, society, and the environment. We take proactive measures to ensure that our practices align with the principles of sustainability, seeking to minimize our ecological footprint and contribute positively to the communities we serve.



Furthermore, our commitment to ethical conduct extends to all aspects of our business, from research and development to marketing and distribution. We prioritize the well-being and safety of employees, customers and stakeholders, always striving to make a positive difference in the lives of those we touch.

By embracing innovation, responsibility, and sustainability, we aim to set new benchmarks in the chemical industry and inspire positive change in the industry.

## **Our Commitments**

### ● **Environment, Health, Safety and Security for Individuals:**

Our commitment to the well-being of each individual extends to providing a secure and healthy working environment. This includes fostering personal growth and embracing diversity, ensuring employees feel valued, respected, and supported within a safe workplace atmosphere.

### ● **Corporate Responsibility in EHSS Practices:**

As part of our EHSS Policy, we dedicate ourselves to high standards of performance and corporate responsibility across all activities. This involves adhering to EHSS principles in interactions with business partners, suppliers, and customers, emphasizing ethical practices, and legal compliance, and maintaining integrity throughout our engagements.

### ● **Societal and Environmental Engagement:**

Within the context of our EHSS Policy, we uphold ethical and social standards by actively participating in environmental protection and community engagement. We commit to abiding by local, national, and international environmental laws, proactively communicating our environmental initiatives, and collaborating with relevant authorities to promote responsible environmental practices.

### ● **EHSS-Centric Sustainable Development:**

Our dedication to sustainable development, inherent in our EHSS Policy, drives us to employ innovative and environmentally friendly technologies and processes. By minimizing our environmental impact through sustainable practices, we contribute positively to the environment, striving for long-term ecological balance.

### ● **Embracing EHSS-Centric Innovation:**

As outlined in our EHSS Policy, we consider innovation as crucial for success. We view change as an opportunity, fostering a culture of continuous improvement and adaptability. This commitment encourages us to embrace new ideas, technologies, and approaches within the EHSS framework, ensuring competitiveness and relevance in the market.

### ● **Ongoing Improvement in EHSS Performance:**

Under our EHSS Policy, we commit to continuous improvement by benchmarking against industry standards and best practices. Transparent reporting is integral to this commitment, allowing us to identify areas for improvement and enhance effectiveness and efficiency in our EHSS initiatives.



- **EHSS Integration into Operations:**

Within our EHSS Policy, we are dedicated to providing, maintaining, and upgrading facilities and operations that prioritize safety for employees, contractors, the community, and the environment, facilitating sustainable growth eventually.

This commitment involves allocating necessary resources, offering training, and motivating employees to perform operations and activities effectively and responsibly to prevent untoward incidents, injuries, and illness, and protect the environment while conserving natural resources.

- **Integration into Decision-Making Processes:**

We commit to integrating environment, occupational safety, process safety, health, and security aspects into our business planning and decision-making processes.

- **Regulatory Compliance and Standards:**

Our dedication extends to complying with applicable Environment, Health, Safety and Security regulations and adopting national and international standards and codes as applicable.

- **Risk Assessment and Mitigation:**

We actively assess the risk of processes and services, incorporating appropriate controls for risk mitigation. Periodical reviews are conducted to maintain risks at acceptable levels.

- **EHSS Performance Reporting:**

EHSS performance is an integral part of individual and business performance reports which are diligently disclosed furthering the transparency of our operations.

- **Information Dissemination:**

We are committed to disseminating necessary information to employees, the public, transporters, end-users, customers, and the community about hazards and risks associated with chemicals.

- **Distinctive Responsibilities and Compliance:**

Distinctive responsibilities are assigned to employees, contractors, visitors, transporters, and other agencies to ensure compliance.

- **Emergency Preparedness:**

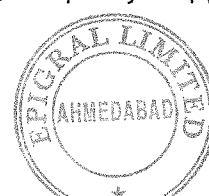
We design and maintain emergency response plans, procedures, control measures, and business continuity capabilities to ensure swift and effective responses in critical situations.

- **Stakeholder Engagement for Sustainability:**

We actively inform, interact, and cooperate with external and internal key stakeholders regarding periodical performance and progress for sustainability.

## Scope of the Policy

The scope of this policy delineates its comprehensive coverage, defining the breadth of individuals and operational domains it encompasses. Specifically, this policy is applicable to all personnel involved in the manufacturing operations of Epigral.



This inclusive category extends to employees, contractors, and stakeholders, encompassing a diverse array of individuals contributing to or affected by the company's activities.

