

Department

EHS

ENVIRONMENTAL, HEALTH & SAFETY POLICY

Doc No.	MTL/COR/EHS/PLY/01
Effective Date	03/01/2024
Revision Date	14/02/2025
Revision No.	1

Policy Statement:

Manjushree Technopack Limited (MTL) is dedicated to operating with a commitment to sustainable development principles, aiming to reduce environmental impact and safeguard the well-being of our employees, service providers, contractors, distribution and logistics partners, suppliers, neighboring communities, and customers through our **Environmental**, **Health & Safety (EHS) Policy**.

Scope:

This policy applies to all activities, products, and services conducted by MTL, including all operational sites, due diligence processes, mergers and acquisitions activities, service providers, contractors and distribution and logistics management suppliers, neighboring communities, and customers

We are committed to taking proactive measures by:

- Adhering to all EHS statutory requirements and laws, recognizing compliance with statutory EHS requirements as the baseline performance standard. We are dedicated to exceeding these requirements and embracing more stringent standards.
- Integrating EHS into business decisions to proactively safeguard the health and safety of our employees and communities, while also advocating for environmentally sustainable practices by consultation and participation of workers and worker representatives in EHS planning and implementation process.
- Raising awareness to internal and external stakeholders on environmental management policy and environmental impacts.
- Minimizing waste and emissions, encouraging material reuse and recycling, promoting the
 adoption of renewable energy, reducing greenhouse gas emissions, and conserving energy
 and water whenever feasible to lessen our environmental impact. We actively strive to
 preserve biodiversity, including the habitats surrounding our environment.
- Establishing health and safety standards to cultivate a secure and healthy workplace, consistently working to minimize hazards and risks to prevent workplace injuries and illnesses.
- Communicating both adherence to and deviations from compliance to relevant regulatory bodies and other stakeholders, accompanied by prioritized actions to rectify non-compliance.
- Communicating this policy to employees, customers, shareholders, suppliers, the community, and other stakeholders, including in due diligence processes, mergers and acquisitions, and service provider interactions. MTL EHS Standards, Procedures, and other resources empower these stakeholders to implement this policy and share best practices throughout MTL, promoting continuous improvement and enhancing environmental, health, and safety performance.



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For the Effective Implementation EHS policy, MTL shall:

Establish Objectives and Targets: Our organization is committed to surpassing industry standards by setting clear targets and objectives focused on reducing our environmental impacts. We achieve this by developing, implementing, and maintaining management systems that drive continuous improvement, ensuring we not only meet but exceed our legal obligations and other requirements. In alignment with the Factories Act, 1948, Section 43, we have established an OHS Committee with equal representation from management and employees, ensuring effective communication and collaboration in our safety and environmental initiatives.

Environmental Health and Safety Targets:

- 1. MTL has achieved zero fatalities over the past five years and is committed to maintaining this record continuously.
- 2. MTL aims to achieve zero Lost time injury and to maintain continuously.
- 3. MTL ensures 100% compliance on machinery and equipment safety.
- 4. We commit to obtaining ISO 14001 and ISO 45001 certifications by the end of FY 25.
- 5. We pledge to provide 10 man-hours of training per person, including both company employees and contractors, on Behavior-Based Safety and other EHS (Environmental, Health, and Safety) topics in FY25.

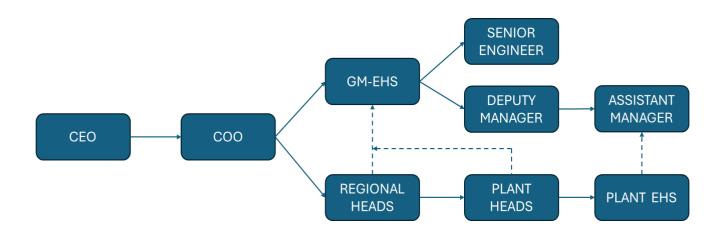
We have identified key areas for improvement within our current processes from an environmental perspective and have set specific targets to enhance these areas.

- ***These targets have been mentioned in their individual policies like energy management /water management /waste management policy ***
- Regular Training: Regular training will be provided to all teams on ESG aspects, tailored to
 their specific needs. This training ensures that each team is well-informed and capable of
 effectively addressing and monitoring environmental, social, and governance issues
 pertinent to their roles, thereby supporting our overall ESG goals and compliance.
- Regular Monitoring: Regular EHS review meetings will occur monthly, involving plant heads
 and their respective EHS personnel. The analysis of EHS objective achievements will be
 closely monitored, and necessary actions will be implemented as needed. Each unit has been
 monitored monthly to assess their progress toward achieving the above-mentioned
 improvement targets.



