



*Godrej*



**OCCUPATIONAL HEALTH & SAFETY POLICY**  
**Godrej & Boyce Mfg. Co. Ltd.**

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Message from the  
Chairman & Managing Director

At Godrej, we believe that sustained competitive advantage can be attained only by providing greater customer value in the form of differentiated products and services delivered through flawless, continually refined business processes.


Such highly evolved processes can be developed and deployed by none other than employees, who enjoy and excel at their work, innovate continuously and are committed to making a difference in the lives of millions of people.


To enable people to perform accordingly, it is essential for us to create and provide a safe, supportive and productive work environment to all our employees and business associates.

I, therefore, appeal to all our employees and those associated with us to commit themselves fully to the principles of our

Occupational Health and Safety Policy and practice diligently its tenets and guidelines in their daily work.

I look forward to everyone's wholehearted commitment and involvement in the successful implementation of the new OHS policy.

  
(Jamshyd Godrej)





## OCCUPATIONAL HEALTH & SAFETY POLICY

### I : The Goal

To achieve, the milestone of “Zero Accident” by 31st March 2010 in the organization.

This milestone will be achieved by systematically working on all OHS processes to reduce the

Frequency Rate of accidents by over 33% every year for the next three years.

## II : Guiding Principles

This Occupational Health and Safety Policy is guided by the following principles:

1. It is essential to respect human life.
2. Working safely is a condition of employment.
3. All accidents are preventable as all hazards can be safeguarded either physically or through safe working procedures.
4. It is the responsibility of the management to ensure that injuries are prevented.
5. Occupational Health and Safety training is essential at all levels.
6. Periodic Occupational Health and Safety audit by management is a must.
7. Occupational Health and Safety promotes good business practices, pays high dividend.
8. Whatever we do, we shall do it safely.

### III : Scope

#### **The Occupational Health and Safety (OHS) Policy covers:**

- Employees of the Company including Trainees & Apprentices at all locations, including Customer sites.
- Service providers including Contractors, Transporters, their sub-contractors, and their employees,
- Vendors and their employees.
- All visitors to our establishments.

#### IV : Action Plan for Occupational Health and Safety (OHS)

Our safety goal shall be achieved by organizing the OHS function at the Corporate and Divisional levels with defined employees responsibilities and accountability to build and support a culture that fosters and nurtures a safety mindset in the organization. The following specific steps shall be taken to achieve the above:





### A) Organizing the OHS function :

1. Establish an organizational structure to implement the OHS policy.
2. Communicate OHS responsibilities and accountabilities to each and every employee.
3. Empower each and every employee to take action for implementing the OHS policy requirements through a mandate, promulgated by the Top Management.
4. Form OHS committees at unit (Corporate, Division, Plant, Branch) levels, as well as at departmental level for active engagement and involvement of employees in promoting Occupational Health & Safety.
5. Do regular and repeated Training at all levels.
6. Communicate OHS related knowledge and information regularly, for fostering deeper understanding and sharing of the best practices.
7. Analyze & disseminate information from the monthly, quarterly and annual OHS performance reports to improve company-wide performance on OHS.
8. To conduct audits both internally and with external help for reviewing and improving status of Occupational Health & Safety at the work place.
9. Integrate OHS requirements in all decisions involving material, machinery, processes as well as in the selection and deployment of personnel.

**Annexure 1** : gives details of the organization structure to implement OHS.

**Annexure 2** : gives details of all the OHS roles and responsibilities of employees at all levels, across the organization.

**Annexure 3** : gives details of promotion and consequences for OHS activities.



**B) Role of Corporate OHS Department :**

The Corporate OHS department will promote, coordinate and monitor the OHS policy implementation in the organization. The Head of Corporate OHS Department will report to the designated “Occupier” or “Manager” under The Factories Act, 1948.

**(C) Role of Divisional OHS Department :**

The Divisional OHS Heads will promote, co-ordinate, implement and monitor OHS activities at Divisional level in alignment with Corporate Policies and Guidelines.

The Divisional OHS Heads will report administratively to the Divisional Head, and functionally to the Corporate OHS Head.

**(D) Role of Occupational Health & Medical Centre :**

The Occupational Health & Medical Centre will proactively advise to identify, reduce and eliminate Occupational Health Hazards arising out of occupational activities.

The Company’s Medical Officers will function as Medical Co-ordinators for enhancing Occupational Health.

V : Review of OHS Progress and Policy

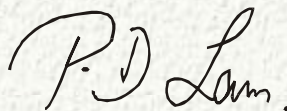
1) Review of progress :

Under the requirement of this policy, periodic and multilevel reviews must be held at all levels to monitor & review the progress made towards the achievement of the annual milestones set to achieve the overall OHS goal laid down in the policy.

2) Review of the OHS Policy :

This OHS policy will be reviewed every three years or earlier, if required.

