



**Namdev Finvest Private Limited**

Har Pal Aap Ke Saath ..



**Policy Document on  
Environment, Health & Safety &  
Governance**

**NAMDEV FINVEST PRIVATE LIMITED**

Har Pal Aap Ke Saath ..

**Registered Office:**

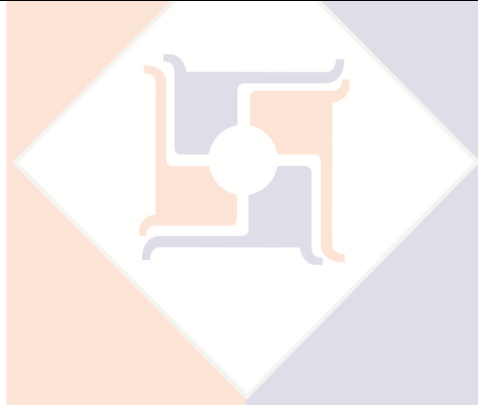
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**Approved By: Board of Directors**

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**Revised on: May 09<sup>th</sup>, 2023**

# **Environmental, Social and Governance (ESG) Policy**

## **1. POLICY STATEMENT**

The ESG Policy of NFPL is driven by its mission to gain a deeper understanding of specific customer segments and fulfil their financial needs, through customized products and simple processes. The ESG Framework of the company is focused towards ensuring overall sustainable development in its area of operation and hence the environmental and social considerations play a significant role in the way it conducts its own business and, in the activities, carried out by borrowers and other stake holders.

## **2. PURPOSE & SCOPE OF POLICY**

The ESG policy is applicable to our employees, customers, key stakeholders associated with us and third-party service providers to the extent possible. This policy shall be applicable to our operations and all the products in consideration or offered by us following the date hereof, and will be interpreted in accordance with Local, State and National Laws and regulations.

NFPL also recognizes that Environment Health and Safety (EHS) is an important and integral component of the broader ESG policy. The company, its employees, members and other stake holders are committed to providing a safe and healthy working environment and comply with all regulations for the preservation of the environment. They will prevent the wastage of natural resources and minimize any hazardous activity during its operations and disposal of waste. They will strive for a safe and healthy environment, free from occupational injury & diseases. The company will also pursue high standards of safety, health and environmental management as an integral part of efficient management of the business.

## **3. GUIDING PRINCIPLES**

The Company will commit to continuous improvements with respect to management of the environment and social matters and work overtime to apply relevant international best practice standards with appropriate targets and timetables for achieving them. Therefore, the Company will implement management systems which effectively address E&S risks and realize E&S opportunities as a fundamental part of a company's value and to act in accordance with the following principles.

- ✓ minimize adverse impacts and enhance positive effects on the environment and all stakeholders (including employees and any affected communities) as relevant and appropriate;
- ✓ make efficient use of natural resources and to protect the environment wherever possible;
- ✓ support the reduction of greenhouse gas emissions;
- ✓ work within a defined timeframe towards full compliance with the Core labour Standards and the Basic Terms and Conditions of Work and to respect the International Bill of Human Rights in line with the UN Guiding Principles on Business and Human Rights;
- ✓ operate in accordance with good international industry practices, recognize and, as appropriate, promote the social aspects of the development impact;
- ✓ consider the potential for positive impacts and opportunities from business activities (e.g., certifications to enter new markets, strengthening of supply chain structures/management).

## **Environment**

- ✓ A model of sustainable development will be followed;
- ✓ The company will monitor, control and upgrade technology to prevent pollution and conserve resources;
- ✓ All projects and processes shall be designed keeping in view environmental protection as an integral part to achieve sustainable development;
- ✓ The company will focus on maximum recycling;
- ✓ The company will ensure reduction in the use of water consumption;
- ✓ The company will ensure permissible noise limit in public places;
- ✓ The company will ensure prohibition on smoking in public places;
- ✓ The company will ensure minimize generation of plastic waste;
- ✓ The company will ensure hand over the e-Waste to the registered buyer.

## **Health**

- ✓ Availability of First Aid Boxes in every department/section and maintenance thereof.
- ✓ The company will impart necessary health education to members.
- ✓ The company will ensure availability of equipped ambulance through third parties at all the times to shift the patient to the nearest hospitals.

