

Title: APAR Health and Safety Policy
Released by : Head HR
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Policy No. : APAR/SOCIAL/POL/04
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Health and Safety Policy

1. Objective :

This policy lays down the guidelines to be followed for providing a healthy and safe working environment to employees, visitors, contractors and sub-contractors in APAR.

2. Scope :

This policy applies across all Divisions and locations. It covers all employees, visitors, contractors and sub-contractors of APAR.

3. Guidelines :

- Policy Statement:

APAR's overall health & safety objective is to minimize the risk of work-related injuries and occupational ill-health at all locations under Company management control. Specifically, it is the Company's objective that the following 'Minimum Control Arrangements' are in place at all APAR locations:

- a) Employees access to and basic understanding of this Policy.
- b) Documented responsibilities for Health and Safety at work.
- c) Up-to-date Health and Safety risk assessments and fire risk assessments.
- d) The provision of necessary Health and Safety information, instruction and training including instructions in local language.
- e) The provision and use of necessary personal protective equipment (PPE).
- f) Arrangements for emergency response / evacuation, first aid and occupational health.
- g) Documented procedures / safe systems of work, where necessary to establish and maintain a safe and healthy working environment.
- h) Health and Safety control arrangements for contractors and visitors.
- i) Communication and consultation with employees (and their representatives) on Health and Safety issues.
- j) Monitoring, investigation and reporting of any incidents, accidents or occupational ill-health.
- k) Corrective and preventative actions where any incidents, accidents or occupational ill-health occur.

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- APAR (including its companies globally, together the "company") is committed to complying with all laws and regulations which govern our operations in every country in which we operate. This Policy provides guidance on our individual responsibility to comply with appropriate laws around the world.
- Any violation of this policy may result in disciplinary action, up to and including dismissal, termination of contract in appropriate circumstances. It is therefore extremely important that employees, visitors, contractors and sub-contractors familiarize themselves with this Policy and strictly adhere to it.

4. Control Arrangements:

Group Level Control Arrangements:

APAR shall have in place and shall maintain a Corporate Occupational Health and Safety Control Arrangements comprising

- This Policy Document, APAR's Health and Safety Objectives, Role and Responsibilities for Health and Safety and Control Arrangements.
- Performance monitoring, auditing and reporting arrangements at all locations of APAR.

Location-level Control Arrangements:

All locations under Company management and control shall have in place and maintain

- Health and Safety Standards, OHS Manual/Guidelines, necessary Health and Safety Control Arrangements.
- As required by this Policy Document, the nature of hazards posed by their operations, their Health and Safety risks and opportunities and their applicable legal requirements.
- Improvement Programs and Targets.
- The 'Minimum Control Arrangements' listed in (Items – (a) to (k) in Policy Statement) shall be established and maintained at all APAR locations.

5. Responsibilities:

(A) Location Level Responsibilities:

Employees, Visitors:

It is the duty of every employee at work and of any visitors, contractors and sub-contractors at Company facilities:

- To take reasonable care for the health & safety of themselves and others who may be affected by their acts or omissions.
- To cooperate with colleagues, line management and the Company on health & safety

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- To not intentionally or recklessly interfere with, or misuse anything provided in the interests of health and safety.
- To report any health & safety concerns to their line manager and / or the site Health and Safety Co-ordinator / Manager.

Line Management:

It is the responsibility of line management to establish health and safety standards at location:

- To implement this policy document in the areas under their control.
- To ensure, as far as practicable, that 'Minimum Control Arrangements' (Items – (a) to (k) in Policy Statement) are in place, understood and implemented in the areas under their control.
- To make available adequate resources for the management of health and safety at work.

The line management should percolate down the level from Senior Management (SMC) to Middle Management (MMC) and Junior Management (JMC).

It is the ultimate responsibility of Senior Management at location to manage the health and safety at work.

The day to day management of health and safety may be delegated through the line management structure as above.

Health and Safety Manager/ Safety Co-ordinator:

Health and Safety Manager / Safety Co-ordinator is responsible for co-ordination of health and safety control arrangements at location. However, this position doesn't remove or substitute the other direct or delegated positions' health and safety responsibilities.

Contractors and Sub-contractors:

The Contractor/Sub-contractor is responsible

- To comply in all respects with current Health and Safety legislation as detailed in our Health and Safety Policy, arrangements and Strategy.
- To respect and follow health and safety legislation or our Health and Safety Policy and Strategy. In case of any breach, APAR reserves the right to terminate the contract without notice.
- To submit the health and safety documentation as detailed in the subcontract verification form.
- To deliver Job Specific Training to his employees.

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- To ensure all job specific training are delivered and accreditations records are kept up to date, in-case records or accreditations are not maintained APAR reserves the right to suspend allocation of work.

(B) Group Level Responsibilities:

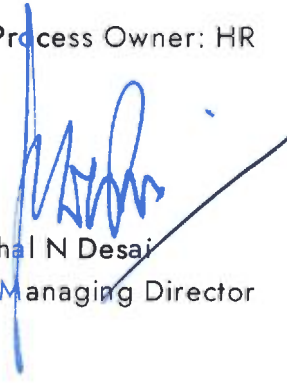
Chief Human Resource Officer(CHRO):

The CHRO through Division HR – Head is responsible to establish and maintain this policy document.

Unit Head (UH):

The Unit Head is responsible to implement this policy document within the area under his control.

Process Owner: HR


Kushal N Desai
Chairman & Managing Director

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