

## **EHS Policies Implementation Guiding Principle**



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**List of Policies**

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## EHS Policies Implementation Guiding Principle

### Guidance Note

Issue date:	02-12-2024
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The Solara Policies Implementation Guiding Principle have been prepared with an intention of setting out the requirements, including establishment, documentation, implementation, maintaining and continually improving the effectiveness in line with the current applicable legal and other compliance obligations at Solara Active Pharma Sciences Limited.

#### Registered Office:

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27, Vandaloor Kelambakkam Road,  
Keelakottaiyur Village, Melakkottaiyur Post,  
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#### In this context we

- Design, develop, implement and review of Environment, Health, Safety and Sustainability policies.
- Ensure adherence to various aspects of the current applicable social laws of the land including
- ISO14001 and 45001 requirements.
- Promote awareness amongst employees and all other interested parties on aspects related to
- Environment, and health & safety, Sustainability procurement others through trainings and other
- channels of communication.
- This policy is also a guiding framework for implementation of the EHS relevant policies which are listed in Table -1 of the introduction and the policies are enclosed as annexures in this implementation guideline .

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### 1.0 OBJECTIVE:

- To define policy and procedure on Environmental health safety and sustainability, intended to protect workers from exposure and injuries, resource conservation and customer health
- To promote improved sustainable measures and adopt a holistic management system to that ensure to identify, control, and minimize workplace hazard, environment and sustainable aspects

### 2.0 SCOPE:

- This policy and procedure apply to all personnel employed by the Solara as well as suppliers, contractors engaged by Solara.
- This guideline is applicable to the policies defined under Environmental health safety and sustainability sections are listed in table -1 and attached as annexures with this guideline.

### 3.0 RESPONSIBILITY: –

- Unit EHS is responsible for implementation of all the procedures and policies listed in the guideline
- EHS Committee / Site Leadership Team (SLT)/ Management Committee are responsible to monitor the implementation by Conducting internal audits. and management review meetings.
- Corporate EHS is responsible for periodic summation of the progress and periodic organisation of the status review meeting.
- Interested parties are responsible to underling and abiding to Solara Environmental Health Safety and Sustainability policies

### 4.0 Policy Details

At Solara we follow these guidelines for driving the policies related to the sustainable manufacturing. As the guidelines are driven principally by EHS this is applicable for principal policy (i.e. EHS) and as well as to the sub-policies

#### 4.1 Principal policies - Environment Health and Safety Policy and Sustainability policy

At Solara all the sustainability policy are derived with the basic EHS policy and hence the implementation is similar and hence in this guidelines EHS policy is considered as the principal policy to be followed for the implementation of the remaining policies.



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### Environment, Health & Safety Policy

Solara Active Pharma Sciences Limited is committed to proactively adopt, improve and maintain a high standard of Environmental, Health & Safety (EHS) across all sites and locations

We shall strive to achieve **Goal Zero** –zero safety accidents, zero injuries and zero incidents that cause harm to the environment

To move to **Goal Zero**, we will:


- Comply with all the applicable requirements (Legal and other) with regards to EHS
- Inculcate a positive EHS culture throughout the organization
- Foster awareness and provide appropriate training for all employees to support Goal Zero
- Provide a safe, healthy workplace to our employees, contractors, sub-contractors, visitors and all other stakeholders
- Encourage a collaborative and a participative approach towards EHS with all employees, contingent employees and visitors on site
- Enable all employees, contingent employees and visitors to identify and report EHS hazards, conditions and near misses
- Reduce the EHS impact of our products throughout their lifecycle.
- Make best efforts to work with suppliers and business partners who run safe and environmentally responsible operations.
- Work towards mitigation of pollution and conservation of precious resources like water and energy by optimizing their utilization.
- Establish specific and measurable objectives to achieve continual improvement of our EHS performance. Monitor performance of all sites/ locations on a regular basis and encourage achievement of the objectives

### Sustainability Policy

At Solara, we are committed to fulfilling our Environmental, Social and Economic responsibilities while conducting business. We will always focus on conserving natural resources and enhance social equity to achieve sustainable growth.

Towards our Sustainability Journey we shall,

- Incorporate environmental and social considerations as part of our business priorities.
- Reduce adverse impact of climate change, augment resource efficiency and promote the usage of renewable energy.
- Foster a culture of caring to enhance environmental, safety and well- being of employees and society.
- Continue to ensure good governance, ethics, labour & human rights, sustainable procurement and transparency in our engagements with stakeholders, and advocate responsible business practices.
- Make best efforts to adopt sustainable and resource efficient processes.
- Partner with communities in the identified areas and continually strive to improve our Sustainability performance.

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#### 4.2. Sub-Policies – EHS and Sustainability policies (Listed in Table -1)

The Sub -Policies which are harmonized and adapted is listed in the **Table-1** below,

**Table -1**  
**List of Applicable Policies**

Policy No	Name of the Policy	Annexure Number	Page Number
<b>Main Policy</b>			
1.	Environment Health and Safety Policy	Annexure-1	2-3
2.	Sustainability.Policy		4-6
<b>Sub- Policies</b>			
3.	Process Safety Policy	Annexure-1	7-8
4.	Energy policy		9-10
5.	Greenhouse Gases Policy		11-12
6.	Water Policy		13-14
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## 5. PROCEDURE:

### 5.1. Principles of implementation

- 5.1.1.Solara will provide a safe and healthy workplace environment and shall take effective steps to prevent potential health and safety incidents and occupational injury or illness arising out of, associated with or occurring in the course of work. It shall minimise or eliminate, so far as is reasonably practicable, the causes of all hazards in the workplace environment, based upon the prevailing safety and health knowledge of the industry sector and of any specific hazards.
- 5.1.2.Solara will assess all the workplace risks to new, expectant and nursing mothers including those arising out of their work activity, to ensure that all reasonable steps are taken to remove or reduce any risks to their health and safety.
- 5.1.3.Solara will operate with all the efforts to conserve water, energy, air and natural resources during operations. Solara will review all the aspects of manufacturing steps towards so as to ensure principles of reduce, reuse and recycle .
- 5.1.4.Solara will commit to the conservation of flora and fauna and ensure that their facilities and stakeholder activities will conserve the biodiversity in the region they operate.
- 5.1.5.Where hazards remain after effective minimisation or elimination of the causes of all hazards in the workplace environment, the organisation shall provide personnel with appropriate personal protective equipment as needed at its own expense. In the event of a work-related injury the organisation shall provide first aid and assist the worker in obtaining follow-up medical treatment.



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- 5.1.6. Solara will appoint a senior management representative to be responsible for ensuring the policies implementation along with the standard manpower and facilities for effective implementation and monitoring
- 5.1.7. The change number to personnel, on a regular basis, effective environment, health and safety training, including on-site training and, where needed, job-specific training. Such training shall also be repeated for new and reassigned personnel, where incidents have occurred, and when changes in technology and/or the introduction of new machinery present new threat or opportunity for sustainability development.
- 5.1.8. Solara established documented procedures to detect, prevent, minimise, eliminate or otherwise respond to potential risks to the environment, health and safety.
- 5.1.9. Solara will provide, for use by all personnel, free access to clean toilet facilities, potable water, suitable spaces for meal breaks, and, where applicable, sanitary facilities for food storage.
- 5.1.10. Solara will ensure that any dormitory facilities provided for personnel are clean, safe and meet their basic needs, whether it owns, leases or contracts the dormitories from a service provider.
- 5.1.11. All personnel shall have the right to remove themselves from imminent serious danger without seeking permission from the organisation.
- 5.1.12. Solara will ensure the following to ensure Environment Health & Safety system in place.
- 5.1.13. Licenses/Permits/Certificates: Licenses, permits and/or certificates are maintained as required by law and renewed in order to retain their validity date
- 5.1.14. These documents are issued by a valid and recognized legal entity and issued to the organisations possessing them, with the appropriate location, scope and validity date .

*These documents include, for example:*

- Business and operating permits; fire safety and electrical certificates; permits for equipment such as boilers, generators, elevators, fuel and chemical storage tanks; and building, emissions and waste-disposal permits.
  - A record of the maximum number of people allowed to be in the building at one time (maximum occupancy) is available. In multi-story buildings, the maximum occupancy number for each floor is publicly posted on the appropriate floor.
  - A list of the individuals on site can be produced in real time so that an accurate head count can be performed.
- 5.1.15. Solara will adapt manufacturing process that can generate minimum effluent, waste and air emissions wherever possible or will implement suitable preventive / control measure to protect the environment in which it operates.
  - 5.1.16. Solara will align with the sustainability goals for climate changes or global warming programs framed on various national and international programmes, progress on such goals will be disclosed on time-to-time basis.
  - 5.1.17. Solara will manufacture the products and shall carry out the life cycle assessment so as to devise the programme to select the opportunities for minimum sustainability impacts during the cradle to grave of the product.



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## 6. COMMITTEE

### 6.1. Methodology

- 6.1.1. A committees will be formed as relevant to the policies, comprised of a well-balanced group of management representatives and workers, shall be established and maintained. Unless otherwise specified by law.
- 6.1.2. At least one worker member(s) on the committee shall be by recognised trade union(s) representative(s), if they choose to serve. In cases where the union(s) does not appoint a representative or the organisation is not unionised, workers shall appoint a representative(s) as they deem appropriate.
- 6.1.3. Its decisions shall be effectively communicated to all personnel. The committee shall be trained and retrained periodically in order to be competently committed to continually improving the environment, health and safety conditions.
- 6.1.4. We shall conduct periodic environment, health and safety risk assessments to identify and then address current potential environment, health and safety hazard.
- 6.1.5. Records of these assessments and corrective and preventive actions taken shall be kept.

