



C.L Gupta Exports Ltd.

18 Km before Moradabad, Delhi Highway
Vill. Jivai, Amroha – 244221, India
Tel: +91 591 2477 000 Fax: +91 591 2477 300

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Environment, Health & Safety Policy

Introduction

C.L. Gupta Exports Limited (herein referred to as either “Company” or “CLG”) considers its employees to be its most valuable assets and undertake steps to safeguard them through providing and maintaining, as far as reasonably practical, a working environment that is safe and without risk to employees’ health. The Company aims at providing and maintaining a healthy and safe working environment, with a view to continuous improvement and is focused on protecting and preventing any adverse impact to environment, wherever it operates, through training, communication & performance measurement of EHS criteria & ensure improvement. The purpose of Health and Safety policies and procedures is to guide and direct all employees to work safely and prevent injury, to themselves and others.

In ensuring a safe and healthy working environment all employees are required to work closely in minimizing any risk that might jeopardize the Health & Safety of employees of the Company. All employees are encouraged to participate in developing, implementing and enforcing Health & Safety policies and procedures. Employees must take reasonable steps to prevent accidents and never sacrifice safety for expedience.

Policy

C.L. Gupta Exports Limited is committed to conduct its operations in compliance with legal regulations and other requirements in line with other party concerns. We are committed to:

- Provide and maintain a healthy, safe workplace and lifestyle;
- Provide and maintain safe equipment with appropriate safety training;
- Protect and prevent any adverse impact to the environment and comply with applicable legal & other requirements;
- Improving environmental quality, by minimizing waste and emissions, reusing and recycling, reducing the use of natural resources, and promoting pollution prevention efforts throughout;
- Conducting operations to ensure culture and values.

Principles

CLG strives to continuously improve the occupational health, safety and environmental performance by adhering to following principles:

- Developing and improving programs and procedures to ensure compliance with all applicable laws and regulations;
- Ensuring that employees/workers are properly trained and provided with appropriate safety and emergency equipment, where applicable;

Taking appropriate action to correct hazards or conditions that endanger health, safety and the environment;





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- Considering safety and environmental factors in all operating decisions including planning and acquisition;
- Engaging in sound re-use and recycling practices and exploring feasible opportunities to minimize the amount and toxicity of waste generated;
- Encouraging personal accountability and emphasizing compliance with standards and conformance with Company policies and best practices during employee training and in performance reviews;
- Communicating our desire to continuously improve our performance and fostering the expectation that every employee will follow this policy and report any environmental, health, or safety concern to management.

Objectives

The policy is a step towards improvement in safety, health and environment at workplace. It seeks to achieve below objectives:

- Continuous reduction in incidence of work related injuries, fatalities, diseases, disasters, and loss of natural assets;
- Improved coverage of work related injuries, fatalities, diseases and provide for a more comprehensive data base for facilitating better performance and monitoring;
- Continuous enhancement of community awareness regarding safety, health environment at workplace related areas;
- Continually increasing Community expectation of workplace health and safety standards;
- Improving safety, health and environment at workplace by creation of “green jobs” contributing to sustainable enterprise development.

Responsibility

- CLG and its employees are committed to provide a safe and healthy working environment and comply with all regulations for the preservation of the environment of the territory it operates in during the course of its operations.
- The Company and its members shall be committed to prevent the wastage of natural resources and minimize any hazardous impact of the development, production, use & disposal of any of its products and services on the ecological environment.
- The Company as a responsible corporate citizen shall consider its obligation to maintain highest standards of the environmental management and ensure for all its members, consultants, contractors and customers a safe and healthy environment free from occupational injury & diseases. The Company & its employees shall pursue high standards of safety, health and environmental management as an integral part of efficient management of the business ensuring that all business decisions are taken after considering the safety, health and environmental implications

Management's Responsibilities:

Will provide and maintain as far as possible:

- To provide and maintain safe working environment;
- To provide safe systems of work;





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- To ensure plant and substances are in safe condition;
- To enforce facilities for the welfare of workers;
- Information, instruction, training and supervision that is reasonably necessary to ensure that each worker is safe from injury and risks to health;
- A commitment to consult and co-operate with workers in all matters relating to health and safety in the workplace;
- A commitment to continually improve our performance through effective safety management.

