

# ENVIRONMENT, HEALTH, SAFETY AND WELLNESS POLICY



## PURPOSE

Healing lives responsibly through pioneering green science

## VISION

To establish ourselves as a world leader in green chemical and pharmaceutical industry by harnessing cutting-edge technologies to enhance quality of life.

## OUR VALUES



Challenging Limits



Futuristic Thinking



Empowering Employees



Customer Driven



Quality Everywhere



Environmental Stewardship

## Environment, Health, Safety and Wellness Policy

**Granules Committed to uphold ethical business practices, employee safety, environmental protection, and sustainable operations respecting Human Life and Dignity through the following commitments:**

- Ensure compliance with applicable EHS regulations and enforce adherence to our EHS and Sustainability policies among all stakeholders.
- Achieve Zero Harm to People and the Environment by proactively driving EHS risk reduction through comprehensive hazard identification, robust engineering controls in the planning, design, and execution of all projects and processes, ensuring inherently safer operations, and conducting systematic audits.
- Promote a healthy and safe ecosystem through the implementation of strong industrial hygiene practices, comprehensive occupational health, and wellness programs.
- Build a strong EHS culture by actively engaging employees and contractors, promoting a sense of responsibility and enhancing awareness.
- Working safely is a basic requirement for all employees. Promote a culture of Intolerance to any Safety Violation across the Organization. Outstanding commitment to safety will be recognized and rewarded.
- Proactively identify and act on leading indicators, investigate all incidents to prevent recurrence, and ensure strong emergency readiness through a robust management and response system.
- Assess training needs, deliver competency based training, and ensure open communication to strengthen a sustainable safety, health, and environmental culture.
- Implement a structured review process to evaluate EHS system performance and drive continual improvement through defined objectives and targets.
- Drive circularity by optimizing resource use and applying green chemistry principles, while advancing waste reduction, energy efficiency, and resource conservation to strengthen environmental sustainability through innovative and eco-friendly technologies.
- Promote sustainable procurement by partnering with suppliers to strengthen environmental, health and safety, and ethical practices, enabling a responsible and resilient supply chain.

This policy applies to all workers, contractors, and business partners engaged with Granules, covering all workplaces and associated operations. This policy will be reviewed as and when required, to ensure its relevance and alignment with evolving relevant standards and best practices.



Dr. Krishna Prasad Chigurupati  
Chairman And Managing Director

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# ENVIRONMENT, HEALTH, SAFETY AND WELLNESS POLICY IMPLEMENTATION FRAMEWORK



This Section provides detailed guidance for implementing the organization's EHS policy commitments. Each commitment is supported by expanded actions describing how the company will operationalize safety, health, environmental sustainability, and responsible behavior across all operations, employees, and contractors.

**1. Commitment: Ensure compliance with applicable EHS regulations and enforce adherence to our EHS and Sustainability policies among all stakeholders.**

- Maintain a detailed Legal and Other Requirements Register, listing all relevant national, state, and local EHS laws, including updates.
- Ensure timely renewal of licenses, permits, and statutory clearances.
- Translate legal obligations into internal standards, procedures, and SOPs.
- Communicate key regulatory requirements to all stakeholders.
- Conduct compliance audits and inspections to identify and address gaps.
- Document non-conformities, assign corrective actions, and ensure timely closure with verification.
- Integrate compliance requirements into contractor agreements and vendor onboarding processes.
- Maintain complete and traceable records of permits, inspection logs, training, and audit reports.

**Reference Procedures:** Statutory & Legal Requirements, Legal Compliance Digital Platform, EHS Manual (ISO-14001 & 45001).

**2. Commitment: Achieve Zero Harm to People and the Environment by proactively driving EHS risk reduction through comprehensive hazard identification, robust engineering controls in the planning, design, and execution of all projects and processes, ensuring inherently safer operations, and conducting systematic audits.**

- Conduct early-stage risk identification (HAZID) during conceptual planning, engineering design, and process development.
- Use structured risk assessment techniques like HIRA, JSA, HAZOP, FMEA for all operations, especially high-risk and non-routine tasks.
- Apply the Hierarchy of Controls, prioritizing robust engineering solutions for inherently safer operations.
- Integrate EHS requirements into design reviews, approvals, and Management of Change (MOC) processes.