### 6.2. Types of Committees

- 6.2.1. The committees are formed at site based on the above methodology, while corporate committees are nominating by the highest executive of the Solara which may be a part of the Board of members.
- 6.2.2. For all site committee Plant head will be the chairman and while the corporate committee are chaired by the MD.
- 6.2.3. The list of the Committee is given in the **Table-2: List of committees**

**TABLE-2**  
**LIST OF COMMITTES**

LIST OF COMMITTES	
SITE COMMITTES	CORPORATE COMMITTES
<ul style="list-style-type: none"> <li>• Safety Committee</li> <li>• EHS Committee</li> <li>• Energy Committee</li> </ul>	<ul style="list-style-type: none"> <li>• Audit Committee</li> <li>• Risk Committee</li> <li>• Sustainability committee</li> </ul>

#### 6.2.3.1. EHS Committee

A documented procedure for the EHS committee's periodic Environment health and safety risk assessments is available.

The risk assessment covers current and potential health and safety hazards, including ergonomic risks and geographic risks and threats, such as hurricane, seismic activity, flood and landslide

The Aspect and impact of the manufacturing activities, covers the impact and minimisation programs of environment that includes air, water ,energy , hazardous material , hazardous waste , product life cycle and pharmaceutical in environment .

- The committee is trained on incident investigation and health and safety inspection and hazard recognition.
- The committee participates in the Gemba -walk to find the arrangements, compliances, opportunities to prevent the accidents, environmental pollution and sustainability improvements.
- The committee or their nominees will be participating in review of process /product / machineries improvement , introductions , modification which occur on time to time basis .The committee is involved in all incident investigations.

6.2.3.2. *Audit Committee:*

- Reviewing and monitoring the auditor’s independence and performance and effectiveness of audit process.
- Review on regular basis the adequacy of internal audit function, the structure of the internal audit department, approval of the internal audit plan and its execution, staffing and seniority of the official heading the department, reporting structure, coverage and frequency of internal audit.
- Review the findings of any internal investigations by the internal auditors into matters where there is suspected fraud or irregularity or a failure of internal control systems of a material nature and reporting the matter to the Board.
- Review with the management, statutory and internal auditors, the adequacy of internal control systems and related matters. Review of management letters / letters of internal control weaknesses issued by Statutory Auditors / Internal Auditors.

6.2.3.3. *Risk management committee*

- To advise the Board in identification and managing the full range of risks the enterprise faces. - Provide oversight during the design and implementation of a comprehensive risk management framework and common-sense approach to manage risks across the entire organization. - Establish and communicate risk vision and philosophy, approve risk strategy, and establish risk appetite. -
- Review and approve the Enterprise Risk Management framework of company on a periodic basis. The Committee shall review and approve the risk management culture, processes, and practices of the company
- Risk Management Committee may form and delegate authority to a sub-committee, which shall assist the Committee to project manage the ERM with regards to environment health and safety

**7. Emergency Preparedness and Business continuity plan**

Emergency plan had been prepared to address the identified risk within the plant, similarly a business continuity plan is made available to address the unforeseen events in the case of upstream and downstream transports.

7.1 *Procedures and key facilities:*

7.1.1.A documented emergency preparedness and response plan that outlines the actions that all personnel should take in case of fire and/or other emergencies (manmade and/or

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- natural disasters) is available. The plan clearly defines the persons responsible for preventing, reducing the impact of, and addressing any such emergency event.
- 7.1.2. Automated fire safety systems (fire detection, smoke detection, alarm, fixed or mobile extinguisher systems) exist and are subject to routine checking and maintenance.
- 7.1.3. Evacuation plans are posted at regular intervals by the organisations in the workplace and in
- 7.1.4. Residences and property provided by the organisations, in the language(s) of the workers, with a clear "You are here" mark.
- 7.1.5. Signs that indicate the identity of the first aid providers, fire wardens, emergency response team and the manager in charge of health and safety are posted conspicuously in the workplace.
- 7.1.6. Exit doors are unlocked during working hours or are push-bar doors that can be unlocked from the inside and are clear and unblocked. Exit doors open in the direction of travel, can be readily opened from inside the workplace by any worker without the use of keys or tools, and open wide enough to safely evacuate personnel in the case of an emergency.
- 7.1.7. There are enough exits to safely serve the number of workers and the height and type of building or structure. Window fire exits are not acceptable as viable fire exits. — There are at least two emergency exits per floor. — The maximum travel distance to an emergency exit is 200 feet or 60 meters for industrial buildings with no sprinkler systems.
- 7.1.8. All doors to exit hallways and staircases open in the direction of travel and can be readily opened from inside by any worker without the use of keys or tools. Evacuation routes are clear and unblocked.
- 7.1.9. Doors that lead to the exterior of the building that are not designated as exits are labelled as such (e.g. "Not-An-Exit" sign in the local language(s) and the language of the workers)
- 7.1.10. There is one or more designated and marked assembly points outside the workplace. The assembly points are in an area that is a safe distance away from the reach of a possible fire. The area is large enough to accommodate the full number of employees and other personnel who may reasonably be on site at any given time.
- 7.1.11. Emergency exit signs are visible from 30m, use letters at least 18cm high and are illuminated in bright colours or have a photo-luminescent front panel.
- 7.1.12. Exit routes have emergency lighting and are marked with signs, with at least one easily seen from any area within the workplace. Battery-operated exit signs are checked regularly and batteries replaced after the manufacturers designated time period.
- 7.1.13. Personnel are guided to exits or away from hazardous areas with floor markings, tape or other indications.
- 7.1.14. Emergency battery lighting is provided for all stairways and where needed on exit routes.

## 7.2 Fire Extinguishers

- 7.1.15. Fully operational firefighting equipment is maintained, regularly tested, unobstructed, clearly marked and accessible.
- 7.1.16. Personnel demonstrate knowledge and understanding of the basic practical use of fire extinguishers.
- 7.1.17. If fire hydrants are present, then the hoses, standpipes and all water sources, including fire pumps, are inspected and flushed at least twice per year (e.g. during fire drills).

### 7.3 Alarm System

- 7.1.18. An alarm system exists and is audible throughout the entire organisations on every floor, including production areas, warehouses, canteens any other
- 7.1.19. Employer-provided worker service facilities. The alarm has a distinct sound that is different from any other noise notification systems.
- 7.1.20. An alternative system is available when the alarm system is undergoing maintenance.

### 7.4 Personal protective equipment (PPE)

- Personnel are provided with and use PPE as mandated by the organization's occupational health and safety risk assessment.
- All personnel demonstrate their knowledge and understanding of:
  - Which PPE is necessary for each task, operation or process
  - When the PPE is necessary
  - How to use and adjust the equipment
  - Limitations of the equipment; and
  - Proper care and maintenance of the equipment.


### 7.5 General working environment

- Workplaces, including walkways and aisles, yard and storage areas, lifts and stairways, are kept clean and maintained in good condition.
- All primary aisles are a minimum of 1.12 meters wide or wider as stated by local law, are marked, & kept unobstructed at all times.
- Stairway railings of no less than 1-meter high are installed on exposed stairs where a person could potentially fall off the side of the stairway.
- A documented procedure to prevent the ignition of fires from sources of heat, open flames, electrical sparking, hot surfaces, welding, smoking, heat or sparks is available.
- The procedure includes a mandate for adequate housekeeping to ensure that uncontrolled combustible material is removed, as well as decontamination measures. It mandates that hazardous material is stored and handled in a safe way and includes the following measures:
  1. Workplaces are clean, free from dirt and dust, and are not exposed to potential ignition sources, such as cigarettes.
  2. Flammable and hazardous materials are properly stocked and kept away from ignition sources.
  3. Gas sensors are placed around gas-using and processing equipment.

## 8. KEY NOTES FOR IMPLEMENTATION

### 8.1. Water, Air, Noise and Temperature

- Safe and clean drinking water is always free and available within a reasonable distance of all workstations. There is an adequate amount of potable water stations relative to the number of personnel. The means to drink water (i.e. cups) is safe, sanitary and available in an appropriate amount.

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- Employees are not subjected to noise levels greater than 85 decibels for more than 8 hours per day without the use of hearing protection.
- In high noise level areas, hearing protection is provided. In addition, clear signage requiring the use of such protection is posted and worker usage is enforced in an appropriate manner.
- Calibrated sound meters are used to take periodic measurements of noise levels in the organisations and record the sound levels in the various work areas
- Legal requirements are met regarding worker hearing tests in order to determine whether workers have experienced any hearing loss.
- All the process emissions are estimated while introduction of the product or process and are provided with the Scrubbers and condenser to avoid the emissions to the atmospheres.
- Continuous monitors and periodical third -party monitoring will be carried out to ensure the environmental quality parameters are met.
- Regular R&D shall be carried out to reduce the resource consumption and less emissions for a sustainable manufacturing.

### 8.2. *Energy and Green House Gas.*

- The priority focus in the usage of renewable energy in the operations will be made either by installing inhouse or by agreement with the external producers of solar or wind energy.
- During the purchase equipment with BEE certification or less energy consumption equipment will be prioritized.
- Fuel switch, such as moving into briquette or high calorific value fuels will be made in all steam and cogeneration plants.
- Energy and Green House Gas reduction projects are planned at the beginning of every financial year the budgets for each project are evaluated.
- Based on the systematically comparing energy consumption and GHG from each facility over a defined period via audit the budget are released for reduction of energy consumption and GHG emission projects sites and sector wise are release.
- The process of the projects and reduction of energy consumption and GHG emission is monitored and imparted to the management.

