Infosys HSE Management System

PREAMBLE

Infosys is committed to providing a safe and healthy work environment to all its employees including contract workmen. This Policy elaborates the core intent of the organization on Health, Safety and Environment and its intended implementation.

OZONE -HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM (HSEMS)

Our Health, Safety and Environmental Management System (HSEMS) is certified to ISO 45001:2018 standard and ISO14001:2015 standard. The scope of HSEMS is all activities, which are a part of our operations and employees working for and on behalf of the company including deputees at client sites. Safety and well-being of our employees is accorded the highest priority. The certifications can be found in the following link

https://www.infosys.com/about/esg/certifications.html

HSE POLICY

The Health, Safety and Environmental (HSE) Policy is a statement by the Top Management, enunciating the philosophy and commitment of the Company towards Environmental protection and Management of Health & Safety of employees, contract workmen and visitors and the larger community as relevant. The policy statement is available in the link below

https://www.infosys.com/sustainability/resources/documents/health-safety-environmental-policy.pdf

GOVERNANCE

Infosys has established a Health, Safety and Environmental Management System (HSEMS) under the aegis of the HSE policy and is certified to ISO14001 and ISO45001 in line with the Strategy. The HSEMS at Infosys is headed by the EVP & Global Head finance & Chief Risk Officer. Our Board instituted an Environmental, Social and Governance Committee to discharge its oversight responsibility on matters related to organization wide ESG initiatives, priorities, and leading ESG practices which are demonstrated through our HSEMS. ESG goals are being cascaded to our business leaders and chalking out a roadmap to achieve the same. The ESG Committee of the Board is apprised of the progress on the goals on a quarterly basis.

POLICY OVERVIEW

I. Sustainable Resource Usage:

Aligned to its core values and in line with the Sustainability policy, Infosys intends to work towards conservation of natural resources with guidance from the top management and ensure sustenance.

The focus areas for conservation include and is not limited to:

a. **Energy:**
- Reduction in per capita consumption of electricity through optimization and implementation of emerging technologies in operations
- Construct energy efficient buildings (green buildings)
- Implement smart building solutions
- Harness energy from on-site and off-site renewable sources
  - Sourcing Green power
  - Investing in Solar power

b. **Water:**
- Reduction in per capita fresh water consumption
  - Increased use of recycled water in operations
  - Optimization
  - Implementation of emerging technologies in operations
- Water sequestration
  - Rain water harvesting

c. **Paper:**
- Reduction in paper consumption
  - Digitization
  - Employee Awareness
  - Smart procurement

d. **Fuel:**
  - Use of efficient equipment
  - Optimization

II. Prevention of pollution

Pollution prevention at Infosys covers the following:

a. **Waste:**
- Reduction at source
- Segregation
- Reuse / Recycle
- Scientific disposal in adherence to applicable legislations

b. **Emissions:**
- **GHG emissions:**
  - Aggressive targets and programmes for reduction in GHG emission

- **Stack emissions:**
  - Monitoring and compliance to stipulated legal norms
  - Efficient equipment

- **Sewage:**
  - Stringent water recycling and replenishing systems
  - Reuse of recycled water

- **Noise:**
  - Acoustic enclosures for noise reduction
  - Advanced equipment

III. Compliance Obligations
- Applicable Legal requirements

- Other requirements – Infosys internal requirements like standards / Regulatory Guidelines (NBC), customer requirements, Benchmarking requirements etc.,

IV.   Awareness and Training

Our journey towards continual improvement and embedding HSE culture in the organization involves employee awareness, engagement, and participation. Employees are sensitized on aspects of HSE through induction programmes, mailers, portals, Infy TV, sessions by experts etc.,

