

## LUMINA DATAMATICS LIMITED

### HEALTH, SAFETY & ENVIRONMENT POLICY

|                |  |                     |                |
|----------------|--|---------------------|----------------|
| Title          | <b>Health, Safety &amp; Environment Policy</b> |                     |                |
| Department     | Human Resource                                 | Version Control     | 2.0            |
| Date of effect | April 1, 2025                                  | Date of Next Review | March 31, 2028 |

*The objective of this policy: A safe workplace and sustainable business*

Lumina Datamatics Limited believes that without a safe and clean environment, healthy working conditions, social justice and economic growth cannot be achieved and that safe and healthy working environment is recognized as a fundamental human right. Employees are considered an asset to the Company, creating and fostering a good workplace is an essential element of a successful and sustainable business.

Health, Safety and Environment (HSE) in the workplace is not only about eliminating the incidence of work-related injuries, diseases, fatalities, disasters and losses of national assets and ensure the achievement of a high level of occupational safety, health and environmental performance through proactive approaches but also to enhance the well-being of employees and society, at large.

Below is our Health, Safety and Environment Policy

At Lumina Datamatics Limited, we are committed to ensuring a safe, healthy and environmentally responsible workplace. Through continuous improvement, awareness and accountability, we strive for zero harm and sustainable growth.

#### Sustainable use of resources

- **Energy:** Minimizing per capita electricity consumption, and building energy-efficient systems /buildings.
- **Water:** Reducing freshwater wastage and optimizing operations.
- **Paper:** Minimizing the usage of paper through digitization, raising awareness among employees, and smart procurement.
- **Fuel:** Employing efficient equipment and optimizing fuel usage.
- Promoting sustainable development in all our activities including software design and development.
  - Pursuing innovative solutions that can contribute to the overall objective of our firm's health, safety, and environment management.
  - Establishing methods to use energy more efficiently, reduce waste, and prevent accidents.

## **Prevention of Pollution**

- **Waste:** Minimization of waste at the source, segregation, reuse and recycling, and ensuring scientific disposal according to legal norms.
- **Emissions:** Fixing targets for emission reduction of greenhouse gases and employing efficient machinery.
- **Water and Sewage:** Adopting strict recycling and replenishment systems and recycling water.

## **Compliance**

Lumina Datamatics Limited ensures adherence to all relevant legal and regulatory requirements, internal standards, and customer-specific guidelines.

## **Health Safety and Environment Management**

- The HSE Management System at the corporate level is headed by the Chairperson of the Environmental Social Governance Committee and assisted by a cross-functional team.
- In each location, a Department Head heads a local team responsible for HSE activities.
- Internal roles, responsibilities, and authorities are defined and communicated clearly.

## **Risk Management**

- Occupational health, safety, and environmental hazards are identified proactively for all operations, including new, current, or changed processes.
- Quarterly reviews of incidents, with critical hazardous conditions given priority to the elimination or control, are performed.
- Risk assessments are reviewed after applying controls to assess residual risks.
- Involvement by respective personnel and subject matter experts is ensured during the risk assessment.

## **Objectives, Targets, and Management Programs**

- Measurable and achievable HSE objectives and targets are established at every level.
- Action plans are developed, documented, and assigned with clear responsibilities and timelines.
- The views of stakeholders, including regulatory agencies and employees, are considered in setting these objectives.

## **Emergency Preparedness**

- Lumina Datamatics Limited has contingency systems for various emergencies, including natural disasters, technological incidents, and political events.
- The ERT team is set up with clear roles and responsibilities. Emergency Response Procedures (ERP) are established, with clear roles and responsibilities.
- Regular mock drills are carried out to assess readiness and areas for improvement.
- Emergency procedures are reviewed and revised as needed following incidents.

## **Incident Management**

- There is a formal process for reporting, investigating, and rectifying incidents, including near misses and potential risks.
- All staff, contractors, and visitors are required to report incidents.
- Investigations aim to determine root causes and system failures, with corrective measures taken to prevent recurrence.

## **OH&S Committees**

- Occupational Health & Safety (OH&S) committees are formed at every office.
- Committees are headed by the Admin Head and comprise representatives from cross-functional teams, employees, and management.
- The committees analyze incidents, create and implement best practices, and act as a forum for raising concerns and suggesting solutions.

## **Training and Awareness**

- Job nature and likely impact are the basis for determining training needs.
- Employees are provided with induction, job-specific, and refresher training on HSE matters.
- Training addresses emergency preparedness, safe work practices, and the effects of non-compliance.
- E-learning modules and regular demonstrations are utilized to reiterate awareness.

## **Inspections**

- Routine, systematic workplace inspections are conducted quarterly.
- Implied inspections are performed when new hazards are encountered or new substances, processes, or equipment are added.
- Records are kept to monitor the closure of identified gaps and deficiencies.

## **Health & Safety Initiatives**

- Health risk assessments assist in the identification of areas for specialist advice and intervention.
- Wellness among employees is encouraged by workshops, health screening, awareness-raising, and web-based support.
- Employee health information is safeguarded in accordance with data protection legislation; trend data is passed alone to HSE teams for analysis.
- Contract staff and employees are supported by health screening, insurance coverage, and intervention programs based on identified risks.
- Safety culture is prioritized, with individual accountability, controls at the operational level, audits, and ongoing improvement at the heart of Lumina Datamatics' strategy.

### **Health and Safety Committee**

- The Health and Safety Committee will be headed by the Admin Head.
- The Committee shall consist of members from Admin, HR and Operations as indicated in Annexure 'A'.
- This Committee shall meet at least once during every quarter or as and when convened by the Admin Head on the basis of emerging situations.

### **Review**

Maintaining appropriate controls, including periodic review of this policy, to ensure its applicability and relevance to the changing scenarios and stakeholders' expectations.

### **Prepared By**

**Sd/-**  
**Divya Kumat**  
**Corporate Head - Legal & Secretarial**

### **Approved by**

**Sd/-**  
**Sameer L. Kanodia**  
**Managing Director & CEO**

**Annexure A**

| <b>Location</b>   | <b>Admin Team<br/>(Core Team)</b> | <b>HR Team Members</b> | <b>Operations Team Members</b>         |
|-------------------|-----------------------------------|------------------------|--|
| <b>Puducherry</b> | Site Admin Lead                   | Site HR Lead/ nominee  | Nominated by Admin Head/ Delivery Head |
| <b>Chennai</b>    | Site Admin Lead                   | Site HR Lead/ nominee  | Nominated by Admin Head/ Delivery Head |
| <b>Mumbai</b>     | Site Admin Lead                   | Site HR Lead/ nominee  | Nominated by Admin Head/ Delivery Head |
| <b>Noida</b>      | Site Admin Lead                   | Site HR Lead/ nominee  | Nominated by Admin Head/ Delivery Head |
| <b>Madurai</b>    | Site Admin Lead                   | Site HR Lead/ nominee  | Nominated by Admin Head/ Delivery Head |