### 8.3. *Water and Effluent*

- The operation sites of Solara, R&D centre and offices use fresh water from the local industrial board or ground water.
- Flow meters are provided at all the water influent points and the blocks generating the effluent for accounting the water accurately.
- They practice water accounting for good water management in to order to conserve the water and reuse.
- Solara identifies the water reduction projects at the beginning of every financial year and the budgets for each project are evaluated .
- Based on the systematically comparing water consumption from each facility over a defined period via audit the budget are released for water conservation projects sites and sector wise.
- Sites having the ZLD treat the effluent generated from the process and reuse the treated water for utility management.
- The sites having no ZLD facilities sent the effluent to common treatment plant
- Rainwater Harvesting Pits arc provided for the recharge of ground water.



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#### 8.4. *Pharmaceutical in Environment*


- Sites having the ZLD treat the effluent generated from the process and analysis the treated water to ensure that no pharmaceutical from the process effluent is present in the treated Water and contaminating the environment.

#### 8.5. *Hazardous Material and Hazardous Waste Handling and Storage*

- A documented master inventory/list of chemicals and their storage location(s) on the premises is available.
- The material safety data sheet (MSDS) for any substance and chemical used in the organisations is easily accessible from where the chemical is stored or used. Chemical safety information and product labels are available in the local languages of the workers. Labels include information on hazardous ingredients, characteristics and properties and special precautions to follow when using, handling and storing the chemical.
- A documented procedure for storing chemicals in order to avoid contact between incompatible chemicals and providing for secondary containment is available.
- Chemical handling and storage areas have immediate access to an eyewash station and shower.
- A documented procedure for proper labelling of chemicals is available.
- A documented procedure for the proper handling and storage of hazardous waste is available. Only authorized employees handle hazardous waste.
- Hazardous waste storage containers are separated from ordinary waste, are clearly and properly marked and are protected from the weather and any fire risks.
- Hazardous waste storage containers are checked regularly for spills and secondary containment is provided to prevent direct exposure to the environment.
- All the waste while disposal is accompanied with the transport emergency response card (TREM) for emergency information.

#### 8.6. *Medical care.*

- pre-employment medical exams, when required by law, are provided free of charge to all personnel. these exams may not include pregnancy or virginity tests.
- Annual occupational health checks for workers handling hazardous materials are conducted. these occupational health checks are conducted by a qualified medical professional at the organization's expense.
- Medical care is available on-site or the organizations is in close proximity to facilities where basic health and injury needs can be addressed. if there is no medical care provided on-site, the organizations has a system in place to address severe injuries when needed.
- one properly stocked and readily accessible first aid kit is available for at least every 100 workers. the kit contains, at a minimum, basic supplies such as bandages, scissors, gloves and gauze.
- The locations of first aid boxes are posted with a first aid sign, which also includes the names and photographs of trained first aid personnel for each shift and an emergency contact number
- Restroom facilities, An adequate number of restroom facilities are provided. The facilities meet local hygiene requirements and have functioning toilets and sinks with running water. There are a sufficient number of facilities relative to the number of employees and, where practicable, facilities are separated by sex.
- Restroom facilities are cleaned and serviced regularly.

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- Toilet paper is free of charge. Cleansing agents or hand soap and hand towels or dryers and garbage pails are provided in all restroom facilities.

#### 8.7. *Kitchen, Cafeteria and Canteens*

If a kitchen, cafeteria and/or canteens are available on the premises:

- Kitchen, cafeteria and canteens areas operate under sanitary, safe conditions and have anti-slip floor mats.
- K-class fire extinguishers are provided in all kitchens (The K-class fire extinguisher works on fires caused by fats, greases and oils).
- Kitchen, cafeteria and canteens have sufficient seating to accommodate the majority of workers working at a given time. The seating is also sufficient if there is enough space for workers to eat in shifts.
- Kitchen, cafeteria and canteen staff ensure that any spoiled or questionable food is not served and is properly disposed. Staff ensures that utensils, dishes and cookware are properly sanitized after each use.
- Kitchen, cafeteria and canteen staff have a health check at least annually and/or obtain a health certificate if required by local law.
- All workers that handle food wear an apron, gloves and hair net and wash their hands after using restroom facilities.
- 100% of kitchen, cafeteria and canteen personnel have received training in hygienic food preparation and nutrition.
- The kitchen has a pest and vermin program that effectively ensures that there are no pests and vermin present


#### 8.8. *Process Safety and Customer Safety*

- New Product introduction guidelines are in place. All the process will undergo calorimetric studies and powder safety analysis to assess the risk of fire and explosion hazards
- HAZOP study shall be conducted including the process safety information, P&ID information and necessary controls for safe incorporating the operations.
- Appropriate interlocks, safety relief valves and containing equipment are provided as part of the “Safety by Design” Concept

#### 8.9 *Customer Safety:*

- Toxicological Studies are conducted to identify the Exposure limits and will be shared along with the MSDS
- The relevant Fire, Explosion and toxicological data will be incorporated in the MSDS and will be shared with the customer.
- International classified, labelling and packaging systems Such as ECHA/UNGHS will be followed to frame Hazard and Precautionary phrases.
- The summary of the hazard, precautionary phrases and pictograms are incorporated in the GHS label. The same will be pasted on each container before dispatch for the information of the public and the customer.

### 9. **Internal and External Communication:**

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All policies and procedures related to EHS Policies Implementation Guiding Principles are communicated to all employees during induction and periodic trainings, and to suppliers/contractors during selection, induction & reviewed during supplier performance monitoring.

All the policies and procedures related to EHS Policies Implementation Guiding Principles are made accessible to every employee of Solara and also displayed in prominent work areas in the plant/offices of Solara for employees/suppliers.

**10. Training and Capability Building:**

Solar provides relevant training to all internal and external interested parties (employees, contract workmen, contractors and suppliers) on EHS Policies Implementation Guiding Principle and effectiveness will be measured

**11. Monitoring and Review**

Solara Policies Implementation Guiding Principle are monitored annually for implementation and reviewed based on the changing business circumstances and for opportunity for improvement.

**12. Records Management**

Solara Policies Implementation Guiding Principle Records of training are maintained for 3 years

**13. Audits:**

Solara will conduct Internal and External audits under the Management systems or it's principals such ISO 14001, 45001 and 50001. The progress will also be verified while publishing under BRSR and Global Reporting Initiative

**14. Management Review:**

Management Reviews will be conducted at defined intervals to review and evaluate the effectiveness of Solara Policies Implementation Guiding Principle.

**15. Reference Documents:**

- ISO 14001 - Environmental Management System (EMS)
- ISO 45001 Occupational Health and Safety Management System
- ISO 50001:2018 - Energy Management System
- ISO 26000 Certification: Promoting Social Responsibility and Sustainability
- ISO 41001 Certification Facility Management - Management System
- ISO 31001:2018 Risk Management System
- ISO 14064-1:2018 Part 1: Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals
- ISO 14040:2006 Environmental management — Life cycle assessment — Principles and framework
- GRI 302 – Energy 2016





## EHS Policies Implementation Guiding Principle

### Guidance Note

Issue date:	02-12-2024
Validity date:	01-12-2027
Revision No:	00

- GRI 303 – water and Effluents 2018
- GRI 304 – Biodiversity 2016
- GRI 305 – Emissions 2016
- GRI 306 – waste 2020
- GRI 403 – Occupational Health and Safety 2018
- GRI 404 – Training and Education 2016
- GRI 407: Freedom of Association and Collective Bargaining 2016
- GRI 416: Customer Health and Safety 2016
- GRI 417: Marketing and Labelling 2016
- National Guidelines for Responsible Business Conduct (NGRBCs) – 9 BRSR principles
- The Science Based Targets initiative (SBTi) – Goal Zero Target setting
- UNGC – Sustainable development Goals

## ANNEXURE - 1

### List of Sub-Policies - EHS and Sustainability Policies.

- Environment Health and Safety Policy
- Sustainability Policy
- Process Safety Policy
- Energy policy
- Greenhouse Gases Policy
- Water Policy
- Biodiversity Policy
- Air and Noise management Policy
- Handling of Hazardous Materials and Chemicals policy
- Waste handling Storage and Disposal Policy
- Product end of life Policy
- Pharmaceutical in Environment Policy
- Customer Health and Safety Policy
- Sustainability Procurement Policy

Policy Number 01	Environment, Health & Safety (EHS) Policy	Issue Date	05-09-2023
		Revision Date	05-09-2026

## Environment, Health & Safety (EHS) Policy



**Solara Active Pharma Sciences Limited is committed to proactively adopt, improve and maintain a high standard of Environmental, Health & Safety (EHS) across all sites and locations**



We shall strive to achieve **Goal Zero** i.e. zero safety accidents, zero injuries and zero incidents that cause harm to the environment...  
To move to **Goal Zero** we will:



Comply with all applicable requirements (Legal, Others) with regards to EHS



Inculcate a positive EHS culture throughout the organization



Foster awareness and provide appropriate training for all employees to support Goal Zero



Provide a safe & healthy workplace to our employees, contractors, sub-contractors, visitors and all other stakeholders



Encourage a collaborative and a participative approach towards EHS with all employees contingent employees and visitors on site



Enable all employees, contingent employees and visitors to identify and report EHS hazards, conditions and near misses



