

1. Purpose:

This SOP articulates the process to ensure necessary compliances, zero harm to people working in ETL premises and emphasize to follow ETL EHS golden rules while working in the premises.

2. Scope:

This SOP is applicable to all company (direct / Indirect) employees, contractor / sub-contracting employees and service provider's employees visiting to ETL premises for shop floor work, manpower supply, equipment, or services including maintenance, transportation, security, canteen services etc.

3. Definition:

3.1 Unsafe Act: -

Unsafe Act (UA) are any actions or behavior that put ourselves or others at risk or harm or injury.

3.1 Unsafe Condition: –

Unsafe Condition (UC) are the hazards that have potential to cause injury or death to the person.

4. Procedure Statement:

4.1 People working in ETL premises shall comply with all applicable legal compliances requirement.

4.2 All people working in premises need to undergo through medical check-up.

4.3 People working in hazardous process like plating, painting, powder coating and fettling shall undergo medical checkup once in six months.

4.4 PF & ESIC compliance is mandatory to all the contractors (Including less than 20 manpower).

4.5 In case ESIC is not applicable then need to comply workmen compensation (WC) insurance policy.

4.6 EHS golden rules implementation is applicable to all people working in ETL premises:

1. **“I assess and control risks before starting any task / activity”**
2. **“I only perform activities for which I am authorized”**
3. **“I comply with the applicable laws, procedures, work permits and personal protective equipment's (PPE's)”**
4. **“I intervene in un-safe or non-compliant situation”**
5. **“I report all injuries and incident's”**

4.7 Unsafe Acts:

- Work permit system violation.
- Working without PPE's wherever defined.

4.8 Unsafe Condition:

- Equipment's used are without proper electrical standards, interlock not working.
- Damaged ladder / stair case is in use.
- Fire-fighting equipment's are blocked with other material or relocated Fire extinguisher.
- Spillage / leakages of oils from equipment's.

Note:

1. In case of unsafe-act / practice: company/ contract employee has the right to stop work.
2. Company coordinator should ensure briefing & adherence of EHS golden rules by the visitor during their visit to plant.

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5. Consequence of EHS violations:

5.1 Procedure for Staff:

- 5.1.1 For first time violation, warning note will be issued with the statement that offence has been committed. (For issuing warning letter Plant HR & Plant EHS can take decision based on investigation of the report)
- 5.1.2 Second time violation shall lead to Suspension for 10 working days based on Severity of Violation.
- 5.1.3 Third time violation will lead to termination of the employee.

Note: In case of major incident causing injury or damage to property/ environment, high severity incident, the plant CFT can decide to appropriate action against the employee or may refer to central CFT.

5.2 Procedure for Permanent Workmen:

The consequence management process will be governed as per the Standing Orders and union agreements of the Plant applicable for permanent workmen.

5.3 Procedure for Contractor & Contractor employees:

The contract employee working in premises need to comply with ETL compliance requirement and in case of violation the penalty provision shall be applicable as mentioned in below table A under section 06 of the procedure.

6. Penalty Execution & Authority:

- A. Any employee / person can report the safety violation relating to ETL compliance requirement in the plant to concern HOD, plant HR, plant EHS and Plant Head / Operation Head (will be term as first information report).
- B. Based on the First information report the plant HR & EHS will conduct initial enquiry on spot and decide the case on its merit. Depending on severity of the case / incident, consequence management action to be initiated immediately as per procedure.
- C. In case of critical / grave matter, plant CFT will invest the matter and take appropriate action as per procedure.
- D. The composition of cross function team (CFT) are as follows

6.1 Plant CFT consist of

- 1) Plant Head / Operation Head, 2) Plant Head HR 3) Department HOD & 4) Plant EHS Leader

6.2 Central CFT consist of

- 1) Corporate Head ER/IR 2) CBUH 3) Corp. EHS Head

6.3 Penalties:

In case of un-safe act / practices observed in the premises, violation of ETL golden rules, Non-compliance to code of conduct clause may result in Penalty. In case of repetition plant CFT can terminate the contract.

