

TOPWORTH URJA & METALS LIMITED

HEALTH AND SAFETY POLICY FOR EMPLOYEES

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A. Organizational Set Up for Implementing Safety & Health Policy -

The safety and health of our employees are company's most important business consideration. No employee will be required to do a job that they consider it unsafe.

The Company will comply with all applicable workplace safety and health requirements and maintain occupational safety and health standards that equal or exceed the best practices in the industry.

The Company will establish a Safety Committee, consisting of management and workmen representatives, whose responsibility shall be identifying hazards and unsafe work practices, removing obstacles to accident prevention, and helping evaluate the company's effort to achieve an accident and injury free workplace.

B. Scope -

1. All injuries and work-related illness can be & must be prevented.
2. Management is responsible and accountable for safety and health performance.
3. Employee engagement and training is essential.
4. Working safely is a condition of employment.
5. Excellence in safety & health supports excellent business results.
6. Safety & health must be integrated in all business management processes.

C. Responsibilities of the Management -

1. Proactively seeking to eliminate unacceptable risks through a systematic risk identification and assessment process that is an integrated part of day-to-day operations.
2. Providing a level of leadership and training to ensure that work is managed to achieve a safe, efficient and productive outcome.
3. Gaining the total involvement and commitment of all employees to achieving an accident free and healthy workplace.
4. The provision of adequate resources and logistics support to ensure the requirements of the Safety measures like PPE's, Safety and Fire Equipment are implemented.
5. The provision of adequate resources and logistics support to ensure the requirements of the Safety measures like PPE's, Safety and Fire Equipment are implemented for Contractual workers and Service provider.

HEALTH AND SAFETY POLICY FOR EMPLOYEES

6. Management Systems are implemented.
 7. Comply with all applicable legislation, acts, regulations, codes of practice and standards.
 8. Internally and externally auditing safety performance in all areas.
 9. To provide effective injury management and rehabilitation for all employees.
 10. The Company will establish Apex Safety Committee and Departmental Safety Committee, consisting of management and workmen representatives, whose responsibility shall be identifying hazards and unsafe work practices, removing obstacles to accident prevention, and helping evaluate the company's effort to achieve an accident and injury free workplace.
 11. Ensuring the Health and Safety Policy is available to all employees, contractors, visitors and interested parties, and that they are informed of and understand their obligations in respect to the policy.
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D. Responsibilities of the Head of the Department -

1. Effective implementation of Health & Safety policy within the factory and area under their control.
2. Review the implementation of Health & Safety policy periodically and make recommendation for compliance and improvement to the Chairman of the Apex Safety Committee.
3. Strive in laying down standard procedures and systems for safe working in the factory.
4. Arrange to provide necessary information and instruction to Head of the Section (HOS) and all the employees.
5. Involvement and participation of the staff working under their control in the implementation of the Health & Safety policy and improvement of working environment.
6. Use of all the necessary techniques like safety inspection, safety audits at design stage, commissioning stage, shutdown & breakdown stage and at any modification and facilities.
7. Communication with employees, safety captains, safety committee members and supervisors to develop behavioural safety aspects.
8. Consultation with professional staff for implementation of safety rules and standards, nomination of employees through TNI & Skill mapping to in house and external training programs etc.

HEALTH AND SAFETY POLICY FOR EMPLOYEES

9. Appraise employees with necessary technical, legal and all statutory obligations for the implementation of Health & Safety policy.
10. Take periodic inspection rounds in the area under their control and instruct their employees for safe working procedures and best housekeeping

E. Responsibilities of the Head of the Section -

1. The Head of the Section will keep in their mind, importance of the safety during the operation and maintenance of the plant.
2. He must inform, instruct, train, motivate and counsel and if necessary, admonish individual employee in maintaining safe work culture.
3. Ensure that all the activities related to operation, maintenance, erection, fabrication, construction, dismantle, inspection, repair and testing is done according to laid down safety procedures with proper protocol and work permit.
4. Take daily rounds of the plant/area under their control to check housekeeping, uses of Personal Protective Equipment's and safe working practices and take necessary action to correct any lapses.
5. Give feed back to their superiors in the safety matters and suggest improvements in the working conditions, methods, procedures as well as in Safety & Health policy.
6. Motivate people to report any kind of Near miss, incidence, unsafe act or unsafe conditions prevail in the factory.

