Steel Strips Wheels Limited

ENVIRONMENTAL COMPLIANCE POLICY

Document Number: SSWL/ ESG/EC/ 01

Classification: Internal

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Document Control

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

Revision History

Revision Number	Change Requested By	Approved By	Revision Date	Sections Modified / Summaryof Changes

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1. Purpose

Steel Strips Wheels Limited (SSWL) is committed to conducting its operations in a manner that protects the environment, ensures regulatory compliance, prevents pollution, and continually improves environmental performance. This Environmental Compliance Policy ("Policy") establishes minimum requirements to identify and comply with applicable environmental legal and other requirements, maintain effective permit and consent management, prevent and correct non-compliances, and ensure transparent reporting, documentation and accountability.

This Policy is a compliance document and is not limited to EcoVadis. It also supports evidence expectations under the EcoVadis Environment theme (legal compliance, monitoring and reporting, pollution prevention and waste management), with relevant linkages to Occupational Health & Safety and Sustainable Procurement.

2. Scope and Applicability

This Policy applies to all SSWL locations, plants, warehouses, utilities and offices, and to all activities, processes, products and services that may have environmental impacts, including contractors working on SSWL premises.

The Policy covers, at a minimum: air emissions, water use and discharge, effluent treatment, waste (hazardous and non-hazardous), chemicals, noise, soil and groundwater protection, resource consumption, spill prevention, emergency response, monitoring, recordkeeping and statutory reporting.

3. Definitions

For the purpose of this Policy:

- Compliance Obligation: Any applicable legal requirement (acts, rules, notifications, permits, consents, authorizations) and other commitments (customer requirements, corporate standards and voluntary codes) related to environment.
- Non-Compliance: Any breach of a compliance obligation, including exceedance of consent conditions, missing approvals, improper storage/disposal, unreported incidents, or incomplete statutory documentation.
- Legal Register: A controlled repository of applicable laws, permits, conditions, reporting requirements and evidence of compliance actions.
- Corrective and Preventive Action (CAPA): Actions taken to eliminate the causes of an identified non-compliance/incident and prevent recurrence.

4. Policy Commitments

SSWL commits to the following principles:

- Ensure legal compliance with applicable environmental laws, permits, consents and conditions, including timely renewals.

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- Pollution prevention and environmental protection through robust controls to prevent releases to air, water and land.
- Risk-based environmental management, prioritizing high-risk activities such as chemical handling, ETP operations, hazardous waste storage, fuel storage and emissions sources.
- Transparency and accountability through accurate records, monitoring data integrity and timely statutory reporting.
- Contractor and supplier alignment to SSWL site environmental rules and responsible procurement practices where environmental risks are material.
- Continual improvement through audits, training, technology upgrades and effective closure of CAPA.

5. Governance, Roles and Responsibilities

5.1 Deputy Managing Director / Plant Head

Provide oversight and resources for environmental compliance, approve this Policy, and ensure accountability across the organization.

5.2 Head – EHS/Department Heads / Compliance (Policy Owner)

- Maintain the environmental compliance framework, legal register, permit register, monitoring plans and audit program.
- Ensure statutory reporting and regulatory communications are completed accurately and on time.
- Lead investigations for environmental incidents and non-compliances, and track CAPA closure.

5.3 Plant Head / Department Head

- Ensure site compliance with consent conditions and applicable legal requirements.
- Ensure competent staffing, operational controls, emergency preparedness, and timely corrective actions.
- Ensure contractors comply with site environmental rules and legal requirements applicable to their work.

5.4 Functional Heads (Production, Maintenance, Utilities, Stores, Procurement, HR)

- Ensure departmental SOPs and controls align with compliance obligations.
- Ensure training and recordkeeping within their control areas and support closure of audit findings and CAPA.

5.5 Employees and Contract Workers

- Follow environmental SOPs and site rules, use required controls and PPE, and do not bypass pollution prevention systems.
- Report incidents, near misses and suspected non-compliances immediately to supervisors/EHS.

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6. Environmental Compliance Management System (Minimum Requirements)

6.1 Identification of Legal and Other Requirements

SSWL shall maintain a controlled Legal and Compliance Register that includes:

- Applicable environmental laws, rules and notifications, and site-specific applicability.
- Permits/consents/authorizations and their conditions.
- Statutory monitoring, testing, reporting and record requirements.
- Applicable customer or voluntary requirements where relevant.

The register shall be reviewed at least quarterly and whenever laws, permits or operations change, and shall be accessible to relevant stakeholders.

6.2 Permits, Consents and Authorizations

Each site shall maintain a Permit and Consent Register containing:

- Approval/authorization numbers, validity, key conditions and renewal dates.
- Owners responsible for meeting conditions and reporting requirements.
- An evidence repository for renewals and submissions.

Regulated activities shall not be conducted without required approvals. Any identified risk of lapse shall be escalated immediately and mitigated through defined actions.