## **Safety**

- ✓ Any accident, however trivial it may be, shall be reported. An official or any sub- Committee identified by the ESG Committee shall investigate and find out the probable cause and suggest preventive measures. The recommendations suggested by the officer/team shall be implemented. The company and its members shall strive to achieve zero accident on sustainable basis.
- ✓ Fire extinguishers of required type and capacity shall be installed at appropriate places in the branches/offices. Members shall be imparted training to operate fire-fighting equipment's.
- ✓ Preparation of On-site emergency plans, conducting of regular mock drill and evacuation program will be ensured.
- ✓ Dissemination of relevant information to employees relating to general safety, equipment operating safety and cautioning through visual media.
- ✓ Development of safety culture, enforcement of safety rules and accepted safe practices.

## **Governance**

The company is committed to the principle of transparency and good governance and will ensure the following:

- ✓ Have adequate number of Directors.
- ✓ Provide for adequate transparency about the company's operations, and a governance structure that demonstrates appropriate accountabilities.
- ✓ Take demonstrative action to ensure that its employees are not involved in corrupt practices, ensure that the employees' conduct scrupulously adhere to the policy governing the "Code of Conduct."
- ✓ Employees uphold high standards of business integrity and honesty; and
- ✓ Deal with regulators in an open and co-operative manner.

#### 4. ESG RESPONSIBILITY

Company shall be responsible for following.

- ✓ Compliance with all legislative requirements pertaining to ESG as minimum standard and where ever appropriate, institute additional measures.
- ✓ Review and Revision of guidelines for EHS, whenever required.
- ✓ Dissemination of information regarding EHS amongst members and promoting awareness of EHS by organizing inter department, inter unit competitions and contests throughout the year and specially on the occasion.
- ✓ Observe National Safety Day i.e. 4<sup>th</sup> day of March, National Fire Service Day i.e. 14<sup>th</sup> day of April and World Environment Day i.e. 5<sup>th</sup> day of June.
- ✓ Providing at least 4 hours of EHS training annually to each member, contractors and others who work with the Company.
- ✓ Implementation of guidelines laid down from time to time for safe & healthy environment.
- ✓ Encouraging voluntary involvement of members by creating conducive environment.

The Company shall, on a best-efforts basis, comply with E&S Requirements, implement policies and commit to continuous improvements on E&S matters.

The company will within ten (10) days of a request by Investor, provide such information as is reasonably requested by the Investor to confirm that the Company is in compliance with the E&S Requirements.

#### 5. E-WASTE:

Electronic waste or e-waste is generated when electronic and electrical equipment become unfit for their originally intended use or have crossed its total working life span. Computers, servers, mainframes, monitors, compact discs (CDs), printers, scanners, copiers, calculators, fax machines, battery cells, cellular phones and air conditioners are examples of e-waste (when unfit for use). These electronic equipment's get fast replaced with newer models due to the rapid technology advancements and production of newer electronic equipment.

Some eco-friendly waste disposal technique that the Company can adopt to dispose of electronic waste locally are Dispose of Electronic Waste to a Certified E-Waste recycler;

Exchange Policy: A lot of electronic companies tend to have an exchange policy whereby they take back your old gadgets when you buy a later version, sometimes offering you a discount on your new purchase; or Donate to a small social welfare institution.

**ANNEXURE**  
**EXCLUSION LIST**

This E&S Exclusion List consolidates the following lists:

- Harmonized European Development Finance Institution (EDFI) Exclusion List;
- Harmonized European Development Finance Institution (EDFI) Fossil Fuel Exclusion List;
- International Finance Corporation (IFC) Microfinance Exclusion List; and
- CDC Code of Responsible Investing, Schedule 6 Exclusion List.