Reduce the EHS impact of our products throughout their lifecycle



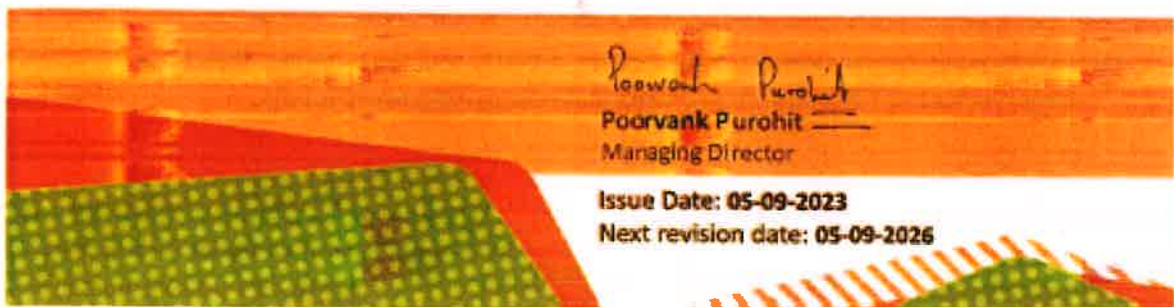
Make best efforts to work with suppliers and business partners who run safe and environmentally responsible operations



Work towards mitigation of pollution and conservation of precious resources like water and energy by optimizing their utilization



Establish specific and measurable objectives to achieve continual improvement of our EHS performance. Monitor performance of all sites / locations on a regular basis and encourage achievement of the objectives



Policy Number	<b>Environment, Health &amp; Safety (EHS) Policy</b>	Issue Date	05-09-2023
01		Revision Date	05-09-2026

## **Environment, Health & Safety (EHS) Policy**

### **1. Policy Statement**

Solara Active Pharma Sciences Limited is committed to adopting, maintaining, and continuously improving high standards of Environmental, Health, and Safety (EHS) across all its sites and locations. Our vision is to achieve **Goal Zero**—zero safety accidents, zero injuries, and zero incidents that harm the environment.

### **2. Scope**

This policy applies to all employees, contractors, subcontractors, visitors, and stakeholders at Solara’s sites and locations. It extends to our operations, supply chain, and lifecycle of products.

### **3. Objectives**

To achieve **Goal Zero**, Solara is committed to:

1. **Compliance:** Adhering to all applicable legal and regulatory EHS requirements.
2. **EHS Culture:** Promoting a positive EHS culture across the organization.
3. **Awareness and Training:** Providing appropriate EHS training and fostering awareness among employees and stakeholders.
4. **Workplace Safety:** Ensuring a safe and healthy workplace for all employees, contractors, and visitors.
5. **Collaboration:** Encouraging collaborative and participative approaches to EHS.
6. **Hazard Reporting:** Enabling all stakeholders to identify and report EHS hazards, conditions, and near misses.
7. **Product Lifecycle Management:** Minimizing the EHS impact of products across their lifecycle.
8. **Supplier Engagement:** Partnering with suppliers and business partners who prioritize safe and environmentally responsible operations.
9. **Pollution Mitigation and Resource Conservation:** Working towards pollution mitigation and conserving resources like water and energy through optimized utilization.
10. **Continuous Improvement:** Establishing specific and measurable objectives for continual improvement of EHS performance and monitoring progress regularly.

### **4. Review Mechanism**

The EHS Policy will be reviewed annually or as required to ensure its alignment with:

- Emerging regulatory and industry standards.
- EHS performance metrics and objectives.

Policy Number	<b>Environment, Health &amp; Safety (EHS) Policy</b>	Issue Date	05-09-2023
01		Revision Date	05-09-2026

- Feedback from stakeholders and audit outcomes.

Performance will be monitored regularly through site inspections, audits, and stakeholder engagement, with necessary updates communicated organization wide.

## 5. Conclusion

Through this policy, Solara reaffirms its commitment to safeguarding the environment, health, and safety of all stakeholders. By striving for **Goal Zero**, we aim to create a culture of safety, sustainability, and excellence that protects our people and the planet.

## 7.Revesion History

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	22-08-2020	New Document	Implementation	NA
01	27-05-2022	Change in Top management authority	Change in Top management authority	00
02	05-09-2023	Change in Top management authority	Change in Top management authority	01

## 6. Reference

- Applicable legal and regulatory EHS requirements.
- Solara's ESG Guidelines.
- Industry best practices for EHS management.

*Poorvank Purohit*

**Poorvank Purohit**  
Managing Director & Chief Executive Officer

Policy Number	Sustainability Policy	Issue Date	05-09-2023
02		Revision Date	05-09-2026



## Sustainability Policy

At Solara, we are committed to fulfilling our Environmental, Social and Economic responsibilities while conducting business. We will always focus on conserving natural resources and enhance social equity to achieve sustainable growth.

Towards our Sustainability Journey we shall,

- Incorporate environmental and social considerations as part of our business priorities.
- Reduce adverse impact of climate change, augment resource efficiency and promote the usage of renewable energy.
- Foster a culture of caring to enhance environmental, safety and well-being of employees and society.
- Continue to ensure good governance, ethics, labour & human rights, sustainable procurement and transparency in our engagements with stakeholders, and advocate responsible business practices.
- Make best efforts to adopt sustainable and resource efficient processes.
- Partner with communities in the identified areas and continually strive to improve our Sustainability performance.

*Poorvank Purohit*

**Poorvank Purohit**  
Managing Director

Issue Date : 05-09-2023

Next Revision date : 05-09-2026

Policy Number	Sustainability Policy	Issue Date	05-09-2023
02		Revision Date	05-09-2026

## Sustainability Policy

### 1. Policy Statement

At Solara Active Pharma Sciences Limited, we are committed to integrating sustainability into our business operations to fulfill our Environmental, Social, and Economic responsibilities. By prioritizing the conservation of natural resources and enhancing social equity, we strive to achieve long-term sustainable growth.

### 2. Scope

This policy applies to all aspects of Solara's operations, including manufacturing, supply chain, stakeholder engagement, and community initiatives. It encompasses all employees, contractors, suppliers, and other stakeholders involved in achieving our sustainability goals.

### 3. Commitments

To advance our sustainability journey, Solara pledges to:

#### 1. Environmental and Social Priorities:

- Incorporate environmental and social considerations into business decisions and priorities.

#### 2. Climate Action:

- Reduce the adverse impact of climate change, improve resource efficiency, and promote the use of renewable energy.

#### 3. Culture of Care:

- Foster a culture that prioritizes environmental protection, safety, and the well-being of employees and society.

#### 4. Good Governance:

- Uphold high standards of governance, ethics, labor and human rights, sustainable procurement, and transparency in all stakeholder engagements.

#### 5. Resource Efficiency:

- Implement sustainable, resource-efficient processes to minimize environmental impact.

#### 6. Community Partnerships:

- Collaborate with communities in identified areas and continuously improve sustainability performance through targeted initiatives.

Policy Number	<b>Sustainability Policy</b>	Issue Date	05-09-2023
02		Revision Date	05-09-2026

#### 4. Review Mechanism

This policy will be reviewed every three years or as necessary to adapt to evolving business circumstances and emerging sustainability opportunities:

##### 1. Monitoring and Evaluation:

- Establish key performance indicators (KPIs) to measure sustainability progress and address gaps.

##### 2. Stakeholder Feedback:

- Gather inputs from employees, communities, and other stakeholders to refine and enhance sustainability practices.

##### 3. Audits and Improvements:

- Conduct regular audits to ensure compliance with sustainability standards and implement corrective actions as needed.

#### 5. Conclusion

Through this Sustainability Policy, Solara reaffirms its commitment to environmental stewardship, social equity, and responsible governance. By embedding these principles into our business operations, we aim to create long-term value for our stakeholders and contribute to global sustainability goals.

#### 6. References

- Applicable legal and regulatory frameworks.
- ISO 14001: Environmental Management Systems.
- Solara's ESG Guidelines.
- Industry best practices for sustainability management.

#### 7.Revesion History

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	05-02-2021	New Document	Implementation	NA
01	27-05-2022	Change in Top management authority	Change in Top management authority	00
02	05-09-2023	Change in Top management authority	Change in Top management authority	01

*Poorvank Purohit*

**Poorvank Purohit**

Managing Director & Chief Executive Officer



Policy Number	Process Safety Policy	Issue Date	02-12-2024
03		Revision Date	01-12-2027

## Process Safety Policy

### 1. Policy Statement

Solara Active Pharma Sciences Limited is committed to maintaining the highest standards of process safety across all its sites and operations. By proactively identifying risks, fostering a culture of safety, and implementing robust safety systems, we aim to ensure the protection of employees, stakeholders, and the environment.

### 2. Scope

This policy applies to all employees, contractors, equipment, processes, and operations at Solara's sites and locations. It encompasses all activities involving hazardous materials, process safety management, and emergency response planning.

### 3. Objectives

To uphold process safety excellence, Solara commits to:

1. **Leadership Commitment:** Allocate resources, provide training, and promote a safety culture throughout operations.
2. **Hazard Identification:** Conduct regular risk assessments to identify and mitigate hazards involving hazardous materials.
3. **Accurate Documentation:** Maintain comprehensive and up-to-date process safety information, including chemical, process, and equipment details.
4. **Safe Operating Procedures:** Develop and periodically update procedures for safe operations, including startup, shutdown, and emergencies.
5. **Competency Building:** Conduct periodic refresher training for employees and contractors to enhance process safety competency.
6. **Management of Change (MOC):** Implement an MOC system to assess the safety implications of organizational or operational changes, ensuring proper training before implementation.
7. **Preventive Maintenance:** Establish preventive maintenance programs for regular inspections and testing of critical systems.
8. **Incident Investigation:** Investigate process safety incidents and near misses to identify root causes, implement corrective actions, and share learnings organization-wide.
9. **Emergency Response:** Develop and maintain an emergency response plan, ensuring effective coordination with local authorities and emergency services.
10. **Compliance and Audits:** Conduct regular audits to assess compliance with process safety requirements and regulatory standards.
11. **Transparent Communication:** Engage with regulators and local communities to ensure clear communication about process safety risks and controls.
12. **Performance Monitoring:** Establish KPIs to monitor, evaluate, and improve process safety performance.

