

# Global Quality, Occupational Health, Safety, Environment & Energy Management Policy

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## Executive Summary

Firstsource Solutions Limited aims to achieve and maintain the highest standards of Quality, Occupational Health & Safety, Environment and Energy (QOHSEE) usage, incorporating the principles of sustainable development throughout its worldwide business. FSL identifies the health and safety of its employees, contractors and visitors, the satisfaction of its customers, the protection of the environment and the development of the communities where it has its operations as integrated key drivers of its business; the entire organization is oriented towards achieving these goals openly and transparently.

## Introduction

QOHSEE management and risk assessment fundamentals are integrated in all business processes. Management is responsible and accountable for achieving excellence in QOHSEE performance for successful business results. FSL is committed to training all its employees in the appropriate use of its QOHSEE management systems, strengthening its management through updating of professional and managerial skills, fostering diversity, emphasizing employee evaluation and motivation. Nothing is more important than the health and safety of everyone who works for us, works with us or visits us. All injuries and work-related illnesses can and must be prevented.

Working safely is a condition of employment. Quality is our main competitive advantage. Requirements and expectations of our customers must be satisfied. We are committed to developing a long-term sustainable business. Preventing pollution and minimizing the environmental impact of our operations. Making the most efficient use of natural resources and energy business FSL recognizes the importance of implementing this policy throughout its QOHSEE management systems, covering the entire supply chain from suppliers to customers and the proper and efficient use of its products in accordance with their agreed specifications.

FSL commits to comply with applicable legal requirements and all other requirements relating to quality, health & safety, environment and energy issues to which it subscribes. These will be managed within each geography, details of which can be obtained by the geography SPOC.

The objectives and targets identified shall be implemented at a geographical level by drawing a suitable OHSE management program. As a part of potential hazard & impacts identification, the emergency situations shall also be identified to develop the emergency preparedness and response plan. All the employees including those of the sub-contractors, service providers, Contractors/ Vendor Partners shall be trained about the control measures to be adopted to prevent, control, or reduce the relevant potential hazards & environmental impacts.

Firstsource Solutions has both objectives and quantitative targets within its Integrated Management System (IMS), comprising of ISO 9001, 14001, 45001 and 50001, these are presented in the annual Management Review of the IMS.

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# 1. Purpose and Scope

## 1.1 Purpose

The main purpose of this Global Policy is to be a reference manual to establish the relevant QOHSEE standards, procedures, communications and outline management strategies and actions to meet the global and regional objectives.

Each geography has their own integrated management system, consisting of the relevant standards for their geography. The IMS has been created to ensure adherence and certification of standards for the business and for client and prospective client assurance. Detailed geography specific SOP's can be referred to which detail the specific IMS and legislation requirements for each location.

## 1.2 Scope/ Objective

This QOHSEE Policy applies to all of Firstsource's operations, including the development, delivery, and support of its products and services. The scope of the policy extends to Suppliers and Contractors. We ensure that our environmental standards are upheld by joint ventures and outsourcing partners. In the case of mergers or acquisitions, we will conduct due diligence in accordance with this policy.

The objective of these guidelines is to specify the proactive and preventative measures that will provide the degree of safety from risks identified at centers for QOHSEE performance, as far as is reasonably practicable.

# 2. Definitions and Abbreviations

## 2.1 Definitions

**Acceptable risk:** Risk that has been reduced to a level that can be tolerated by the organization having regard to its legal obligations and its own QOHSEE policy.

**Audit:** Systematic, independent, unbiased, and documented process for obtaining “audit evidence” and evaluating it objectively to determine the extent to which “audit criteria” are fulfilled.

**Continual improvement:** Recurring process of enhancing the QOHSEE Management System, to achieve improvements in overall QOHSEE performances, consistent with the organization’s QOHSEE Policy.

**Corrective action:** Action taken to eliminate the cause of a detected nonconformity or other undesirable situation to prevent recurrence.

### Environment

Surroundings in which an organization operates, including air, water, land, natural resources, flora fauna, human beings and their interrelation.

Note: Surroundings in this context extend from within an organization to the global system.

### Environmental Aspects

Elements of an organization’s activities, products or services that can interact with the Environment.

significant environmental impact.

**Environmental Control Measures / Operational Control Measures:** This is a documented procedure, which shall be established and maintained to cover situations where their absence could lead to deviations from the existing environmental policy and their objectives and targets.

### **Environmental Impact**

Any change to the environment, whether, adverse or beneficial wholly or partially resulting from an organization's activities, products, or sources.

**QOHSEE Management Program:** This plan is a derived action plan for achieving the geography-related QOHSEE objectives and targets. It sets priorities for locating HSE risks and develops an action plan to reduce them by detailing the responsibilities and time frames required to achieve at each relevant function and level of the organization.

### **QOHSEE Core Team:**

The employees or stakeholders who are responsible for the maintenance of the management system.

### **Centre Management:**

That part of the overall management leads / representatives responsible for managing and maintaining the resources and processes by planning activities, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, reviewing, and maintaining the QOHSEE policy at center.

