

HEALTH, SAFETY AND ENVIRONMENT POLICY

Pursuant to the Occupational Safety, Health and Working Conditions Code, 2020; Factories Act, 1948; and Environment (Protection) Act, 1986

1. Our Commitment

ShinzoX Group Limited is committed to conducting its operations across all business verticals — including healthcare, banking and financial services, information technology and digital services, global trade, spirits, logistics, and industrial equipment — in a manner that protects the health and safety of every employee, contractor, visitor, and community member, while minimising our environmental footprint. We believe that all occupational incidents, injuries, and adverse environmental impacts are preventable. This is not merely a compliance commitment — it is a core business and ethical imperative.

Our HSE Vision

"Zero harm to people, zero damage to the environment — in everything we do."

2. Scope

This Policy applies to:

All employees, contractors, sub-contractors, and temporary workers engaged at any ShinzoX facility, project site, or operational location

All offices, factories, warehouses, logistics hubs, healthcare facilities, and field operations

Activities undertaken by third parties on behalf of ShinzoX Group Limited where the Company has operational control

3. Legal and Regulatory Framework

The Company shall comply with all applicable health, safety, and environmental laws and regulations, including but not limited to:

The Occupational Safety, Health and Working Conditions Code, 2020

The Factories Act, 1948 and rules thereunder

The Environment (Protection) Act, 1986 and rules thereunder

The Water (Prevention and Control of Pollution) Act, 1974

The Air (Prevention and Control of Pollution) Act, 1981

The Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016

The E-Waste (Management) Rules, 2022

Sector-specific regulations applicable to healthcare, spirits manufacturing, logistics, and industrial operations

4. HSE Principles

4.1 Leadership and Accountability

HSE performance is the personal responsibility of every manager and employee. Every business unit head is accountable for HSE outcomes within their area. HSE performance shall be included in the KPIs of all managers. The Managing Director (Virendra Pratap Singh) shall personally review HSE performance at least quarterly.

4.2 Risk Assessment and Hazard Control

The Company shall conduct systematic risk assessments for all significant operational activities and workplaces. Hazards shall be controlled through the hierarchy of controls: Elimination > Substitution > Engineering Controls > Administrative Controls > Personal Protective Equipment (PPE). Risk assessments shall be reviewed annually and after any significant incident, near-miss, or change in operations.

4.3 Safe Working Practices

The Company shall develop and maintain written Safe Operating Procedures (SOPs) for all high-risk activities. Permit-to-Work systems shall be implemented for confined space entry, hot work, working at height, electrical isolation, and other high-hazard tasks. No work shall proceed without adequate risk controls in place.

4.4 Incident Reporting and Investigation

All accidents, near-misses, occupational illnesses, and dangerous occurrences shall be reported immediately to the HSE function and the relevant line manager. All incidents shall be investigated to determine root causes, and corrective actions shall be implemented, tracked, and verified. Serious incidents shall be reported to the Board and relevant regulatory authorities as required by law.

4.5 Emergency Preparedness

Each facility shall maintain an Emergency Response Plan covering fire, medical emergency, hazardous material spill, natural disaster, and security incidents. Emergency response equipment (fire extinguishers, first aid kits, emergency exits) shall be maintained in working order. Emergency drills shall be conducted at least twice annually.

4.6 Occupational Health

The Company shall:

- Provide pre-employment and periodic medical examinations for all employees in hazardous roles
- Monitor workplace exposures to noise, dust, chemicals, radiation, and ergonomic risks
- Provide access to occupational health services and an Employee Assistance Programme (EAP)
- Promote employee wellness, mental health awareness, and healthy working conditions

4.7 Environmental Management

The Company shall:

- Monitor and manage air emissions, effluent discharges, and solid waste across all facilities
- Minimise the use of natural resources (water, energy, raw materials) and pursue circular economy principles
- Prevent pollution at source wherever practicable
- Obtain and maintain all required environmental consents, authorisations, and NOCs
- Conduct Environmental Impact Assessments for new projects as required under applicable law
- Disclose environmental performance in the Company's Business Responsibility and Sustainability Report (BRSR)

5. Training and Competence

The Company shall ensure that all employees and contractors receive HSE induction training before commencing work, and role-specific HSE training appropriate to the hazards they encounter. Refresher training shall be provided at least annually. HSE competence shall be a criterion for role assignment in high-hazard functions.

6. Contractor Management

Contractors working at Shinox facilities or on Shinox projects shall comply with this Policy and all applicable site HSE rules. HSE performance shall be a criterion in contractor selection. The Company shall monitor contractor

HSE performance and shall suspend or terminate contractors with persistent non-compliance.

7. Performance Monitoring

The Company shall track and report HSE performance indicators including:

- Lost Time Injury Frequency Rate (LTIFR) and Total Recordable Injury Rate (TRIR)
- Number of near-misses reported and resolved
- Regulatory inspections and compliance status
- Environmental emissions, effluent quality, and waste generation data
- Employee health monitoring outcomes

HSE performance shall be reported to the Board at least quarterly and disclosed publicly through the Annual Report and BRSR.

8. Review and Continuous Improvement

This Policy shall be reviewed annually by the Board. The Company is committed to continuous improvement in HSE performance and shall set annual targets for each key performance indicator. Lessons learned from incidents and audits shall be shared across all business units.

Signed: Virendra Pratap Singh, Chairman & Managing Director, ShinzoX Group Limited