Policy Number	<b>Process Safety Policy</b>	Issue Date	02-12-2024
03		Revision Date	01-12-2027

#### 4. Review Mechanism

The Process Safety Policy will be reviewed annually or as necessary due to changes in regulations, operations, or organizational priorities.

- **Audit and Monitoring:** Regular internal audits will evaluate adherence to process safety practices and regulations.
- **Feedback and Learning:** Stakeholder feedback and incident learnings will inform policy updates.
- **Training Updates:** Training programs will be revised based on changes in safety protocols or processes.

#### 5. Conclusion

Solara is dedicated to maintaining the highest process safety standards through proactive risk management, robust systems, and continuous improvement. By adhering to this policy, we ensure the safety of our people, operations, and the environment.

#### 6. Reference

- Applicable local, national, and international safety regulations.
- Solara's ESG Guidelines.
- Process Safety Management (PSM) standards and best practices.

#### 7.Revision History

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	02-12-2024	New Document	Implementation	NA



**M.Mohan**  
Executive Director & COO

Policy Number	Energy Policy	Issue Date	02-12-2024
04		Revision Date	01-12-2027

## Energy Policy

### 1. Policy Statement

Solara Active Pharma Sciences Limited is committed to conserving natural resources by reducing energy consumption across all operational sites. We aim to become a more energy-efficient organization by implementing engineering solutions, promoting sustainable practices, and fostering continual improvement to ensure a safe and comfortable work environment.

### 2. Scope

This policy applies to all sites, facilities, operations, and stakeholders of Solara Active Pharma Sciences Limited, including internal employees, contractors, and external partners involved in energy usage and conservation.

### 3. Objectives

To achieve energy efficiency and sustainability, Solara commits to:

1. **Energy Efficiency:** Strive to become a more energy-efficient active pharmaceutical ingredient manufacturer.
2. **Energy Reduction:** Reduce overall energy consumption by enhancing production quality, environmental, and safety practices.
3. **Engineering Solutions:** Design and implement engineering-based solutions to minimize energy consumption, reducing reliance on manual intervention.
4. **Energy Audits:** Determine energy usage across all sites, systematically compare consumption over defined periods, and work towards reduction goals site-wise and sector-wise.
5. **Stakeholder Engagement:** Communicate the Solara Energy Policy to internal and external stakeholders, motivating external partners to adopt energy conservation measures.
6. **Legal Compliance:** Comply with all applicable legal requirements related to energy usage, consumption, and efficiency.
7. **Continuous Improvement:** Review and update the policy regularly to adapt to changing business circumstances and identify opportunities for improvement.

### 4. Review Mechanism

This policy will be reviewed periodically or as required due to changes in regulations, business priorities, or energy conservation opportunities.

- **Audit and Monitoring:** Conduct regular energy audits to evaluate consumption patterns and identify reduction opportunities.
- **Stakeholder Feedback:** Incorporate feedback from internal and external stakeholders to enhance energy management strategies.
- **Performance Metrics:** Establish and monitor key performance indicators (KPIs) for energy efficiency and conservation.

Policy Number	<b>Energy Policy</b>	Issue Date	02-12-2024
04		Revision Date	01-12-2027

## 5. Conclusion

Solara Active Pharma Sciences Limited is dedicated to conserving energy and natural resources through innovative engineering solutions, sustainable practices, and stakeholder collaboration. By adhering to this policy, we aim to enhance energy efficiency, reduce environmental impact, and contribute to a sustainable future.

## 6. Reference

- Applicable legal and regulatory requirements for energy usage and efficiency.
- Solara's ESG Guidelines.
- Industry best practices for energy management and conservation.
- 

## 7.Revesion History

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	02-12-2024	New Document	Implementation	NA

  
**M.Mohan**  
 Executive Director & COO

Policy Number	Greenhouse Gas (GHG) Policy	Issue Date	02-12-2024
05		Revision Date	01-12-2027

## Greenhouse Gas (GHG) Policy

### 1. Policy Statement

Solara Active Pharma Sciences Limited is committed to conserving natural resources and reducing greenhouse gas (GHG) emissions across all operational sites. Through strategic planning, innovative technologies, and stakeholder engagement, we aim to mitigate climate change impacts and support sustainable development.

### 2. Scope

This policy applies to all operations, sites, and facilities of Solara Active Pharma Sciences Limited, including employees, suppliers, and stakeholders involved in activities that contribute to GHG emissions throughout the product lifecycle.

### 3. Objectives

To reduce GHG emissions and promote sustainability, Solara commits to:

1. **Setting Targets:** Establish reasonable and achievable targets and timelines for GHG emission reductions.
2. **Sustainable Infrastructure:** Develop and maintain long-term infrastructure plans that promote GHG reduction, including the adoption of non-fossil fuel alternatives.
3. **Lifecycle Efficiency:** Improve energy efficiency and reduce GHG emissions across operations and supplier activities by leveraging cost-effective and emerging technologies.
4. **Research and Innovation:** Invest in research and implement new technologies, manufacturing processes, and materials to further conserve resources and enhance energy efficiency.
5. **Clean Energy Adoption:** Encourage and facilitate the use of lower GHG-emitting energy sources while carefully evaluating associated risks and consequences.
6. **Policy Disclosure:** Communicate the GHG Policy to employees, suppliers, and stakeholders to foster collective action.
7. **Continuous Improvement:** Review the policy every three years or as needed based on changing business circumstances and emerging opportunities.

### 4. Review Mechanism

The Greenhouse Gas Policy will be reviewed periodically to ensure relevance and effectiveness:

- **Monitoring and Reporting:** Track GHG emissions, assess progress toward established targets, and report findings to stakeholders.
- **Stakeholder Engagement:** Gather feedback from employees, suppliers, and stakeholders to refine strategies and improve outcomes.
- **Performance Metrics:** Develop and evaluate key performance indicators (KPIs) to ensure alignment with emission reduction goals.

Policy Number	<b>Greenhouse Gas (GHG) Policy</b>	Issue Date	02-12-2024
05		Revision Date	01-12-2027

**5. Conclusion**

Solara Active Pharma Sciences Limited is committed to reducing its GHG emissions through innovation, efficiency, and collaboration. By adhering to this policy, we aim to minimize our environmental impact, support global climate goals, and contribute to a sustainable future.

**6. Reference**

- Applicable legal and regulatory requirements for GHG emissions.
- Solara’s ESG Guidelines.
- Industry best practices for climate change mitigation and emission reductions.

**7.Revesion History**

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	02-12-2024	New Document	Implementation	NA

  
**M. Mohan**  
 Executive Director & COO

Policy Number	Water Policy	Issue Date	02-12-2024
06		Revision Date	01-12-2027

## Water Policy

### 1. Policy Statement

Solara Active Pharma Sciences Limited is committed to conserving water as a critical natural resource across all its operational sites. By implementing sustainable practices, leveraging advanced technologies, and fostering stakeholder engagement, we aim to optimize water usage and reduce our water footprint.

### 2. Scope

This policy applies to all Solara operations, manufacturing sites, and facilities, including employees, contractors, and stakeholders involved in water conservation and management activities.

### 3. Objectives

To achieve sustainable water management, Solara commits to:

1. **Regulatory Compliance:** Adhere to all applicable regulatory frameworks while focusing on water conservation and management.
2. **Water Accounting:** Establish accurate water accounting systems at all manufacturing units to monitor and reduce water footprints through optimized water usage.
3. **Rainwater Harvesting:** Integrate rainwater harvesting measures into planning and strategies across all locations.
4. **Technological Advancements:** Emphasize the use of advanced technologies to improve efficiency, recycling, recharge, and reuse of water.
5. **Demand-Supply Balance:** Create a sustainable balance between water demand management and the development of new water sources aligned with conservation programs.
6. **Policy Disclosure:** Communicate the water policy to employees and stakeholders to encourage collective action toward conservation goals.
7. **Continuous Improvement:** Review the policy every three years or as needed, based on changing business circumstances and opportunities for improvement.

### 4. Review Mechanism

The Water Policy will be reviewed periodically to ensure its relevance and effectiveness:

- **Monitoring and Reporting:** Regularly monitor water usage metrics and report progress on water conservation initiatives.
- **Stakeholder Engagement:** Involve employees and external stakeholders in water conservation strategies and gather feedback to enhance the policy.
- **Performance Metrics:** Develop and evaluate key performance indicators (KPIs) to measure success in achieving water conservation goals.

Policy Number	<b>Water Policy</b>	Issue Date	02-12-2024
06		Revision Date	01-12-2027

**5. Conclusion**

Solara Active Pharma Sciences Limited is committed to sustainable water management by reducing consumption, leveraging innovation, and fostering responsible practices. This policy reflects our dedication to preserving water resources for future generations while maintaining operational excellence.

**6. Reference**

- Applicable legal and regulatory requirements for water management.
- Solara’s ESG Guidelines.
- Industry best practices for water conservation and reuse.
- 

**7.Revesion History**

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	02-12-2024	New Document	Implementation	NA

  
**M.Mohan**  
 Executive Director & COO



Policy Number	Biodiversity Policy	Issue Date	02-12-2024
07		Revision Date	01-12-2027

## Biodiversity Policy

### 1. Policy Statement

Solara Active Pharma Sciences Limited is committed to reducing its impact on endangered flora and fauna and preserving biodiversity. Through strategic planning, resource allocation, and proactive initiatives, we aim to protect and restore local ecosystems and promote sustainable practices across all operational sites.

