

**Environment, Health &  
Safety (EHS)  
Management System  
Manual**

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Approved By	Sahib Kataria
Date	24/09/2021

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## Document Change History

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**DISTRIBUTION LIST:**

<b>Department</b>	<b>Designation</b>
MR Function	MR – Master Copy
To All Departments, the Manual is made available on the portal in “READ ONLY” format	

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## Company Profile

Coforge Limited endeavours that in our association with society, the society benefits substantially more than what we get in return. Coforge will meet any and every commitment made to society irrespective of any cost that may have to be incurred. Coforge has therefore set-up comprehensive systems for managing software development, ensuring a high level of quality in all the software developed which meets the requirements, products and special needs of the customers in keeping with the obligations towards all stakeholders and promoting high standard of business ethics.

## Scope:

The company has developed and implemented an Environment, Health and Safety Management System (EHSMS) to regulate the consumption of resources, provide a healthier and a safer working atmosphere to its employees and to improve the management of the company. The Environmental, health and Safety Management System conforms to the requirement of ISO 14001:2015 and ISO 45001:2018.

In keeping with the obligations towards all stakeholders and promoting high standard of business ethics, Coforge has launched an EHS Management System (comprising EMS ISO 14001:2015 and HSMS ISO 45001:2018) with an objective of reducing our resource consumption, reducing pollution to the environment and ensure a safe and healthy work environment for all its staff members, visitors, vendors and related groups. The management system framework ensures that all stated and expected requirements of all the interested parties are understood.

EHS Management System is built on the premise that all processes can be controlled using clearly defined processes through documented procedures, backed by regular reviews & audits and promoting company- wide culture of continual improvement.

The key objectives of EHS Management System (EHSMS) are:

- To provide a documented policy, development and support processes and work instruction / guidelines that meet the requirements of the two management systems ISO 14001:2015 and ISO 45001:2018.
- To ensure that a common and consistent methodology is followed for all the processes, which is identified and have the Environment, Health and Safety impact of the product, services, activities and processes executed by them and to be able to have consistent approach in management / mitigation of these identified risks and impacts.
- To continually identify the weaknesses, incidents and accidents and report them, and also use a structured process to evaluate the root cause for these incidents and implement Corrective and Preventive Measure to ensure process improvement and safe and healthier work environment for all impacted parties.

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- Identifying significant environmental aspects and unacceptable risks arising out of activities performed, products & services defined within the scope
- Identifying EHS related legal and & other requirements applicable.
- Setting up of objectives & targets driven by significant environmental aspects, opportunities for improvement, unacceptable OHS risks, EHS policy, legal & other requirements, technological options and views of interested parties.
- Implementing EHS Management Programme(s) for achieving objective(s) & target(s).
- Identifying the resources required for implementing the EHS.
- Determining an organizational structure along with roles, responsibilities, accountability and authorities at all levels.
- Determination of Competence requirements:
  - Provision of Adequate resources for EHS.
  - Identification of training needs and imparting the same.
  - Establishing communication with internal and external interested parties.
  - Customer communication, feedback, enquires & complaint management.
  - Establishing EHS documentation and ensuring proper control.
  - Operational Control Procedure(s) to control & sustain significant environmental aspects and unacceptable OHS risks.
  - Identification of potential emergency situations and its response.
  - Monitoring and measurement of EHS performance indicators.
  - Control of monitoring and measuring equipment.
  - Identification, maintenance and disposal of EHS records.
  - System for periodic auditing of the EHS Management System.
  - System Management Review by the Top Management (MRM)
  - Strive for Continual Improvement in processes and activities

**Exclusions:**

Nil



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The **Scope of Certification** shall be:

**“Design, development, testing, implementation and maintenance of software, system integration solutions & IT/ITES/Telecom infra-structure management services for all offshore development centres”**

**Locations :**

<b>Coforge Limited</b>	
<b>G.Noida : Head Office</b>	<b>Mumbai</b>
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### 3. Abbreviations, Terms and Definitions