Furthermore, the policy extends its reach to encompass various operational domains, including all facilities, laboratories, offices, and other areas under the operational control of Epigral. By explicitly detailing these areas, the policy aims to eliminate ambiguity and ensure a broad and inclusive application of its directives. This approach establishes consistency and clarity, providing a robust foundation for adherence and comprehension among all individuals engaged in or associated with the company's manufacturing operations.

## **Compliance**

At Epigral, an unyielding dedication to compliance forms the foundation of our endeavours. We commit to wholeheartedly adhere to all applicable laws and regulations in every jurisdiction where we operate. Beyond meeting legal obligations, Epigral establishes its internal Environment, Health, Safety and Security (EHSS) Guidelines, Guidance Notes, and Directives to the most stringent standards. Through this unwavering commitment to compliance, we safeguard the integrity, safety, and credibility of our operations, cultivating a culture of responsible business conduct throughout the organization.

## **Significance**

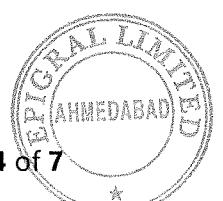
Environment, Health, Safety and Security (EHSS) considerations are deeply ingrained within every aspect of our business at Epigral. Our commitment to EHSS extends not only within Epigral's internal operations but also beyond, as we recognize our broader responsibility to society and the environment.

EHSS matters take precedence in our business activities, ensuring that we prioritize the well-being and safety of our employees, stakeholders, and the communities we serve. While we acknowledge the importance of economic considerations, we do not compromise on EHSS standards. Rather, we strike a balance that upholds both our ethical obligations and our economic goals.

## **Priorities**

At Epigral, our top priority is prevention, which serves as the cornerstone of all our activities, decisions, and measures aimed at ensuring safety, security, health, and environmental protection. We deeply analyse our business activities to gain a comprehensive understanding of their potential negative impacts. Through innovation and forward-thinking, we actively seek out solutions to minimize these impacts, striving to make positive contributions to both human health and the environment.

To ensure a robust Environment, Health, Safety and Security (EHSS) management system, we systematically manage EHSS risks. This entails identifying hazards, rigorously evaluating and assessing various scenarios, and taking proactive measures to prevent and reduce risks. Open and effective risk communication is a key aspect of our approach, ensuring that all stakeholders are well-informed and engaged in promoting safety and sustainability.



If, despite our best efforts, an EHSS risk is deemed unacceptable even after implementing all feasible technical, organizational, and personnel measures, we take decisive action. In such cases, materials or processes that pose unacceptable risks are replaced, withdrawn, or discontinued, demonstrating our unwavering commitment to safeguarding our people, communities, and the environment.

At Epigral, we firmly believe that integrated process optimization holds greater value than solely relying on end-of-pipe waste treatment or pollution control. By designing and implementing inherently safe plants and processes, we prioritize preventive measures, reflecting our deep dedication to proactive risk management.

## **Organization and Responsibilities**

### **EHSS Committee**

The Safety Committee plays a pivotal role in shaping our Environment, Health, Safety and Security (EHSS) Policy, guided by the fundamental Epigral Corporate Principles and the Epigral Sustainability Framework. With a comprehensive understanding of our business values and sustainability goals, the Safety Committee assumes the responsibility of formulating this vital policy. This committee is headed by the Senior Management Personnel of the organisation.

Recognizing the significance of effective implementation, the Safety Committee further defines the appropriate organizational structures and designates functional responsibilities necessary to ensure the seamless execution of the EHSS Policy across the organization.

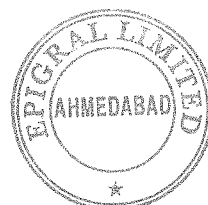
By establishing clear lines of responsibility, we foster a culture of accountability and commitment to environmental protection, health, safety and security.

In addition to the policy's creation and structuring, the Safety Committee upholds its crucial supervisory role by overseeing the organization's compliance with the EHSS Policy in its entirety. This vigilant oversight ensures that all levels of the organization are dedicated to upholding the principles and standards set forth in the policy.

Through the guidance and direction of the Safety Committee, we fortify our commitment to EHSS matters and create a resilient framework that promotes a safe, sustainable, and responsible environment for all stakeholders and Customers. By aligning our practices with our core principles and sustainability aspirations, we strive to lead by example, making a positive impact on our people, society, and the environment we share.

