

# HEALTH & SAFETY POLICY (V1.0)

**SAFETY IS NOT OPTIONAL. IT IS  
OPERATIONAL DISCIPLINE**

**NE**  **STAR**

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## 1. Purpose

This policy sets out our commitment to providing a safe and healthy working environment for all persons engaged in our operations.

We recognize that health and safety is not achieved through declarations or protective equipment alone, but through **process discipline, supervision, training, and daily behavior** – especially in industrial settings where fatigue, shortcuts, and informal practices can create real risk.

## 2. Scope

This policy applies to:

- All employees.
- Contract and temporary workers engaged at our facilities.
- Visitors, service providers, and contractors while on our premises.

## 3. Legal Compliance as a Baseline

We comply with all applicable Indian laws and regulations relating to occupational health and safety, including requirements under the Factories Act and associated rules.

Legal compliance is **mandatory** and **non-negotiable**. However, we recognize that compliance alone does not guarantee safety if risks are not actively identified, communicated, and managed.

## 4. Our Staged Approach to Health & Safety

Stage 1 – Compliance and Hazard Recognition (Baseline)

- Compliance with statutory safety requirements.
- Identification of workplace hazards and unsafe conditions.
- Clear safety instructions, signage, and basic protective measures.
- Defined roles and responsibilities for safety supervision.

This stage establishes legality and visibility of risk.

### Stage 2 – Prevention, Training, and Safe Behaviour

Beyond compliance, we focus on preventing incidents by:

- Training workers on safe work practices relevant to their roles.
- Ensuring machinery, tools, and processes are used as intended.
- Addressing fatigue, unsafe shortcuts, and procedural violations.
- Supervising work to reinforce safe behavior.

Safety is treated as a **shared operational responsibility**, not an individual burden.

## Stage 3 – Review, Learning, and Continuous Improvement

Health and safety risks evolve with equipment, processes, and workforce composition. We therefore commit to:

- Reviewing incidents, near-misses, and unsafe conditions.
- Learning from failures rather than concealing them.
- Improving controls and procedures over time.
- Encouraging reporting of hazards without fear of blame.

### 5. Core Health & Safety Commitments

#### 5.1 Safe Working Conditions

We strive to maintain workplaces that are:

- Clean, orderly, and free from avoidable hazards.
- Equipped with appropriate safety guards and controls.
- Designed to minimize exposure to physical, chemical, and ergonomic risks.

#### 5.2 Machinery and Process Safety

- Machinery must be operated only by trained and authorized personnel.
- Safety guards, interlocks, and controls must not be bypassed.
- Maintenance and repairs must follow defined procedures.

Production targets do not justify unsafe operation.

#### 5.3 Training and Competence

- Workers receive safety training appropriate to their role and risks.
- New tasks or processes require corresponding safety instruction.
- Skill development is recognized as a contributor to safer work.

Competence reduces risk.

#### 5.4 Personal Protective Equipment (PPE)

- PPE is provided where required and must be used correctly.
- PPE is a **last line of defence**, not a substitute for safe processes.
- Supervisors are responsible for enforcing PPE use.

#### 5.5 Fatigue, Working Hours, and Safety

We recognize that fatigue significantly increases accident risk. Accordingly:

- Legal limits on working hours are respected.
- Excessive or unsafe overtime is discouraged.
- Rest periods are treated as a safety requirement, not a concession.

## **5.6 Health, Hygiene, and Wellbeing**

We commit to:

- Access to clean drinking water and sanitation facilities.
- Basic workplace hygiene and cleanliness.
- Reasonable measures to protect physical wellbeing.

Health protection is integral to safety.

## **6. Incident Reporting and Response**

All incidents, near-misses, and unsafe conditions should be reported. We commit to:

- Prompt investigation of incidents.
- Corrective action to prevent recurrence.
- No retaliation against those who report safety concerns.

Learning from incidents is essential to prevention.

## **7. Contractor and Visitor Safety**

Contractors and visitors must:

- Follow applicable safety rules while on site.
- Comply with instructions provided by site management.
- Use required protective equipment.

Safety responsibilities extend to all persons on our premises.

## **8. Governance and Accountability**

Health and safety are overseen as part of overall operational governance. We commit to:

- Periodic review of safety practices.
- Accountability for unsafe behavior or supervision failures.
- Continuous improvement based on experience and evidence.

## **9. Closing Statement**

Health and safety are not secondary to productivity. Unsafe work undermines people, operations, and long-term performance.

Compliance is essential. Prevention is critical. Discipline saves lives.