### 2. Scope

This policy applies to all Solara operational sites, facilities, employees, contractors, and stakeholders involved in activities impacting biodiversity. It encompasses efforts to conserve flora, fauna, and ecosystems in areas affected by our operations.

### 3. Objectives

To preserve and enhance biodiversity, Solara commits to:

1. **Green Belt Maintenance:** Develop and maintain green belts as per legal requirements to protect and support local flora and fauna.
2. **Biodiversity Assessments:** Conduct annual biodiversity assessments to evaluate and mitigate the impact of operations on local ecosystems.
3. **Conservation Plans:**
  - Develop and implement biodiversity conservation plans to restore areas impacted by facility development or resource extraction.
  - Continuously reduce pollutants and emissions that may harm biodiversity.
4. **Awareness and Engagement:** Raise awareness among employees and suppliers about biodiversity conservation and encourage active participation in related initiatives.
5. **Performance Metrics:** Establish and monitor key performance indicators (KPIs) to measure and achieve biodiversity commitments.
6. **Policy Communication and Review:** Regularly communicate the policy to employees and stakeholders, and review it based on changing business circumstances and improvement opportunities.

### 4. Review Mechanism

The Biodiversity Policy will be reviewed periodically to ensure relevance and effectiveness:

- **Monitoring and Reporting:** Track KPIs and assess the effectiveness of biodiversity conservation efforts.
- **Stakeholder Engagement:** Involve employees, suppliers, and local communities to gather feedback and enhance conservation initiatives.

Policy Number	<b>Biodiversity Policy</b>	Issue Date	02-12-2024
07		Revision Date	01-12-2027

- **Annual Assessment:** Use findings from biodiversity assessments to refine and improve conservation plans.

## 5. Conclusion

Solara Active Pharma Sciences Limited is dedicated to preserving biodiversity by implementing sustainable practices, reducing environmental impacts, and fostering collective responsibility. This policy highlights our commitment to protecting ecosystems and promoting environmental stewardship.

## 6. Reference

- Applicable legal and regulatory requirements for biodiversity conservation.
- Solara's ESG Guidelines.
- Industry best practices for biodiversity protection and restoration.
- 

## 7.Revesion History

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	02-12-2024	New Document	Implementation	NA

  
**M. Mohan**  
 Executive Director & COO

Policy Number	Air and Noise Management Policy	Issue Date	02-12-2024
08		Revision Date	01-12-2027

## Air and Noise Management Policy

### 1. Policy Statement

Solara Active Pharma Sciences Limited is committed to minimizing air and noise pollution across all operational sites to create a safe, comfortable, and environmentally friendly workplace. By adopting advanced technologies and adhering to regulatory frameworks, we aim to achieve continual improvement in air and noise management practices.

### 2. Scope

This policy applies to all Solara operational sites, facilities, employees, contractors, and stakeholders involved in activities that may contribute to air and noise pollution. It covers all aspects of air quality management, noise mitigation, and compliance with regulatory requirements.

### 3. Objectives

To manage and reduce air and noise pollution, Solara commits to:

1. **Emission Reduction:** Prioritize manufacturing processes with minimal emissions by evaluating their impact before implementation at operational sites.
2. **Engineering Controls:** Implement and monitor engineering controls for air pollution prevention and noise mitigation and carry out preventive measures to ensure uninterrupted operations.
3. **Technology Adaptation:** Adopt technologies that facilitate recovery, reuse, or minimization of pollutants at the source.
4. **Regulatory Compliance:** Ensure strict adherence to applicable regulatory frameworks related to air quality and noise mitigation.
5. **Monitoring and Measurement:** Establish continuous monitoring systems and periodic assessments to verify the efficiency of air pollution control equipment and ensure compliance with air quality standards.
6. **Stakeholder Communication:** Communicate the policy to employees and stakeholders to promote awareness and collective action.
7. **Policy Review and Improvement:** Review and update the policy every three years or as necessary based on changing circumstances and opportunities for improvement.

### 4. Review Mechanism

The Air and Noise Management Policy will be reviewed periodically to ensure alignment with evolving regulatory standards and operational needs:

- **Monitoring Systems:** Regularly monitor air and noise levels using advanced systems and report findings to relevant stakeholders.
- **Audit and Feedback:** Conduct internal audits and gather stakeholder feedback to enhance mitigation strategies.

Policy Number	<b>Air and Noise Management Policy</b>	Issue Date	02-12-2024
08		Revision Date	01-12-2027

- **Performance Metrics:** Establish and evaluate key performance indicators (KPIs) to measure success in achieving air and noise management goals.

## 5. Conclusion

Solara Active Pharma Sciences Limited is dedicated to mitigating air and noise pollution through proactive measures, technological advancements, and regulatory compliance. By adhering to this policy, we aim to protect the environment and create a safe, sustainable workplace for all stakeholders.

## 6. Reference

- Applicable legal and regulatory requirements for air and noise management.
- Solara's ESG Guidelines.
- Industry best practices for air pollution and noise mitigation.

## 7.Revision History

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	02-12-2024	New Document	Implementation	NA

  
**M.Mohan**  
 Executive Director & COO

Policy Number	<b>Handling of Hazardous Materials and Chemicals Policy</b>	Issue Date	02-12-2024
09		Revision Date	01-12-2027

## Handling of Hazardous Materials and Chemicals Policy

### 1. Policy Statement

Solara Active Pharma Sciences Limited is committed to reducing the impact of hazardous materials and chemicals in its operations. Through safe handling practices, compliance with regulations, and continuous improvement, we aim to ensure the safety of employees, the environment, and the communities in which we operate.

### 2. Scope

This policy applies to all Solara operations, employees, contractors, and stakeholders involved in the handling, storage, use, and disposal of hazardous materials and chemicals at all operational sites.

### 3. Objectives

To ensure safe and sustainable handling of hazardous materials and chemicals, Solara commits to:

1. **Hazard Minimization:** Minimize hazards associated with hazardous materials and chemicals by implementing standard operating procedures (SOPs) and regular employee training.
2. **Inventory Management:** Maintain an accurate inventory of all hazardous materials and chemicals to ensure accountability and safe usage.
3. **Green Chemistry:** Optimize manufacturing processes by adopting green chemistry principles to replace hazardous materials and chemicals with safer alternatives where feasible.
4. **Personal Protective Equipment (PPE):** Provide employees with appropriate PPE and ensure proper usage through training and enforcement.
5. **Environmental Protection:** Implement mitigation measures to prevent contamination of air, water, and soil during the handling of hazardous materials and chemicals.
6. **Regulatory Compliance:** Comply with all applicable local, national, and international regulations governing the handling of hazardous materials and chemicals.
7. **Stakeholder Communication:** Disclose the policy to employees and stakeholders to promote awareness and collective responsibility.
8. **Continuous Improvement:** Review the policy every three years or as necessary, based on changing circumstances and opportunities for improvement.

### 4. Review Mechanism

The Handling of Hazardous Materials and Chemicals Policy will be reviewed periodically to ensure alignment with operational and regulatory requirements:

- **Audits and Monitoring:** Conduct regular audits and monitoring to evaluate compliance with SOPs and regulatory standards.
- **Performance Metrics:** Develop and track key performance indicators (KPIs) to measure effectiveness in handling hazardous materials and chemicals.

Policy Number	<b>Handling of Hazardous Materials and Chemicals Policy</b>	Issue Date	02-12-2024
09		Revision Date	01-12-2027

- **Stakeholder Feedback:** Incorporate feedback from employees and stakeholders to refine practices and improve safety measures.

## 5. Conclusion

Solara Active Pharma Sciences Limited is committed to safe and sustainable handling of hazardous materials and chemicals by adopting best practices, ensuring compliance, and fostering a culture of safety and responsibility. This policy underlines our dedication to protecting people, the environment, and the integrity of our operations.

## 6. Reference

- Applicable legal and regulatory requirements for hazardous materials and chemicals.
- Solara’s ESG Guidelines.
- Industry best practices for hazardous materials management.

## 7.Revision History

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	02-12-2024	New Document	Implementation	NA

  
**M. Mohan**  
 Executive Director & COO

Policy Number	<b>Waste Handling, Storage and Disposal Policy</b>	Issue Date	02-12-2024
10		Revision Date	01-12-2027

## Waste Handling, Storage, and Disposal Policy

### 1. Policy Statement

Solara Active Pharma Sciences Limited is committed to minimizing environmental impact through the safe and compliant handling, storage, and disposal of hazardous and non-hazardous waste. By adhering to sustainable practices, we aim to protect employees, communities, and the environment while promoting responsible waste management.

### 2. Scope

This policy applies to all Solara operational sites, facilities, employees, contractors, and stakeholders involved in the generation, handling, storage, and disposal of waste, including hazardous and non-hazardous materials.

