

**Kewaunee Labway India Private Limited**  
**Occupational Health and Safety Policy**

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<b>Reviewed by (VP- Finance, Treasury and Compliance)</b>	<i>Rani Tibrewal</i>
<b>Approved by (Managing Director)</b>	<i>[Signature]</i>

## 1. Introduction

Kewaunee Labway India Private Limited (Kewaunee or the Company) is committed to providing a safe, healthy and injury free workplace for all employees, workers, contractors, visitors and other interested parties. We recognize that occupational health and safety is an integral part of our business operations and overall performance.

This Health and Safety Policy is established in alignment with applicable legal requirements and international standards with the objective of preventing work-related injury and ill health, ensuring safe and healthy working conditions and continually improving OH&S performance.

## 2. Scope

The policy applies to all operations and facilities managed by Kewaunee extending to every employee whether permanent, temporary or on contract. It encompasses all external providers, contractors and suppliers attending our premises or project sites and covers the full spectrum of our activities including manufacturing, installing, project management and laboratory services.

## 3. Principles

Kewaunee Labway India Private Limited's approach to Occupational Health and Safety is guided by the following core principles, which underpin all our operations, decisions and behaviors:

- **Safety as a Fundamental Value:** Occupational health and safety is a non-negotiable priority and a fundamental value of the Company. We believe that all work-related injuries, illnesses and incidents are preventable and that safe working conditions are essential to sustainable business performance.
- **Legal Compliance and Responsible Conduct:** We are committed to complying with all applicable occupational health and safety laws, regulations and statutory requirements and to meeting relevant international standards and best practices wherever we operate.
- **Hazard Prevention and Risk Reduction:** We proactively identify hazards, assess risks and implement appropriate control measures using the hierarchy of controls to eliminate or reduce occupational health and safety risks across all activities, products and services.
- **Leadership Accountability and Ownership:** Top management and leaders at all levels are accountable for providing safe working conditions, demonstrating visible safety leadership and ensuring that health and safety responsibilities are clearly defined, communicated and implemented.
- **Worker Consultation and Participation:** We recognize that active consultation and participation of workers is critical to effective occupational health and safety management. Employees and workers are encouraged to contribute to hazard identification, risk assessment, incident reporting and improvement initiatives without fear of reprisal.
- **Competence, Awareness and Safe Behavior:** We emphasize competence through appropriate training, awareness and supervision to ensure that all employees, contractors and other relevant parties understand hazards, risks and their responsibilities and perform their work safely.
- **Prevention-Oriented Culture:** We promote a proactive and prevention-oriented safety culture that encourages early identification of unsafe acts, unsafe conditions and near misses, and supports open communication and continuous learning.
- **Continual Improvement:** We are committed to continually improving our Occupational Health and Safety Management System, safety performance and workplace conditions through monitoring, review, corrective actions and integration of lessons learned.

## 4. Definitions

- **Occupational Health and Safety:** conditions and factors that affect or could affect the health and safety of employees or other workers.
- **OH&S Management System:** management system or part of a management system used to achieve the OH&S policy.
- **OH&S policy:** policy to prevent work-related injury and ill health to workers and to provide a safe and healthy workplace.
- **Hazard:** source with a potential to cause injury and ill health.
- **Incident:** occurrence arising out of, or in the course of, work that could or does result in injury and ill health.
- **Near misses:** an incident where no injury and ill health occurs but has the potential to do so.
- **Consultation:** seeking views before making a decision.
- **Participation:** involvement in decision making.
- **Top management:** person or group of people who directs and controls an organization at the highest level.
- **Continual improvement:** recurring activity to enhance performance.

## 5. Policy Commitments

We are committed to providing safe and healthy working conditions across all operations and activities. To achieve this, we commit to the following:

- Ensuring that all occupational health and safety practices comply with applicable legal requirements, regulatory obligations, and other relevant standards.
- Implementing, monitoring and maintaining an effective Integrated Management System aligned with ISO 45001:2018 standard.
- Identifying workplace hazards and assessing occupational health and safety risks associated with routine, non-routine and emergency activities and applying the hierarchy of controls to eliminate or reduce risks.
- Providing safe systems of work by ensuring that plant, equipment, materials and processes are designed, operated and maintained to minimize health and safety risks.
- Ensuring that employees, contractors, and relevant parties perform their work safely through appropriate training, awareness, and communication.
- Promoting consultation and participation of workers in occupational health and safety matters including hazard identification, risk control and improvement initiatives.
- Establishing effective emergency preparedness and response arrangements to minimize harm arising from incidents and emergency situations.
- Encouraging prompt reporting, investigation and corrective action for incidents, near misses, unsafe acts and unsafe conditions to prevent recurrence.
- Monitoring, measuring and reviewing occupational health and safety performance to support continual improvement of the OH&S Management system.

## 6. Hazard Identification and Risk Assessment

We shall establish and maintain a systematic process for identifying workplace hazards and assessing occupational health and safety risks associated with all routine, non-routine and emergency activities. Hazard identification shall consider physical, chemical, biological, ergonomic and psychosocial factors across manufacturing, installation, maintenance, logistics and office operations. Identified risks shall be evaluated and controlled using the hierarchy of controls with risks assessments reviewed periodically and whenever there are changes in processes, equipment or working conditions.

## 7. Training and Awareness

We shall ensure that all employees, contractors and relevant stakeholders are competent to perform their work safely through appropriate education, training and awareness programs. Training shall be provided based on job roles, risk exposure and legal



requirements and shall include induction, job-specific training, refresher training, toolbox talks and emergency response awareness. We shall also ensure awareness of this policy, identified hazards, control measures and individual OH&S responsibilities.

### **8. Emergency Preparedness and Response**

We shall identify potential emergency situations that may arise from its activities including fire, chemical spills, medical emergencies, accidents and natural disaster. The company shall develop, implement and maintain emergency preparedness and response plans to minimize harm to people, property and the environment. Periodic mock drills shall be conducted to test preparedness and emergency equipment, first-aid facilities and trained personnel shall be made available and maintained.

### **9. Incident Reporting and Investigation**

Kewaune Labway India Private Limited promotes a no-blame reporting culture. All incidents, near misses, unsafe acts, unsafe conditions and occupational illness shall be reported promptly in accordance with established procedures. We shall investigate reported incidents to identify root causes and underlying system failures. Corrective and preventive actions shall be implemented and monitored to prevent recurrence, and findings shall be communicated to relevant stakeholders to support continual improvement.

### **10. Performance Monitoring and Review**

We shall monitor and measure OH&S performance through inspections, internal audits, compliance evaluations, safety observations and key performance indicators. We shall regularly review compliance with legal and other applicable requirements and evaluate the effectiveness of control measures. OH&S performance and the effectiveness of the management system shall be reviewed by Top management at planned intervals.

### **11. Continuous Improvement**

We are committed to the continual improvement of our Occupational Health and Safety Management System by setting and reviewing OH&S objectives, addressing non-conformities and implementing corrective and preventive actions. Lessons learned from incidents, audits and performance reviews shall be used to strengthen controls and improve safety outcomes. Worker consultation and participation shall be encouraged to enhance safety culture and overall OH&S performance.

### **12. Policy Review**

This Health and Safety policy shall be reviewed at least annually and whenever there are significant changes in operations, organizational structure, legal requirements or occupational health and safety risks to ensure its continued suitability, adequacy and effectiveness.