<b>Term</b>	<b>Definition</b>
CSO	Commercial Services Organisation
BU	Business Unit
HR	Human Resources
ISO	Standards from International Organization for Standardization
IT	Information Technology
MR	Management Representative
MRM	Management Review Meetings
NC	Non-Conformance
EHSMS	Environment Health and Safety Management System
EHSM	EHS Manual
WI	Work Instructions
EHS	Environment, Health & Safety
EAA	Environmental Aspect Analysis
HIRA	Hazard Identification & Risk Assessment
EMP	Environmental Management Programme
HSMP	Health & Safety Management Programme
OCP	Operational Control Procedure
ERT	Emergency Response Team
EHSP	EHS Procedure

In this EHS Manual following terms/ definitions have been used:

**Environment**

Surroundings in which Coforge Limited operates including air, water, land, natural resources, flora & fauna, humans and their interrelation.

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**Environmental Aspect**

Element of the organization's activities, products or service that can interact with the environment.

*Note: A significant environmental aspect is an environmental aspect that has or can have a significant environmental impact.*

**Environmental Impact**

Any change to the environment, whether adverse or beneficial, wholly or partially resulting from the organization's environmental aspects.

**EHS Management System**

The part of the overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources used to develop and implement the EHS Management System policy and manage the product environmental aspects, occupational hazards & risk and social aspects.

**Internal Audit**

A systematic independent and documented process for obtaining the audit evidence and evaluating it objectively to determine the extent to which the EHS management system conforms to the EHS management system audit criteria set by the organization are fulfilled.

**Environmental/Health & Safety Objectives**

Overall environmental/health & safety goal, consistent with the EHS policy, that the organization sets itself to achieve.

**Environmental/Health & Safety Performance**

Measurable results of the organization's management of its environmental aspects/occupational hazards based on its EHS policy, EHS objectives, EHS targets and other EHS performance requirements.

**EHS Policy**

Statement by the organization of its intentions and principles in relation to its overall quality, environmental, health, safety and social performance as formally expressed by top management

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which provides a framework for action and for the setting of its quality, environmental & OSH objectives and targets.

**Environmental/OSH Targets**

Detailed performance requirement, applicable to the organization or parts thereof, that arises from the environmental & OSH objectives and that needs to be set and met in order to achieve those objectives.

**Interested Party**

Individual or group concerned, inside or outside the **workplace**, concerned with or affected by the Environmental and Health & Safety performance of Coforge Limited.

**Organization**

Coforge in whole or part or combination thereof, which has its own functions.

**Prevention of Pollution**

Use of process, practices, techniques, materials products, services or energy to avoid, reduce or control the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts.

*Note: Prevention of pollution can include source reduction or elimination, process product or service changes, efficient use of resources, material and energy substitution, reuse, recycling, reclamation and treatment.*

**Correction**

Action taken to eliminate a detected nonconformity.

**Corrective action**

Action to eliminate the cause of a detected nonconformity.

**Preventive action**

Action to eliminate the cause of potential nonconformity.

**Non-conformity**

Non-fulfilment of a requirement.

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**Record**

Document stating results achieved or providing evidence of activities performed.

**Procedure**

Specified way to carry out an activity or a process.

*Note: Procedures can be documented or not.*

**Document**

Information and its supporting medium.

*Note: The medium can be paper, magnetic, electronic or Optical computer disc, photograph or master sample, or a combination thereof.*

**Auditor**

Person with the competence to conduct an audit

**Acceptable risk**

Risk that has been reduced to a level that can be tolerated by the organization having regard to its legal obligations and its own EHS policy.

**Hazard**

Source with a potential to cause injury and ill health

**Hazard Identification (HI)**

Process of recognizing that a hazard exists and defining its characteristics

**Ill health**

Identifiable, adverse physical or mental condition arising from and/or made worse by a work activity and/or work-related situation

**Incident**

Work-related event(s) in which an injury or ill health (regardless of severity) or fatality occurred, or could have occurred

*NOTE 1: An accident is an incident which has given rise to injury, ill health or fatality.*

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*NOTE 2: An incident where no injury, ill health, or fatality occurs may also be referred to as a “near-miss”, “near-hit”, “close call” or “dangerous occurrence”.*

*NOTE 3: An emergency situation is a particular type of incident.*

### **Occupational Health and Safety (OH&S)**

Conditions and factors that affect, or could affect the health and safety of employees or other workers (including temporary workers and contractor personnel), visitors, or any other person in the **workplace**.