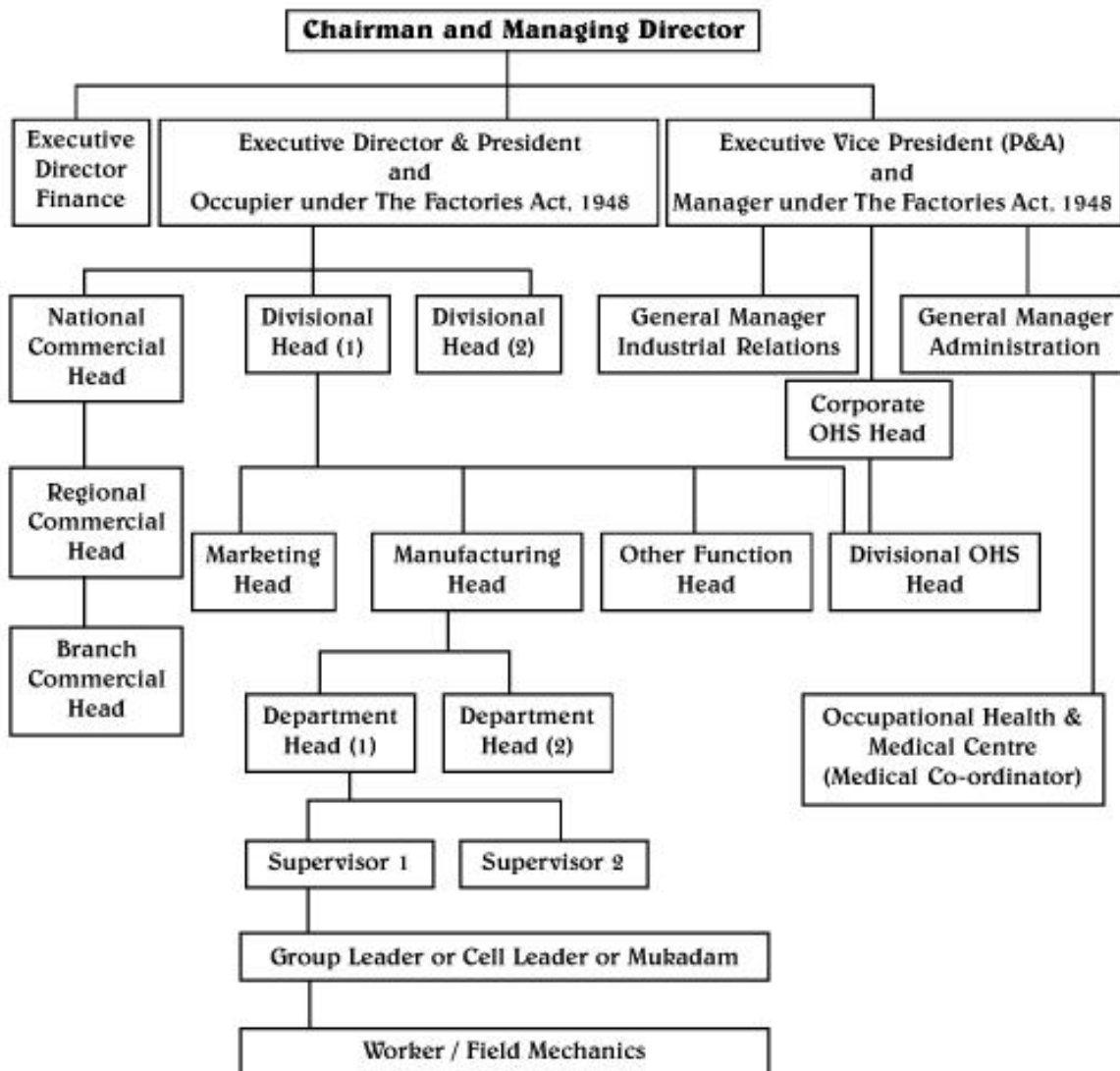
This new OHS Policy supersedes the earlier OHS Policy dated 4th March, 1995 and will come into effect from 8th November, 2007.

A handwritten signature in black ink, appearing to read 'P. D. Lam', is centered on the page.

P. D. Lam  
Executive Director & President  
and  
Occupier under The Factories Act, 1948

## ANNEXURE - 1

### Organization Structure for compliance of OHS Policy



ANNEXURE - 2  
OHS Duties and Responsibilities

Part A :  
General

The higher authorities are empowered to :

- 1) Ensure disciplined and responsible behavior at all levels for the compliance of duties and responsibilities specified including those details mentioned in “ On-Site Contingency Plan” drawn by each division.
- 2) Organize the execution of duties at subordinate level in their absence.
- 3) Include OHS duties and responsibilities at all levels and integrate the same into their Performance Management System (PMS).
- 4) Sponsor and campaign activities that will enhance Occupational Health and Safety in the Organization.