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury or ill health or a combination of these.

**Hazard identification:** Process of recognizing that a hazard exists and defining its characteristics.

**Integrated management System:** This is a combined management system developed to achieve Quality, Environment, Energy, Occupational Health and Safety of the centers. It is a developed and documented procedure, periodically reviewed as part of continual improvement. Integrated Management System is established under the guidance ISO 14001 (Environment) and ISO 45001 (Occupational Health & Safety), ISO 50001 (Energy) and ISO 9001 (Quality), where applicable Integrated Management System is periodically audited through internal audit team and external certifying agency. External continuing assessments are conducted annually in order to maintain certification on a 3-year cycle with our external certifying agency.

**Ill health:** Identifiable, adverse physical or mental condition arising from and/or made worse by a work activity and/or work-related situation.

**Incident:** Work-related event(s) in which an injury or ill health (regardless of severity) or fatality occurred or could have occurred.

**Interested party:** Person or group, inside or outside the workplace, concerned with or affected by the Occupational Health and Safety Management System performance of an organization.

**Non-conformance:** Non-fulfilments of a requirement

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and

safety of employees or other workers (including temporary workers and contractor personnel), visitors and any other person in the workplace.

**Occupational Health and Safety Management System:** It is a management framework that allows FSL to consistently identify and control its occupational health, safety and environment risks to reduce the potential accidents, injuries, and helps in achieving compliance with health safety and environment legislation and requirements from management and other interested parties.

**Occupational Health and Safety objective:** Occupational Health and Safety Goals, in terms of Occupational Health and Safety performance that an organization sets itself to achieve.

**Preventive action:** Action to eliminate the cause of a potential nonconformity, or other potentially undesirable situation, to prevent occurrence.

**Prevention of pollution:** Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts.

**NOTE:** Prevention of pollution can include source reduction or elimination, process, product or service changes, efficient use of resources, material and energy substitution, reuse, recovery, recycling, reclamation, and treatment.

**Risk:** Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or ill health that can be caused by the event or exposure.

**Risk assessment:** Process of evaluating the risk(s), arising from hazard(s), considering the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable.

**Work place:** Any physical location in which work related activities are performed under the control of the organization.

**NOTE:** When giving consideration to what constitutes a workplace, the organization should take into account the QOHSEE effects on personnel who are, for example, travelling or in transit (e.g. driving, flying, on boats or trains), working at the premises of a client or customer, or working at home.

## 2.2 ABBREVIATIONS

<b>Global CAO</b>	Global Chief Administration Officer
<b>FSL</b>	Firstsource Solutions Ltd – and all it's subsidiaries
<b>IMS</b>	Integrated Management System
<b>ISO</b>	International Organization for Standardization
<b>SOP</b>	Standard Operational Procedure
<b>SMART</b>	Specific, Measurable, Achievable, Realistic and Time bound
<b>SEA</b>	Significant Environmental Aspect
<b>OHS</b>	Occupational Health & Safety
<b>QOHSEE</b>	Quality, Occupational Health, Safety, Environment & Energy
<b>HIRAC</b>	Hazard Identification, Risk Analysis & Controls
<b>AI</b>	Aspect Impact
<b>MCB</b>	Miniature Circuit Breaker
<b>ELCB</b>	Earth Leaking Circuit Breaker
<b>ERM</b>	Enterprise Risk Management
<b>RO Plant</b>	Reverse Osmosis Plant
<b>ACM</b>	Annual Contract Maintenance

### 3. Reference Documents

The following documents are referred while preparing the Outline Occupational Health Safety & Environment Plan. The latest revision of the referred documents is as mentioned below.

**Table - 1**

Sr. No	Description of Document	Reference No.
1	Occupational Health & Safety management System	BS OHSAS-18001:2007
2	Environmental Management System	ISO 14001:2015
3	Occupational Health & Safety Management System	ISO 45001 : 2018
4.	Quality Management System	ISO 9001:2015
5.	Energy Management System	ISO 5001:2011/2018

### 4. QOHSEE Management System Elements

#### 4.1 General Requirements:

A designated team within each geography shall establish & maintain the Management system that satisfies to all the requirements in line with ISO 14001:2015 & ISO 45001:2018 and for the UK, ISO 9001:2015, ISO 5001:2011 BS OHSAS 18001:2007 requirements

#### 4.2 QOHSEE Corporate Policy: -

FSL has a Corporate QOHSEE policy defining its organizational contribution in QOHSEE commitment, protection & development enclosed as Annexure 1.

#### 4.3 Planning

##### 4.3.1 Identification, Risk Assessment & Determining Controls

###### A) Hazard identification, risk assessment & determining control

Prior to start of activities or during the due course of activities, the QOHSEE core team shall carry out the Risk Assessment exercise in each of its activities with the help of well-defined procedure for **Hazard Identification and Risk Assessment (HIRA)**. Depending upon the risk level of each hazard, appropriate control measures will be proposed/ revised in daily standard operational procedures keeping in view of various legal & other requirements, specifications, and contractual requirements.