The Company will not be involved in any of the following excluded activities:

1. Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements.
2. Trade in wildlife or wildlife products regulated under CITES (Convention on International Trade in Endangered Species). A list of CITES listed species is available on <https://www.cites.org/eng/disc/species.php>
3. Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where the Lender considers the radioactive source to be trivial and/or adequately shielded.
4. Production or trade in or use of unbonded asbestos fibres.
5. Production or trade in pharmaceuticals subject to international phase outs or bans.
6. Production or trade in pesticides/herbicides subject to international phase outs or bans.
7. Unsustainable fishing methods (e.g., blast fishing and drift net fishing in the marine environment using nets in excess of 2.5 km in length).
8. Production or activities involving harmful or exploitative forms of forced labour and child labour.
  - Forced labour means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty as defined by ILO conventions.
  - Child labour means persons may only be employed if they are at least 14 years old, as defined in the ILO Fundamental Human Rights Conventions (Minimum Age Convention C138, Art.2), unless local legislation specifies compulsory school attendances or the minimum age for working. In such cases the higher age shall apply.
9. Commercial logging operations for use in primary tropical moist forest.
10. Production or trade in products containing ozone depleting substances, such as PCBs (Polychlorinated Biphenyls) and other specific subject to internal phase out. PCBs: Polychlorinated biphenyls - a group of highly toxic chemicals. PCBs are likely to be found in oil-filled electrical transformers, capacitors and switchgear dating from 1950-1985.
11. Production or trade in wood or other forestry products from unmanaged forests.
12. Purchase of logging equipment for use in primary tropical moist forest.
13. Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals. Hazardous chemicals includes:
  - Hazardous pharmaceuticals;
  - Pesticides/herbicides or chemicals;
  - Gasoline, kerosene and other petroleum products, including the extraction of oil (conventional and unconventional), gas and other fossil fuels as referred to in no. 20 to 28.
14. Production or activities that impinge on the lands owned, or claimed under adjudication, by Indigenous Peoples, without full documented consent of such peoples.
15. Cross-border trade in waste and waste products, unless compliant to the Basel Convention and the underlying regulations.
16. Destruction of High Conservation Value areas, meaning the (1) elimination or severe diminution of the integrity of an area caused by a major, long-term change in land or water use or (2) modification of a habitat in such a way that the area's ability to maintain its role is lost. High Conservation Value (HCV) areas are

defined as natural habitats where these values are considered to be of outstanding significance or critical importance (see <http://www.hcvnetwork.org>).

17. Pornography and/or prostitution.
18. Racist and/or anti-democratic media.
19. Use of genetically modified organisms (GMOs).
20. Coal prospection, exploration, mining or processing.
21. Oil exploration or production.
22. Standalone fossil gas exploration and/or production.
23. Transport and related infrastructure primarily used for coal for power generation.
24. Crude oil pipelines.
25. Oil refineries.
26. Construction of new or refurbishment of any existing coal-fired power plant (including dual).
27. Construction of new or refurbishment of any existing HFO-only or diesel-only power plant producing energy for the public grid and leading to an increase of absolute CO2 emissions.
28. Any business with planned expansion of captive coal used for power and/or heat generation.
29. Any activity involving significant altercation, damage or removal of way critical cultural heritage.
30. Exploitation of diamond mines, and commercialization of diamonds, when the host country has not adhered to the Kimberley, or other similar international agreements (actual or to be formed), on similar extractive resources.
31. Any sector or service subject to United Nations, European Union and/or French embargo without limitation.
32. Investments with net greenhouse gas emissions of greater than one million tons per annum of CO2 equivalent.
33. Gas-fired power plants.
34. Coal, oil and gas (both conventional and unconventional) exploration and production activities or any operations exclusively dedicated to the transport of these materials.
35. Mini-grid projects powered by “hybrid” power plants of limited capacity unless:
  - a. their specific greenhouse gas emissions are lower than 500kg CO2 equivalent/MWH; the hybrid mix is a minimum ratio of 1/3 renewable to 2/3 diesel by installed capacity; and
  - b. the share of renewable energy by output is a least 50% on an annual basis.
36. Bio-mass projects that undermine food security and/or biodiversity in the location concerned or require significant resettlement of local populations.<sup>(\*)</sup>

The Company will not be “substantially involved” in any of the following excluded activities:

1. Production or trade weapons, munitions or nuclear products, primarily designated for military purposes.
2. Production or trade in alcoholic beverages (excluding beer and wine).
3. Production or trade in tobacco.
4. Gambling, casinos and equivalent enterprises.

For the purposes of the E&S Exclusion List:

- (i) in respect of Investee Entities active in the Financial Services Sector, “**substantially involved**” means an activity representing more than 10% of their underlying portfolio volumes; and in respect of other Investee Entities, “**substantially involved**” means an activity representing more than 10% of their consolidated balance sheets or earning.