*NOTE Organizations can be subject to legal requirements for the health and safety of persons beyond the immediate workplace, or who are exposed to the workplace activities.*

### **OH&S Risk**

Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or **ill health** that can be caused by the event or exposure(s)

### **Risk Assessment (RA)**

Process of evaluating the **risk(s)** arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable

### **Worker**

Person performing work or work related activities that are under the control of the organization

### **Participation**

Involvement in decision-making

### **Workplace**

Place under the control of the *organization* where a person needs to be or to go for work purposes  
Note 1 to entry: The organization’s responsibilities under the *OH&S management system* for the workplace depend on the degree of control over the workplace.

## **4. Context of the organization**

### **4.1 Understanding the Organization & its Context:**

Coforge determines internal and external issues that are relevant to its purpose and influence these issues could have on its ability to achieve the objectives and outcomes that it intends to achieve namely (but not limited to):

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- Protection of Environment by prevention of pollution, conservation of natural resources and waste management.
- Provide safe work place by prevention of injury and ill health.
- Comply with applicable EHS legislation and other requirements.
- Continual improvement in EHS performance.

### **External Context**

External Context shall be established by considering issues (but not limited to) such as the following:

- Legal Factors – Legal, Statutory, Regulatory and contractual requirements.
- Political Factors–Political Stability, trade practices, industrial relations, political influences.
- Economic Factors– Economic growth, interest rates, exchange rates, inflation rates, cost of capital, global /national/local trends and drivers, financial markets
- Social Factors - Culture, Demographics, Education, Population growth.
- Environmental Factors – Climate, natural hazards –Earthquake, Cyclone and Tsunami etc.
- Law and Order – Unrest, terrorist attack

### **Internal Context:**

Internal Context shall be established by considering issues (but not limited to) such as the following:

- Technical Factors –technology, equipment and machinery.
- Economic Factors – Financial management system, cash flow, capital reserves and commercial viability.
- Organizational Factors- Capabilities, policies, standards, guidelines, strategies, management systems, structures and objectives, integration of information system into organization’s process.
- Political Factor - Governance, decision making systems, stakeholders, internal politics, roles and accountabilities.
- Awareness –Low awareness regarding information security among new staff.
- Attrition Rate – Attrition rate affects the organization’s ability to retain core knowledge.

### **Reference: Context of Organization EHS/CBR/01**

## **4.2 Understanding the needs and expectations of workers and interested parties**

Coforge shall identify:

- Interested parties & workers
- Needs and expectations of interested parties & workers in relation to EHS
- Compliance obligations (legal, statutory, regulatory and contractual) as applicable

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- Documented Information shall be maintained.

**Reference: List of interested parties & needs and expectations EHS/LIP/01**

### 4.3 Determining the scope of the Environmental, Health and Safety management system

EHS Management system has been established and conforming to the requirements of ISO 14001: 2015 and ISO 45001: 2018.

Both Physical and Logical boundaries have been determined by the organization and updated periodically as per changed conditions.

While determining the scope, the following are be taken into account:

- Internal and external context of the organization
- Workers & Interested parties.
- Organization units, functions and physical boundaries
- Applicable compliances – legal, statutory, regulatory and contractual
- Its authority and ability to exercise control and influence.

The Scope shall be made available as documented information.

### 4.4 Environment Health & Safety Management System

Coforge shall establish, implement and maintain EHS management system and continually improve its effectiveness in accordance with the requirements of International Standard ISO 14001: 2015 and ISO 45001:2018.

- Determining the processes needed for the EHS management system and their application throughout the organization
- Determining sequence and interaction of these processes
- Determining criteria and methods needed to ensure that both the operation and control of these processes are effective
- Ensure the availability of resources and necessary support for the operation and



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monitoring of these processes

- Monitor, measure where applicable, and analyse these processes, and
- Implement actions necessary to achieve planned results and continual improvement of these processes.

Documented procedures have been laid down for the relevant activities that are required to be followed, so that the operations conform to specified requirements. Periodic review is done for the performance of different areas / activities in order to ensure the availability of resources & information necessary to support the operations and monitor measure where applicable, analysis for taking corrective actions and prepare plan for improvement.