The designated regional team shall maintain the relevant documentation, data & records concerning the identification of hazards, assessment and control of risks up to date with respect to ongoing activities and also extend them to cover new developments & new or modified activities, before they are introduced.



#### **Review of hazard identification, risk assessment & risk control:**

The hazard identification, risk assessment, & risk control process should be reviewed periodically at least annually. The period may vary depending upon the following considerations: -

1. Nature of the hazards.
2. Magnitude of the risk
3. Changes from the normal operations.
4. Changes in raw materials, chemicals etc.

**Procedure:** Hazard Identification & Risk Analysis procedure

#### **B) Aspect Impact**

Prior to start of activities during the due course of activities, the QOHSEEE core team shall carry out the Aspect Impact exercise in each of its activities with the help of well-defined procedure for Environmental Aspects, Impacts and its Evaluation (AI). Depending upon the impact level of each environmental aspect, control measures will be proposed/ revised in daily standard operational procedures keeping in view of various legal & other requirements, specifications and contractual requirements.

**Procedure:** Environmental aspect & impact identification & evaluation procedure

### **4.3.2 External Stakeholder Engagement in Environmental Policy Development**

We consulted external stakeholders, such as sustainability experts, during the development of our environmental policy to ensure that our approach remains aligned with evolving environmental standards and stakeholder expectations. We also partner with various vendors and service providers to implement key elements of our environmental policy, ensuring effective execution across our operations

## **4.4 Legal & Other Requirements**

The designated regional teams shall identify and follow the various legal and other statutory requirements applicable to their geography during the course of execution for management system requirements and keep the Legal Register up-to-date as required in line with the ISO standards and government guidelines. This is detailed further in the geography specific SOP. The designated team should also identify and update other requirements and comply with these applicable requirements during course of activities carried out.

Here other requirement means requirements by Contract agreement, Business partners, Local Administrative bodies, Local NGO's etc.

**Procedure:** Identification, Maintenance & Reviewing of Legal and Other Requirements Procedure

## **4.5 Objectives and Targets**

The QOHSEEE objectives and targets will be determined and set at a geographical level and will be stored

within the relevant management system with individual and global objectives and targets where necessary.

Firstsource Solutions has both objectives and quantitative targets within its Integrated Management System (IMS), comprising of ISO 9001, 14001, 45001 and 50001, these are presented in the annual Management Review of the IMS.

## 5 Implementation & Operation

### 5.1 Roles and Responsibilities

Roles and responsibilities will be defined within each regional management system's own roles and responsibilities SOP. These may include global responsibilities but will be determined regionally and updated accordingly. Each regional SOP will outline the requirement for senior managers to be responsible for the management systems.

### 5.2 Competence, Training & Awareness

FSL is committed to training all its employees in the appropriate use of its Quality, Occupational Health & Safety, Environment, and Energy management systems, strengthening its management through updating professional and managerial skills, fostering diversity, and emphasizing employee evaluation and motivation. In each geography, the designated team should also conduct and evaluate training for performing hazards identification, risk assessment, and risk control measures. Firstsource is dedicated to fostering environmental awareness and responsibility among both internal and external stakeholders. All contractors on sites will be required to provide evidence of competency, risk assessments, method statements, and any additional relevant documentation prior to commencing work.

### 5.3 Communication, Participation and Consultation

In line with the requirements of ISO 45001, FSL are committed to ensuring clear communication, participation and consultation with all employees. The methods of communication and any prior meetings will be managed separately at each geography or as mentioned in detailed in the relevant geography specific SOP.

**Procedure:** Communication & Participation Procedure

### 5.4 Standard Operational Controls

The Standard Operational Control and respective procedures shall be derived from Risk assessments, controls and aspect impacts forms for different activities for safe & environment friendly operation which shall be implemented during execution of work. These assessments will vary across the geographies.

Apart from the below mentioned, the general practices and system to be followed for safer work environment are as follows:

- All the workers shall be provided management system training (Induction training on applicable standards) on the first day prior to work.

- Technical inputs and behavior-based safety training will be provided to all personnel to enhance their safety performance.
- A periodic center inspection shall be adopted to monitor the QOHSEE performance.
- Periodic QOHSEE audits shall be conducted as per internal audit procedure & plan.
- Procurement or purchase of equipment and contract shall adhere to QOHSEE requirements and shall satisfy the QOHSEE performance.

For Setting up the Standard Operational Control the Centre activities should refer the following general guideline in their respective activities.

