ENVIRONMENTAL AND SOCIAL GOVERNANCE (ESG) POLICY

OFFICIAL DOCUMENT

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REVISION LIST

Version	Date	Author	Verified By	Approved By	Revision Reason	Revision Description
1.0	21-Apr-2015	Karthik Ramakrishnan	Dr. S P Singh	Dr. A Raghuvanshi	-	-

1. Objective

NH as an organization and as an employer is committed to environment conservation and health & safety of its associates and will ensure formulation and deployment of relevant process and protocols, undertake preventive action and periodic assessments to manage any risks to its associates arising from work activities. This policy captures NH's position on, and the responsibilities of associates with respect to, Environment conservation, Occupational Health & Safety and Community Health & Safety Practices.

2. Scope

This policy is applicable to all associates at NH including contractors and part-time consultants, patients, patient attendants, visitors, public and the community around NH's existing and upcoming hospital facilities.

3. Responsibilities of various broad stakeholder categories

All Associates are advised to take measures at all times to ensure compliance to the environment and social governance processes. Listed below are responsibilities of all associates, supervisors and the leadership team at NH.

a. Associates Responsibilities (Doctors, Staff, Students and Contractors)

- Read, understand and obey written and verbal ESG guidelines
- Operate only such equipment that he/she has been trained and authorised for safe usage
- Read the Material Safety Data Sheet before using any hazardous material
- Mandatorily use the safety gear provided for the assigned / mandated tasks
- Keep work areas clean and orderly
- Not indulge in actions or work behaviour that may lead to workplace injury for self or others
- Report non-compliance to the ESG guidelines to his/her supervisor
- Assist and facilitate other associates, patients and the general public to comply with the ESG guidelines
- Report incidents in violation of the ESG guidelines for e.g. in case of any accidents or personal injury arising during work activities

b. Supervisor Responsibilities (Head of Departments, Nursing Managers, Paramedical Supervisors, Administrative supervisors)

- Ensure
  - workplace is safe from hazards (refer **Annexure-1**),
  - guidelines are displayed where appropriate
  - non-compliant practices to this policy are identified and corrected
  - provision of relevant training and education and suggest corrective action to ensure compliance to this policy
- Facilitate subordinates to recognise and protect themselves against hazards in the workplace and promote safe use of hazardous materials and monitor compliance to the processes and protocols
- Promote training on energy conservation initiatives
- Ensure incidents in violation of the ESG guidelines have been reported and are escalated to the relevant functions within NH for undertaking suitable corrective measures

c. Leadership Team Responsibilities (Facility Directors, Medical/Nursing Directors/ Superintendent, Group Heads, Centre Heads)

- Ensure work procedures, systems and the working environment are safe and do not pose any health risks
- Implement environment and social governance processes across their area of responsibility
- Provide adequate resources to effectively meet commitment to environment, health & safety
- Engage the workforce in promotion and achievement of safe and healthy conditions
- Provide information, training and supervision to allow employees to carry out their work safely
- Review implementation of relevant actions from the ESG guidelines to meet agreed performance targets
- Take steps to control hazards as they are reported; investigate incidents and implement corrective actions addressing the root causes of the incident

4. Policy Guidelines

a. Environment conservation and promotion of sustainable environment practices

- **Design development process**

- Ensure a multi-disciplinary design team approach, to design and development of new hospital projects, comprising of engineers, operations manager, quality auditors, architects
- Agree on an outcome document for the project keeping in line with this policy
- Implement lean design practices and environment friendly design for new facilities, wherever possible.