### 3. Objectives

To achieve excellence in waste management, Solara commits to:

1. **Safe Waste Management:** Ensure the safe handling, storage, and disposal of waste in compliance with applicable laws and regulations.
2. **Environmental Protection:** Minimize environmental impact through waste reduction, recycling, and responsible disposal practices.
3. **Employee Safety:** Protect employees, contractors, and communities from hazardous waste exposure by providing appropriate PPE and training.
4. **Mitigation Methods:** Prevent contamination of air, water, and soil through scientific segregation and storage as per Pollution Control Board (PCB) classifications.
5. **Standard Operating Procedures:** Implement SOPs for the handling, storage, and disposal of hazardous and non-hazardous waste.
6. **Continuous Monitoring:** Track and monitor waste generation and disposal to ensure accountability and compliance.
7. **Waste Reduction:** Implement efficient production processes and optimize packaging to reduce waste generation.
8. **Sustainability:** Promote environmentally friendly waste treatment methods and reduce the carbon footprint of waste-related activities.
9. **Employee Training:** Conduct regular refresher training for employees on waste management best practices.
10. **Policy Disclosure:** Communicate the policy to employees and stakeholders to foster awareness and collective responsibility.

### 4. Review Mechanism

The Waste Handling, Storage, and Disposal Policy will be reviewed periodically to ensure its effectiveness and alignment with changing regulations and business needs:

Policy Number 10	<b>Waste Handling, Storage and Disposal Policy</b>	Issue Date	02-12-2024
		Revision Date	01-12-2027

- **Audits and Monitoring:** Conduct regular audits and monitoring of waste management practices to assess compliance.
- **Performance Metrics:** Develop and evaluate KPIs for waste reduction, recycling, and disposal efficiency.
- **Stakeholder Engagement:** Gather feedback from employees and stakeholders to refine and enhance waste management practices.

## 5. Conclusion

Solara Active Pharma Sciences Limited is dedicated to responsible waste management by adhering to best practices, ensuring compliance, and fostering sustainability. Through this policy, we aim to reduce environmental impact, protect public health, and contribute to global sustainability goals.

## 6. Reference

- Applicable local, national, and international waste management regulations.
- Solara's ESG Guidelines.
- Industry best practices for hazardous and non-hazardous waste management.

## 7.Revesion History

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	02-12-2024	New Document	Implementation	NA

  
**M.Mohan**  
 Executive Director & COO



Policy Number	<b>Policy On Product End of Life</b>	Issue Date	02-12-2024
11		Revision Date	01-12-2027

## Policy on Product End of Life

### 1. Policy Statement

Solara Active Pharma Sciences Limited is committed to designing and managing the lifecycle of active pharmaceutical ingredients (APIs) and intermediates from manufacturing to disposal (cradle to grave) to minimize environmental impact. By adhering to stringent quality and regulatory requirements and incorporating the 3R principles (Reduce, Reuse, and Recycle), we aim to achieve sustainability and operational excellence across our value chain.

### 2. Scope

This policy applies to all products manufactured by Solara, covering the entire product lifecycle, including raw material sourcing, manufacturing, packaging, distribution, and end-of-life disposal. It includes all employees, contractors, suppliers, and stakeholders involved in product management.

### 3. Objectives

To minimize the environmental impact of products throughout their lifecycle, Solara commits to:

1. **Lifecycle Design:** Incorporate environmentally sustainable practices in the design, manufacturing, and packaging of products.
2. **3R Principles:** Adapt the 3R principles to reduce, reuse, and recycle materials, especially in manufacturing operations.
3. **Supply Chain Optimization:** Enhance supply chain performance through efficient demand planning, capacity and production planning, turnaround times, and inventory management.
4. **Quality Assurance:** Maintain product quality as per pharmacopeial or customer needs to avoid wastage and ensure compliance.
5. **Material Efficiency:** Strive for high conversion rates, yield optimization, and minimization of materials, chemicals, and waste.
6. **Shelf Life Management:** Implement robust stability programs and accurate shelf-life assignment to prevent products from nearing or reaching expiry.
7. **Product Recall/Reuse:** Minimize product returns or recalls by following stringent quality systems and GXPs. In case of returns, ensure safe reuse or reprocessing through approved quality procedures.
8. **Performance Metrics:** Establish and monitor KPIs annually to achieve continual improvement in lifecycle management.
9. **Stakeholder Engagement:** Disclose this policy to employees and stakeholders to foster collective responsibility and awareness.

### 4. Review Mechanism

The Product End of Life Policy will be reviewed every three years or as needed due to changes in regulations, market dynamics, or operational priorities.

- **Performance Monitoring:** Evaluate the effectiveness of lifecycle management practices using KPIs.

Policy Number	<b>Policy On Product End of Life</b>	Issue Date	02-12-2024
11		Revision Date	01-12-2027

- **Audit and Feedback:** Conduct regular audits and gather feedback from stakeholders to improve processes and refine the policy.
- **Continuous Improvement:** Use insights from reviews and audits to implement necessary enhancements to product lifecycle management.

## 5. Conclusion

Solara Active Pharma Sciences Limited is dedicated to sustainable product lifecycle management by minimizing environmental impact, adhering to quality standards, and fostering a culture of continual improvement. This policy reflects our commitment to responsible operations and sustainability.

## 7.Revesion History

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	02-12-2024	New Document	Implementation	NA

  
**M.Mohan**  
 Executive Director & COO

Policy Number	<b>Policy On Pharmaceuticals in the Environment (PIE)</b>	Issue Date	02-12-2024
12		Revision Date	01-12-2027

## **Policy on Pharmaceuticals in the Environment (PIE)**

### **1. Policy Statement**

Solara Active Pharma Sciences Limited recognizes the potential environmental impact of pharmaceuticals throughout their lifecycle, from manufacturing to disposal. We are committed to minimizing the presence of pharmaceuticals in the environment (PIE) through sustainable processes, innovative treatment systems, and proactive management strategies.

### **2. Scope**

This policy applies to all Solara operations, including the development, manufacturing, and delivery of active pharmaceutical ingredients (APIs) and intermediates. It encompasses activities related to pharmaceutical waste management, effluent treatment, and stakeholder engagement.

### **3. Objectives**

To address the environmental impact of pharmaceuticals, Solara commits to:

1. **Efficient Processes:** Develop and implement efficient processes from cradle to grave to minimize environmental impact.
2. **Waste Minimization:** Maximize production yields and reduce waste at the source through optimized manufacturing practices.
3. **End-of-Pipe Treatment Systems:** Build and maintain robust end-of-pipe treatment systems to ensure proper handling of pharmaceutical effluents.
4. **Zero Liquid Discharge (ZLD):** Adopt and sustain a ZLD philosophy in effluent treatment plants to prevent pharmaceutical contaminants from entering waterways.
5. **Policy Communication:** Disclose this policy to employees and stakeholders to foster awareness and collective action.
6. **Continuous Improvement:** Review the policy every three years or as necessary, based on evolving business circumstances and emerging opportunities for improvement.

### **4. Review Mechanism**

The Policy on Pharmaceuticals in the Environment will be reviewed periodically to ensure its effectiveness and alignment with best practices:

- **Monitoring and Measurement:** Evaluate PIE impact through performance metrics and regular assessments of effluent treatment systems.
- **Stakeholder Feedback:** Gather inputs from employees, regulators, and stakeholders to enhance PIE management strategies.
- **Audits and Improvements:** Conduct audits of processes and facilities to identify areas for improvement and implement necessary changes.

Policy Number	<b>Policy On Pharmaceuticals in the Environment (PIE)</b>	Issue Date	02-12-2024
12		Revision Date	01-12-2027

## 5. Conclusion

Solara Active Pharma Sciences Limited is dedicated to addressing the impact of pharmaceuticals in the environment through sustainable practices, advanced treatment technologies, and ongoing improvements. This policy underlines our commitment to protecting ecosystems and public health while adhering to global standards for environmental responsibility.

## 6. Reference

- Applicable legal and regulatory requirements for pharmaceutical waste and effluent management.
- Solara's ESG Guidelines.
- Industry best practices for PIE management and sustainability

## 7.Revesion History

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	02-12-2024	New Document	Implementation	NA

  
**M. Mohan**  
 Executive Director & COO

Policy Number	Customer Health and Safety Policy	Issue Date	02-12-2024
13		Revision Date	01-12-2027

## Customer Health and Safety Policy

### 1. Policy Statement

Solara Active Pharma Sciences Limited, as a customer-centric organization, is committed to ensuring the health and safety of its customers by providing world-class products and services that meet the highest standards of safety and performance. This policy reflects our dedication to creating a zero-accident environment for the benefit of our customers and employees.

### 2. Scope

This policy applies to all Solara manufacturing facilities, offices, and processes covering the entire lifecycle of products. It involves all employees, contractors, suppliers, and stakeholders engaged in activities that impact customer health and safety.

### 3. Objectives

To ensure customer health and safety, Solara commits to:

1. **Safe Products:** Manufacture active pharmaceutical ingredients (APIs) using recognized safe ingredients subjected to the highest safety and performance standards.
2. **Stringent Standards:** Adopt stringent safety standards, good manufacturing practices (GMP), robust quality management systems, and Environment, Health, and Safety (EHS) management systems aligned with ISO 14001, ISO 45001, and other third-party certifications.
3. **Lifecycle Safety:** Ensure customer safety through all activities and processes across the product lifecycle, engaging all interested parties.
4. **Process Implementation:** Establish and implement processes necessary to deliver results in accordance with customer safety requirements.
5. **Performance Monitoring:** Continuously monitor and measure processes against safety requirements and take corrective actions to ensure continual improvement.
6. **Policy Communication:** Disclose this policy to employees and stakeholders to foster awareness and collective responsibility.
7. **Continuous Improvement:** Review the policy every three years or as necessary, based on changing business circumstances and opportunities for improvement.

### 4. Review Mechanism

The Customer Health and Safety Policy will be reviewed periodically to ensure its alignment with evolving customer needs and regulatory requirements:

- **Audits and Monitoring:** Conduct regular audits to evaluate adherence to safety standards and performance metrics.
- **Stakeholder Feedback:** Gather feedback from customers, employees, and stakeholders to refine processes and improve safety measures.