F. Responsibilities of Supervisors/Employees -

1. The Supervisor/Employees are responsible for safe working practices and environment.
2. Maintain all the plant equipment, tools, tackles and area under their control in safe working condition and in good housekeeping.
3. Bring to the notice of their HOS, HOD, Senior Management and Safety department about any hazardous/unsafe condition, unsafe act, near miss incident etc.
4. Give their suggestion for improvement in the working environment to their Superiors, Safety Captains, Safety Committee Members and Safety Department.

HEALTH AND SAFETY POLICY FOR EMPLOYEES

5. Make & ensure regular uses of all Personal Protective Equipment always made available to them in the factory and suggest improvement in their quality
6. Assist in investigation of incidents with the object of introducing measures to prevent their recurrences.

G. Responsibilities of the Safety Committee -

1. The Safety Committee members assisting and co-operating with the management in achieving the aims and objectives outlined in Health & Safety Policy.
2. Dealing with all matters concerning Health, Safety & Environment and to arrive at practicable solutions to problems encountered.
3. Creating safety awareness amongst all workers.
4. Undertaking technical and behavioural training and promotional activities based on Health & Safety.
5. Deliberating on reports of Health & Safety surveys/ Safety Audit/ Emergency Preparedness plan/ Hazard Identification/ Risk assessment and implementation of the recommendations made in the reports.
6. Looking into any complaint made on the likelihood of an imminent danger to the Health & Safety of the workers and suggests corrective actions.
7. Reviewing the implementation of the recommendations made by it.
8. Disclose the confidential information related to health and safety as required under Rule 73N and 73Q in accordance with the parameters referred under Rule 73 U 1 to the workers and District Emergency Authority.
9. Make available the health records of workers once in year or immediately after examination.

H. Responsibilities of the HSE Department/ Safety Champions/ Internal Auditors -

1. The professional Safety Officers, designated Safety Captains, internal auditors inspect the factory areas periodically and audit selected jobs for safety and take necessary action for control point of view.
2. To suggest safe methods, systems, rules & procedures.

HEALTH AND SAFETY POLICY FOR EMPLOYEES

3. Discuss with HOD, HOS and Senior Management and lay down such procedures in the safe working manual/ standards.
4. Plan and conduct training session for concerned employees with in-house and external expertise.
5. Audit effectiveness of implemented procedures and safety norms.
6. Safety department maintain and make available necessary information, standards, statutory provision and statistics regarding safe working of the plant to the line manager for the implementation of Health & Safety policy
7. Maintain liaison with statutory and voluntary agencies for the improvement of Safety, Health & Environment.
8. Organize and assist in audit, inspections, investigations and maintain record of safety related occurrences.
9. Publish such records with recommendation and analysis on a periodic basis for the implementation of all concerned.
10. In view of the overall importance safety department (Officer) has the authority to overrule the decision of line management and to order to stoppage of method of working or a machine, which they consider to be unsafe, till such time can be resolved by top management.
11. Ensure that no worker can carry excessive load that may jeopardize health and safety.
12. Ensure that no room in the factory is overcrowded to an extent injurious to health of the worker.

I. Responsibilities of Service Provider -

1. Service Provider will remain responsible for safety of the people deputed by him.
2. While carrying out operations under contract, the service provider will strictly adhere to the safety norms.
3. Service provider shall provide all necessary safety gadgets like Safety shoes, Safety helmets, Safety goggles, Nose mask, Hand gloves, Ear plug, Aprons, Suit etc. of suitable quality to his employees.
4. The safety gadgets provided shall comply with the standards, instructions, and guidelines issued by the management from time to time. The Service Provider shall also ensure proper usage and timely replacement of such PPE.
5. Neither service provider nor his employees shall be permitted to enter factory premises without safety gadgets like Safety helmet and shoes.

HEALTH AND SAFETY POLICY FOR EMPLOYEES

6. The service provider shall ensure strict compliance of safety measures adopted by the company. Any violation of safety measures by the contractor or his employees shall be taken seriously, and, in such situation, the company reserves the right to cancel the contract and/or suitably penalize the contractor. The obligation of strict compliance of safety measures shall be incorporated in the service contract to be signed with the service provider by the Company.
7. The contractor shall immediately knowing upon of any accident, damage or losses, in which he/his employees are involved on the site, shall inform the area in-charge and Safety/Security department immediately. The service provider shall not negotiate, pay settle, admit or repudiate any claim without consent of the company
8. The service provider shall take all safety precautions and provide adequate supervision by the competent person(s) in order to do the job safety and without damage to factory, personnel and equipment. Guidelines and clearance of the company, site staff to be followed while undertaking jobs.
9. The service provider shall ensure that its employees at the company premises or while carrying out the job, observe the standard of cleanliness, decorum and general discipline laid down by the company.

