



RAVIRAJ FOILS LIMITED.

EHS PROCEDURE

HR DEPARTMENT

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TITLE: Assessment and Management of Spills and Leakages Policy

DOC. NO.

RFL/EHS/PR/66

REV. NO.

00

EFFECTIVE DATE

20/08/2024

REVIEW DATE

19/08/2025

SUPERSEDES

NIL

1. Purpose

The purpose of this policy is to establish a systematic approach to assess, manage, and publicly disclose the risks associated with Spills and Leakages within Raviraj Foils Ltd.'s operations. This policy is designed to minimize environmental contamination, protect human health, and maintain transparency with stakeholders.

2. Scope

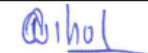
This policy applies to all facilities and operations of Raviraj Foils Ltd., focusing on the assessment, prevention, detection, and remediation of Spills and Leakages that could contaminate air, water, or soil.

3. Core Principles

Risk Management: We commit to identifying and mitigating the risks of Spills and Leakages through proactive risk assessments and the implementation of robust management plans.

Transparency and Public Engagement: We will publicly disclose our spill and leakage management plans and ensure that affected populations are informed and engaged in the monitoring process.

Continuous Improvement: Our spill and leakage management plans will be regularly reviewed and updated to reflect the latest scientific knowledge, regulatory requirements, and stakeholder expectations.

PREPARED BY:	CHECKED BY:	APPROVED BY:
		
Safety Officer	Sr. EHS Officer	HR - Head
DATE: 20/08/2024	DATE: 20/8/2024	DATE: 20/08/2024

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4. Assessment and Management of Spills and Leakages

4.1 Risk Assessment

Major Risk Areas: Raviraj Foils Ltd. will conduct an assessment of major risk areas within its operations where Spills and Leakages could potentially contaminate air, water, or soil. This assessment will identify and document all major risk areas and potential sources of contamination.

Risk Identification: The assessment process will involve the identification of potential risks, including the evaluation of existing control measures and the development of additional measures where necessary.

Control Measures: Identified risks will be mitigated through documented control measures, which may include:

Regular training for relevant workers on spill prevention and mitigation.

Regular inspections of leak prevention and containment equipment and structures.

Integrity testing of bulk storage vessels, pipes, and fill points by technical specialists.

Installation of leak detection equipment and implementation of leak detection processes.

Monitoring systems aimed at preventing and detecting Spills and Leakages.

Predictive modeling of potential Spills and Leakages.

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4.2 Management Plan Implementation

Management Plan: Raviraj Foils Ltd. will implement a comprehensive management plan to prevent, detect, and remediate Spills and Leakages. This plan will include compliance controls, a monitoring program, and remediation strategies.

Remediation Plans: The management plan will include detailed remediation plans for potential spills and leakages, along with a communication plan to ensure timely notification of affected populations and regulatory authorities.

Community Participation: Indigenous Peoples and local communities will be empowered to participate in the monitoring of risk areas to prevent and detect Spills and Leakages.

4.3 Plan Review and Continuous Improvement

Regular Reviews: The spill and leakage management plan will be reviewed at least every five years. Additional reviews will be conducted after any spill or leakage event or following any significant business changes that alter the risks associated with Spills and Leakages.

Trigger-Based Reviews: Irregular or significant adverse events, or indications of a control gap, will trigger an immediate review of the management plan.

Plan Improvement: Post-review, any identified improvements will be implemented to ensure the effectiveness of the plans in meeting objectives, stakeholder expectations, and legislative requirements.

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5. Public Disclosure and Verification

5.1 Public Disclosure

Disclosure of Plans: The latest versions of the spill and leakage management plans, along with any updates or changes, will be publicly disclosed through the company's website, sustainability reports, and other relevant channels.

Reporting Standards: Public disclosures will align with relevant international standards, ensuring transparency and consistency in communication.

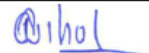
5.2 Independent Verification

Mandatory Verification: All publicly disclosed data on Spills and Leakages will undergo independent verification before publication to ensure accuracy and reliability.

Verification Process: The verification will be conducted by qualified and independent entities, ensuring that the disclosed data accurately reflects our risk assessments and management efforts.

6. Documentation and Monitoring

Comprehensive Documentation: Detailed records of all processes related to spill and leakage management will be maintained, including methodologies, assumptions, and data sources used in the development and execution of management plans.

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Continuous Monitoring: Spills and leakages will be continuously monitored to ensure progress toward targets, with regular internal audits to verify compliance with this policy.

7. Review and Continuous Improvement

7.1 Policy Review

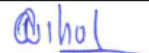
Regular Reviews: This policy will be reviewed at least every five years or as needed based on changes in industry standards, regulatory requirements, or business operations. The review process will involve input from senior management and relevant stakeholders.

7.2 Continuous Improvement

Ongoing Improvements: Raviraj Foils Ltd. is committed to continuously improving its practices related to Spills and Leakages, ensuring alignment with the latest scientific findings, industry best practices, and stakeholder expectations.

8. Revision History:

Sr. No.	Issue Date	Reason for revision	Revision No.	Obsolete Doc No.
1	20/08/2024	First Issue	00	-

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