6.3 Operational Controls and SOPs

SSWL shall establish and implement operational controls aligned with legal requirements and consent conditions, including:

- ETP/STP operations and discharge compliance, including operating logs and preventive maintenance.
- Air pollution control devices (e.g., scrubbers, filters, and baghouses) maintenance and monitoring.
- Waste management controls including segregation, storage, manifests, authorized vendors and disposal certificates.
- Chemical storage and handling controls including secondary containment and spill prevention measures.
- Storm water management to prevent contamination and ensure clean/dirty water segregation where applicable.
- Noise control measures and housekeeping practices to prevent nuisance and environmental harm.

6.4 Monitoring, Measurement and Testing

SSWL shall implement monitoring programs aligned with permit conditions and applicable requirements, which may include:

- Stack and ambient air monitoring, as applicable.

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- Effluent and wastewater monitoring at defined points, including ETP/STP influent/effluent and discharge points.
- Groundwater and soil monitoring where relevant, especially near chemical and waste storage areas.
- Waste generation tracking (hazardous and non-hazardous) and disposal route verification.
- Resource consumption tracking (water, energy) to support improvement actions.

Monitoring shall be carried out by competent personnel and/or approved laboratories as required, and results shall be reviewed and retained with integrity controls.

6.5 Compliance Evaluation and Statutory Reporting

SSWL shall:

- Periodically evaluate compliance against the legal register and consent conditions.
- Submit statutory returns and reports accurately and on time, as applicable.
- Maintain records of regulatory inspections, notices and responses, and ensure timely closure of commitments.

6.6 Environmental Incidents, Non-Compliance and CAPA

All environmental incidents, near misses and non-compliances shall be:

- Reported immediately to EHS/Plant management and contained to prevent escalation.
- Investigated using root cause analysis and documented.
- Closed with CAPA (owners, timelines and evidence), with management escalation for repeated or material issues.

6.7 Audits and Management Review

SSWL shall implement:

- Internal environmental and compliance audits at least annually, with higher frequency for high-risk areas.
- Permit/consent compliance audits and documentation integrity checks.
- Contractor compliance checks where relevant.

Audit findings shall be tracked to closure and key outcomes shall be reviewed by management at defined intervals.

6.8 Training and Competence

SSWL shall ensure:

- Induction training for employees and contractors on relevant environmental controls and site rules.
- Role-based training for high-risk functions (ETP operators, chemical handlers, hazardous waste handlers and utilities).
- Refresher training at defined intervals and maintenance of training records.

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6.9 Emergency Preparedness and Response

SSWL shall maintain emergency preparedness for environmental scenarios such as chemical spills/leaks, ETP failures, storm water contamination events and hazardous waste incidents. At a minimum, each site shall:

- Maintain documented emergency plans, spill kits and site-specific response resources.
- Conduct mock drills at defined intervals and close learnings through CAPA.
- Ensure escalation, external communication and statutory reporting where applicable.

6.10 Contractor and Supplier Environmental Compliance

SSWL expects contractors to comply with SSWL environmental rules while on SSWL premises. Where relevant to the supply chain and customer expectations, SSWL may require suppliers to provide environmental compliance evidence (e.g., permits, compliance declarations, certifications) and cooperate with corrective actions.

6.11 Recordkeeping and Document Control

SSWL shall maintain auditable records, including:

- Legal register and permit/consent register (including renewals and conditions tracking).
- Monitoring results and laboratory reports.
- Waste manifests, disposal certificates and authorized vendor documentation.
- ETP logs, preventive maintenance records and breakdown logs.
- Incident reports and CAPA evidence.
- Audit reports, management review records and training records.
- Record retention shall follow legal requirements and internal controls, whichever is more stringent.

7. Speak-Up, Grievance and Non-Retaliation

SSWL encourages reporting of environmental concerns, unsafe practices or suspected violations through line management, EHS, and applicable grievance/ethics reporting channels. Retaliation against any person reporting in good faith is prohibited.

8. Non-Compliance and Enforcement

Violation of this Policy (including deliberate bypassing of environmental controls, improper disposal, or failure to report incidents) may result in disciplinary action as per company procedures and may include contractor removal, supplier suspension or termination of business relationships where warranted.

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9. Review and Updates

This Policy will be reviewed at least once in two year or earlier if required due to changes in applicable laws or permit conditions, significant operational changes, audit outcomes, incidents, or stakeholder/customer expectations.

Annexure A – Environmental Compliance Template (Minimum)

Suggested template fields (may be maintained in an internal register/ spreadsheet & additional columns can be added as a continual improvement):

Applicable Requirement/ Particulars	Issuing authority	Statutory Requirement	Reference	Frequency	Evidence/Record	Status	Remarks/CAPA

Annexure B – Compliance KPIs

Sites may track the following indicators to demonstrate control and continual improvement:

- Statutory submissions on time (%)
- Non-compliance incidents (#) and average closure time (days)
- Monitoring compliance rate (% as per schedule)
- Waste disposal through authorized vendors (%)
- Repeat audit findings (#) and closure effectiveness.

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

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** End of Document**

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