The criteria and methods needed to ensure the effectiveness of operations and control of these processes are determined. Control points and quality objectives have been determined for it. Coforge identifies outsource processes and their controls that affects conformity to advisory requirements.

The key objectives of the Coforge EHS Management System (EHSMS) are:

- To provide a documented policy, development and support processes and work instruction / guidelines that meet the requirements of the two management systems ISO 14001:2015 and ISO 45001:2018.
- To ensure that a common and consistent methodology is followed for all the processes, which is identified and have the Environment, Health and Safety impact of the product, services, activities and processes executed by them and to be able to have consistent approach in management / mitigation of these identified risks and impacts.
- To continually identify the Weaknesses, Incidents and accidents and report them, and also use a structured process to evaluate the root cause for these incidents and implement Corrective and preventive measure to ensure process improvement and safe and healthier work environment for all impacted parties.

## 5. Leadership

### 5.1 Leadership & Commitment:

Leadership is committed to establishment and implementation of EHSMS & continually improve its effectiveness. Leadership shall ensure:

- Establishment of Policy and Objectives and ensure that it is embedded into the day to day actions of staff and that any new projects meet the Policy & Objectives.
- Integration of Environment, Health & Safety Management System into organization' s processes.

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- Ensuring adequate resources are made available to ensure compliance with EHSMS requirements.
- Communication for demonstrating commitment to EHS.
- Ensuring that EHS Management System achieves its intended outcomes.
- Directing and supporting persons to contribute to effectiveness of EHS Management System.
- Supporting other management roles in demonstrating their leadership as relevant to their respective areas.
- Fostering development and sharing of solutions to EHS problems.
- Enforce the use of relevant EHS documentation; adhering to EHS management operating procedures and record keeping relevant to their job roles.
- Ensuring continual improvement of EHS Management System.
- Protecting worker from reprisals when reporting incident, hazard, risks & opportunities

## 5.2 EHS Policy

Coforge Limited has established the policy considering that it is appropriate to the purpose of the organization and commitment is included to comply with the requirements and continually improve the effectiveness of the EHS Management System.

While establishing the policy it is considered that it must provide a frame work for establishing and reviewing EHS Objective(s) to achieve planned results.

Policy is conveyed and understood within the organization so that it should be always in mind. It is displayed in various office locations to enable each employee to understand.

Review of the policy is done for its suitability in each management review meeting.

Policy includes following commitments:

- Establishment and maintenance of Environmental Health & Safety Management System to meet the requirements of standards.
- Meet applicable compliance obligations including legal, statutory, regulatory and contractual, as applicable to our EHS management system.
- Implement and audit control measures to effectively manage and mitigate the significant EHS aspects.

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- Continue to work in partnership with other stakeholders to improve & ensure that Coforge operations do not have a detrimental effect on community.
- Support initiatives and programme aimed at improving awareness of sustainability and engaging the employees.
- Included commitment to consultation and participation of workers.

Coforge Policy is maintained as documented information, understood, communicated and implemented at all levels of the organization through employee training, publication of policy, and prominent display of policy at Coforge facility. It is the responsibility of all employees that the policy is read, understood and implemented in their areas of responsibility.

Coforge has fashioned the policy to be its vision of how to attain a Safe, Healthy and Pollution free work environment for all its stake holders.

The Policy shall be made available to interested parties as required.

### 5.3 Organizational roles, responsibilities & authorities

The overall responsibility for the effective deployment of the EHS Management System rests with the MR, however, a core group representing all the impacted departments are part of the core team.

Core Group is the Management Sponsor for the EHS initiative responsible for providing management direction, resources and periodic review of the ongoing compliance and continual improvement of the EHS

Head Commercial (CSO) shall be the Management Representative coordinating the effective documentation, deployment and on-going compliance to the established EHS Management System.

In addition to the functional roles and responsibilities defined for all the employees at various levels and departments within the organization, EHS specific roles, responsibilities, accountabilities and authorities are documented in terms of DO's and DONT's and all the employees are made aware of the same through various communications methods including, awareness sessions, circulars, notifications and management debriefs.

