Steel Strips Wheels Limited

CHEMICAL MANAGEMENT POLICY

Document Number: SSWL/ ESG/EHS/ 01

Classification: Internal

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Approved By	Dy. Managing Director

Revision History

Revision	Requested By	Revision Date	Sections modified/ Summary of Changes	Approved By

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1. Purpose

Steel Strips Wheels Limited (SSWL) recognizes that responsible chemical management is critical to protecting people, preventing environmental pollution, ensuring regulatory compliance, and meeting customer expectations for product stewardship and safe operations. This Policy establishes a framework for the identification, evaluation, approval, procurement, safe handling, storage, transport, use, emergency preparedness and disposal of chemicals across SSWL operations and controlled worksites.

This Policy is intended to serve as a compliance and control document and as evidence for EcoVadis under the Environment theme (chemical management, pollution prevention and compliance), with relevant linkages to Occupational Health & Safety, Ethics and Sustainable Procurement.

2. Scope and Applicability

This Policy applies to all SSWL manufacturing plants, warehouses, laboratories, maintenance areas, utilities and offices where chemicals are stored, handled or used. It applies to all employees, contract workers, apprentices/trainees, visitors and any third party operating on SSWL premises.

Covered chemicals include (illustrative): oils and lubricants, paints/coatings, thinners/solvents, degreasers and cleaning agents, coolants, surface treatment chemicals, acids/alkalis, gases, adhesives and sealants, and laboratory reagents. The Policy also applies to contractor activities involving chemicals and to chemical-related waste streams.

Plant: Village Somalheri/Lehli, Ambala-Chandigarh Road, P.O. Dappar, SAS Nagar, Punjab-140506

Plant: Village Muria, P.O.- Kolabirathana No.-150 Distt. Seraikela, Jharkhand - 833220

Plant: Plot No. 77,78,136B & 394, Village- Martoli, Taluka – Jotana, Mehsana, Gujarat, India-3844330

Plant: Plot No. 733, 734, 735, 747 Jojobera, Chhota Govindpur, East Singhbhum, Jharkand – 831 015

Plant: A-10, Oragadam Sipcot Industrial Growth Centre, Mattur PO, Vallam Village, Oragadam, Sriperumbudur , Taluk, Kanchipuram, Tamil Nadu – 602105

3. Definitions

For the purpose of this Policy:

- Chemical: Any substance or mixture used or generated in SSWL operations (including process chemicals, consumables, gases and maintenance chemicals).
- Hazardous Chemical: A chemical classified as hazardous under applicable laws and/or GHS hazard classification.

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- SDS (Safety Data Sheet): Document that provides hazard identification, safe handling, storage, emergency measures and disposal guidance.

- GHS: Globally Harmonized System of Classification and Labelling of Chemicals.
- Restricted Substances: Chemicals/substances that are prohibited or controlled due to regulatory, customer, environmental or health risks (including SVHC where applicable).

4. Policy Commitments

SSWL commits to the following minimum requirements:

- Comply with applicable chemical safety, occupational health, environmental, fire safety and hazardous waste regulations and maintain required licenses/authorizations and registers.
- Apply the hierarchy of controls: eliminate, substitute, implement engineering controls, implement administrative controls, and use PPE as the last line of defense.
- Prevent chemical exposure, injury, occupational illness, fires/explosions and pollution, and prevent uncontrolled releases to air, water and soil.
- Maintain accurate chemical inventories, accessible SDS, effective labelling, and incident reporting and investigation.
- Promote responsible supply chain practices through procurement controls, supplier engagement and contractor requirements.
- Maintain evidence for audits, customer requirements and sustainability assessments (including EcoVadis).

5. Governance, Roles and Responsibilities

5.1 Dy. Managing Director / Plant Head

Provide leadership commitment, approve this Policy, and ensure adequate resources for effective implementation.

5.2 Head – EHS (Policy Owner)

- Establish and maintain chemical management systems, procedures, training frameworks, emergency preparedness and compliance monitoring.
- Maintain chemical inventory governance and performance reporting and ensure corrective actions are tracked and closed.

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5.3 Plant Head / Unit Head

- Ensure site-level implementation, resources, and adherence to SOPs and statutory requirements.
- Ensure contractors comply with SSWL chemical requirements and site rules.

5.4 Department Heads (Production, Maintenance, Stores, Procurement, R&D/Lab, HR)

- Ensure departmental compliance with chemical approval, safe work procedures and training requirements.
- Ensure only approved chemicals are used and stored and ensure PPE and engineering controls are maintained.

5.5 Employees and Contract Workers

- Follow SOPs and permit-to-work requirements, use PPE, and do not bypass controls.
- Report hazards, near misses and incidents immediately and participate in investigations and corrective actions.