ELEMENTS OF HSEMS

I.   HSE Organization

At the Corporate level the HSEMS is headed by the CHIEF RISK OFFICER AND EVP - FINANCE OF the company. A core team of senior representative of business and enabler functions led by Program Manager support the Head HSE to manage the initiative and provide strategic and thought leadership. A team of cross functional managers are responsible for day-to-day management of the initiative. At the location level a cross functional team headed by the Development Centre (DC) Head is responsible for this activity. Detailed roles, responsibilities and authorities are established and published internally.
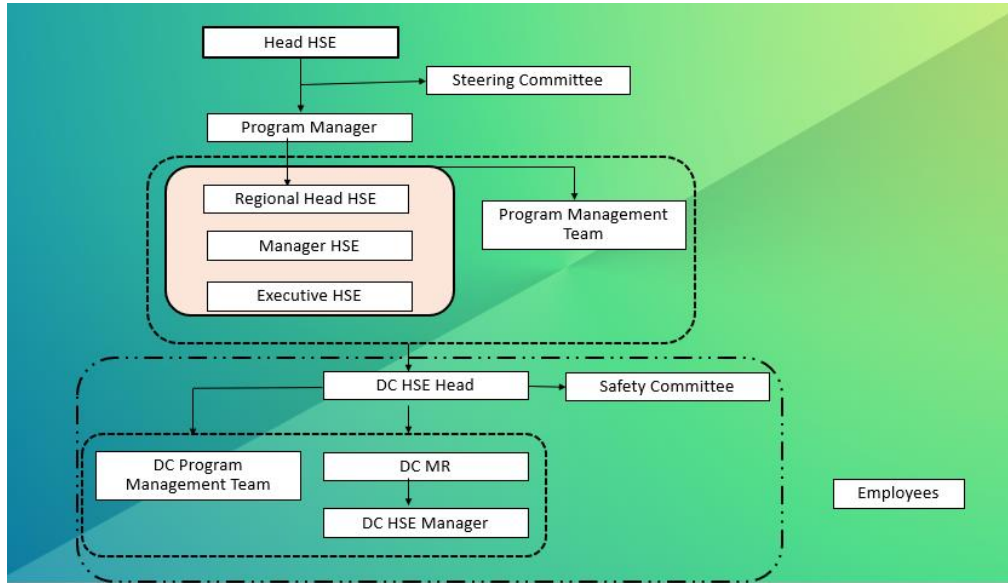
II. Risk Management

We identify occupational health and safety risks and aspects causing an environmental impact proactively, for all existing /new / modified activities, process, products or services, and legal / regulatory changes including routine and non-routine activities. Risk assessment also includes quarterly evaluation of incidents that have occurred. Hazardous conditions present are identified and prioritized for elimination and control. Once the identified hierarchy of controls are implemented, the risk assessment is revisited to assess the residual risks. As Infosys is an IT/ITES company, there are no product risks but those related to the provision of services like ergonomics in work, emotional wellbeing, risks associated with operation of utilities, commute, resource depletion, emissions, Waste management etc. Participation and consultation with relevant personnel involved in the activities is ensured during process of risk assessments. HSE subject matter experts across our locations enable day to day management of the requirements. Risks are also assessed prior to and post the development of new buildings. Experience from previous projects and current operations are also considered.

III. Objectives, Targets and Management Programs

Documented HSE objectives and targets are established and maintained, at each relevant function and level within the campus. When establishing and reviewing environmental, occupational health and safety objectives and targets, the following are considered:

- Significant environmental aspects and their impacts
- Significant OHS hazards and risks.
- Legal & other requirements
- Commitment to the HSE policy
- Use of best available technology, which is economically viable, cost effective and deemed to be appropriate
- Financial, operational, and business requirements
- Views of interested parties such as the Central/State Pollution Control Boards, Regulatory Agencies, investors, customers, neighboring industries, employees, statutory bodies, and neighboring settlements.

The HSE objectives established are measurable and achievable (SMART). A detailed action plan for achieving the HSE objectives and target is decided and documented. The responsibilities and time frames for the action plans are recorded in the Programmes. Each action plan may be subdivided to address specific elements of the action plan (e.g., planning and execution) and recorded in the Programmes for specific measures such as provision of infrastructure/ modifications of systems.

IV. Emergency Preparedness

The company faces the threat of disaster from internal and external sources. They could be natural or man-made, technological, or political disasters. Disasters could be accidental or intentional. Such disasters could be controllable or those beyond the organization's control. Disasters could strike with prior warnings or could come with no prior warnings. We have established contingency systems to minimize damages due to emergencies. Mitigation addresses the positioning of those measures and activities that will lessen the possibility or the impact of an adverse incident occurring in the organization.