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Part B :

**Specific Duties and Responsibilities of Divisions  
/ Commercial Organization Personnel**

**1) Heads of Division / Commercial  
Organization :**

- a) Ensure implementation of the OHS policy including all statutory requirements across the Division / Department.
- b) Provide adequate budget for the above.
- c) Chair the Division / Department OHS committee meetings, provide guidance and leadership for achieving the OHS plan / goals / objectives.
- d) Conduct regular reviews of the Division / Department progress and performance in meeting the OHS plan goals / objectives.
- e) Ensure goals / objectives pertaining to OHS are incorporated in the Key Result Areas (KRA) of all their direct reportees and are cascaded appropriately.
- f) Do Quarterly / Annual appraisal of all reportees against OHS set goals / objectives.
- g) Ensure that remedial action on the OHS audit findings are taken.
- h) Involve Divisional OHS Head / Corporate OHS Head while planning any changes in plant machinery, materials used, shop floor layout and technology to ensure OHS requirements are met.

2) **Heads of Manufacturing / Regional Commercial Heads :**

- a) Ensure implementation of the OHS policy including statutory requirements across departments.
- b) Utilize OHS budget judiciously in meeting the planned goals / objectives.
- c) Conduct regular reviews of the Division / Department progress and performance in meeting the OHS plan goals / objectives.
- d) Do Quarterly / Annual performance appraisal of all reportees against OHS set goals / objectives.
- e) Participate in the Divisional / Department Committee Meetings, and take joint leadership for meeting the OHS goals / objectives specified in the annual plan.
- f) Initiate periodic OHS audits, and ensure that remedial action is taken on the issues highlighted in the audits.
- g) Study and review reports sent by Department / Sections concerned and initiate remedial action wherever required.
- h) Involve Divisional OHS Head while planning any changes in plant machinery, materials used, shop floor layout and technology.





### 3) Heads of Department / Branch Commercial

#### Heads :

#### Common Duties and Responsibilities

- a) Prepare the annual OHS plan for Department.
- b) Set OHS goals / objectives, with appropriate performance indicators for the department.
- c) Review departmental OHS performance periodically. Discuss the same with immediate superior and take inputs on performance improvement.
- d) Ensure good Housekeeping in the department by following guidelines as per '5-S', checklists, etc.
- e) Carry out OHS inspection every fortnight in the department to observe and rectify unsafe practices, if any.
- f) Assess the risk, if any, arising out of departmental processes in co-ordination with the OHS department and decide on an action plan to reduce the risks and prepare OHS rules / guidelines for the residual risks.


- g) Organize departmental OHS Meeting every fortnight of all supervisors along with few representatives of workmen. Review OHS activities in the department, decide remedial measures related to unsafe conditions / acts, prepare action plan, assign responsibilities for implementing the same, establish review mechanism and submit report of fortnightly meetings to the Manufacturing Head with intimation to Divisional Head.
  - h) Institute a process of investigating all near miss accidents, first aid injuries and non-reportable and reportable accidents occurring in the department.
  - i) Investigate personally in-depth all reportable accidents, and ensure that corrective and preventive measures are taken.
  - j) Maintain and update OHS information related to departmental processes, chemicals and machinery in consultation with the OHS department and communicate the same to the employees concerned through Training, Safe Operating Procedures, Displays of Material Safety Data Sheet (MSDS), etc.
- 

- k) Maintain focus and vigil on hazardous areas in the department.
  - l) Motivate supervisors and workmen for OHS improvements, suggestions and implementations.
  - m) Ensure that Department supervisors and workmen are trained regularly on key OHS issues and latest updates.
  - n) Actively participate in OHS committee meetings & toolbox meetings of the Department.
  - o) Ensure effective implementation of Work Permit System, Statutory and Other requirements, within the department.
- 

4) **Heads of Planning :**

- a) Perform common duties and responsibilities as mentioned under the title “Heads of Department / Branch Commercial Heads” in Annexure-2, Part B, Subtitle 3, wherever applicable.
- b) Work pro-actively towards eliminating hazards at the planning level itself.
- c) Participate in developing safe work procedures in co-ordination with Purchase and Divisional OHS Department, whenever any hazardous materials, chemicals are involved.