### 5.4.1 Housekeeping

- It is everyone's responsibility to maintain cleanliness on sites and employees are encouraged to clean as they go
- Keep the center free from the risk of fire, Bio-chemical Hazard by keeping and maintaining the housekeeping at the best level.
- Use all the Personal Protective Equipment such as hand gloves, nose mask, etc
- Keep work areas and storage facilities clean, neat, and orderly.
- Do not place supplies on top of lockers, boxes, or other moveable containers at a height where they are not visible from the floor and near the heat sources.
- Keep all aisles, stairways, passageways, exits and access ways to buildings free from obstructions at all times.
- Clean and Clear all spilled lubricants & water immediately.
- Keep danger sign boards against the danger of wet floor, broken floor, etc
- Eating will not be permitted on any of the production floors unless this has been approved by operations or due to unforeseen circumstances, including but not limited to, pandemic or other emergencies, at which time operations will communicate the approval by SPOCs. Store safely empty boxes, paint containers, wastepaper, tools or other equipment which shall have a potential to create a hazard like spillage, fire and injury.
- Clear off all the accumulated wastage material at regular intervals.
- Storage areas should be kept free from accumulation of materials that cause tripping, fire, explosion, or the harboring of rodents and other pests.
- Stored material should remain 18" below the plane of the sprinkler heads, or 24" below the ceiling in areas without automatic sprinkler systems.
- Store all cleaning materials and chemicals as per prescribed standards. These materials should be stored in proper storages with correct, clear, visible labelling.
- MSDS (Material Safety Data Sheet) for every stored and used material must be provided by the service provider to ensure usage of environment friendly cleaning material.
- Keep Material safety data sheet readily available with store owner.
- Display the contents / instructions of identified hazardous chemicals from the MSDS near the storage area.
- Provide training for the MSDS and best storage and housekeeping practice to housekeeping employees.
- Make sure sharp tools, paints, pesticide containers and other hazardous items are properly stored.
- Use ISI standards, sound and fault free equipment which should be intrinsically safe & avoid any kind of injury to the equipment operator.
- Also, prior to using these equipment clearances should be obtained from the facilities engineering maintenance team.
- If worker has to work at height endangering his life shall be provided with inspected fall protection gears and training shall be imparted to use these gears such as Full body harness, Ladders, platforms,

etc.

- All the identified and marked dustbins should be covered and cleared time to time.
- The collected garbage should be packed in bags and should be carried using a trolley to the dump yard. All possible personal protection will be used during these operations and all the garbage will be disposed to a proper government licensed Contractors/vendor partners only.
- Collection & Disposal of garbage should be done as per Waste Management Policy

**Procedure:** Waste Reduction, Reuse and Recycling & Disposal Management procedure

## 5.4.2 Cafeteria, Food & Beverage Services

### 5.4.2.1 Hygiene

- Keep the center free from the risk Disease outbreaks by keeping and maintaining the hygiene at the best level.
- The canteen management will take proper hygienic measures and all employees should adhere to the up-keep of Cafeteria all the times.
- The medical fitness certificate of cooking and serving employees shall be submitted to admin team at regular intervals.
- Proper hygiene care should be taken while serving the food, such as wearing caps, gloves, etc.
- Food will be stored in properly cleaned & maintained refrigerator as per the standards.
- Equipment used in cafeteria shall confirm to at the relevant standards.
- Random audits are made at our Contractors/ vendor Partners kitchen to check any service/ hygiene/maintenance related deviations as per the standard audit checklist.
- Audits have to be conducted in presence of QOHSEE/ Food committee member/s and HR SPOC at the Contractors/ vendor Partners kitchen.

### 5.4.2.2 Water and Food Analysis Reports

- Food served at Cafeteria & Drinking Water (Packaged or RO plant water) served to Employees should be tested at regular intervals to ascertain fitness for human consumption. These tests should be conducted at certified laboratories which are fully equipped to conduct Food/ Water analysis.
- Food & Water samples should be taken on random basis without giving any prior intimation to concerned Contractors/ Vendor Partners.
- Drinking water would be provided through packaged water cans, water coolers or through RO plants available within Office premises, wherever applicable.
- Drinking water test are to be done from accredited and authorized laboratory as per the Indian Standards.
- Food test are to be done from accredited and authorized laboratory for Pesticides, veterinary drugs residues, antibiotic residues and microbiological counts and Contaminants, naturally occurring toxic substances, heavy metals, etc per the respective Indian standards testing methodology.
- All food serving operators shall be declared medically fit against his medical fitness for suffering from infectious, contagious or loathsome disease.
- Any deviations found in the reports must be shared with the concerned Contractors/ vendor partners for further corrective measures or penalties are levied as per service level agreement with the concerned Contractors/ vendor partners.
- All reports must be made visible at the cafeteria notice board for ready reference to all Employees.

- To ensure proper functioning of RO Plant equipment, daily checks & chemical dosage would be carried out by in-house facilities team as per the standard and supplier's manual requirement.
- Preventive maintenance will be carried out by the AMC Contractors/ vendor partners on monthly basis.

#### 5.4.2.3 Food Poisoning

- This shall be treated as an emergency situation and shall be identified in central emergency manual for defining actions and authorities.
- All the food should be taken off the serving table. Immediate medical attention has to be arranged by the admin team member on duty. Severe cases must be sent to nearby hospital by vehicles. Follow the procedure & prepare emergency plan for the same under central emergency plan.