5.6 Procurement and Supplier Management

- Procure chemicals only from approved suppliers and ensure SDS and label compliance.
- Ensure suppliers support product stewardship and restricted substances declarations where applicable.

6. Chemical Lifecycle Requirements

6.1 New Chemical Introduction (Pre-Approval Mandatory)

No new chemical may be introduced or used onsite unless it has been reviewed and approved through SSWL's New Chemical Introduction (NCI) process. At minimum, approval shall confirm receipt and review of a current SDS, hazard classification, compatibility and storage requirements, engineering and PPE controls, emergency response needs, and feasibility of safer alternatives/substitution.

High-hazard chemicals (e.g., carcinogenic, mutagenic, reproductive toxicants, highly flammable/toxic gases) require enhanced review and may be restricted or prohibited unless justified and fully compliant with legal requirements and risk controls.

6.2 Chemical Inventory and Risk Assessment

- Maintain a controlled chemical inventory register (chemical name, quantity, location, hazard class, SDS reference and responsible owner).
- Maintain storage maps and segregation/compatibility controls.

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- Conduct task-based risk assessments (e.g., JSA) for handling tasks and enhanced risk assessments for high-risk operations (spray painting, acid handling, ETP dosing, gas cylinders).
- Review and update the chemical inventory at least quarterly (or per site procedure) and whenever chemicals are received, moved, consumed or disposed.

6.3 Procurement Controls and Supplier Expectations

Procurement shall ensure:

- Purchase only from approved vendors with demonstrated compliance capability.
- Each delivered chemical has GHS-compliant labels and a current SDS (local language where required).
- Suppliers provide composition disclosures and restricted substances declarations where required for customer/product compliance (e.g., automotive supply chain requirements).
- Suppliers and transporters comply with safe packaging and transport requirements and support corrective actions.

SSWL may suspend suppliers for repeated non-compliance, falsified documentation, unsafe deliveries or failure to support corrective actions.

6.4 Receiving, Labelling and Storage

All sites shall ensure:

- Incoming chemicals are inspected for container integrity, labeling, batch/expiry details and SDS availability.
- Chemicals are stored only in designated areas with secondary containment for liquids and appropriate ventilation and fire safety controls for flammables.
- Segregation is maintained based on compatibility (e.g., acids vs alkalis, oxidizers vs organics).
- No chemical storage near open drains or unprotected soil; access is restricted and signage is maintained.
- Gas cylinders are secured upright, capped, segregated by type, and handled only by trained personnel.

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6.5 Safe Handling and Use (Operational Controls)

SSWL shall implement:

- Written SOPs for chemical handling, mixing, transfer, spray operations, maintenance chemicals and ETP dosing.
- Permit-to-Work controls where required (hot work, confined space entry, line breaking and chemical cleaning).
- Engineering controls such as local exhaust ventilation, closed transfer systems, bunding and interlocks where applicable.
- Mandatory PPE as per task risk assessments (gloves, goggles/face shields, respirators, aprons and safety shoes).
- Prohibition of eating/drinking in chemical handling areas and availability of eyewash/safety showers where corrosives are used.

6.6 Occupational Health Protection

- Assess exposure risks and implement monitoring where required (air monitoring and health surveillance).
- Conduct role-based medical checks for relevant risk groups as per law and site risk profile.
- Maintain first-aid and emergency medical response arrangements for chemical exposure.

6.7 Emergency Preparedness and Response

Each site shall maintain and periodically test:

- Emergency response plans for chemical spills, fires, toxic releases and exposure incidents.
- Spill response procedures and adequately stocked spill kits (absorbents, neutralizers, drain covers).
- Internal and external escalation protocols and statutory reporting where applicable.
- Mock drills at defined intervals with documented learnings and corrective actions.

All chemical spills, exposures, near misses and unsafe conditions must be reported immediately and investigated using root cause analysis with CAPA tracking.

6.8 Chemical Transport (Internal and External)

- Internal movement shall be performed by trained personnel using suitable containers and secure methods.
- External transporters shall comply with applicable rules for hazardous goods transport (packaging, labeling, documentation and emergency instructions).

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- Contractor drivers and logistics providers shall comply with SSWL site safety rules for loading/unloading and movement.

6.9 Waste, Containers and Disposal

SSWL shall:

- Classify chemical waste and contaminated containers in accordance with applicable hazardous waste requirements.
- Store chemical wastes in authorized areas with labeling, secondary containment and required documentation controls.
- Dispose through authorized recyclers/TSDF and retain manifests, disposal certificates and supporting records.
- Prevent illegal dumping, burning or discharge of chemical waste to drains or land and promote waste minimization and responsible recycling.