Emergency Response procedure (ERP) is established considering various scenarios. The ERP covers aspects like pre-event controls, actions to be taken during the emergency and post event activities. There is a clear definition of roles and responsibilities, and mock drills are conducted at defined frequencies to test our preparedness and identify and address any gaps as per the defined ERP. Emergencies are identified under HSE and BCMS. The emergency response procedure

considering various scenarios is documented with defined roles and responsibilities of personnel. Emergency preparedness and response will also be reviewed and revised, when necessary, after the occurrence of the emergency.

V. Incident Management

A process for Incident management exists including Incident reporting, investigation and implementation of appropriate correction and corrective measures. Employees, contractual staff, visitors are all expected to report incidents including near miss and potential hazards in addition to accidents. Mechanisms have been implemented to report incidents.

The investigations would focus on root causes and system failures and measures are identified and implemented to prevent recurrence or occurrence of such incidents which will enable reduce future injuries and losses. Detailed investigations should be carried out for all incidents. Less serious incidents (near misses or incidents where there is no lost time) should be investigated with a degree of rigor appropriate to the potential for loss or injury.

VI. OH&S Committees

OH&S committees are established at each campus/office. The committees are chaired by respective center heads with representations from employees, senior management, and cross-functional teams. The committee's function in line with local legislations, globally. The representation of employees in the committees is 100%.

The OH&S committees are responsible for conducting investigation of reported incidents, assisting in the development and implementation of the OH&S best practices to minimize risks, and providing an opportunity to raise concerns and recommend solutions for various OH&S-related issues.

VII. Training and Awareness

Embedding a safety-first culture in the organization necessitates competency development. Training needs are identified based on the nature of jobs. Personnel whose work may create a significant impact on the environment or whose work may pose occupational health and safety risk will be given an appropriate orientation to make them aware of:

- The significant environmental, occupational health and safety impacts and consequences, actual or potential, of their work activities and the benefits of improved personal performance.

- Their roles and responsibilities in achieving conformance with the HSE policy and procedures, and with the requirements of the HSEMS, including emergency preparedness and response requirements.
- The potential consequences of deviations from specified operating procedures.
- Specialized safety training sessions dealing with an employee's unique job assignment must be developed by each supervisor. It is the responsibility of each supervisor to understand his/her employee's job tasks and related hazards.
- Training is also provided to employees concerning general safe work practices (Safety Training Program) as well as specific instruction with respect to hazards unique to each employee's job assignment.

Training includes awareness-building, mock drills, classroom sessions and periodic demonstrations. It is also a part of our employee induction programs. E-learning module is available globally as a continuous learning platform for employees. Job-specific trainings are regularly conducted for contractual staff during induction and later through refresher courses.

VIII.   Inspections

A health and safety inspection program is established to ensure reduction in unsafe campus conditions, which may expose employees and the public to incidents that could result in injury to individuals or property damage.

Scheduled workplace inspections

- Regular and systematic workplace inspections are scheduled for all areas. Area specific supervisors are assigned to conduct these inspections.
- The frequency of regular workplace inspections is once every quarter.

Unscheduled workplace inspections

- Departments will conduct an immediate inspection whenever new substances, processes, procedures, or equipment, which represent a new potential health and safety hazard, are introduced.
- Departments also will conduct an inspection whenever notification of a new or previously unrecognized hazard is received.
- Unscheduled inspections of any workplaces to help ensure the maintenance of a safe and healthful workplace. Non-compliance will result in notices of deficiencies being issued.

Records of scheduled and unscheduled inspections are maintained which enable identification of unsafe conditions and work practices. The closure of identified gaps is ensured and tracked.