J. Facilities For Making The Health & Safety Policy Effective -

1. While selecting new employee preference shall be given to their safety awareness and background with respect to their academic career and service with the previous employment.
2. Regular use of safety equipment supplied to them during their course of employment is compulsory.
3. Induction training of new joining includes familiarization with various statutory rules and regulation applicable to the factory, company Health & Safety policy, safe procedures, use and location of firefighting equipment, name and location of first aid boxes with first aider, Use and availability of PPEs, Hazards concerned with his job, general hazards in plant, procedure for reporting incidents and getting medical assistance if required, procedure included in the emergency management plan.
4. The management organizes training programs both in-house and on job for plant operation, emergency handling, firefighting, first aid, safety procedures, safe working methods and all related subjects to make working life efficient and safe.
5. Where flammable or combustible material is stored, handled and used, sparks and flame producing articles are prohibited and effectively controlled.

HEALTH AND SAFETY POLICY FOR EMPLOYEES

6. Instructions about safety requirements are displayed in language understood by majority of employees and by displaying pictorial posters in concerned locations
7. All maintenance, repair, inspection, erection, fabrication, construction, testing jobs are controlled by the prescribed Work permit/Protocol system.
8. All jobs involving cold work (jobs involving daily routine job like inspection, housekeeping, hot work at open ground, work which need not electrical isolation), hot work, height work, confined space work and excavation work are covered in Safe Work Permit.
9. All jobs involving Electrical works are covered special Electrical Work Permit.
10. While carrying out any new job for which there is no previous experience or any critical nature of job or hazardous activities and require coordination of different agencies are covered by protocol system. Protocol will be made with Risk assessment in the prescribed format for the execution of job.
11. Work permit shall be authorized only by the company employees (engineer and above) after they have satisfied themselves that the laid down conditions in the permit having been complied with.
12. Testing and inspection of equipment's, tools, machine and plant is carried out regularly and reports of such testing and inspection are forwarded to the top management for information and comments.
13. All the equipment's hired for specific purpose from outside party is inspected and certified by responsible person before being allowed to be used in the active plant area
14. Purchase of equipment and materials is approved after satisfying with their safety standard and all such equipment's are inspected by a competent person in-house before being use.
15. All the alteration, modification of the plants, machine, procedure and systems are subject to review, which is carried out by production, mechanical, electrical, instrumentation and safety departmental personnel before approval for implementation.
16. Safety committees (Departmental) are constituted to deliberate on the matters of Safety, Health & Environment from managerial staff and workmen. These committees meet once in a month and minutes are circulated to all concerned for compliance.
17. All the employees are subject to pre-employment medical checkup, periodic medical checkup and selected cases special medical checkup.
18. Environmental monitoring of the workplaces is carried out regularly and record of such monitoring is maintained.
19. If any abnormal condition detected, it shall be immediately corrected.

HEALTH AND SAFETY POLICY FOR EMPLOYEES

20. All the wastewater discharging from the plant is monitored and treated to make it safe and reuse it in the factory for plantation and sprinkling work for dust suppression.
21. All incidents of dangerous nature irrespective of whether they involve any injury, damage, loss or not are subject to thorough investigation by specially appointed investigation committee and their recommendations are complied with.
22. All the near miss incidents, accident cases shall be reported with prescribed format to the Safety department within scheduled time.
23. During appraisal of the employee due weightage is given to their safety performance as one of the criteria.
24. All the statutory standards, specifications, information's, booklets, testing certificates, safety statistics, reports on Health & Safety, recommendations, notices, procedure, system, notes, memos, suggestions and complaints are available with respective depts.
25. Emergency management plan for the factory is maintained and regularly updated and surprise mock drill conducted at regular intervals to check its effectiveness.
26. Provider workmen are trained for the Health & Safety policy and safety regulations prevalent in the factory before assigning jobs to them.
27. Revision of Health & Safety policy is carried out at regular intervals, and it is updated whenever any expansion or modification having implications on Health & Safety of persons at work or whenever new substances are introduced in the manufacturing process having implications on Health & Safety of persons exposed to such substances.

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