Workers Responsibilities:

Each worker has an obligation to:

- Comply with safe work practices, with the intent of avoiding injury to themselves and others and damage to plant and equipment;
- Take reasonable care of the health and safety of themselves and others;
- Wear Personal Protective Equipment (PPEs) and clothing where necessary;
- Comply with all instructions given by management for health and safety;
- To not misuse or interfere with anything provided for health and safety;
- Report all accidents and incidents on the job immediately, no matter how trivial;
- Report all known or observed hazards to their supervisor or manager.

Guiding Factors for Health

- Medical check-up at the time of employee joining and regular medical checkups for existing employees & maintenance of records thereof;
- Availability of dispensary 24 hours a day with requisite staff, equipments and necessary medicines to handle any casualty;
- Provision for permanent Medical Officer at CLG's dispensary
- Availability of First Aid Boxes in every department/section and maintenance thereof
 - First aid trained persons in each department/sub departments who are trained time to time from qualified doctors;
 - First Aid Boxes shall be identified, easily accessible and kept in the charge of various department heads (HOD). The photographs and name of First Aid trained persons deputed in that area are pasted there for expeditions;
 - The welfare officer is responsible for routinely maintaining a logbook mentioning the list of indents & replacements of all medicines and first aid items;

Availability of equipped ambulance at all the times to shift the patient to the nearest hospitals

- Beside the facilities of First Aid boxes within the company, there is a panel of Hospitals in case of any major illness or accident. C.L. Gupta Exports Limited has arrangements for employee/workers treatment with nearby hospitals such as:
 - Ahsan Eye Hospital, Lodhipur
 - Medical College, Teerthanker Mahavir University (TMU), Delhi Road
 - Shri Sai Hospital, Moradabad
 - District Hospitals at Amroha and Moradabad
 - Jeevan Nursing Home, Chaudarpur





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Sanitary & Drinking Water facilities

To ensure clean and hygienic working conditions for its employees/workers, the company has:

- Sanitary facilities within the premises with a ratio as one for every 50 employees/workers;
- Separate and identified sanitary facilities for male and female employees working in the company;
- Routine and timely cleaning of toilets ensuring appropriate hygiene standards;
- Housekeeping supervisor responsible for ample water supply in toilets and maintenance of cleanliness records.

Clean Drinking Water Facility

- Drinking water sample is tested by hygienist once in every quarter to meet clean and safe drinking water standards;
- Water filtration equipment fitted at all drinking water points and are replaced as per schedule;
- Overhead water tanks are cleaned periodically;
- Water drinking points are marked in Hindi and optionally in English indicating “Water for Drinking”

Guiding Factors for Safety (Equipments & Protective Clothing)

Any accident, however trivial it may be, shall be reported. A team comprising of members of EHS Committee or any subcommittee thereof shall investigate and find out the probable cause and suggest preventive measures. The recommendations suggested by team shall be implemented. The Company and its employees shall strive to achieve zero accident on sustainable basis.

Fire Safety

- Portable fire extinguishers of required type and capacity shall be installed at appropriate places;
- Employees/Workers shall be imparted training to operate firefighting equipment's;
- Where required sprinkler system and smoke detectors are fixed;

All fire Extinguisher have been identified and ensuring that the equipment is easily accessible

- Fire Extinguisher are inspected and verified on regular basis, fire prevention and equipments working report is obtained every year from the Local Fire Authorities;
- Preparation of onsite emergency plans and evacuation plans made available in all departments;
- All fire exits shall be identified and kept free from obstructions;
- In order to have specific and practical guidelines to ensure full preparedness during any casualty, routine fire mock drills are conducted for CLG employees, records for same are maintained;
- The Company will not use any newly constructed or expanded area for any manufacturing activities without complying with the Health and Safety requirements.