5) **Heads of Design :**

- a) Perform common duties and responsibilities as mentioned under the title “Heads of Department / Branch Commercial Heads” in Annexure-2, Part B, Subtitle, wherever applicable.
  - b) Eliminate hazards at the design stage itself and ensure safe operations at all subsequent stages including end users.
- 

- 6) **Heads of Purchase and Stores /Sourcing Department :**
- a) Perform common duties and responsibilities as mentioned under the title “Head of Department / Branch Commercial Heads” in Annexure-2, Part B, Subtitle 3, wherever applicable.
  - b) Consider OHS implications / impact while procuring, transporting, handling, storing raw materials and accessories.
  - c) Consider the OHS requirements while procuring Capital Equipments, Material Handling Equipments, Fire Extinguishers, etc.
  - d) Ensure strict compliance with statutory and relevant Indian or International Standards as applicable, for all purchases and stores material.
  - e) Nominate a representative to attend OHS Committee Meetings.
  - f) Ensure vendors / contractors comply with OHS rules of the Company. (Refer duties of contractors / vendors in Annexure-2, Part E - a & b).
  - g) Obtain and provide “Material Safety Data Sheet” (MSDS) to the user, while procuring any new chemicals.
  - h) Ensure that safety related indents are processed on priority.

- i) Include a penalty clause for non-compliance of safety measures, in all purchase orders and contracts.
- j) Ensure scrap yards are maintained well and disposal of waste is as per statutory requirements.
- k) Maintenance and monitoring OHS related items for stock, quality and distribution on time.



7) **Heads of Marketing :**

- a) Perform common duties and responsibilities as mentioned under the title “Heads of Department /Branch Commercial Heads” in Annexure-2, Part B, Subtitle 3, wherever applicable.
- b) Marketing, Sales and Service personnel should convey to the Design and Manufacturing Departments any safety related product and service feedback obtained while working in the field or market from internal and external customers including trade partners.
- c) Ensure that field service personnel comply with defined safety measures at all the times.
- d) Ensure that all distribution warehouses comply with the company’s OHS Policy requirements.
- e) Effectively communicate all product safety related issues to dealers and customers, so that mishaps, if any, are prevented whilst product is in use.



8) **Heads of Plant Warehousing & Logistics :**

- a) Perform common duties and responsibilities as mentioned under the title “Heads of Department / Branch Commercial Heads“ in Annexure-2, Part B, Subtitle 3, wherever applicable.
- b) Ensure competent personnel are engaged in delivery and proper hand tools and lifting equipments are used.
- c) Engage trained personnel in loading, unloading and reloading of products to avoid accidents during the above operations.
- d) Encourage use of personal protective equipments, wherever applicable.
- e) Ensure proper storage & use of packing material for prevention of fire and accidents, whilst handling.
- f) Ensure that the transporters follow the guidelines given in Section 2, Part E – a & b and ensure that the company’s product & property are safe guarded.
- g) Conduct periodic audits to identify OHS hazards and initiate necessary action.

### 9) Heads of Finance :


- a) Perform common duties and responsibilities as mentioned under the title “Heads of Department / Branch Commercial Heads” in Annexure-2, Part B, Subtitle 3, wherever applicable.
- b) Provide financial perspective on all risk assessment exercises and compliance issues so that, every one clearly understands the financial implications of actions taken or not and are not taken by surprise.
- c) Look out for opportunities to participate in various schemes and programmes to obtain external funding for enhancing OHS internally & externally.
- d) Appraise Division’s Top Management periodically on the financial implications of OHS performance.
- e) Co-ordinate between Division and Corporate Finance Department.

#### 10) Heads of Maintenance :


- a) Perform common duties and responsibilities as mentioned under the title “Heads of Departments / Branch Commercial Heads” in Annexure-2, Part B, Subtitle 3, wherever applicable.
- b) Develop & implement annual plan of Preventive Maintenance for Plant and Machinery, and maintaining appropriate records as per OHS requirements.
- c) Ensure that, contractors and their employees working in the Plant follow safety procedures. Use “Work Permit” wherever applicable.
- d) Supervise and co-ordinate periodic inspections by a competent person as specified under The Factories Act, 1948 and applicable State Factory Rules, in order, to ensure safety norms.
- e) Ensure high level of Housekeeping pre and post maintenance work.

11) Supervisors / Service Engineers :


- a) Prepare annual OHS Plan for Department / Section / Location.
- b) Implement OHS Plan as above, monitor progress and make fortnightly and monthly reports highlighting progress, impediments, support required and any other issues, which if tackled appropriately in time, would enhance OHS.
- c) Carry out safety inspection every day in the section / department for on the spot rectification of unsafe practices.
- d) Report every accident including “near miss” occurring in every section / department to the OHS Department, with a copy to Personnel Department.
- e) Investigate every accident including “near miss” occurring in section/department.
- f) Submit the report of corrective and preventive measures planned to the OHS Department and implement the same.
- g) Seek assistance from Department Head to rectify all unsafe conditions requiring their intervention.
- h) Ensure high standards of housekeeping in every section / department by following guidelines as per ‘5-S’, checklists, etc.