#### 5.4.2.4 Health and hygiene

- The Health of the employee will be monitored by the medical incidences reported at occupational health center or clinic, through the sick reporting of employees, as well communications from the local health authority and news, etc
- All the employees will be made aware about the pandemic and epidemic diseases either through the training awareness or through the posters in consultation with doctor on panel and QOHSEE, this will be site specific (specific to India and Philippines geography)
- All best practice of Health and Hygiene posters should be displayed at cafeteria and washrooms.

#### 5.4.3 Workplace, ergonomics & Design

- Workplace design & equipment procurement & placement shall be done in line with the ergonomic requirement of the workplace & equipment taking care of Safety, Comfort, Ease of use, Productivity / Performance, Aesthetics
- The master design layout to be developed as per the building code and regulations.
- Adequate corridors and passages are provided such that in case of emergencies, the fire escape routes are sufficient to cater to the traffic levels that need to get evacuated within the right time.
- Latest fire emergency plan layout to be maintained as per the changes & modifications on floor.
- Design is worked out such that all the fire escape staircases are connected in an unhindered manner, so that main passage serves as the main fire escape route as well.
- Electrical, Plumbing, Smoke detector, Fire sprinkler design & location layout is kept readily available at control room & to be maintained by admin of the center.
- Washroom counts are taken care to check if they are adequate as per the occupancy levels.
- Air Conditioned atmosphere is maintained within the prescribed comfort zone for our employees inside the workspace.
- Allocation of appropriate breakout/ recreation spaces in the floor plate which act as de- stress areas for employees.
- Center shall incorporate of medical rooms & separate gender specific bunker rooms for our employees at center.
- Centre shall incorporate of dry & wet pantry spaces inside the floor plate.
- Design incorporates inbuilt frisking booths, locker rooms, function specific store areas, changing rooms inside the floor plate.
- All workstations will be set up and assessed to workstation set standards as per geography specific requirements prior to employees using the workstation.

#### 5.4.4 Electrical Safety.

- All staff should report to the Facilities Management any damaged electrical apparatus or wiring – including plugs and cables of portable equipment, and permanent wiring.
- Only appropriately qualified/trained staff should repair electrical equipment.
- All electrical powered equipment must not be brought to the center, unless it has been checked and approved by the functional and security center SPOC.
- Certificates of wiring inspections, alterations and portable appliance test & calibration records will be kept readily available with center facility manager.
- Inspection of storages of all equipment shall be done at regular basis.
- All electrical equipment, extensions will be diverted through the life & equipment saving devices such as MCB and ELCB of proper rating.
- Please ensure that electrical equipment is used safely, following the manufacturer's instructions.
- Maintain all electrical equipment as per the manual provided along with them.
- Do not overload sockets, avoid using extension leads and take care to prevent tripping hazards when laying cables.
- All electrical equipment shall be provided with grounding connections and resistance of earth of the same shall be maintained less than 1 Ohm per earth pit.
- Regular inspection and maintenance shall be carried out for earth pits.
- For all In-house Events which require Sound & Lighting arrangements, electrical connections & wiring activity must be carried only with the supervision of facilities team.
- All highly dangerous electrical activities shall be carried out with due permit procedure only.

#### 5.4.5 Operation & Maintenance of D.G. & HVAC system.

Information will be detailed in geography specific SOP.

#### 5.4.6 Stacking & Storage

- Materials, equipment and any other items will be kept in appropriate storage areas. Where this is not possible for temporary reasons, the staff responsible for those materials will ensure that they are stacked tidily, to a height, which does not constitute a hazard, and in such a way that they do not impede the movement of staff, or visitors duly informed to the security in charge of the center.
  - Do not let materials and supplies that are no longer needed accumulate.
  - Manual handling will be minimized with the mechanical aids & equipment.
- Wherever manual handling cannot be avoided Best manual handling awareness shall be given to the employees

#### 5.4.7 Statutory Compliance of Floor design

Floor designs will be completed in compliance with the relevant geographical legislation and guidance. Mentioned in detail in geography specific SOP.

#### 5.4.8 Transport Safety- India only

- All vehicles used for Employee transport would be checked for vehicle condition, Accessories & required legal documentation. Audit would be primarily conducted by the Security team & observations

would be shared with the Transport Team.

- Employees using two wheelers to commute to office must mandatorily use Helmets for safety. Employees without helmets will not be allowed to park their two wheelers inside office premises/ penalty may be levied on such employees.
- Employees using four wheelers to commute to office must mandatorily use Seat Belts for safety. Penalty may be levied on employees failing to wear seat belts.
- Security team may also randomly check vehicle insurance papers for validity. Penalty may be levied on employees without valid insurance.
- The Center Transport Team would conduct Safety Drives & Driver Training at regular intervals for the topics listed below:
  - Importance of Seat Belt usage.
  - Non-usage of Mobile Phone while driving
  - Traffic obedience & discipline
  - Driving tips during Monsoon/ Foggy weather conditions.
  - Importance of Vehicle maintenance.
  - Provision of Fire extinguisher, First Aid, etc in Vehicles

## 5.4.9 Waste Management and Waste Reduction

- All waste shall be segregated such as Normal waste, Hazardous waste, Bio medical waste, Solid Waste, e- Waste etc as per the local regulations & standards
- Waste bins will be identified & placed at various & accessible locations near to waste generation.
- Due care shall be taken while handling the waste.
- The waste will be disposed of as per the regulations & acts through the authorized Contractors/ Vendor Partners.
- The record of the same will be maintained at the respective department.
- Practice of three R's (Reduce, Reuse and Recycle) shall be implemented to waste management.