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Work Area Safety

- Encouraging use of Personnel Protection Equipments (PPEs) like Head Gear, Caps, Ear Plug/Muff & Dust Mask, Gloves, Safety Belts, Gumboot, Apron & Goggles etc. However, it will be the responsibility of the workers to use the safety gadgets while on duty.
- Awareness sign boards shall be displayed at production floors and all areas that include hazardous operations.
- Safety instructions has be displayed on machine operative instructions.
- Examination of equipments at regular intervals by internal as well as external agencies.
- Dissemination of relevant information to employees relating to general safety, equipment operating safety and cautioning through visual media.
- To ensure facilities for proper ventilation at production floors.
- Temperature, humidity, noise and lighting levels in production areas are within the legal defined parameters.
- Development of safety culture, enforcement of safety rules and accepted safe practices.

Guiding Factors for Environment

- Sustainable development;
- Open Dumping & open burning is prohibited in the facility;
- 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;
- Maximum recycling;
- Reduction in use of water consumption;
- Additional production of energy from wastes;
- Use of treated water inside the factory premises to maintain the plantation of various plants and particularly eucalyptus plants.

(A) Air Pollution

The Unit shall abide by all environmental legal requirements of the Pollution in the air

- The Unit shall ensure emissions are kept under the permitted level through verification by External Consultant approved by U.P. Pollution Control Board.
- Necessary certificate of compliance of pollution control shall be obtained from U.P State Pollution Control Board by submitting the test report of external authorities.

(B) Noise Pollution

- The Unit shall abide by all environmental legal requirement of the Noise Pollution.
- The Unit shall ensure noise emissions are kept under the permitted level through verification by external consultant approved by U.P. Pollution control board.
- The Unit shall identify the machines causing heavy noise pollution such as Polishing machine, Generators and Hydraulic cutting machines.
- Necessary certificate of compliance of pollution control shall be obtained from U.P. State Pollution Control Board by submitting the test report of external authorities.





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(C) Water Pollution

- The Unit shall abide by all environment legal requirements of the Water pollution.
- The Unit shall ensure water discharges are kept under the permitted level through verification by External Consultant approved by U.P. Pollution Control Board or as per norms set by the government time to time.
- The Unit shall identify the type of water discharges to outside environment. The only discharge is of sanitation water.
- All effluents generated in the Toilets and Urinals shall be discharged and treated in STP.

(D) Non Hazardous Waste

The unit shall take all measures to provide a safe & healthy environment by minimizing Non-Hazardous Waste and their sources.

- All the Non-Hazardous Waste shall be separated and stored in designated areas.
- Non-Hazardous Waste shall be disposed of by selling the same to the scrap contractor and the records maintained accordingly
- The empty containers of lacquer, thinners and chemicals etc. are returned to respective supplier as per agreement.

(E) Environmental Improvements

The company is very well conscious about the environment which is the backbone of the business with International Buyers. Recognizing the responsibilities for implementing environmental legislation, CLG Exports Ltd. is committed to ensure the best practicable protection of the environment under its jurisdiction consistent with commercial opportunity.

The company endorses the principals contained in the environmental codes of practice and will work towards a cleaner environment through the implementation of effective management strategies.

The concept of best environmental options and duty of care will be adopted as guiding principles in the development of the Groups Environmental Management system and targets of improvement and further enhancement will be assessed through planned programs of monitoring and auditing. Accordingly, the company is trying to:

- Seek to conserve natural resources through efficient use and careful planning.
- Carry out an Environmental Improvement Assessment of any significant development, activity and procedure.
- Disposal of waste, particularly hazardous waste, in a safe and responsible manner in accordance with the relevant legislation.
- Develop and maintain an appropriate monitoring system in order to measure progress towards target and confirm where appropriate.
- Make all employees aware of the company's environmental commitments, provide suitable instruction and allocate clear responsibilities.
- Produce emergency plans, which will prevent or minimize pollution in the event of an environmental incident.
- Make contractors aware of their environmental responsibilities.
- Control of waste discharge from factory.





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List of efforts taken by C.L. Gupta Exports Limited to meet above objectives:

Conservation of Natural Resources

The company has an open area of over 70%, which is maintained by green plantation. For its watering the discharge of treated water is used through pumps installed in the sumps. We have arrangements of rain water harvesting as the water is stored in sumps and recycled in cooling zones, thereby the water strata are protected.

The soil's fertility is maintained by protecting it from factory effluents, as we have installed an effective Effluent Treatment Plant & not a single drop is left to flow untreated. To prevent ground contamination, we have in practice secondary containment at every possible place.