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- Periodic Review of EHS Policy and EHS Plan: The EHS policy will undergo an annual review, and if any adjustments are necessary, the policy will be upgraded accordingly. The objectives will be updated based on annual trends, and the plant team will formulate site-specific plans to achieve these objectives.
- Plant EHS Committee Meeting: EHS related concerns, risk, opportunities, improvements are
 discussed with EHS committee members that include workers, worker representatives and any
 changes need for new updates or new implementations are initiated by consultation and
 participation of EHS committee members.
- Organizational Structure for EHS Policy Compliance: To ensure effective EHS policy
 implementation, we adhere to a robust organizational structure. Management will provide the
 necessary resources, support, and oversight and Compliance with this Policy will be regularly
 monitored and evaluated by ESG Steering Committee.



CEO (Chief Executive Officer)

- Responsibilities:
 - Sets the strategic direction and overall vision for environmental management within the organization.
 - Provides leadership and ensures adequate resources are allocated for the implementation of the environmental policy.
 - Oversees compliance with legal and regulatory requirements related to environmental management.



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COO (Chief Operating Officer)

- Responsibilities:
 - o Implements the strategic direction set by the CEO in operational processes.
 - Ensures that the environmental policy is integrated into the daily operations and activities of the company.
 - Collaborates with the GM EHS and other key leaders to ensure policy adherence across all levels.

GM EHS (General Manager of Environment, Health, and Safety)

- Responsibilities:
 - Develops, implements, and updates the environmental management policy and related procedures.
 - Provides guidance and direction to regional heads, plant heads, and EHS officers for policy implementation.
 - o Monitors compliance with the policy and reports to the ESG Steering Committee.

Deputy Manager - EHS

- Responsibilities:
 - Assists the GM EHS in developing and implementing the environmental management policy.
 - Coordinates with regional heads, plant heads, and EHS officers to ensure consistent policy implementation.
 - Conducts audits and reviews to ensure compliance with environmental standards and regulations.

Assistant Manager - EHS

- Responsibilities:
 - Supports the Deputy Manager in coordinating policy implementation across different levels of the organization.
 - Provides technical support and assistance to regional and plant heads in environmental management practices.
 - Assists in preparing reports and documentation for the ESG Steering Committee and other stakeholders.

Senior Engineer - EHS

- Responsibilities:
 - Maintaining 100% EPR compliance and filing annual returns for all plants.
 - Assists in preparing reports and documentation for the ESG Steering Committee and other stakeholders.



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 Ensuring and assessing international social compliance for overall organization as per local and international labor standards.

Regional Heads

- Responsibilities:
 - o Oversee the implementation of the environmental policy within their respective regions.
 - Ensure that plant heads and EHS officers are properly trained and equipped to follow environmental guidelines.
 - Report on regional compliance and performance to the GM EHS and the ESG Steering Committee.

Plant Heads

- Responsibilities:
 - Implement the environmental policy at the plant level, ensuring all operations comply with established standards.
 - Work closely with EHS officers to monitor and manage environmental risks and issues.
 - Communicate plant-level environmental performance and challenges to regional heads.

EHS Officers (Environment, Health, and Safety Officers)

- Responsibilities:
 - Conduct regular inspections and assessments to ensure compliance with the environmental policy.
 - Identify and address potential environmental risks and incidents at the operational level.
 - Provide training and support to employees on environmental management practices and procedures.

ESG Steering Committee

- Responsibilities:
 - Regularly monitor and evaluate the implementation and effectiveness of the environmental management policy.
 - Provide feedback and recommendations for policy improvements and strategic initiatives.
 - Ensure that the organization's environmental management practices align with broader ESG goals and objectives.



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This structure ensures a comprehensive approach to environmental management, with clear roles and responsibilities across different levels of the organization to facilitate effective policy implementation.

Conclusion:

In conclusion, MTL is committed to maintaining a comprehensive Environmental, Health, and Safety (EHS) program. Our objective is to continually enhance workplace safety, minimize environmental impact, and prioritize employee well-being. Through regular reviews, robust procedures, and proactive measures, we strive to create a secure and sustainable work environment at MTL.

REVIEWED BY	APPROVED BY	DATE	CHANGES MADE
Kannan B (GM-EHS)	Thimmaiah Napanda Poovaiah (MD & CEO)	03/01/2024	No Changes
Kannan B (GM-EHS)	Thimmaiah Napanda Poovaiah (MD & CEO)	14/02/2025	Included about awareness to stakeholders on EMS