Policy Number	Customer Health and Safety Policy	Issue Date	02-12-2024
13		Revision Date	01-12-2027

- **Continuous Improvement:** Use insights from monitoring and audits to update and enhance the customer health and safety framework.

## 5. Conclusion

Solara Active Pharma Sciences Limited is committed to safeguarding customer health and safety by adhering to world-class safety standards, robust systems, and proactive measures. This policy underlines our dedication to creating a safe and reliable environment for our customers and employees.

## 6. Reference

- ISO 14001: Environmental Management Systems
- ISO 45001: Occupational Health and Safety Management Systems
- Solara’s ESG Guidelines
- Industry best practices for customer health and safety

## 7.Revesion History

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	02-12-2024	New Document	Implementation	NA

  
M. Mohan

Executive Director & COO

:

Policy Number	Sustainability Procurement Policy	Issue Date	02-12-2024
14		Revision Date	01-12-2027

## Sustainable Procurement Policy

### 1. Policy Statement

At Solara Active Pharma Sciences Limited, we are committed to integrating sustainability principles into our procurement processes to fulfill our Environmental, Social, and Economic responsibilities. Our goal is to conserve natural resources, protect biodiversity, and enhance social equity while ensuring long-term sustainable growth in all procurement decisions.

### 2. Scope

This policy applies to all procurement activities, supply chain operations, and stakeholder engagements at Solara, covering all group functions, manufacturing sites, and subsidiaries.

### 3. Objectives

To achieve sustainability in procurement, Solara commits to:

1. **Environmental and Social Considerations:** Incorporate environmental and social criteria into supply chain selection and evaluation processes.
2. **Climate Change Mitigation:** Reduce adverse impacts of climate change by augmenting resource efficiency and promoting the use of renewable energy across the supply chain.
3. **Biodiversity and Employee Well-being:** Foster a culture of care to enhance biodiversity, environmental responsibility, and the safety and well-being of supply chain employees.
4. **Human Rights and Fair Labor:** Uphold the highest standards of human rights and ensure fair labor practices, including the elimination of forced labor, child labor, and discrimination in operations and supply chain activities.
5. **Governance and Transparency:** Maintain good governance, ethics, and transparency in all procurement engagements and advocate for responsible business decisions.
6. **Resource Efficiency:** Adopt resource-efficient processes and encourage sustainable consumption of Solara's products and services among stakeholders.
7. **Stakeholder Partnerships:** Partner with stakeholders to improve sustainability performance and build awareness among employees and external partners.
8. **Land Use Practices:** Commit to sustainable land use practices that minimize deforestation and habitat destruction. Actively seek to restore degraded land and promote reforestation initiatives as part of broader sustainability goals.
9. **Compliance:** Ensure strict adherence to all regulatory, legal requirements, and Solara's ESG guidelines.

### 4. Review Mechanism

This policy will be reviewed every three years or as needed, based on changing business circumstances and emerging opportunities for improvement:

Policy Number	<b>Sustainability Procurement Policy</b>	Issue Date	02-12-2024
14		Revision Date	01-12-2027

- **Monitoring and Evaluation:** Regularly assess procurement practices to ensure compliance with sustainability objectives and KPIs.
- **Stakeholder Feedback:** Gather input from stakeholders to refine and improve procurement processes.
- **Audits and Reporting:** Conduct audits to ensure adherence to the policy and report findings to relevant stakeholders.

## 5. Conclusion

Solara Active Pharma Sciences Limited is dedicated to fostering a sustainable procurement ecosystem by embedding environmental, social, and governance considerations into our supply chain. Through this policy, we aim to contribute to global sustainability goals and create long-term value for all stakeholders.

## 6. References

- Applicable legal and regulatory requirements for sustainable procurement.
- ISO 20400: Sustainable Procurement Guidelines.
- Solara's ESG Guidelines.
- Industry best practices for sustainable supply chain management.

## 7.Revesion History

Rev. No.	Issue date	Details of change	Justification	Supersedes
00	02-12-2024	New Document	Implementation	00

  
**M. Mohan**  
 Executive Director & COO



## Annexure-2

Key performance Indicators

On Sub-Policies, EHS and  
Sustainability Policies

**(Adopted for FY 2024)**

**Long term Environment indicators: Qualitative objectives and Quantitative Targets**

Sl. No.	Objectives	KPI	Targets	Scope	Responsibility	Monitoring Frequency
1.	<b>Energy and GHG emission</b>					
a	Increase of Renewable Energy share by 40% by FY -2025 Considering base year FY-2022, with 10% increase year on year basis	10%	31 <sup>st</sup> March 2024	All the Sites	Unit EHS -Heads	Monthly
2.	<b>Water</b>					
a	Reduction of Fresh Water Consumption by 15 % by FY-2025 Considering base year FY-2022, with 5% decrease year on year basis	5%	31 <sup>st</sup> March 2025	All the Sites	Unit EHS -Heads	Monthly
3.	<b>Materials, Chemicals and Waste</b>					
a	Commit to reduce harm to the environment by reducing incinerable waste by 15% by FY 2025 Considering base year FY-2022	15%	31 <sup>st</sup> March 2025	All the Sites	Unit EHS -Heads	Monthly
b	Commit to reduce harm to the environment by reducing landfill waste by 20% by FY2025. Considering base year FY-2022	20%	31 <sup>st</sup> March 2025	All the Sites	Unit EHS -Heads	Monthly
4.	<b>Environmental impacts from Products End-of-Life</b>					
a	Commit to reduce harm to the environment by life cycle assessment of our 12 commercial API by 2030 Considering base year FY-2023	12	31 <sup>st</sup> March 2030	All the Sites	Unit EHS- Heads	Half Yearly
5.	<b>Pharmaceutical in environment</b>					
a	Analysis of high-volume PIE in treated water 2030	10	31 <sup>st</sup> March 2030	All the Sites	Unit EHS-Heads	Half Yearly
6.	<b>Customer Health and Safety</b>					
a	Maintain Zero product recall	zero	Continuous	All the Sites	EHS/ QA Heads	Monthly
7.	<b>Sustainable Procurement</b>					
a	Reduce the over-seas supplier's contribution	<33%	31 <sup>st</sup> March 2025	SCM Head	SCM Heads	Yearly

  
**M. Mohan**  
 Executive Director

**Short term Environment indicators: Qualitative objectives and Quantitative Targets**

Sl. No.	Objectives	KPI	Targets	Scope	Responsibility	Monitoring Frequency
<b>1.</b>	<b>Energy and GHG emission</b>					
a	Reduction of Specific Energy by 5% YOY per tons of production	5%	31 <sup>st</sup> March 2024	All the Sites	Unit EHS -Heads	Monthly
b	Reduction of Specific GHG emission by 5% YOY per tons of production	5%	31 <sup>st</sup> March 2024	All the Sites	Unit EHS -Heads	Monthly
<b>2.</b>	<b>Materials, Chemicals and Waste</b>					
a.	Cost of goods sold over Average Inventory	NLT1%	31 <sup>st</sup> March 2024	All the Sites	Unit EHS -Heads	Yearly
<b>3.</b>	<b>Biodiversity</b>					
a	Strive to maintain 30-40% greenbelt.	30-40%	31 <sup>st</sup> March 2024	All the Sites	Unit EHS -Heads	Half Yearly
<b>4.</b>	<b>Air pollution</b>					
a	Compliance to discharge, AAQ and Stack Emission Standards.	100%	31 <sup>st</sup> March 2024	All the Sites	Unit EHS -Heads	Monthly
<b>5.</b>	<b>Noise pollution</b>					
a	Compliance to standard permissible limit	100%	31 <sup>st</sup> March 2024	All the Sites	Unit EHS -Heads	Quarterly
<b>6.</b>	<b>Customer Health and Safety</b>					
a	Safety data sheet along with all the consignment	100%	Continuous	All the Sites	EHS/ QA Heads	Monthly

  
**M. Mohan**  
 Executive Director

**Short Occupational Health and Safety: Qualitative objectives and quantitative targets**

Sl. No.	Objectives	KPI	Targets	Scope	Responsibility	Monitoring Frequency
1	Lost time injury frequency rate 10%reduction YOY basis	0.2	31 <sup>st</sup> March 2024	All the Sites office	EHS -Heads	Monthly
2	Total recordable incident rate	0.06	31 <sup>st</sup> March 2024	All the Sites office	EHS -Heads	Monthly
3	Total process safety incident rate	0.2	31 <sup>st</sup> March 2024	All the Sites office	EHS -Heads	Monthly
4	No. of work-related illness	0	31 <sup>st</sup> March 2024	All the Sites office	EHS -Heads	Monthly
5	Reporting of Near Miss per plant per month	NLT15	31 <sup>st</sup> March 2024	All the Sites	EHS -Heads	Half Yearly
6	Reporting of Number of Unsafe Acts & Unsafe Conditions per month /employee	0.2	31 <sup>st</sup> March 2024	All the Sites	EHS -Heads	Monthly
7	High risk safety observation overdue	0	31 <sup>st</sup> March 2024	All the Sites	EHS -Heads	Monthly
8	Safety training per month / per employee	0.2	31 <sup>st</sup> March 2024	All the Sites	EHS -Heads	Monthly
9	Conducting Mock Drills Per Annum for identified Emergency Scenarios	2	31 <sup>st</sup> March 2024	All the Sites	EHS Heads	Half Yearly

  
**M. Mohan**  
 Executive Director