Wastes of wood unit (saw dust and wooden pieces) are reused in Boiler and Thermic Fluid Heater for generating steam and heating oil. The steam is used for wood seasoning and heating processing tanks. The heated oil is used to heat the tank in plating department. From surplus saw dust we press them in form of briquettes which have higher Calorific Value and are used again in boiler to generate steam.

The waste from glass department is recycled by mixing with fresh batch of glass raw material and is melted again.

Environmental Impact Assessment

The Company is working towards Carbon Dioxide Emission neutralizing scheme in this area

Disposal of Waste

We have arrangement of segregating non-hazardous waste and hazardous waste. The hazardous wastes are stored according to norms for which we have a License and then disposal is done through approved contractors of Pollution Control Board with whom the company has signed an agreement.

Existence of Monitoring System

The company has a monitoring system for Ambient Air and Noise and the same are checked at all corners of the company for parameters like noise level, humidity, temperature etc. The noise levels at generator points are checked to be within permissible limits and necessary control measures are taken like provision of acoustic walls.

Awareness of Environmental Commitment

An awareness programme is launched for employees on and off. Apart from this EHS Scheme (Environment, Health & Safety) is in existence and monitored through EHS Task Force. Slogans on walls and controls for preservation of plants are promulgated to achieve this target.

Emergency Plans

On site & off site emergency plans are prepared for the company to depict all possible parameters relating to safety, environment and health including Evacuation Plans and test for Internal Air quality.





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Training to Contractors

Like company's employees and work places the same norms of compliances are adhered with respect to contractors and contract workers. Emphasis is laid on importance and usage of Personal Protective Equipments.

Control on Water Discharge from Factory:

The discharge of Polluted/dirty water from factory is also restricted. The company has made following arrangements as:

- a) Soft Treatment Plant (STP);
- b) Rain water harvesting;
- c) Recycling Through STP;

The water is treated to the extent for use in farming within the factory. There are few discharges from where we have inducted recycling fresh water requirement in processes is also met through Rain Water Harvesting. Thereby we are maintaining water balance. As and where required, we also use RO Plants for purification of water.

Contribution to EHS Issues:

1. Induction of Red Tag

If a machine has gone under maintenance and its use under repairs may be risky. The safety department will put a Red Tag on it and records it in the maintenance registers. After satisfactory repairs, Safety Department will remove the Red Tag.

2. Use of Shoes/Gum Boots

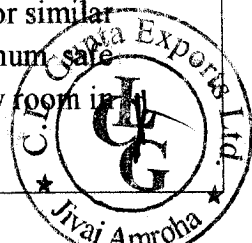
Use of shoes at Production area/work area is very necessary to maintain safety at work. The areas where Acids and other reactive substances etc. are used, the use of Gum boots is recommended.

3. Avoid wearing loose clothes

Workers are not allowed to wear loose clothes at production sites/machine operational areas, loose clothes might get entangle in running machines and results in serious accidents.

4. Safety Measures for Striking gear and Devices for Cutting off Power

- Suitable striking gear or other efficient mechanical appliances to be provided and used to move driving belts to and from fast and loose pulleys which form part of transmission machinery. Driving belt when not in use shall not be allowed to rest or ride upon shaft in motion.
- Further suitable devices for cutting off power in emergencies from running machinery to be provided.
- Casing of New Machinery, every set screw, bolt or key on any revolving shaft, spindle, wheel, or pinion shall be so sunk, encased or otherwise effectively guarded as to prevent danger in all machinery driven by power and installed in the factory.
- Revolving machinery, effective measures shall be taken to ensure that the safe working peripheral speed of every revolving vessel, cage, basket, flywheel, pulley disc or similar appliance driven by power is not exceeded. A notice indicating the maximum safe working peripheral speed of every revolving machinery shall be put up in every room in a factory in which the process of grinding is carried on.