IX.   Health & Safety

At Infosys, we are committed to providing and maintaining a healthy, safe workplace by:

- Eliminating hazards and reducing risks
- Providing and maintaining safety equipment
- Appropriate, timely, and regular safety training

Well-equipped Occupational health centers are established at our campuses in India with physiotherapy facilities as well. All relevant norms are ensured including competent Medical Staff being provided by the hospitals who are associated for operations of the OHC and physio centers. Health risk assessments are conducted, which enable identification of areas for specialist consultations/interventions. We work on tackling the rising concerns of employee stress, health and overall wellness through workshops, awareness communication, health checks, online chat sessions and focused communication campaigns. In compliance to GDPR and other data protection laws, the specific health information of employees are available only with doctors. Only trends are made available to HSE teams for analysis. Through this, we also ensure the information is not used for any favorable or unfavorable treatment of workers.

There are also benefits provided to employees with options of health checks, interventions through our extended tie up with hospitals to benefit employees and dependents for addressal of non-occupational related illness too. Insurance coverage is ensured for employees and contractual staff. Specific programs for contractual staff like mandatory health checks are conducted, along with interventions based on analysis of the risks or hazards.

Safety at the workplace is accorded one of the highest priorities at Infosys. We have always focused on building a culture of safety, emphasizing individual responsibility. Systems have been established, including work permits, trainings, LOTO (lockout/tagout), safety inspections, audits, operational controls, monitoring, audits and assessments and others. Gaps, learnings, deviations, findings if any are identified, controls implemented and tracked for effective closure.

Comprehensive interventions under the following major themes are planned and ensured:

- Physical wellness

- Emotional wellness

- Safety

- Leisure

X. Environment

Climate change and its ramifications like rising global temperatures, deteriorating air quality and contamination of our waterbodies are among the largest crises looming over the planet in recent times. At Infosys, we recognized the gravity of this issue early on and began focusing on climate action since 2008, through energy efficiency, renewable energy, and carbon offset programs. Our aim to adopt, invent and spread smarter ways to mitigate GHG emission, reduce energy consumption and manage water and waste. To make our planet stronger by consistently embracing clean tech in our operations and client solutions, thereby minimizing the impact on nature. We achieved Carbon Neutrality in fiscal 2020, 30 years ahead of the 2050 timeline set by the Paris Agreement, as a culmination of our decade long efforts in environment stewardship and have been consistently achieving the same for the past 4 years.   Over the past decade, we have leveraged technology to build and run some of the most efficient buildings and campuses globally. Campuses that conserve energy, save water and treat waste responsibly. Our campuses are 'living labs' for clean technology. Leveraging our expertise, we set up the Sustainability Practice Unit in 2020 with a mission to serve the preservation of our planet by shaping and sharing technology solutions. The practice works collaboratively with business units to scale technology-led solutions to tackle climate change. Our sustainability philosophy is about ensuring that our business, our clients' businesses, and our ecosystems are all sustainable. Now, we are bringing our net carbon neutral success to sustainable offerings for our clients' businesses, throughout the market. We have proven that we understand the metrics of sustainability and global reporting criteria.

We have over the years implemented energy efficiency projects across HVAC and lighting spaces through various initiatives that include:

- Retrofits in HVAC – Chiller efficiency improvements
- Augmentation of water heating with solar water heaters
- Lighting
- Transition of remote desktops to VDI interface to automatically shut down desktops which are on
- Replacement of conventional UPS with Modular UPS
- UPS Retrofits leading to over 10% efficiency improvement.
- High efficiency data centers

Infosys by virtue of its long-term commitments on Sustainability including aspects of Climate Change, Sustainable Resource Usage, Prevention of pollution and others in addition to ensuring adherence to applicable legal requirements has made great strides in this area and is a leader in this space. HSE performance is tracked, monitored, reviewed in detail. The areas for Environmental Monitoring include:

- Evaluation of Compliance to ensure adherence.
- Evaluation of progress of environmental goals
- Testing of various parameters through MOEF approved / NABL certified labs to ascertain adherence to applicable norms and ensure parameters are within legal norms.
    - Raw Water, Drinking Water, Sewage Treatment Plant (STP) treated water, Sludge.
    - Stack emissions, Ambient Air, Ambient noise, Insertion loss (DG sets)
    - Used oil (Hazardous Waste) before disposal.
    - Calibration of instruments / solutions against certified instruments/solutions having a known valid relationship to National / International Standards.