- i) Ensure that, all work including contract work in every section / department is done safely. Use “Work Permit” wherever applicable.
  - j) Develop and enforce the OHS rules for the Department / Section on the basis of risk assessment.
  - k) Re-emphasize Safe Operating Procedures to workmen on a regular basis.
  - l) Undergo training periodically. Implement new methods of enhancing OHS by sharing ideas and best practices with team.
  - m) Participate daily in Toolbox Meeting,
  - n) Ensure daily update of Departmental OHS Board.
  - o) Encourage workmen / technicians to identify and report hazards at the work place.
- 

12) **Group Leaders / Cell Leaders / Mukadams :**

- a) Impart on - the - job OHS training to employees.
  - b) Inspect and maintain in safe usable condition all hand tools, lifting tackles, safety devices, jigs and fixtures in the work area.
  - c) Report all unsafe practices to the supervisor. Suggest and implement suitable remedial measures.
  - d) Assist supervisor in investigation of all near-miss accidents, property damage, first aid injuries, non-reportable and reportable accidents.
  - e) Appraise the OHS committee representative for OHS issues relating to their work area.
- 

### 13) Workmen / Service Technicians :

- a) Follow Safe Operating Procedures and Rules.
  - b) Use and maintain all Personal Protective Equipments and other Safety Equipments issued / made available.
  - c) Work with appropriate hand tools, maintain the same in safe usable condition and store them in a proper place.
  - d) Ensure safety of all team members and people around by working safely.
  - e) Maintain a high standard of housekeeping in the working area.
  - f) Report to the supervisor or Group Leader / Cell Leader / Mukadam or OHS Committee Member about any unsafe condition/act, near miss incidences, other accidents and initiate corrective preventive measures with their guidance and help.
  - g) Do not do any unauthorised work.
  - h) Take active part in all OHS activities like toolbox meetings, contests etc.
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#### 14) Divisional Personnel Heads :

- a) Comply with the requirement under the Chapter V titled 'Welfare' of The Factories Act, 1948 and Maharashtra Factories Rules, 1963.
- b) Identify OHS training needs at all levels, plan annual training calendar in consultation with the Divisional OHS Head and ensure the training is conducted as per the training calendar.
- c) Participate in the Plant OHS Committee Meetings regularly.
- d) In case of reportable accident, fill up Form no. 24 (as per The Factories Act, 1948), and if required Form no. 16 (as per E. S. I. Act, 1948), or any other form as applicable for the location. While filling the form (No. 24 or No. 16) consult Manufacturing Head, Shop floor Supervisor and OHS Head, wherever required. Arrange to get the said form duly signed by the Company appointed "Manager" under The Factories Act, 1948, and arrange to send the same to the Directorate of Industrial Safety and Health, and / or the appropriate authority under E. S. I. Act, 1948, as applicable, within stipulated time.
- e) Organize transport for the seriously injured. If necessary, organize to send an escort with the injured and arrange for medical assistance.




- f) Arrange company officials visit to seriously injured person at hospital / home, report the status to the Manufacturing Head / Divisional Head concerned and also share information with the Divisional and Corporate OHS Head.
- g) Investigate malingering cases of reportable accidents, and take suitable action.
- h) Ensure that all new / transferred employees undergo safety induction training.



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## 15) Divisional Occupational Health and Safety (OHS) Heads :

- a) Prepare an annual Divisional OHS Plan in consultation with Functional & Department Heads. Get the plan approved by the Division Head.
- b) Ensure that the plan is broken into detailed activities with timeliness. Monitor progress regularly. Any deviation in plan to be highlighted at multiple levels for mobilizing all around support for the fulfillment of the Plan.
- c) Impart OHS training at all levels.
- d) Ensure timely compliance to all applicable OHS statutory requirements.
- e) Develop a process of hazard identification, and ensure that it becomes a part of daily work of all concerned so that hazards are identified proactively and regularly.
- f) Monitor vigorously the elimination of root causes of the hazards identified.
- g) In case hazardous work is inevitable, Divisional OHS personnel, in consultation with employees responsible for operations, identify/ acquire / develop user friendly, cost effective Personal Protective Equipment (P.P.E.) for usage.
- h) Impart regular training for the correct usage of P.P.E., and highlight instances of non-usage noticed during OHS audits / rounds.

- i) Improve and align OHS activities with requirements of OHSAS 18001, ISO 9001, and ISO 14001, or any other standards adopted by the Division.
  - j) Prepare and regularly update the “On - Site Contingency Plans” and ensure mock drills are conducted periodically.
  - k) Undertake OHS promotional activities to create awareness, interest and enthusiasm for enhancing OHS performance across the Division.
  - l) Conduct OHS audits objectively as per plan, and report areas of non compliance / remedial action to authorities concerned for compliance,
  - m) Investigate all reportable accidents and selective cases of near miss accidents, property damage, first aid injury and non-reportable accidents.
  - n) Timely preparation of monthly OHS report.
  - o) Participate actively in Company-wide OHS initiatives.
  - p) Develop a comprehensive database incorporating unique knowledge pertaining to the OHS aspects of the work processes. This database must be updated regularly and the knowledge therein must be disseminated for improving OHS work practices.
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- q) Perform all duties as a responsible & committed member of Divisional and Corporate OHS committees.