Similar information is also shared with vendors who work at the premises and even offsite to ensure that their activities do not lead to a negative impact on the environment, health and safety.

It is decided that the MR shall be responsible to ensure that there is adequate information and understanding within the organization and also external to the concerned parties on the management's policy relating to the EHS and also that there is compliance to the same. All required resources to ensure that it is effectively executed shall be provided by the senior management.

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MR is the key contact for communication on all issues related to EHS and sends communication to all employees within the scope through official circulars. Information is also circulated to other external agencies as on demand basis limited to Policy.

Management has communicated to all employees that it is their responsibility to ensure compliance with all management systems to ensure a Safe and Healthier work environment. Also, management is keen to ensure that every employee participates to ensure ongoing continual improvement of the management system.

Roles and Responsibilities are documented and maintained with HR and in all the respective departments.

**Reference: EHS/M/01 Appendix D**

## 5.4 Consultation & participation of workers

The consultation and participation of workers, and, where they exist, workers' representative, will be key factors and will be encouraged through defined processes. Coforge will provide workers with workers with timely training and necessary resources required for participation and consultation. Determine and remove/minimize obstacles or barriers to participation.

Coforge will emphasize the consultation of non-managerial workers on the following:

- a. Determining the needs and expectation of interested parties.
- b. Establishing the EHS policy
- c. Assigning roles & responsibility
- d. How to fulfil legal and other requirement
- e. Establishing objective
- f. Determining applicable controls for outsourcing, procurement and contractors.

Coforge will also emphasize participation of non-managerial workers in the following:

- a. Determining the mechanism for their consultation and participation
- b. Identifying hazard and assessing risks and opportunities
- c. Determining actions to eliminate hazard and reduce OH&S risks
- d. Determining competence requirement, training needs, Training and evaluating training.

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## 6 Planning

### 6.1 Actions to address risks & opportunities

#### 6.1.1 General

The following shall be taken into consideration while planning for EHS Management System:

- Scope of EHS Management System
- Context of the Organization: Internal and External issues that affect EHS Management System and its ability to achieve desired outcomes are considered.
- Needs and Expectation of Interested parties.
- Risks and Opportunities related to environmental aspects, occupational health and safety hazards, compliance obligations and other issues related & requirements related to context of the organization and interested parties that influence the effectiveness of the organization's EHS management system or interrupt its operations are identified.
- Legal and regulatory requirements that affect EHS Management System and its ability to achieve desired outcomes are considered.
- Appropriate actions are taken to prevent / reduced the undesired effects of the identified risks and opportunities and to achieve continual improvement.
- Actions are integrated into the process of EHS Management System and effectiveness of these actions is evaluated.
- Potential emergency situations including those having environmental impact shall be determined within the scope of EHS Management System.

Documented Information shall be maintained.

#### 6.1.2 Environment Aspects, and Health and Safety Hazards.

##### 6.1.2.1 Environmental Aspect Analysis (For EMS):

Risk analysis documentation has been established, implemented & maintained on the basis of review undertaken to establish the current position with regard to the environment using evaluation criteria provided. This information is kept up to date by regular reviews.

The environmental aspects of the activities, of Coforge which are directly controlled and influenced by the operations, are identified and their impacts are evaluated. Aspect identification is also done for the planned, new and/or modified activities, products and services.

Procedure is in place for identification of aspects. The impacts of all identified aspects are evaluated taking into consideration its Scale (Quantity / Span), Severity, Probability, Detectability, Legal concerns, Emergency situations. The significant aspects are managed through Objectives & targets, Management Programme (MP), Operational Control Procedures (OCP), & Emergency preparedness.

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Environmental aspects are evaluated by all departments on basis of initial environment reviews, observation of employees, site visits, Internal / External audit, Legal concerns, communication from external/internal interested parties and workplace monitoring.

**Reference: Procedure for Environmental Aspects and Impact Analysis EHS/P/01**

**6.1.2.1. For Hazard Identification & Risk Assessment (For ISO):**

Procedure is defined for Hazard identification and risk assessment. The identified OHS (Occupational Health and Safety) hazards are assessed taking into consideration its Severity of injury or ill health and probability of an occurrence of a hazardous event, Legal concern, emergency situation and existing controls. All unacceptable risks are managed either through Objectives & targets, Management Programme (MP), Operational Control Procedure (OCP) and/or emergency preparedness plan.

