



RAVIRAJ FOILS LIMITED.

EHS PROCEDURE

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	REV. NO.	00
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	REVIEW DATE	19/08/2025
	SUPERSEDES	NIL

1. Purpose

This procedure establishes the guidelines for implementing and maintaining a Responsible Sourcing Policy that addresses environmental, social, and governance issues, ensuring that sourcing practices at Raviraj Foils Ltd. are sustainable, ethical, and compliant with global standards.

2. Scope

This procedure applies to all facilities and departments of Raviraj Foils Ltd. involved in the sourcing of goods and services. It covers the formulation, publication, review, and enforcement of the Responsible Sourcing Policy.

3. Policy Statement

Raviraj Foils Ltd. commits to responsible sourcing practices that respect the environment, value human rights, and uphold high standards of corporate governance. The Responsible Sourcing Policy reflects this commitment and guides our approach to procurement and supplier relationships.

4. Responsibilities

- **Procurement Manager:** Oversees the implementation of the Responsible Sourcing Policy and coordinates with suppliers to ensure compliance.
- **EHS Manager:** Assesses environmental risks and sustainability practices of suppliers.
- **HR Manager:** Evaluates social aspects, including labor rights and human rights compliance.
- **Compliance Officer:** Ensures that sourcing practices adhere to governance standards and legal requirements.
- **Audit Team:** Conducts regular audits of suppliers and internal processes to ensure adherence to the policy.

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5. Procedure

5.1 Implementation of the Policy

- Develop a Responsible Sourcing Policy that encompasses ESG criteria.
- Ensure the policy is aligned with international standards and local regulations.

5.2 Public Disclosure

- Publish the latest version of the Responsible Sourcing Policy on the company's official website and include it in the annual report.

5.3 Regular Reviews

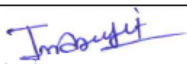
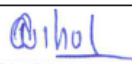
- **Scheduled Reviews:** Review the policy at least every five years to ensure it remains relevant and effective.
- **Event-Triggered Reviews:** Review the policy when there are significant changes in business operations or when new ESG risks are identified.
- **Control Gap Reviews:** Conduct reviews whenever a control gap is indicated through audits or performance assessments.

5.4 Due Diligence Process

- Perform risk identification and assessment for all new suppliers, focusing on potential ESG violations.
- Integrate findings into procurement decisions and supplier management processes.

5.5 Supplier Audits

- Schedule and conduct second-party audits to assess supplier compliance with our Responsible Sourcing Policy.

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- Use audit results to inform supplier development programs and corrective action plans.

5.6 Communication and Training

- Communicate the Responsible Sourcing Policy to all relevant personnel within the company through training sessions and internal communications.
- Engage with suppliers to ensure they understand and commit to our policy requirements.

6. Documentation and Record Keeping

Maintain detailed records of:

- Supplier assessments and audits.
- Contracts that incorporate responsible sourcing requirements.
- Reviews and updates to the Responsible Sourcing Policy.
- Communications regarding policy changes and audit results.

7. 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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Responsible Sourcing Risk Assessment

Risk Category	Identified Risk	Potential Impact	Likelihood	Mitigation Strategies	Responsible Party
Environmental	Non-compliance with environmental regulations by suppliers	Legal penalties, reputational damage	Medium	Conduct environmental audits, require certifications (e.g., ISO 14001)	EHS Manager
Social	Labor rights violations in the supply chain	Reputational damage, legal issues	High	Implement supplier code of conduct, regular social compliance audits, worker rights training	HR Manager

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Risk Category	Identified Risk	Potential Impact	Likelihood	Mitigation Strategies	Responsible Party
Governance	Supplier involvement in corrupt practices	Fines, reputational damage, operational disruptions	Medium	Perform due diligence, enforce anti-corruption policies, continuous monitoring and audits	Compliance Officer
Quality	Poor quality of materials or services	Product failures, customer dissatisfaction	High	Establish quality control standards, regular supplier assessments, require quality certifications	Quality Control Manager
Supply Chain	Supplier dependency and concentration risks	Supply disruption, increased costs	Medium	Diversify supply base, develop alternate supplier relationships,	Procurement Manager

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Risk Category	Identified Risk	Potential Impact	Likelihood	Mitigation Strategies	Responsible Party
Economic	Financial instability of suppliers	Supply chain disruption, increased procurement costs	Low	maintain inventory buffers Financial audits, monitor supplier financial health, establish contingency contracts	CFO
Technological	Cybersecurity risks in supply chain	Data breaches, intellectual property theft	Medium	Require cybersecurity measures, regular IT audits, cybersecurity awareness training	IT Manager
Regulatory	Changes in trade policies and tariffs	Increased costs, supply	Medium	Monitor regulatory developments	Legal Advisor

