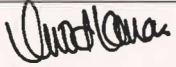
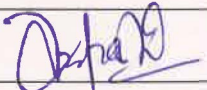




ENVIRONMENT, OCCUPATIONAL HEALTH & SAFETY POLICY



	Name	Designation	Signature	Date
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ENVIRONMENT, OCCUPATIONAL HEALTH & SAFETY POLICY

We, at **Escorts Limited ("EL" or "Company")**, value environment and people as most important resource and are committed to achieve excellence in Environment, Occupational Health & Safety (EHS) management by providing a safe and healthy work environment, at all locations.

VISION:

To develop interdependent safety culture to incorporate and continuously improve the principles and regulations to achieve sustenance of workplace health & safety through education, awareness, training, and other EHS strategies developed through the process. To assimilate the fundamentals of environment protection, health, hygiene and safety in the EL community.

NEED:

The need of the EHS Policy is to align with the expectations of management to our stakeholders and promote the healthy work culture through:

1. Providing transparent guidelines to all stakeholders;
2. Defining the role, responsibility and accountability at all level of Company; and
3. Periodic review and taking necessary actions.

TO ACHIEVE GOALS:

1. The Company is committed for the prevention of occupational injury, hazard & pollution.
2. Providing safe and better technology for ensuring and upgrading EHS standards.
3. Develop, sustain and continually improve safe work practices and standards to safeguard environment, employees, contractors and community.
4. Comply with and endeavoring to exceed all applicable legislative, statutory and regulatory requirements related to Environment, Occupational Health and Safety.
5. Providing information, instructions, training and supervision to employees and service providers to carry out their tasks in safe manner.
6. Monitor and review EHS management systems and working conditions periodically.
7. Minimizing the environmental impact and carbon footprint by optimizing the consumption of energy, conserving natural resources, focusing on renewable resources and adopting and sustaining green initiatives.
8. Providing adequate resources, support and integrating EHS requirements in all activities and decisions for the Company's EHS performance improvement.

All employees should be committed to achieve highest standard of EHS and ensure effective compliance of the EHS policy for achieving the goals specified above.

PROCESS TO ACHIEVE THE GOALS:

The Company has derived the focused approach to achieve the goal in broader category of:

- Leadership approach
- Appropriate structures
- Focused process and actions

In view of the above, roles and responsibilities are defined, for all individuals and departments by developing respective action plan to achieve common goal.

ROLES AND RESPONSIBILITIES:

1. Occupier/ Management

The key responsibilities of the Management regarding the EHS includes but are not restricted to:

- Develop a set of documentation pertaining to the statutory & mandatory requirements for achieving the objectives of this document at Group as well as the Individual Plant Level in line with MTBP.
- Provide framework, periodically analyze & review the effectiveness and implementation of these documents so as to comply with changes/modifications in any legal and other obligatory requirements in horizontal deployment manner.
- Provide means for expert assistance on all aspects related to effectiveness & continual improvement of EHS and compliance to globally recognized standards.
- Provide means to develop strategies and planning to manage & continually enhance the relation between EHS and organization Core Values.
- Provide framework for incorporating EHS responsibilities in all job descriptions & the KRA's of all Employees.
- Provide framework to communicate, receive outcome of the accountability & responsibility for employees at all levels.
- Develop projects and take realistic targets to attain a sustainable management by reducing water & energy consumption, reducing emissions & carbon footprint.
- Provide means & support to participate in EHS related competitions'/awareness programs under National/International agencies to be globally recognized in field of EHS.

2. Plant Head/ Factory Manager:

Factory Manager is the single point of contact for the accountability of EHS Management System for the respective Plant. The functions of Factory Manager include the following but are not limited to:

- Ensure compliance to all requirements specified with legal documentations & other obligations to stimulate the standards of EHS Management throughout the Plant.
- Develop the road map and action plan to achieve the Company's goal and MTBP for EHS and communicate clearly to all stakeholders.
- Provide assistance to Plant EHS Team who will be responsible to organize awareness programs, training and other activities for managing EHS in the Plant.
- Provide means & ensure imparting necessary induction/ refresher/ job specific training(s) to all employees to keep them aware & up to date with the responsibilities, strategies, policies, processes and procedures to aid and improve EHS at work.
- Ensure implementation & review operating procedures and opportunities for the use of EHS friendly strategies/systems.
- Ensure that manufacturing strategies and processes in place are effective to meet EHS objectives and targets.
- Provide means to evaluate the gaps encountered in terms of EHS and to take appropriate action plan to alleviate the risks & develop opportunities, contribute to overall business strategy and annual budget process.
- Take ownership of the EHS policy and therein mentioned objectives, standards, guidelines and other associated documents.