- Verify and authorize implementation of required risk controls before commencing any activity.
- Conduct systematic audits to evaluate the effectiveness of risk-control measures.
- Use incident trends, audit findings, and near-miss data to continually improve risk assessments and engineering controls.

**Reference Procedures:** Process Safety Management, PHA – Process Hazard Identification & Risk Assessment, Management of Change, Pre Startup Safety Review, Universal CAPA Tracking System, Incident Reporting & Investigation.

### 3. **Commitment: Promote a healthy and safe ecosystem through the implementation of strong industrial hygiene practices, comprehensive occupational health, and wellness programs**

- Identify workplace exposure hazards and establish structured monitoring plans.
- Conduct periodic industrial hygiene assessments using accredited or calibrated methods.
- Implement engineering and administrative controls to minimize occupational exposures.
- Carry out job-specific medical examinations, including pre-placement and periodic health checks.
- Monitor occupational illnesses and analyze surveillance data to detect early risk indicators.
- Promote wellness initiatives addressing mental health, ergonomics, lifestyle, nutrition, and fitness.
- Maintain all records of health surveillance, IH monitoring, and implemented controls.

**Reference Procedures:** Industrial Hygiene, Occupational Health & Medical Examination procedure.

### 4. **Commitment: Build a strong EHS culture by actively engaging employees and contractors, promoting a sense of responsibility and enhancing awareness.**

- Conduct structured safety engagements, including toolbox talks, safety interactions, town halls, and focused discussions.
- Involve employees in committees, audits, inspections, and risk assessments to promote ownership of EHS responsibilities.

- Integrate contractors into all EHS communication processes, meetings, and awareness initiatives. Utilize EHS awareness materials – such as visual boards, digital signage, posters, and videos – throughout the facility.
- Encourage open reporting of concerns and improvement suggestions without fear of retaliation.
- Organize key EHS events, including Safety Week, Environment Day, and Fire Prevention Day, to reinforce organizational awareness.

**Reference Procedures:** Stakeholder Engagement, EHS Training & Communication, Safety Committee Meeting.

**5. Commitment: Working safely is a basic requirement for all employees. Promote a culture of intolerance to any Safety Violation across the Organization. Outstanding commitment to safety will be recognized and rewarded.**

- Define and communicate critical safety rules (Life-Saving Rules) and ensure their consistent enforcement across all levels.
- Incorporate safety expectations into job descriptions, contractor agreements, and onboarding programs.
- Apply fair and well-documented disciplinary actions for serious or repeated safety violations.
- Conduct behavior-based safety observations and provide coaching to reinforce safe practices.
- Implement recognition programs to reward individuals or teams demonstrating strong safety commitment.
- Integrate EHS performance metrics into employee and contractor performance evaluations.

**Reference Procedures:** Life Safety Rules, Contractor Safety Management, Rewards & Recognition and Progressive Disciplinary Measures.

**6. Commitment: Proactively identify and act on leading indicators, investigate all incidents to prevent recurrence, and ensure strong emergency readiness through a robust management and response system.**

- Provide accessible hazard and incident reporting channels, including hotlines, mobile applications, registers, QR codes, and verbal reporting options.
- Conduct routine daily or shift-based inspections to proactively identify unsafe conditions and behaviors.
- Track all reported hazards and ensure timely completion of corrective and preventive actions (CAPA).

- Investigate all incidents using structured Root Cause Analysis (RCA) methods and communicate lessons learned across relevant teams.
- Maintain an updated Emergency Response Plan (ERP) covering fire, chemical spills, medical emergencies, natural disasters, and other foreseeable scenarios.
- Conduct periodic emergency drills – such as evacuation, fire, spill-response, and rescue simulations – to ensure operational readiness.
- Ensure emergency equipment is adequately available, easily accessible, and properly maintained at all times.