- **Land use**

- Preserve to the extent possible presence of natural green cover, water bodies etc.
- Prepare master plan in line with the local regulations & statutory environment policies

- **External development**

- Provide for sufficient outdoor recreational spaces for patients, staff & patient attendants
- Provide for a structured parking for sufficient number of vehicles so as to minimize disturbance to the external public infrastructure
- Promote energy efficient inter-connectivity between various buildings within the campus, to the extent possible
- Maximize rain water absorption by providing for sufficient substrate that improves water percolation into the ground; alternatively promote use of scientific water conservation techniques
- Promote use of energy efficient lighting system for the external campus
- Plan for restoration of green cover that might have been disrupted as a result of the site development and construction
- Maximize utilization of waste water recycling for landscaping

- **Water conservation**

- Restrict use of potable water to human consumption
- Promote treatment and recycling of waste water for utilization in cooling systems, landscaping, flushing and cleaning
- Minimize underground water utilization. Where unavoidable, promote proactive replenishment mechanisms for restoring underground water table

- Establish systems and technologies for minimizing domestic water consumption such as bio-degradable urinals, automatic flushing & metering systems etc.
- Design and implement rain water harvesting measures to capture surface run-off water and utilize for ground water replenishment.

- **Energy Conservation**

- Provide adequate provisions in design for energy efficient measures by benchmarking with international standards such as BEE, ASHRAE etc.
- Provide greater preference for selection of higher energy efficiency equipments and lighting fixtures
- Ensure design and selection of material that are environment friendly such as refrigerants free from chloro-fluoro carbons, lead free paints etc.
- Take steps to reduce carbon foot print thereby proactively working towards minimizing ozone depletion in the atmosphere and reducing greenhouse gas emissions
- Encourage use of renewable energy to the extent feasible
- Provide, to the extent possible, monitoring systems to help effective decision making to reduce energy consumption on an on-going basis
- Implement training and development for employees in proactive energy conservation measures
- Utilize automatic lighting control sensors, wherever possible, to minimize unnecessary lighting and air-conditioning
- Enhance utilization of the natural light and ventilation through adequate design provisions of the building
- Facilitate regular energy & environment audits to identify gaps and benchmark performance against best practices
- Promote utilization of efficient commute options for employees, implement employee and environment friendly HR policies

- **Material use & waste management**

- Provide for waste segregation and aggregation systems in the design to ensure proper collection and disposal of hazardous & bio-medical wastes
- Incorporate hazardous waste treatment prior to disposal as a standard design element for new facilities
- Avoid, to the extent possible, use of substances such as mercury, lead, asbestos etc. that have been documented as hazardous and advised against active use
- Ensure responsible collection and disposal of construction debris & waste into designated disposal points
- Encourage use of recyclable material
- Utilize insulating materials in design for reducing the heat load on the air-conditioning systems to the extent possible
- Manage liquid waste in line with local statutory regulations. Implement processes, to the extent possible, to ensure prevention of bio-contamination of ground water sources
- Implement internal process to ensure regular audit of the contractor in case bio-medical waste management is outsourced
- Institute processes to ensure that procurement of environment unfriendly materials such as non-bio degradable materials is minimized
- Ensure proper treated effluent checks are conducted at appropriate intervals

- **Use of chemicals in delivery of healthcare**

- Reduce use of polychlorinated bi-phenyls and asbestos (in construction materials)
- Phase out glutaraldehyde and ethylene oxide with safer alternatives for sterilization
- Replace formaldehyde with safer alternatives for sterilization
- Phase out mercury containing bio-medical equipments

- Promote use of automation, where possible, in laboratory testing for reducing use of reagents thereby minimizing chemical waste generation
- Institute practices to minimize expiry of drugs / pharmaceuticals thereby minimizing chemical waste generation
- Incorporate, in the formulary review process, measures to identify and therefore prevent use of drugs that are deemed hazardous globally
- Review the use of chemical disinfectants and sterilization agents used in the facility and limit the use of hazardous materials
- Promote pest management practices that are environment friendly

- **Learning & Development**
- Promote training of employees in energy conservation initiatives
- Educate employees in infection control, hand hygiene, energy conservation, environment friendly measures such as reducing waste of water, electricity etc.