## 5.4.10 Environmental Performance Management

- All environmentally impacting significant aspects shall be monitored as per the controls defined.
- When it comes to Climate Change we will, reduce our Greenhouse Gas Emissions, reduce our reliance on fossil fuels, explore or climate change vulnerability and look to finance our environmental impact.
- We will ensure that we conserve water wherever possible and other natural resources and protect biodiversity and ecosystems by complying with all relevant legislation.
- We will ensure that we do not emit toxic emissions nor pollute water courses, reduce our packaging materials and waste and ensure that all electronic waste is recycled wherever possible.
- Wherever environmental opportunities exist we will ensure we grasp these, such as green building practices, energy efficiencies and adopting any clean technology.

## 5.4.11 Enhancing Environmental Stewardship and Biodiversity Conservation

At Firstsource, we are committed to proactive environmental stewardship, integrating biodiversity considerations into our operations while ensuring compliance with laws and regulations and setting targets for continuous improvement.



- **Protecting Habitat and Local Species:** We recognize the importance of maintaining ecological balance and supporting local ecosystems. As such, we will actively participate in community conservation initiatives and support local biodiversity preservation efforts. This includes partnering with relevant stakeholders to promote habitat restoration projects and conservation programs that contribute positively to biodiversity conservation.
- **Increasing Plantation and Promoting Awareness:** We commit to increasing plantation initiatives to mitigate emissions and work towards achieving Net-Zero emissions. Additionally, we will foster awareness among our employees and stakeholders regarding the significance of biodiversity conservation. Through educational campaigns, training programs, and community engagement, we will encourage active participation in biodiversity conservation efforts.
- **Minimizing Environmental Footprint and Promoting Eco-friendly Practices:** We will actively seek to minimize our environmental footprint by conserving materials, energy, and water resources. Embracing eco-friendly practices, we will prioritize the use of energy-efficient and sustainable products. Furthermore, we will implement waste segregation strategies, promote recycling initiatives, and discourage the use of single-use plastics to reduce negative impacts on biodiversity. Our commitment extends to partnering with authorized recycling agencies for responsible disposal and adopting sustainable packaging options.

## 5.5 Emergency Preparedness & Response

As per the QOHSEE Standard requirements for Emergency Preparedness & Response, the center management needs to identify potential accidents & emergencies associated with their activities and accordingly develop central emergency preparedness plan as per below mentioned procedure and below mentioned points

- 5.5.1 Roles & Responsibilities of person to take charge during emergency.
- 5.5.2 Details of actions to be taken by personnel during emergency.
- 5.5.3 Evacuation Procedures.
- 5.5.4 Identification & location of hazardous materials, high risk areas, situations & emergency action etc.
- 5.5.5 Facility for communication with employees through public address system, fire alarms & other.
- 5.5.6 Records register & Communication arrangement of emergency communication through badges (backside of badge) & initial introduction with all visitors, business partners & employees
- 5.5.7 Availability of necessary information during the emergency e.g. Layouts (Building layout, Emergency evacuation layout, Electrical Layout, Smoke detectors layout, Fire detection system information & manual, etc.), material safety data sheet, Standard operation procedures & Contact telephone numbers of required persons & authorities to respond emergency situation.
- 5.5.8 Further information will be detailed in the geography specific SOP.

### 5.5.1 Fire Safety

- 5.5.9 Every center is responsible for preparation & execution of Centre Specific emergency plan as per Central Emergency Manual & Fire safety guidelines.
- 5.5.10 In case anybody in the office premises notices any fire hazard, he/ she needs to shout "Fire" repeatedly to alert other employees or use MCP (manual call point) to activate the alarm concerned teams who would take immediate steps to stop the Fire.
- 5.5.11 Fire Instructions can be found at reception and on all production floors.



- 5.5.12 Names of fire marshals/wardens should be known by staff. The fire marshals/wardens are listed on each of the production floors.
- 5.5.13 Emergency Exits, Assembly Point and Assembly Point Instructions are clearly identified by Safety & emergency signs and notices at visible locations.
- 5.5.14 Periodic mock drills shall be conducted to gauge the effectiveness of the Emergency Preparedness and Response Plan for all identified emergencies as per central emergency plan and Fire safety guidelines.

#### 5.5.1.1 Fire Alarm

- 5.5.15 Testing of fire alarms will occur on weekly basis.
- 5.5.16 The Fire Log book will be kept by security and monitored by the Facilities Management team for all alarms and false alarms.
- 5.5.17 The result of each test will be properly recorded in the Fire Log Book and be available for a visiting Fire Officer.

