



OCCUPATIONAL HEALTH, SAFETY & ENVIRONMENT (OHSE) POLICY

1. Policy Statement

Pakka Limited, a public limited company engaged in the manufacturing of kraft paper, poster paper, Tableware (Moulded) products, egg trays, and pith pallets, recognizes that occupational health and safety is fundamental to sustainable business performance, legal compliance, and responsible corporate governance.

Given the hazardous nature of our manufacturing operations, including the handling and use of chlorine and other chemicals, we are committed to preventing work-related injuries, occupational illnesses, major accidents, and environmental harm by implementing robust health and safety management systems.

We believe that all incidents are preventable, and we are committed to providing a safe, healthy, and secure working environment for all team members, contractors, visitors, and other stakeholders.

2. Scope

This policy applies to:

- All Team Members of Pakka Limited
- Contract workers, trainees, apprentices, and consultants
- Contractors, suppliers, transporters, and visitors
- All manufacturing units, warehouses, utilities, offices, and project sites operated or controlled by Pakka Limited

Compliance with this policy is mandatory across all locations and operations.

3. Regulatory & Standards Compliance

Pakka Limited is committed to full compliance with all applicable health, safety, and environment laws and standards, including but not limited to:

- Factories Act, 1948 and State Factory Rules
- Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989

- Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996
- Public Liability Insurance Act, 1991
- ISO 45001: Occupational Health & Safety Management Systems
- Relevant ILO Conventions
- Applicable environmental and ESG regulations

4. Key Commitments

Pakka Limited commits to:

4.1 Hazard Identification & Risk Management

- Identify, assess, and control all occupational health and safety hazards, with special emphasis on chlorine handling, storage, transportation, and emergency response
- Implement a Hierarchy / Matrix of Controls (elimination, substitution, engineering controls, administrative controls, and PPE) to minimize risks
- Conduct Hazard and Operability Studies (HAZOP), Job Safety Analysis (JSA), and safety risk assessments for hazardous processes

4.2 Safe Operations & Infrastructure

- Design, operate, and maintain facilities, equipment, and processes to minimize health and safety risks
- Ensure safe storage, labeling, handling, and disposal of hazardous chemicals
- Provide appropriate engineering controls such as gas detection systems, scrubbers, ventilation, and emergency shut-off mechanisms

4.3 Emergency Preparedness

- Establish and regularly test **On-site and Off-site Emergency Management Plans**, particularly for chlorine leaks or chemical releases
- Coordinate with local authorities, emergency services, and hospitals
- Conduct mock drills and training programs at defined intervals

4.4 Training & Competence

- Provide regular health and safety training to team members and contractors, including chemical safety, chlorine handling, PPE usage, and emergency response

- Ensure only trained and authorized personnel handle hazardous substances
- Promote safety awareness and behavioral safety programs

4.5 Health Surveillance & Wellbeing

- Conduct periodic medical examinations and occupational health monitoring for team members exposed to hazardous substances
- Provide access to occupational health services and promote physical and mental wellbeing

4.6 Team Members Participation & Communication

- Encourage consultation and active participation of team members in health and safety matters
- Promote reporting of near-misses, unsafe conditions, and incidents without fear of retaliation
- Maintain transparent communication on safety performance

4.7 Continuous Improvement & Governance

- Set measurable OHSE objectives, targets, and performance indicators
- Conduct internal and external audits and management reviews
- Investigate incidents thoroughly and implement corrective and preventive actions
- Integrate OHSE performance into ESG and sustainability frameworks

5. Responsibilities

- Board of Directors & Senior Management: Provide leadership, resources, and oversight for OHSE performance
- Management & Supervisors: Ensure safe work practices and compliance at operational levels
- Team Members & Contractors: Follow safety procedures, use PPE, and report hazards and incidents

6. Accountability & Non-Compliance

Compliance with this policy is mandatory. Any violation, negligence, or willful non-compliance will attract disciplinary action as per company rules and applicable laws. All grievances, safety concerns, or incident reports shall be escalated through the designated safety reporting mechanism.

7. Review & Amendment

This policy shall be reviewed at least annually or earlier in case of:

- Changes in legal or regulatory requirements
- Introduction of new processes, chemicals, or technologies
- Major incidents or organizational changes

Approved by: Seva Sangh

Effective Date: 1st April 2026

Review Cycle: 3 Years

A handwritten signature, possibly 'NY', is enclosed in a hand-drawn oval. Below the oval, the date '2/4/26' is written in a cursive script.