**Part C :**

**Specific Duties and Responsibilities of Heads of Corporate Department :**

- 1) **Head, Corporate Personnel and Administration (P&A) Department :**
  - a) Ensure compliance of statutory rules and regulations across the organization.
  - b) Ensure all support including supervision, guidance and control for implementing company wide OHS plan prepared by Corporate OHS in consultation with Divisional OHS Heads.
  - c) In case of repetitive occurrence of non - reportable and reportable accidents or inadequate performance in the area of OHS policy implementation, ensure that the concerned Head of Divisions / Departments, provide and demonstrate leadership and personal commitment for improving OHS performance at the Division / Department.

1.1) Head, Corporate Human Resource Department :

- a) Make guidelines / policies wherein due consideration is given to the candidate's OHS oriented traits at the time of recruitment.
  - b) Make guidelines wherein performance in OHS becomes an integral part of employees' performance evaluation, and is given due weightage in the final assessment.
  - c) Ensure that employee's performance in the area of OHS is considered in case of his / her promotion.
  - d) Promote OHS policy for its implementation through channels of communication.
- 

1.2) Head, Corporate Industrial Relations  
Department :

- a) Ensure timely compliances of statutory suggestions and remarks by authority.
- B ) Ensure a harmonious relationship with the statutory authorities.
- c) In case of eventuality, provide guidance to prevent Industrial Relation problems.

### 1.3) Head, Corporate Administration

#### Department :


- a) Timely submission of Form No. 24 and Form No. 16 incase of an accident.
- b) Maintain accident records in Form No. 30 for DISH and E.S.I. separately. Monitor for resuming back on duty of injured person with respective plant.
- c) Liaison with E.S.I. authorities during inspection.
- d) Workout the compensation and facilitate payment as applicable.



#### 1.4) Head, Security Department :

- a) Train security personnel in the OHS policy and their obligations arising thereof.
- b) Carry out duties specified in organization wide On - Site Contingency Plans.
- c) Co-ordinate with all emergency services for effective and prompt actions.
- d) Document, investigate and take corrective and preventive actions, on all incidences of near miss, property damage, non-reportable and reportable accidents in the factory campus or premises.
- e) Carry out fire tender rounds regularly.
- f) Enforce road safety rules, and prevent entry of stray animals in the campus.
- g) Implement appropriate systems and procedures to control entry of visitors in the campus. Ensure that, the entry pass is not misused, and perimeter security strengthened.

### 1.5) Head, Catering Service Department :

- a) Perform common duties and responsibilities as mentioned under the title “Heads of Department / Branch Commercial Heads” in Annexure-2, Part B, Subtitle 3, wherever applicable.
  - b) Ensure good hygiene is maintained in the canteen.
  - c) Ensure periodical medical check-up of employees as per statutory requirements, and maintain proper records.
  - d) Prepare On - Site Contingency Plan on the basis of risk evaluation, and conduct periodical mock drills.
- 

## 1.6) Medical Co-ordinator :


### General :

- a) Report on the status of occupational health and safety of employees to top management, for information and corrective action, if any.
- b) Co-ordinate with various paramedical agencies to get best possible assistance for the employees in emergencies.
- c) Educate employees through lectures, demonstrations, posters, audio / visuals at work place on various topics such as First Aid, Safety, Diabetes, High B.P, AIDS / HIV, etc.
- d) Maintain proper records of health of employees, evaluate & disseminate information to all concerned at periodic intervals to improve health standards of employees.

### Health Check Up :

- a) Carry out pre employment health check up for all newly appointed employees, trainees and apprentices.
- b) Conduct periodic health checkup of employees, working in (i) hazardous areas (like dust, heat, noise, welding, fumes, oil handlers, etc.), (ii) canteen workers, (iii) forklift drivers, (iv) crane operators and (v) those exposed to industrial X-rays radiation. Periodic eye checkup for color vision, distant vision and near vision for employees handling coloured object, electric wires, etc.
- c) Conduct post sickness / injury examinations and advise employees reporting back for duty after recovery and guide them regarding their rehabilitation.

### Treatment & Follow Through :

- a) Ensure in accident cases, immediate first aid and admission to hospital. Co-ordinate with the hospitals and doctors for treatment.
  - b) Ensure first aid and admission to Hospitals for employees who at the work place suffer from any medical abnormalities. Co-ordinate with the doctors treating the cases and provide guidance to employees families as needed.
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- c) Psychological and psychiatric advice to mentally disturbed employees and or addicted employees. If required, direct them to psychologists / psychiatrists.