#### 5.5.1.2 Floor Plans

- 5.5.18 Infrastructure shall provide updated floor plan layout to admin department along with handover procedure and after any alteration done on the floor.
- 5.5.19 All updated floor plans shall be maintained at the Admin departments.
- 5.5.20 Updated Floor plans are also displayed at various locations as well as in passage areas near fire exits and main floor plan layout shall be kept at control room.

#### 5.5.2 Medical facilities and First Aid:

- 5.5.21 In applicable geographies:
- 5.5.22 Centers shall maintain a dedicated emergency vehicle to serve medical emergencies as per emergency vehicle policy.
- 5.5.23 Use of medical emergency vehicle for any medical emergency or exigency which will be judged by the transport team shift in charge or the admin lead at center.
- 5.5.24 Exigency of the medical emergency vehicle will be judged by the transport team shift in charge or the admin lead at center in consultation with doctor and/or depending upon the medical emergency.
- 5.5.25 Centre shall have at certified First Aiders at all times on site in line with the geographies regulations and guidance. Details of First Aiders for the site will be displayed at each site.
- 5.5.26 If medical assistance beyond first aid is required, the employee will be sent to the hospital on panel or nearest as per the decision taken by the authorities mentioned in escalation matrix.
- 5.5.27 First aid kits are held on each site with the correct first aid resources required. .
- 5.5.28 Where applicable, only approved list of medicines to be maintained at center as per the instructions from Doctor on panel.
- 5.5.29 Where possible and relevant, centers shall have a medical emergency room to serve medical emergencies which are handled by qualified nurses and medical practitioner.
- 5.5.30 The Centre will follow procedures as outlined on BCP plan. For detailed guidelines to be followed during medical emergencies, please refer Center Emergency Manual.
- 5.5.31 All first aid incidents will be recorded in line with the geographical guidance.
- 5.5.32 The Security Department is required to maintain a record of all injuries & report the same to center head & QOHSEE department.

5.5.33 Where applicable, for more information regarding Medical insurance, please refer Employee Welfare Insurance Policy.

### 5.5.2.1 Health Initiatives and sessions:

Health and wellbeing initiatives and sessions are initiated by the FIRSTLEARN team, globally and per geography and include a range of activities that are open to all FSL employees. Additional onsite initiatives take place on a regular basis and are managed by a designated on site team.

## 6 Documentation and Controls

Document control will be managed within each geography, in line with their own document control procedures and policies and is documented in the geography specific SOP.

## 7 Performance Measurement & Monitoring

As per Identifying, Framing, Implementing & Reviewing of Objectives & Targets Procedure for performance measurement and monitoring, the center management should establish a performance monitoring system with measurable indicators defined as per the objectives and targets. The following are examples of methods that could be used to monitor QOHSEE performance: -

- Systematic center inspection using checklists.
- QOHSEE Audits
- Monitoring of Objectives & targets
- Calibrated equipment

The results of measurement & monitoring shall be presented to Management at a frequency mentioned in Identifying, Framing, Implementing & Reviewing of Objectives & Targets Procedure-

### 7.1 Evaluation of Compliance

For Legal & other requirements and their compliance, the QOHSEE team should evaluate the legal compliance periodically with respect to applicable local legal & other requirements and maintain records of the periodic evaluation as per ERM and Regulatory Compliance Reporting System.

Procedure: Identification, Maintenance & Reviewing of Legal and Other Requirements  
Procedure

### 7.2 Incident / Accident Investigation

Any incidents and accidents on site should be reported in line with the geographical processes and documentation. Further detail can be found within the geography specific SOP.

## 8 Internal Audits

QOHSEE internal audits shall be carried out periodically throughout the year to check and monitor implementation of compliance to procedures, regulation, legislation and applicable management systems. QOHSEE audit is a systematic and documented verification process of objectively obtaining and evaluating evidence to determine whether the center confirms the audit requirement. By systematically undertaking QOHSEE audits and reporting their findings, effectiveness of the management system is measured and actions could be initiated, if required.

The trained QOHSEE auditors having adequate knowledge about the QOHSEE standards and shall carry out the audit. The scope of audit shall include all the activities in the center, which are directly controlled or have an influence on FSL processes. All the clauses of ISO 14001, ISO 9001, ISO 45001 and ISO 50001 would be applicable, while carrying out the audit. During the audit, evidence is collected through interviews, examination of documents, observation of activities and conditions in the audit area. The observations during the audit are documented.

Internal audit findings are reported in the audit report as non-conformities and/or suggestions for the improvement (Observations). Also the findings from incident investigation & unsafe acts, unsafe conditions are also considered for corrective & preventive actions. The concerned center team representatives shall close the audit findings in due course and intimate the same to the lead auditor / team leader of the audit team.

Centre QOHSEE core team shall track the compliance of observations raised during audit and its sustainable implementation.

## 9 Management Review

Management reviews will be conducted at a geography level on an agreed periodic basis and will include senior management to review the performance of the management system.