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5. Other Safety Measures in General

- Floors, stairs and means of access, all floors, steps, stairs and passage shall be of sound construction and properly maintained. It is necessary to ensure safety, steps, stairs and passage shall be provided with substantial hand rails (where necessary).
- Pits, Sumps, openings in floor etc., which may be a source of danger, shall be either securely covered or securely fenced. Securely fencing a pit means covering or fencing it in such a way that it ceases to be a source of danger.
- The consumption of drugs and alcohol is strictly prohibited at the work place.
- All chemicals to be stored in secondary containment and only same family of chemicals should be stored nearby.

All the emergency plans will be reviewed by the facility on annual basis

- Machine maintenance is done on periodic basis, schedule for maintenance shall vary from machine to machine
- Flammable chemicals should be kept away from heat generating equipments / machines.

EHS Committee

EHS Committee shall be constituted with the employees of the Company as its members and shall also include representatives of senior management. The EHS Committee shall be responsible for ensuring safe and healthy environment and shall conducted meets at regular intervals. The EHS Committee may form various sub-committees for effective monitoring and observance of EHS.

The EHS Committee shall inter-alia be responsible for following:

- Compliance with all legislative requirements pertaining to EHS as minimum standard and where ever appropriate, institute additional measures for Environment, Health & Safety;
- Exemplary performance in Environmental, Health & safety;
- Framing of guidelines for EHS in sync with this policy;
- Review and revision of guidelines for EHS, whenever required;
- Dissemination of information regarding EHS amongst members and promoting awareness of EHS;
- Providing at least 4 hours of EHS training to each member, contractors and others who work with the Company;
- Observation of EHS in all projects/processes wherever they are carried out;
- Implementation of guidelines laid down from time to time for safe & healthy environment;
- Encouraging voluntary involvement of members by creating conducive environment;
- Identifying the hazards and risk associated with activities, if any and take appropriate corrective measures to minimize the impact of same;
- Promote and maintain open and constructive dialogue with all employees, local communities.

Implementation

C.L. Gupta Exports Limited will adhere to high standards with regard to the implementation of this policy. The Welfare Officer/ Safety Officer will have an overall responsibility for





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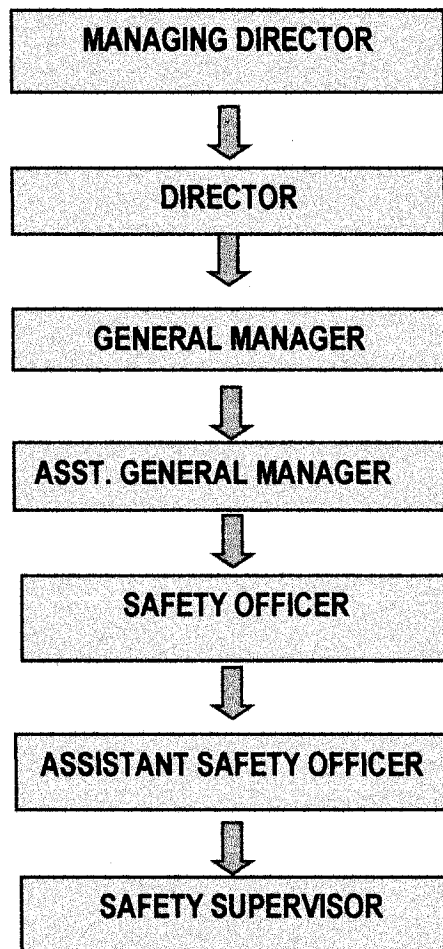
implementing this policy and shall take internal/external approvals wherever necessary. The Welfare Officer/ Safety Officer shall furnish certificate regarding adherence to this policy to Environmental, Health & Safety Policy to Compliance Officer on periodic basis.

This shall be accomplished by making continuous improvement in our operations and management systems. We will continue to strive for excellence in environmental, health & safety performance.

Revisions & Reviews

The policy will be reviewed as and when required and at least once in a period of three years. Appropriate revisions shall be incorporated from time to time on the basis of reviews. Whenever, there will be difference in regards to interpretation on content of this policy with respect to Hindi and English versions, the English version of the policy will have an overriding impact.

Safety Organizational Chart



Shweta

[Signature]

Prepared by	Ms.Shweta Singh	Checked by	Mr.P.N Sahu	Approved by	Mr.Raghav Gupta
Date of last Revision	09/02/2021	Original/ Revision	Revised	Version	1.1