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6.3.1 Penalty Provision for ETL EHS violation:

S. No	Violation of Safety Norms	Penalty Amount	Responsibility
1.	Contractor's not Providing PPEs to their workman and contract employee not using PPE's in ETL premises as per PPE Matrix	INR 1,000/- per incident	PH /OH, HOD, Plant EHS & Plant HR
2.	Working without work Permit / clearance / Isolation or LOTO	INR 25,000/- per occasion	
3.	Non-use of safe electricity at work site (not installing ELCB, using damaged cables with joints, using naked wire without top plug into socket, laying wire / cables on the roads, electrical jobs by incompetent person)	INR 20,000/- per item per day	
4.	Working at height without fall protection / full body harness, using non-standard scaffolding and not arranging fall protection arrangement as required	INR 50,000/- per occasion	
5.	Unsafe handling of compressed gas cylinders (No trolley, jubilee clips, double gauge regulator, improper storage / handling)	INR 25,000/- per item per occasion	
6.	Non-fencing / barricading of excavated areas / not providing shoring / strutting / proper slope and not keeping the excavated earth at least 1.5 M away from excavated area	INR 10,000/- per occasion	
7.	Use of domestic LPG for cutting purpose	INR 25,000/- per occasion	
8.	Sleeping on job, Enter in ETL premises without ID card, carrying or chewing tobacco / guthaka, Mobile and smocking in premises.	INR 1000/- per occasion	
9.	Unauthorized Driving , Over speeding of vehicles / rash driving, etc. (Intimation to Local police office in case of accident) Speed limit 15 KMPH in ETL premises, Fork lift : 5 KMPH	INR 5000/- per occasion	
10.	Driver observed with alcohol drink and drive in company premises or working at customer site	Banned for Lifetime in ETL	
11.	Non-deployment of safety supervisor / supervisor responsible for safety at work site required as per special safety conditions – at Project construction / contractor site	INR 10,000/- per day	
12.	Failure to maintain Crane/ Hoist Test Certificates	INR 5000/- per Occasion	
13.	Failure to correct unsafe conditions under contractor's control after intimation to them	INR 10,000/- per week	
14.	Poor House-keeping and low illumination is applicable for all sites.	INR 10,000/- per site / per day	
15.	Violation of any other safety condition as per safety plan, Safe Works Procedures, work permit and Code of conduct , improper welding or gas cutting equipment's, not keeping fire hose / extinguisher ready at hot work site, unsafe rigging , bringing defective equipment , unauthorized personnel, improper illumination, improper environmental management / waste disposal etc.	INR 20,000/- per occasion	

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6.3.2 Penalty Provision for Legal non-compliance by contractors:

Plant HR to ensure legal compliance related to payment of PF / ESI / Wages by contractors.

Following process to be adhered:

- 6.3.2.1 Plant HR must send email communication to all contractors by 9th of each month to make payment of PF/ESI on time and submit challan for the previous month latest by 17th of next month.
- 6.3.2.2 Obtain wage sheet and PF/ESI Challan from contractors by 17th of each month, check and ensure all necessary compliances related to PF / ESI / Wages before 28th of every month.
- 6.3.2.3 In case any noncompliance is observed, plant HR will send email communication to concern and impose penalty/fine as under:

Type of legal compliance violation	Penalty Provision
Non - payment of PF/ESI contribution for all or some contract Labour	1) Amount of PF/ESI not paid to be put on hold. 2) Contractor need to submit supplementary challan for non-payment of PF. Penalty of INR 1000/- per contract Labour to be imposed
Delayed payment of PF/ESI contribution	Penalty of INR 500/- per lakh of the bill amount. For instance, if total bill amount of an agency is INR Seven Lac, penalty of INR 3500/- to be imposed. However, minimal penalty irrespective of bill amount will be INR 500/-.
Short payment of PF/ESI contribution	1) Amount of PF/ESI not paid to be put on hold and ensure that contractor submit the supplementary challan and will provide paid receipt and then release hold payment. 2) Penalty of INR 300/- per contract Labour to be imposed
Non - payment of wages to all or some Contract labour (CL)	1) Amount of wage not paid to be put on hold. 2) Penalty of INR 300/- per contract Labour to be imposed
Short payment of wages	1) Amount of wages not paid to be put on hold. 2) Penalty of INR 300/- per contract Labour to be imposed
Non punching of attendance by CL on regular basis.	Penalty of INR 100/- instance per contract Labour to be imposed

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7. Roles, Responsibility and Accountability

Sr. No.	Task	Roles and Responsibility	Accountability	Monitoring
01	Implementation of ETL compliance requirements	Department HOD / Plant EHS	Plant Head	CBUH
02	Recommendation of Penalty	CFT members	Plant Head	Plant EHS leader
03	Initiate action as per CFT Recommendation	Plant HR	Corp. regional ER / IR	Corp. Head ER / IR
04	Review of Penalty provision and action against the contractor	Plant HR	Corp. regional ER / IR	Corp. Head ER / IR
05	Submit monthly MIS for MD EHS review meeting	Plant EHS	Plant HR	Corp. EHS

- 1) Deviation form acknowledgement
- 2) Online CSM Evaluation portal
- 3)

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