B. Occupational Health & Safety

- **Infection control**
- Educate employees on infection control, thereby helping avoid spread of infection within the healthcare facility
- Periodically assess any increase in infectious (endemic / pandemic) diseases load and ensure communication of vaccination requirements, preventive measures and hygiene requirements to employees to minimize chances of spread of infectious diseases within the workplace
- Identify and educate healthcare workers working in high-risk areas such as isolation wards, intensive care units, common patient areas etc. on precautionary measures.
- Institute periodic audit to ensure compliance amongst the employees
- Provide, on behalf of the organization, personal protection items such as gloves, masks etc. with a view to prevent unnecessary contracting of infection by employees and ensure that proper protocols like needle stick injury, etc. are in place.
- Ensure that proper infection control surveillance across all areas of the hospital takes place
- Prevent outbreaks and have a mechanism to handle situations in case of outbreaks

- **Hazardous waste handling**
- Provide employees handling hazardous waste with adequate protective gear
- Conduct programs to educate employees on the precautions to be undertaken. Ensure periodic refresher programs to ensure adherence to recommended practices
- MSDS sheet (Material Safety Data Sheet) to be made available for all hazardous chemicals
- Constitute a HAZMAT handling team for managing large spills across the hospitals

- **Radiation exposure**
- Provide continual monitoring of radiation exposure for employees working in clinical areas having equipments emitting radiation
- Measure radiation emissions on a regular basis through area survey using a survey meter across radiology and Catheterization lab areas
- Through tie-ups with OEMs and through internal maintenance teams, institute a preventive maintenance schedule for ensuring optimal performance
- Provide protective gear against radiation to employees to protect against over-exposure
- Formulate an excessive radiation leakage policy and periodically audit for adherence by means of TLD badge to all Clinical and non-clinical staff working in radiation areas and area surveys by use of survey meter under the supervision of a Radiation safety officer
- Ensure no violation of statutory radiation related regulations

- Ensure periodic inspection of all lead apron, thyroid and gonad shields by Radiation Safety Officer for leakage check at least once in a year.

- **Lifts & fire safety**
- Ensure design of building in line with the applicable fire code
- Provide fire control equipments at appropriate places within the facility
- Educate employees on use of these fire control equipments
- Conduct periodic fire drill to ensure speedy and appropriate response in case of an emergency
- Institute a periodic preventive maintenance schedule of the fire-fighting systems installed on the premises
- Ensure that fire exit points and smoke refuge areas are clearly indicated and free from clutter
- Identify fire marshals for each area to handle any fire related incidence across the hospital 24x7
- Ensure that appropriate fire exit signage and fire escape plans are available at all areas
- Ensure that appropriate instructions are provided to prevent the use of lift in case of fire.

C. Community Health & Safety

- **Public amenities**
- Ensure availability of adequate and clean potable water supply at all public places within the healthcare facility
- Provide sufficient first aid kits to ensure immediate availability of care in case of an emergency
- Highlight emergency exit points from the building and ensure that they are maintained free from obstruction
- Ensure through design and adequate maintenance of equipment, that the indoor air quality is in line with recommended standards.

- **Traffic safety**
- Provide adequate guidance on speed limits within the facility
- Ensure rational utilization of speed restriction mechanisms including speed breakers, check-points as may be applicable.

- **Environmental contamination**
- Establish best practices for minimizing the impact of noise pollution
- Minimize development of heat islands by promoting selection of appropriate materials
- Restrict air pollution and emission levels to maximum values prescribed as applicable in the statutory environment regulations and periodically conduct stack emission and noise emission tests for DGs
- Minimize hazardous chemical spills and leakages from percolating into underground water reservoirs by establishing suitable mechanisms

- **Hazard vulnerability, risk analysis and proactive risk assessment**
- Ensure appropriate hazard vulnerability and risk analysis is carried out proactively across all areas identifying and prioritizing risks for taking appropriate steps to prevent some disasters.
- Conduct periodic safety rounds across the hospital to identify potential hazards and take appropriate corrective and preventive action.

- **Safety codes**

- Ensure that appropriate safety codes, to prevent panic among patients like codes for fire, spills, etc., are in place to provide a safe and secure environment.

5. Implementation & Monitoring

Implementation
The Facility Directors/Centre Heads along with the respective Zonal Administrative and Zonal Clinical Directors will be responsible for implementing the ESG guidelines at their respective hospitals/centres.