1.7) Head, Corporate Occupational Health and Safety (OHS) Department :

- a) Formulate and periodically review the Corporate OHS Policy.
- b) Circulate OHS Policy throughout the organization for information and its successful implementation.
- c) Create and sustain organizational mechanisms such as Top Management reviews, Annual OHS Plans, OHS Promotional Activities, Consequences Management, Statutory Compliances, so that all employees can take ownership of OHS and make it a way of life in their area of work.
- d) Provide training resources to Divisional OHS Heads, as well as other employees, to achieve competence in the OHS area.
- e) Maintain good relationship with all external statutory and non - statutory bodies, so that implementing the OHS Policy is facilitated on an ongoing basis.
- f) Submit a periodically well thought, in-depth report on progress and performance on the implementation of the OHS Policy organization wise, division wise, department wise and location wise. Special care must be taken to include the status of policy implementation at branches, distribution warehouses and offices.

- g) Undertake benchmarking regularly to improve the OHS practices across the Company as well as support areas such as training etc. for continuous improvement in Company's performance in OHS.
  - h) Propagate and educate all concerned to use the 'Process View' concept, while carrying out all activities. Care and concern for health and safety in broader sense, should become the major thrust area for prevention of hazards and accidents, without compromising on performance.
  - i) Through regular and intensive communication and interaction with senior management personnel, create a culture of safety at work wherein beliefs and principles of the OHS Policy are well appreciated and respected.
  - j) Formulate and implement annual OHS promotion programme in consultation with all Divisions/Corporate Department. The details of the programme should be communicated at least a month prior to the beginning of the new financial year.
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- k) Act as a resource person for improving substance and quality of the annual OHS improvement plan prepared by the Divisions and Departments, including branches & distribution warehouses. If required, arrange to provide external experts / resources for enabling the Division and Department concerned, to implement their plans, keeping in mind the cost benefit economics.
  - l) Improve and align OHS activities with the requirements of OHSAS-18001, ISO 9001, ISO 14001 and any other standard adopted by the Company.
  - m) Give guidelines regularly to update the 'On - Site Contingency Plan' and monitor that the mock drills are conducted periodically.
  - n) Develop continuously a comprehensive database incorporating unique knowledge pertaining to the OHS aspects of the work processes. This database must be updated regularly, and knowledge therein must be disseminated for improving OHS work practices.
  - o) Leverage the Information Technology for monitoring OHS progress, and improvements in Departments and Divisions.
  - p) Develop & maintain document control and monitoring system.
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2) **Head, Logistics and Distribution  
Department :**

- a) Perform common duties and responsibilities as mentioned under the title “Heads of Department /Branch Commercial Head” in Annexure-2, Part B, Subtitle 3, wherever applicable.
- b) Ensure competent personnel and proper hand tools, lifting equipments are used in operations.
- c) Train all personnel engaged in loading, unloading, reloading of products to avoid accidents outside.
- d) Ensure use of proper Personal Protective Equipments, wherever needed.
- e) Ensure proper Housekeeping of highly combustible packing materials for prevention of fire & accidents whilst handling.
- f) Ensure that the transporters follow the guidelines given under Annexure - 2 Part E - a & b, and ensure that the Company’s property is safe guarded.
- g) Carry out periodic audits to identify OHS hazards, and initiate action for elimination.

3) **Head, Corporate Finance Department :**

- a) At planning stage, thoroughly understand the OHS risk and its implementation, for proper control of funds and their budgetary provisions for enhancing OHS.
  - b) Provide the financial perspective to all risk assessment exercises and compliance issues, so that, every one clearly understands the financial implications of actions taken within budgetary allocations.
  - c) Be on the look out for opportunities to participate in schemes and programme whereby external funding is obtained for enhancing OHS both within and outside of the organization.
  - d) Present to the Top Management the financial implication of OHS performance relating to on-going improvement at divisions.
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### 3.1) Head, Disposal Department :

- a) Perform common duties under the title “Heads of Department / Branch Commercial Heads“ and responsibilities as mentioned in Annexure-2, Part B, Subtitle 3, wherever applicable.
- b) Ensure employees of Contractor lifting disposal material from the company comply with the OHS Policy requirements. (Refer duties of contractors in Annexure-2, Part E-a & b)
- c) Ensure strict enforcement of applicable environmental rules in the handling, storage and disposal of hazardous wastes.
- d) Carry out the periodic OHS compliance audit and submit the report to user Plants as well as to Corporate OHS for information and action, if any.

Part D :

**Employees Working in Corporate Offices /  
Divisional Offices :**

- a) Thoroughly understand the OHS policy and its implications.
- b) Acquaint themselves with the location and use of fire extinguishers, so that in case of fire, it can be extinguished at once.
- c) Acquaint themselves with locations of electrical main switches at their workplace.
- d) Ensure that passages / corridors / exit routes / passage staircases are never blocked or obstructed.
- e) Avoid accumulation of combustible substances (e.g. waste paper, cotton waste and boxes etc.), as it creates fire hazards.
- f) Maintain high standards of Housekeeping.
- g) Take help of Construction / Electrical & Electronics / OHS and Security Department to eliminate workplace hazards.
- h) Adhere to the instructions with respect to the OHS requirements.

