

HFCL Limited

**Occupational Health and Safety (OHS)
Policy**

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1.0	Mr. Neeraj Ahuja, Vice President – Operations	1 April, 2025	Mr. Harshwardhan Pagay, President

1. Objective

HFCL Limited (**"HFCL"** or the **"Company"**) is committed to safeguarding the health, safety, and overall well-being of its employees, workers, contractors, and all stakeholders engaged in its operations. The Company recognizes safe and healthy workplace as a fundamental element in sustaining long-term business success and maintaining the trust of our people, partners, and communities. HFCL aims to foster a culture of safety and care through proactive risk management, compliance with applicable legal and regulatory requirements, and a commitment to continuous improvement in occupational health and safety practices.

2. Scope and Applicability

This Occupational Health and Safety (OHS) Policy applies to all operations of HFCL Limited across its offices, manufacturing facilities, project sites, and field locations. It covers all individuals employed by or working on behalf of the Company, including full-time, part-time, and contractual employees, as well as consultants, contractors, suppliers, and any other persons under HFCL's supervision or operational control.

The Policy aims to ensure that occupational health and safety standards are consistently upheld across the Company's value chain and work environments, regardless of location or employment type.

3. Definitions

- **"Company"**, **"we"**, **"our"**, or **"HFCL"** refers to HFCL Limited.
- **"Policy"** refers to this Occupational Health & Safety Policy of HFCL.
- **"Occupational Health and Safety (OHS)"** refers to the policies, procedures, and practices implemented to ensure the physical, mental, and social well-being of individuals in the workplace by preventing work-related injuries, illnesses, and hazards.
- **"Occupational Health and Safety Management System (OHSMS)"** is a structured framework that enables an organization to manage OHS risks and opportunities systematically, in alignment with applicable legal requirements and international best standards, such as ISO 45001.
- **"Zero Tolerance (ZETO)"** refers to HFCL's safety principle that aims to eliminate unsafe working conditions and behaviors across its operations, aiming for zero workplace incidents and fostering a culture of safety accountability.

4. Policy Commitments

At HFCL, ensuring the health, safety, and well-being of our employees, workers, contractors, and stakeholders is a core responsibility and a foundational element of how we operate. Our commitment goes beyond basic compliance, it reflects our intention to embed a culture of safety, dignity, and care across the Company's own operations as well as its value chain.

The Company is committed to complying with all applicable occupational health, safety, and labor laws, including the Factories Act, 1948 (India), the Health and Safety at Work Act, 1974 (UK), EU Directive 89/391/EEC, the US Occupational Safety and Health Act (OSHA) Act, and other local laws in the jurisdictions where we operate. Additionally, HFCL strives to operate in alignment with international best standards such as, including ISO 45001 and the ILO Conventions 155 (Occupational Safety and Health) and 187 (Promotional Framework for Occupational Safety and Health).

HFCL's commitments under this Policy include:

- Providing and maintaining safe, healthy, and hygienic working conditions for all employees, workers, contractors, temporary staff, and others working under HFCL's supervision, across all locations and operations.
- Preventing work-related injuries, illnesses, and occupational diseases by identifying and mitigating health and safety risks throughout our value chain.
- Establishing measurable health and safety objectives and reviewing performance regularly to ensure continual improvement in occupational health and safety outcomes.
- Eliminating hazards and reducing occupational health and safety risks through proactive planning, engineering controls, and regular monitoring, in line with our Zero Tolerance (ZETO) approach.
- Ensuring full compliance with applicable local, national, and international occupational health and safety (OHS) regulations, including customer-specific requirements and globally recognized industry best practices.
- Maintaining and continually improving our Occupational Health and Safety Management System (OHSMS) in alignment with ISO 45001 standards, to remain responsive to evolving risks and regulatory expectations.
- Fostering a culture of safety through regular visual inspections, emergency drills, and the use of appropriate personal protective equipment (PPE).
- Enhancing emergency preparedness and response through regular drills and scenario-based exercises.
- Conducting regular medical check-ups and health assessments to monitor and support employee well-being.
- Promoting mental health, healthy lifestyles, and work-life balance through focused wellness initiatives.
- Ensuring meaningful consultation and participation of employees as well as workers and their representatives in occupational health and safety decision-making processes.
- Supporting responsible health and safety practices among suppliers, contractors, and service providers operating on HFCL premises or delivering services.
- Promptly addressing findings from audits, incident investigations, and grievance mechanisms to drive corrective and preventive actions.
- Providing mechanisms, time, training, and necessary resources to enable ongoing consultation, participation, and capacity-building among employees, workers, and their representatives, thereby empowering them to uphold a safe and healthy workplace.