### **Implementation**

In pursuit of our EHSS Policy, we seamlessly integrate sustainable practices across water management, waste reduction, energy efficiency, employee well-being, safety culture, and rigorous certifications. This implementation section details our strategic initiatives, ensuring a holistic commitment to environment, health, safety and security.



- **Water Management and Conservation:**

We are committed to increasing water-use efficiency, ensuring sustainable freshwater withdrawal, and strengthening local water security. Our proactive approach involves online monitoring of all plants, promoting compliance and responsible resource stewardship. Continuous oversight by experienced personnel ensures safe and sustainable project management and maintenance, reducing environmental impact through improved effluent treatment and reuse.

- **Waste Management and Sustainability:**

Reducing waste generation through prevention, reduction, recycling, and reuse is pivotal to our strategy. We continuously upgrade infrastructure and retrofit equipment for higher economic productivity. Efficient techniques and recycling methods effectively manage by-products, effluents, and emissions, with a focus on quality inputs and competency enhancement through on-the-job training.

- **Energy Consumption and Renewable Initiatives:**

Central to our sustainability commitment is a holistic approach to energy efficiency and renewable practices. Investing in renewable sources is a cornerstone, aligning with our goal to minimize carbon footprint. With a focus on cutting-edge green technologies, R&D efforts drive solutions for a sustainable energy future. Adherence to energy management standards ensures efficiency, while employee training fosters a culture of responsibility. This integrated strategy reflects our dedication to responsible energy use, innovation, and the seamless integration of renewables into our operations.

- **Employee Well-being and Safety Culture:**

Ensuring our plant operates in a manner that safeguards the well-being of our employees and the surrounding community is paramount. Continuous health monitoring, certifications (ISO 14001, ISO 45001, Energy management-50001), and adherence to the Responsible Care initiative underscore our commitment to environmental, health, safety and security.

- **Certifications and Rigorous Standards:**

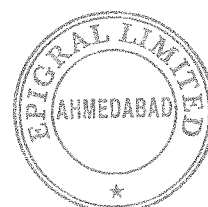
Our certifications, including ISO 9001, ISO 14001, ISO 45001, ISO 50001, RSPO, Reach, Halal, and Kosher, exemplify our dedication to rigorous standards and responsible practices. We continually validate and improve firefighting measures and emergency protocols.

- **Employee Engagement and Risk Perception:**

We engage employees in policy formulation through open dialogue and communication, recognizing the value of their insights. Proactive risk assessment, specialized training, and safety advocacy efforts encourage cooperation to uphold safety standards.

- **HAZOP and 'What If' Training:**

We provide HAZOP and 'What If' training to empower employees in identifying potential hazards and developing skills to mitigate risks, building a robust EHSS system.



- **Customized Safety Training:**

Our commitment to safety extends to customized training tailored to the roles, positions, experiences, and backgrounds of our workforce, enhancing overall preparedness.

- **Contractor Safety Management:**

In an environment dealing with toxic and flammable products, we prioritize contractor safety management. Extensive engagement, dedicated resources, and rigorous audits ensure contractors follow established safety protocols.

- **Emergency Preparedness:**

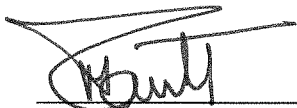
Investments in state-of-the-art emergency equipment, established protocols, and workforce training on handling incidents deepen our culture of safety, equipping employees to identify and mitigate risks effectively.

To uphold the integrity of this Policy, Epigral encourages a culture of open communication and accountability. If any employee suspects a violation of the Policy, they are encouraged to immediately report their concerns to their manager or the designated EHSS representative. Rest assured, no employee will face any disadvantage for reporting a violation or demanding the application of this Policy.

Responsible Epigral managers play a vital role in ensuring compliance with this Policy. It is their duty to take swift and appropriate action to address any violations, thereby fostering a culture of continuous improvement and adherence to our principles.

For effective implementation at the Group level, our Chief EHSS Officer assumes responsibility for informing the EHSS Committee and the Board of Directors about significant EHSS developments, goals, plans, and issues within the Epigral Group. Transparency and accountability at the highest levels of leadership strengthen our commitment to EHSS practices.

We adopt a systematic approach to implement this Policy, incorporating all necessary technical, organizational, and personnel measures. Through a cohesive and comprehensive implementation strategy, Epigral upholds its steadfast commitment to environmental protection, health and safety fostering a workplace culture that prioritizes the well-being of our people and the world we inhabit.



**Maulik Patel**  
**Chairman & Managing Director**  
**(DIN: 02006947)**

