



## Statement of Environment, Health & Safety Policy

### 1. The Goal

The ultimate goal of our policy is

- To achieve "Zero Harm". And to achieve this, we are first targeting to achieve "Zero Lost-Time Accidents" in our organization. This milestone will be accomplished by systematically working on all EHS processes to reduce the Frequency Rate (FR) of accidents on a sustainable basis in the years to come.
- Reduce our environmental impact and continually improve our environmental performance as an integral and fundamental part of our business strategy and operating methods.

### 2. The Guiding Principles: This EHS Policy is guided by the following principles.

- 2.1 It is essential to respect human life.
- 2.2 All accidents are preventable as all hazards can be safeguarded either physically or through safe work-procedures.
- 2.3 Safety is integral part of every job and every activity.
- 2.4 Working safely shall be a condition for employment as well as in all of our contracts.
- 2.5 Environment, Health & Safety (EHS) is the basic responsibility of the line management function and they shall assume responsibility for the EHS of all people working in the areas under their control.
- 2.6 Reduce, reuse, and recycle wastes.  
Incorporate suitable techniques for quality improvement, prevention & control of pollution by adopting reduce, recycling and reuse practices in operations and manufacturing processes.
- 2.7 EHS training is essential at all levels. (Management, staff, workers & contractual workers). No one is allowed to work in premises of all the locations of the company without Safety Training.
- 2.8 Periodical internal and external EHS Audit is essential.
- 2.9 EHS promotes good business practices, improves employee morale and

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productivity and pays high dividends in the long term operations of the company.

- 2.10 No work is so important, and no service is so urgent that does not have spare time to do it safely.
- 2.11 The management is responsible for ensuring good environmental practices and operating in a sustainable manner.
- 2.12 Comply with or exceed the requirements of the current occupational health, safety and environmental legislation and codes of practice.
- 2.13 Permit to work for all non-routine activities is essential. Routine activities shall be performed with SOP's (Standard Operating Procedure)
- 2.14 Reporting of each incident, near misses, unsafe conditions and unsafe acts is essential.

Conserve natural resources, in particular water, energy and raw material and promote the development of green surroundings.

**3. Scope of EHS Policy:** The scope of the EHS Policy is applicable to;

- Employees of the Company including trainees and apprentices.
- Service providers including contractors/vendors, transporters and their employees and subcontractors.
- All visitors to our premises.

#### **4. Action Plan for EHS**

Our safety goal shall be achieved by organizing the EHS function at all levels with defined employee accountability and responsibilities and to develop and support a culture that nurtures a safety mindset in the organization. The following specific steps shall be taken to achieve this goal.

##### **4.1 Organizing the EHS Function**

- 4.1.1 Establish an organizational structure to implement the EHS Policy. (Annexure-I)
- 4.1.2 Communicate to all employees about their EHS responsibilities and accountabilities (Annexure-II).
- 4.1.3 Empower each and every employee to take action for implementing the Company's EHS Policy requirements through a mandate, promulgated by the Top Management.



- 4.1.4 Form EHS committees at the unit level for active participation and involvement of employees.
- 4.1.5 Carry out regular EHS training and refresher programmes at all levels.
- 4.1.6 Communicate EHS-related knowledge and information regularly, for fostering deeper understanding and sharing of the best practices.
- 4.1.7 Prepare monthly, quarterly and annual EHS performance reports and analyze and disseminate information from these reports to continually improve the EHS performance.
- 4.1.8 To conduct audits both internally and externally for reviewing and improving the EHS status at the workplace.

#### **4.2 Role of HR Department**

The Head of the HR Department will promote, coordinate, and monitor the EHS Policy implementation in the entire organization.

To guide/ instruct Security for strict compliance of basic discipline in the entire campus starting from the entrance.

Vigilance in the entire plant to avoid any safety non-compliance and ensure availability/ operability of Fire Hydrant, Fire Extinguishers, and other Life Saving Equipment.

#### **4.3 Role of Plant Safety Department**

The Site Safety In-charge will promote, coordinate, implement and monitor EHS activities at the plant level in alignment with EHS Policy, legal obligations and the Policies and Guidelines in coordination with HR Department and under the guidance of the Unit Head. Site Safety In-charge will report to the Unit Head.

#### **4.4 Role of OHC/ Medical Centre**

The Occupational Health Centre (OHC)/ Medical Center will proactively advise to reduce and eliminate Occupational Health Hazards arising out of occupational activities. OHC/ Medical Centre In-charge will be responsible to provide basic support for any injury/ illness of our employee and their family.

The OHC Head will function as Medical Coordinator for enhancing Occupational Health and Hygiene. He will also maintain the occupational disease and injury records and prepare an annual report containing the occupational disease and injury data with trend analysis.



#### **4.5 Review of EHS Progress and Policy**

##### **4.5.1 Review of EHS Progress**

Under the requirements of this policy, periodic and multi-level reviews must be conducted at all levels to monitor and review the progress made towards the achievement of the annual objectives set by the management.

**Annexure 1:** It provides the organizational structure for implementing EHS Policy.

**Annexure 2:** It gives the details of EHS roles and responsibilities of employees at all levels across the organization.

**Annexure 3:** It gives the details of promotion of EHS activities.

**Annexure 4:** It gives the details of Personnel Protective Equipment issuing and re issuing procedures.

**Annexure 5:** Mandate Safety Rules.

This policy supersedes the earlier Safety Policy released on 19<sup>th</sup> Feb 2019 and shall be reviewed periodically to ensure that it remains relevant and appropriate to the company's operations and business.

Date: September 16, 2022

  
(PRAVEEN GUPTA)

Whole Time Director and Occupier