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Risk Category	Identified Risk	Potential Impact	Likelihood	Mitigation Strategies	Responsible Party
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chain
disruptions

, engage
trade
consultants,
strategic
sourcing
adjustments

:

- **Risk Assessment Frequency:** Conduct this risk assessment annually or whenever there are significant changes in the supply chain or business environment.
- **Stakeholder Engagement:** Regularly engage with suppliers to discuss risk management and improvement strategies. Collaboration can lead to better risk mitigation and compliance.
- **Training and Development:** Provide ongoing training for procurement and supply chain management teams on responsible sourcing practices and risk management.
- **Documentation and Reporting:** Maintain detailed records of risk assessments, mitigation actions, and supplier compliance to ensure transparency and accountability.

Responsible Supplier Risk Assessment Audit - ESG Aspects

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SN	ESG Domain	Specific Point	Compliant (Yes/No)	Final Remarks
1	Environment	Proper waste management systems in place	Yes	Adequate measures taken, continuous monitoring recommended
2	Environment	Use of renewable energy sources	No	Plans to transition to renewable sources required
3	Environment	Reduction of greenhouse gas emissions	Yes	Compliant, but further reductions can be targeted
4	Environment	Compliance with local environmental regulations	Yes	Fully compliant with current legislation
5	Environment	Management of hazardous materials	No	Immediate improvements needed in handling and disposal
6	Social	Fair labor practices (no child or forced labor)	Yes	Good practices observed, regular audits necessary
7	Social	Health and safety standards in the workplace	Yes	Meets industry standards, consider best practice enhancements

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SN	ESG Domain	Specific Point	Compliant (Yes/No)	Final Remarks
8	Social	Employee grievance mechanisms	Yes	Effective systems in place, maintain openness
9	Social	Community engagement and impact assessments	No	Need to establish formal community outreach programs
10	Social	Support for employee education and training	Yes	Strong support observed, continue investment
11	Governance	Ethical business practices (anti-corruption)	Yes	Well-implemented policies, ongoing training advised
12	Governance	Regulatory compliance	Yes	Fully compliant, remain vigilant of changes
13	Governance	Transparency in reporting and accountability	No	Increase transparency in external communications
14	Governance	Board diversity and independence	Yes	Adequate diversity, monitor for continued improvement
15	Governance	Protection of shareholder rights	Yes	All rights respected, continue current practices

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16	Environment	Efficiency in resource use	No	Improvement needed in water and electricity usage
17	Environment	Biodiversity conservation efforts	No	Initiate biodiversity impact assessments and conservation efforts
18	Environment	Emissions monitoring and control systems	Yes	Effective systems, upgrade as technology improves
19	Social	Worker participation in management decisions	No	Should enhance worker participation programs
20	Social	Equality and non-discrimination policies	Yes	Policies are robust and well-enforced
21	Social	Adequate compensation and benefits	Yes	Competitive compensation packages in place
22	Social	Prevention of harassment and abuse	Yes	Effective policies and enforcement noted
23	Governance	Compliance with international trade laws	Yes	Compliant, ongoing updates and training necessary

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24	Governance	Internal controls and audit functions	No	Strengthen internal audits and control mechanisms
25	Governance	Data protection and privacy policies	Yes	Strong measures in place, continue monitoring
26	Environment	Air quality control measures	Yes	Effective controls, monitor for regulatory updates
27	Environment	Water conservation practices	No	Critical need for water management improvements
28	Environment	Sustainable packaging practices	Yes	Practices are sustainable, look for innovative solutions
29	Social	Support for local suppliers and businesses	No	Develop programs to better support local businesses
30	Social	Occupational health services	Yes	Excellent support and healthcare facilities for employees
31	Governance	Crisis management and response planning	No	Lacks a comprehensive crisis response plan

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Summary and Recommendations:

This table presents a detailed look at various ESG aspects concerning Raviraj Foils Ltd.'s suppliers, highlighting areas of compliance and those requiring action. The audit recommends:

- Enhancing engagement and programs in environmental conservation, especially in water management and biodiversity.
- Improving social interactions with the community and boosting worker participation in managerial decisions.
- Strengthening governance through better internal controls and crisis management frameworks.

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