6.10 Training, Awareness and Competency

- Induction and refresher training for employees and contractors handling chemicals.
- Task-based training for high-risk operations (spray painting, acid handling, ETP chemical dosing, gas cylinders).
- SDS literacy and emergency response training (spill, fire and first-aid).
- Maintain training records and monitor completion.

6.11 Audits, Monitoring and Continuous Improvement

SSWL shall:

- Conduct internal EHS audits covering chemical storage, labelling, SDS availability, PPE compliance, spill readiness and waste controls.
- Track corrective actions and close within defined timelines.
- Monitor performance indicators such as number of spills/near misses, SDS coverage, training completion, corrective action closure time and substitution initiatives.

6.12 Non-Compliance and Disciplinary Measures

Any violation of this Policy, deliberate bypassing of controls, or failure to report chemical incidents may lead to disciplinary action as per SSWL procedures (refer HR process) and may include contractor

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removal from site. Suppliers/contractors may be suspended or terminated for repeated or material breaches.

6.13 Speak-Up, Grievance and Non-Retaliation

SSWL encourages employees, contractors and stakeholders to raise concerns regarding unsafe chemical practices, improper disposal or non-compliance through line management, EHS representatives, or established grievance/ethics reporting mechanisms. Retaliation against any person raising concerns in good faith is prohibited.

7. Recordkeeping and Documentation

SSWL shall maintain, at minimum:

- Chemical inventory register and periodic review evidence
- SDS repository (controlled and accessible) and label verification records
- Risk assessments and SOPs/work instructions for chemical tasks
- Training records and competency evidence
- Incident/near-miss logs, investigation reports and CAPA closure evidence
- Waste manifests and disposal/recycling certificates
- Audit reports and management review records

8. Review and Updates

This Policy shall be reviewed at least annually or earlier if required due to changes in legal requirements, customer expectations, operational changes, audit findings or incident learnings.

9. Reference Standards and Legal/Guidance (Non-Exhaustive)

Relevant external references for good practice and compliance awareness include:

- UN GHS framework for hazard communication and SDS/labels
- Manufacture, Storage and Import of Hazardous Chemical Rules, 1989
- The Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996
- Gas Cylinders Rules, 2016 and PESO requirements.

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Annexure A – New Chemical Introduction (NCI) Approval Form (Template)

Chemical Name / Trade Name	
Supplier / Manufacturer	
Intended Use / Process	
Site / Area of Use	
Quantity & Frequency	
SDS Received (Yes/No) & Revision Date	
Hazard Classification (GHS) & Key Hazards	
Required Controls (Engineering/Admin/PPE)	
Storage Requirements & Compatibility	
Approvals (User Dept / EHS / Plant Head)	User: ____ EHS: ____ Plant Head: ____

Annexure B – Chemical Storage Compatibility (Minimum Guidance)

Category	Examples	Segregate From	Storage Controls	Notes
Flammables	Solvents, thinners	Oxidizers, ignition sources	Ventilation, fire-rated storage, bonding/earthing	Limit quantities in work areas
Oxidizers	Peroxides, oxidizing agents	Flammables, organics	Cool, dry storage; avoid contamination	Follow SDS strictly
Acids	HCl, H_2SO_4	Alkalis, cyanides, oxidizers (as per SDS)	Corrosion-resistant trays; eyewash nearby	Do not mix waste streams
Alkalis	Caustic soda	Acids	Corrosion-resistant trays; eyewash nearby	Neutralization only by trained staff
Toxic / Highly Toxic	gases/chemicals-Pesticides/Insecticides	Food areas; unauthorized access	Restricted access; monitoring if required	Enhanced emergency planning

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Annexure C – SDS and Label Minimum Checklist

- SDS is current (latest revision) and in language understood by users where required
- GHS pictograms, hazard statements and precautionary statements are present
- First-aid measures, firefighting measures and spill response guidance are included
- Handling and storage conditions are specified (including incompatibilities)
- Exposure controls and PPE recommendations are specified
- Disposal considerations and transport information are specified
- Supplier details and emergency contact information are provided

Annexure D – Spill Response

- Raise alarm and stop work; inform supervisor/EHS immediately
- If safe, isolate area and eliminate ignition sources (for flammables)
- Use appropriate PPE; refer to SDS for specific guidance
- Contain spill using absorbents/booms; protect drains using covers/blocks
- Collect contaminated absorbents and waste in labeled containers for hazardous waste disposal
- Decontaminate area as per SDS; verify area is safe before resuming work
- Report incident/near miss; complete investigation and corrective actions

Prepared By:	Approved By:
HOD - EHS & ESG	Dy. Managing Director

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** End of Document**

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