The Group ESG Manager will be responsible for overall implementation of the policy and monitoring of compliance to the policy at the Group level. The Group ESG Manager may work with cross-functional teams at the Group level such as Quality, Learning & Development, Projects and Audit to ensure formulation of relevant processes and protocols for the implementation of the ESG policy.

Monitoring
Compliance to the policy will be monitored on an on-going basis by the Unit Leadership team and reviewed by the respective Zonal Leadership.

The Group ESG Manager will conduct periodic reviews and audits (at least 02 (two) times annually) to ensure compliance to the ESG policy at the Group level.

NH Management will review and approve changes to the policy as & when required. The policy review will be carried out at least once in every 03 (three) years.

6. Exceptions

Any exception to the policy guidelines outlined in this document must receive prior written approval of the Unit Facility Director and the Group ESG Manager. All clarification/queries pertaining to this policy must be directed to the office of the ESG Manager.

All exceptions shall be documented and highlighted to the Group CEO's office.

7. Disclaimer

NH will not be liable and shall not hold any responsibility for any acts or omissions that the participants under this policy may commit in their personal capacity.

8. Effective Date

This is with effect from the First day of May 2015.

9. Annexure – 1; Hazards

SAFETY HAZARDS: These are the most common and will be present in most workplaces at one time or another. They include unsafe conditions that can cause injury, illness and death. Safety Hazards include: • Spills on floors or tripping hazards, such as blocked aisles or cords running across the floor • Working from heights, including ladders, scaffolds, roofs, or any raised work area • Unguarded machinery and moving machinery parts; guards removed or moving parts that a worker can accidentally touch • Electrical hazards like frayed cords, missing ground pins, improper wiring • Confined spaces • Machinery-related hazards (lockout/tagout, boiler safety, forklifts, etc.)

BIOLOGICAL HAZARDS: Associated with working with animals, people, or infectious plant materials. Work in schools, day care facilities, colleges and universities, hospitals, laboratories, emergency response, nursing homes, outdoor occupations, etc. may expose you to biological hazards. Types of things you may be exposed to include: • Blood and other body fluids • Fungi/mold • Bacteria and viruses • Plants • Insect bites • Animal and bird droppings.

PHYSICAL HAZARDS: Are factors within the environment that can harm the body without necessarily touching it. Physical Hazards include: • Radiation: including ionizing, nonionizing (EMF's, microwaves, radio-waves, etc.) • High exposure to sunlight/ultraviolet rays • Temperature extremes – hot and cold • Constant loud noise.

ERGONOMIC HAZARDS: Occur when the type of work, body positions and working conditions put strain on your body. They are the hardest to spot since you don't always immediately notice the strain on your body or the harm that these hazards pose. Short term exposure may result in "sore muscles" the next day or in the days following exposure, but long-term exposure can result in serious long-term illnesses. Ergonomic Hazards include: • Improperly adjusted workstations and chairs • Frequent lifting • Poor posture • Awkward movements, especially if they are repetitive • Repeating the same movements over and over • Having to use too much force, especially if you have to do it frequently • Vibration

CHEMICAL HAZARDS: Are present when a worker is exposed to any chemical preparation in the workplace in any form (solid, liquid or gas). Some are safer than others, but to some workers who are more sensitive to chemicals, even common solutions can cause illness, skin irritation, or breathing problems. Beware of: • Liquids like cleaning products, paints, acids, solvents – ESPECIALLY if chemicals are in an unlabelled container! • Vapours and fumes that come from welding or exposure to solvents • Gases like acetylene, propane, carbon monoxide and helium • Flammable materials like gasoline, solvents, and explosive chemicals. • Pesticides WORK

ORGANIZATION HAZARDS: Hazards or stressors that cause stress (short term effects) and strain (long-term effects). These are the hazards associated with workplace issues such as workload, lack of control and/or respect, etc. Examples of work organization hazards include: • Workload demands • Workplace violence • Intensity and/or pace • Respect (or lack of) • Flexibility • Control or say about things • Social support/relations

Source: https://www.osha.gov/dte/grant_materials/fy10/sh-20839-10/circle_chart.pdf