**Reference Procedures:** Incident Reporting & Investigation, Onsite Emergency & Response Plan, Operation & Maintenance of Emergency Safety Systems.

## **7. Commitment: Assess training needs, deliver competency-based training, and ensure open communication to strengthen a sustainable safety, health, and environmental culture.**

- Conduct an annual Training Needs Assessment (TNA) aligned with job roles and associated risks.
- Develop an annual training plan covering mandatory and role-specific EHS modules.
- Deliver induction, refresher, and specialized technical trainings (e.g., PTW, LOTO, WAH, confined space, first aid), including contractor training.
- Assess competency through tests, demonstrations, and practical evaluations.
- Maintain open communication using noticeboards, bulletins, digital dashboards, and meetings.
- Ensure functional safety committees with appropriate employee representation.
- Share case studies, incident learnings, and best practices regularly to strengthen awareness.

**Reference Procedures:** EHS Training & Communication, Permit to Work System, LOTO Procedure, Safety Committee Meetings, Universal CAPA Tracking System, Safety Risk Intelligence Dashboard.

## 8. Commitment: Implement a structured review process to evaluate EHS system performance and drive continual improvement through defined objectives and targets

- Establish an annual and mid-year EHS performance review cycle involving leadership, department heads, and functional teams.
- Define measurable EHS objectives, KPIs, and performance targets aligned with corporate sustainability and risk-reduction strategies.
- Monitor leading and lagging indicators such as incident trends, audit scores, training effectiveness, and behavioral safety observations.
- Conduct periodic management review meetings to assess performance outcomes, identify improvement needs, and approve corrective plans.
- Document review results, action items, and resource requirements, ensuring accountability and follow-through within agreed timelines.
- Benchmark EHS performance against industry standards, peer organizations, and regulatory expectations to identify opportunities for advancement.
- Integrate review outcomes into annual planning, budget proposals, competency programs, and risk-mitigation initiatives.
- Maintain transparent communication of performance results through dashboards, notice boards, and digital reporting tools.

**Reference Procedures:** EHS KPI's, Sustainability KPI's, EHS Audits.

## 9. Commitment: Drive circularity by optimizing resource use and applying green chemistry principles, while advancing waste reduction, energy efficiency, and resource conservation to strengthen environmental sustainability through innovative and eco-friendly technologies.

- Minimize waste at source through optimized processes and material substitution.
- Implement waste segregation into hazardous, recyclable, and biodegradable streams.
- Promote Reduce, Reuse, Recycle (3R) practices across operations.
- Monitor water, energy, and raw material consumption and set reduction targets.
- Implement energy-efficiency and sustainability initiatives such as LED lighting, VFDs, water recycling, waste recovery, and renewable energy.

- Track environmental performance indicators and review them regularly with management.
- Conduct awareness programs to promote resource conservation and green practices.

**Reference Procedures:** Energy Management, Waste Management, Water Management, GHG Accounting, Material Optimization and Hazardous Substance Management.

#### **10. Commitment: Promote sustainable procurement by partnering with suppliers to strengthen environmental, health and safety, and ethical practices, enabling a responsible and resilient supply chain.**

- Embed EHS and sustainability criteria into all vendor selection, evaluation, and contracting processes.
- Conduct supplier assessments or audits to verify safety, environmental, and regulatory compliance.
- Communicate organizational EHS expectations and support suppliers in meeting required standards.
- Promote adoption of certified systems such as ISO 14001 and ISO 45001 across the supply chain.
- Prioritize environmentally responsible, energy-efficient, and ethically sourced materials and services.
- Monitor supplier performance and collaborate on continuous improvement initiatives.

**Reference Procedures:** Supplier Sustainability Program, Vendor Management & Supplier Assessment Audits.





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