Part E :

**Specific Duties and Responsibilities of External Service Providers**

a) **Contractors / Suppliers / Vendors :**

**General Requirements :**

- 1) To follow Safe Operating Procedures / rules and internal traffic safety rules.
- 2) To report all the unsafe conditions, acts, accidents, near miss incidences to the Company's person with whom one is dealing with or the OHS Head or Security Personnel available.
- 3) To take authorization from Division / Department authorized person before beginning any lifting operation or using lifting equipment.
- 4) To ensure that adequate information is communicated before the supply and use of any machine / material.
- 5) To ensure that machine / material, when put to use will be safe and without any risk to the life and limbs of the user.
- 6) To ensure that employees are not wearing loose clothing and ornaments at places of work.

- 7) To ensure that their employees use safety shoes while working.
- 8) To provide appropriate Personal Protective Equipments (PPE) to the employees and ensure that they use the same.
- 9) To ensure good housekeeping at work site.
- 10) To provide safe and usable tools and equipment to employees.
- 11) To ensure that none of the employees operate or use any of the Company's Equipment and machinery, unauthorized in the plant.

#### Statutory and Other Requirements :

- 1) To comply with all statutory obligations in respect of their employees viz, payment of minimum wages, coverage of workmen under E.S.I., P.F., etc.
- 2) To ensure that, their female employees are not assigned hazardous work or dangerous operations listed under The Factories Act, 1948.
- 3) To ensure, before engaging any person that his / her age is between eighteen to fifty eight years only, and they are medically fit to work.
- 4) To obtain permission from the work initiator before starting any work inside the Plant and / or in the factory premises.

- 5) To follow strictly 'Work Permit' procedure for all hazardous work, and give clear OHS instructions to workmen.
- 6) To discuss all the hazards related to work with their employees and also with the Company's Divisional /Department authorized person, OHS Head concerned. Decide corrective and preventive measures and implement them before starting the work in order to avoid any injury or accident.
- 7) To depute adequate number of employees for the allotted work.
- 8) To ensure adequate supervision of employees at work place.



b) **Transporters :**

- 1) To follow scrupulously all laws / rules related to safe transportation of material and people inside and outside the Company's premises.
- 2) To load vehicles within the capacity as prescribed by the manufacturer.
- 3) To provide appropriate Personal Protective Equipments to employees carrying out this work. To follow safe rules while loading and unloading vehicle.
- 4) To mechanize the loading and unloading operation wherever necessary.
- 5) To obtain Transport Emergency Card (TREM Card) from the supplier, and make it available with the driver. Ensure that, the driver has adequate competency to handle emergency situations and necessary emergency kit is available in the vehicle.
- 6) To observe the speed limit within and outside the Company's campus. Ensure that chain hooks of the vehicle sides (Fhalkha) are properly anchored.
- 7) To ensure that no one should take rest below parked / stationary vehicles.
- 8) To ensure special care is taken while parking vehicles on slopes, loading and unloading ramps. Use wooden wedges for all wheels, apply hand brakes, and ensure that vehicle is manned at all times.



### ANNEXURE - 3

#### I. Promotion of Occupational Health and Safety

##### 1. Recognition & Rewards :

###### i) Team :

All employees on the company's role of Manufacturing Plants, Construction Division / Electrical & Electronics Division who achieve 1000 days of working without any Reportable Accident shall be given a recognition in the form of a memento. If this performance is further sustained then the employees shall be again eligible for a memento for every subsequent 365 safe working days.

###### ii) Organizational :

If the entire organization achieves 1000 days without any Reportable Accident, a recognition in the form of a memento will be given to every employee of the company to recognise the milestone achieved.

##### 2. OHS Policy Implementation ;

Every alternate year, Safety Professionals will assess the level of implementation of OHS Policy at all manufacturing plants and the plants having the maximum compliances will be recognised.

3. **Building an OHS culture :**

Different competitions to create awareness and engage employees on OHS related aspects, will be held at the divisional and corporate level and winners shall be suitably recognized.



## II. Consequences

### OHS Management :

- i) For every reportable accident, a detailed presentation will be given by Business Head in General Management Committee (GMC), explaining the probable causes of accident, corrective and preventive actions taken to avoid recurrence.
- ii) Good OHS performance shall be a high impact goal for all employees and non-performance of the same should be captured in the quarterly review and annual performance assessment ratings.

Note :

Please visit our website

<http://gnbintranet.godrej.com/>

To view Occupational Health & Safety Policy