5. Roles and Responsibilities for Implementation

At HFCL, safeguarding health and safety is a shared responsibility that requires the commitment of leadership, employees, and partners across the value chain. Each group plays a vital role in upholding a safe, healthy, and respectful work environment.

- **Senior Management:** Ensure overall compliance with the OHS Policy by allocating adequate resources, embedding occupational health and safety into strategic and operational decisions, and fostering a culture of care, prevention, and continuous improvement.
- **OHS Team:** Lead the implementation and continuous enhancement of the Occupational Health and Safety Management System (OHSMS) in accordance with ISO 45001 and other applicable standards. Monitor health and safety risks, promote wellness initiatives, and ensure legal and regulatory compliance across all sites.
- **Supervisors and Line Managers:** Implement health and safety procedures on the ground, conduct inspections, respond to identified hazards, and create an environment where health, mental well-being, and physical safety are equally prioritized. Encourage open communication and support the right of workers to refuse unsafe work without fear of retaliation.
- **Workforce (Employees and Contractors):** Adhere to all health and safety protocols, correctly use personal protective equipment (PPE), report unsafe or unhealthy conditions, and exercise the right to stop work when they believe there is an imminent risk to health or safety. Actively contribute to a culture of prevention, well-being, and mutual accountability.
- **Business Partners (Suppliers, Vendors, Service Providers):** Operate in alignment with HFCL's OHS standards and expectations. Take responsibility for ensuring safe and healthy practices at HFCL sites and within their own operations. Engage transparently in audits and assessments and take corrective actions when needed.

6. Grievance Redressal

HFCL is committed to fostering a safe and healthy work environment by ensuring that all employees, contractors, and individuals under its supervision have access to clear and responsive mechanisms for reporting occupational health and safety (OHS) concerns.

Employees and other stakeholders are encouraged to promptly report unsafe conditions, hazards, near misses, and incidents to their supervisors or managers. In addition, OHS-related concerns may be raised as protected disclosures to the Vigilance Officer or, in exceptional cases, to the Chairman of the Audit Committee, as outlined in the Company's Whistleblower Policy.

HFCL has established a comprehensive Incident Investigation and Reporting System to ensure that all reported events are thoroughly documented, investigated without bias, and resolved in a timely manner. All disclosures are treated with the highest level of confidentiality and without prejudice. Reported concerns are addressed promptly through appropriate corrective and preventive actions aimed at eliminating risks and preventing recurrence.

7. Monitoring and Review

HFCL is committed to the continuous improvement of its Occupational Health and Safety Management System (OHSMS) and regularly monitors the implementation and effectiveness of this Policy across all its operations. This includes conducting periodic audits, workplace inspections, and performance evaluations to assess compliance, identify areas for improvement, and measure progress against defined OHS objectives and targets.

The Policy is formally reviewed and updated on an annual basis to ensure it remains aligned with evolving legal requirements, international best standards, and the Company's operational context. This review process incorporates feedback from key stakeholders, including employees, contractors, customers, and regulatory authorities, and considers insights drawn from incidents, investigations, and audit findings.

The Safety Committee is entrusted with overseeing the monitoring and review process and is responsible for recommending updates to the Board of Directors for final approval.

8. Communication of the Policy

HFCL ensures that this Occupational Health and Safety (OHS) Policy is effectively communicated and accessible to all relevant stakeholders. The Policy is published on the Company's website and intranet and is included in onboarding materials for new employees. Regular training sessions and awareness programmes are conducted to reinforce understanding of OHS responsibilities, procedures, and reporting mechanisms.

The Company also engages with contractors, vendors, and other business partners to communicate its health and safety expectations and promote alignment with HFCL's standards across the value chain.

9. Related Policies

This policy should be read alongside the following policies of HFCL:

S. No.	Policy
1	Whistleblower Policy
2	Code of Conduct
3	Human Rights Policy