3. Plant EHS Team:

EHS Team/ Manager will be playing pivotal role in developing the Culture which reflect the EHS performances in all directions.

The functions of Plant EHS Manager include the following but are not limited to:

- Provide means & perform periodic audits (internal/external) & inspections to ensure the compliance with respect to EHS requirements specified under local/ national/ international regulations and/or underwritten in Company's standards.
- Provide means for appropriate initial/ refresher/ job specific trainings for employees of all levels to at specific to implement EHS Management Systems at work.

- Develop emergency preparedness by providing means for performing periodic mock drills on fire-fighting, rescue operations, emergency operations, first-aid, etc.
- Maintain & periodically review the Plant Safety Committee Structure for active & equal participation from Union and Management.
- Schedule & provide means to organize Safety Committee Meetings.
- Ensure that detailed & updated operating procedures are provided & maintained for all modes of operations for every Plant process performed therein.
- Provide EHS related training to managers on EHS Management system to review & update procedures formulated upon identifying hazards, associated aspects and take appropriate measures to prevent and/or reduce the risks & impacts.
- Periodically conduct compliance audits under the chairing of respective Plant Head/ Factory Manager and submit the report to the management.
- Identify, document & implement the typical procedures particular to EHS functions applicable for Company's operations. Procedure should be revised & updated periodically to reflect the changes that might take place over time.
- Develop means for investigating unsafe acts/ conditions, near-misses, injuries/illness, fire and/or environmental incidents, enabling the management to take appropriate preventive/corrective action.
- Provide status updates and recommendations to senior management on program and policy development for EHS compliance programs.
- Ensure that the contractors employed to work in and around the installation that involves hazardous processes, materials, environment must be focused to accomplish the desired job tasks without compromising the Health & Safety of all employees.

4. Area Owner(s):

Individual Departments are governed by their predetermined Area Owner(s) who will be responsible for ensuring implementation of EHS in their area(s) either individually or through a Departmental Safety Committee.

Function of Area Owner(s) or Departmental Safety Committee will be:

- Ensure that all statutory requirements must be complied with at all times.
- Ensure that all personnel must use approved safe working procedures without making any risky short-cuts.
- Ensure that all employees are provided basic EHS, fire-fighting, first-aid training and are subjected to general and specific medical checkup on pre-employment and thereafter on periodic basis.
- Ensure that all personnel (own or contractors) deployed must be given relevant training before assigning them work.

- Ensure that a very high standard of housekeeping must be maintained at all places.
- All incidents, however small, must be reported to the Plant EHS Manager and the Plant Head/ Factory Manager. The lessons learned from those incidents must be disseminated to all levels of workforce.
- Ensure that the observations made during Safety Observation Tour (SOT) is disseminated on the SOT boards which are updated to the latest SOT done.
- Ensure that any changes or alteration in the process and facilities are reported to EHS Manager prior to carrying out such changes.
- Ensure that all new, non-routine and/or dangerous activities are subjected to Job Safety Analysis (JSA), Hazard Identification and Risk Assessment (HIRA) and are reviewed with the Plant EHS Manager.
- Ensure that documents containing Process Safety Information (PSI) such as Material Safety Data Sheet (MSDS), Process Flow Diagrams (PFD), other Chemical Hazard, Process Technology & equipment information.
- Provide means & perform Process Hazard Analysis (PHA) and maintain documentation for the recommendations to reduce hazards.
- Develop, implement & maintain clearly written detailed procedures for safely operating & maintaining a process during all operating modes.
- Fully evaluate the initial startup & normal operating procedures to ensure a safe transfer into the normal operating mode.
- Ensure the mechanical integrity by properly installing, maintaining and replacing the process equipment to prevent failure & accidental releases which might result in Pollution to Environment, Damage to property, injury/illness to employees.

Area Owner(s) must understand that any non-compliance of this policy will attract severe disciplinary action. The attendance, involvement, meetings and improvement must be duly recorded in the register that is to be reviewed by the EHS Manager and the Plant Head/ Factory Manager.

Dated 05.04.2022



Shailendra Agrawal

Occupier