## 10 Policy Statement

### Quality, Occupational Health, Safety, Energy & Environment (QOHSEE) Policy

At Firstsource, we recognize that our employees are our most valuable assets. We are committed to safeguarding their wellbeing by providing a healthy and safe working environment across all our centers. We believe it is our responsibility to conduct all business activities in a responsible manner, striving to maintain a work environment free from recognized risks for our employees, service providers, suppliers, business partners, communities, and visitors.

Firstsource is dedicated to the continuous improvement of Quality, Occupational Health, Safety, Energy & Environment (QOHSEE) Management, considering both internal and external factors that influence our organization. Our approach is aligned with international best practices and frameworks, including the Paris Agreement, Net-Zero by 2050, and the Science Based Targets initiative (SBTi), reflecting our commitment to global climate action and sustainable development. To achieve the objective, we will:

- Adopt safe and environmentally friendly practices and work procedures across the organization, integrating QOHSEE standards into all business processes.
- Recognize quality as our main competitive advantage, striving to meet and exceed customer expectations while continuously improving our quality standards.
- Comply with all relevant Occupational Health, Safety, and Environmental (OHSE) legal requirements and other applicable obligations, aiming for "beyond compliance" leadership.
- Ensure leadership at all levels is responsible and accountable for proactively addressing factors that negatively impact the work environment, and for promoting positive influences on OHSE management.
- Foster consultation and participation among all stakeholders, including employees, vendors, suppliers, contractors, and the wider community.
- Eliminate risks and prevent occupational ill health and injuries by implementing robust risk assessment and control measures.
- Provide adequate resources for OHSE criteria in the selection and placement of personnel, equipment, suppliers, vendors, and processes.
- Set strategic, measurable objectives and targets, conducting periodic performance reviews to ensure continual improvement.
- Build OHSE awareness and competency at all levels through appropriate training and capacity-building programs.
- Engage all employees and supply chain partners in our OHSE mission, promoting a safe and sustainable upstream supply chain.
- Conduct regular inspections, audits, and mock drills to ensure emergency preparedness and compliance with OHSE requirements.
- Communicate this policy to all employees, vendors, interested parties, and stakeholders, ensuring transparency and accessibility.
- Periodically review this policy to reflect changes in OHSE scenarios, maintaining its relevance to our operations and evolving stakeholder expectations.

#### Climate Action and Environmental Commitments:

- Address climate change by reducing greenhouse gas emissions, decreasing reliance on fossil fuels, assessing climate vulnerability, and seeking to finance our environmental impact, in line with the Paris Agreement and Net-Zero by 2050 goals.
- Set and pursue ambitious, science-based emissions reduction targets in line with the Science Based Targets initiative (SBTi).
- Embed internal carbon pricing mechanisms into strategic and operational decision-making, accelerating the shift toward low-carbon solutions and future-proofing our business against evolving carbon regulations.
- For emissions that cannot be eliminated, invest in high-quality, third-party verified carbon offsets—advancing both nature-based solutions and technological removals, according to internationally

recognized standards (e.g., Verified Carbon Standard or Gold Standard)—ensuring that offsetting complements but does not replace direct emissions reductions.

- Conserve water and other natural resources, protect biodiversity and ecosystems, and comply with all relevant environmental legislation.
- Prevent toxic emissions, avoid watercourse pollution, minimize packaging materials and waste, and ensure responsible recycling of electronic waste.
- Pursue environmental opportunities, such as green building practices, energy efficiency, and adoption of clean technologies, to further our sustainability agenda.

**Accountability and Transparency:**

- We expect all employees and service providers to adhere to QOHSEE procedures and standards, actively contributing to the effective implementation of this policy.
- This policy will be uploaded to the Intranet, displayed at strategic locations for all employees, and shared with interested parties upon request.



Name: Ritesh Idnani  
MD & CEO  
Date: 21 July 2025

**References to International Climate Frameworks:**

Paris Agreement: Our commitment to reduce greenhouse gas emissions and limit global warming aligns with the Paris Agreement's objectives.

Net-Zero by 2050: We are dedicated to achieving net-zero emissions by 2050, in accordance with global climate action targets.

Science Based Targets initiative (SBTi): We are committed to setting and validating science-based targets for emissions reduction, ensuring our climate actions are aligned with the latest climate science.

## 11 Revision Log

Version	Changes Made	Revision Date
V1.00	Policy Statement was signed by CEO and now changed signature to CFO	26-08-2022
V1.1	Changes to environmental objectives added and updated Policy Statement	08-11-2022
V1.2	Changes to Scope/ Objective, Objectives and Targets and Competence, Training & Awareness	31-01-2024
	Policy Statement signed by CEO	31-01-2024
V1.3	Added biodiversity conservation initiatives and enhanced environmental stewardship section	01-07-2024
V1.4	Revised the environmental policy incorporating Climate framework and Internal Carbon Pricing	21-07-2025
	Revised Policy Statement signed by CEO	21-07-2025
	Changed QHSEE to QOHSEE	1-08-2025