Hazard Identification and Risk Analysis is done by all departments on basis of observation of employees, site visits, Internal / External, legal concerns, communication from external/internal interested parties and workplace monitoring.

The occupational hazards & environmental aspects are identified such that Coforge can have control over them.

The occupational hazards are reviewed to determine the significant risks and environmental aspects are reviewed to determine the significant impacts as per Procedure for Evaluation of Occupational hazard, risks & environmental impact.

The Significant risks & impacts are considered in setting objectives & making EHSMP.

The information regarding the significant aspects and significant hazards is kept up-to-date by conducting reviews at least once in a year.

Identification of aspects and hazards include:

- Routine and non-routine activities.
- Activities of all personnel having access to the workplace (including subcontractors and visitors)
- Facilities at the workplace, whether provided by the Organisation or others.

Risk analysis documentation has been established on the basis of a review undertaken to establish the current position with regard to the health & safety using evaluation criteria provided.

Whenever changes are being planned to the system their impact on the Environment, safety and health of the persons or activities involved in the change are carried out and the risk assessment records are updated accordingly.

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**Reference:**

- **Procedure for Hazard Identification and Risk assessment EHS/P/01**
- **Format for Hazard Identification & Risk Assessment (HIRA)**

**6.1.2.2 Assessment of OH&S risks & other risks to the OH&S Management System**

Once all hazards are identified organization will assess risks of identified hazards, considering existing controls in place

**6.1.2.3 Assessment of OH&S opportunities and other opportunities for the OH&S Management system:**

Coforge will identify opportunities to enhance OH&S performance, while taking into account planned changes, opportunities to eliminate hazard & reduce risks

**6.1.3 Determination of legal & other requirement/Compliance Obligations**

Procedure has been established to identify, have access to, and understand all legal and other requirements to which the organization subscribes, which are directly attributable to the environmental aspects and OHS hazards of its activities, products and services.

Updating of legal and other requirements is done in accordance with the above procedures.

A legal register is established to keep a track of the legal & other requirements which contains a list of all environmental, energy, occupational health and safety laws & regulations pertaining to its activities, product and services.

CSO ensures identification, evaluation and up-d action of applicable legal requirements at least once in a year. Compliance to the requirements shall be the responsibility of the concerned departments.

Legal Register is used for ensuring the evaluation of compliance

**Reference: Legal Checklist EHS/LC/01****6.1.4 Planning Actions**

Coforge plans to take actions for the following:

- Significant Environmental aspects and unacceptable risks- occupational health & safety hazards.
- Compliance Obligations.

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- Risks and Opportunities.
- Prepare & respond to emergency situation

Actions taken as above shall be integrated into EHS Management System.

Effectiveness of these actions shall be ensured.

## 6.2 EHS Objectives and planning to achieve them.

### 6.2.1 EHS Objectives

Environmental, Occupational Health and Safety objectives shall be formulated based on the following:

- Environmental, Occupational Health and Safety risk assessment:
  - Concerns which have significant Impact & Risk, are listed out on the basis of that objective has been defined.
- Compliance Obligations.
- Organization Policy.
- Customer Requirements.
- Continual Improvement.
- Context of the Organization.

The Objectives & Targets are documented and communicated to relevant personnel

Operational Control Procedures have also been documented to ensure that the compliance to these defined norms shall ensure ongoing compliance and continual improvements.

Key objectives to be measured by the Organization are identified and relate to:

- Conservation of Natural Resources
- Waste and Pollution reduction
- Providing a healthy and safe working atmosphere through zero workplace injuries/ accidents
- Compliance to legal, regulatory and other requirements.

Coforge has developed measurable objectives for management of significant environment and unacceptable OHS risks, wherever possible, to improve the performance in line with the EHS policy. These objectives and targets at relevant functional levels are approved during the starting of the year. The targets are reviewed & tracked on regular basis for suitability and improvement in the Management review meetings.

### 6.2.2 Planning actions to achieve EHS Objectives

Coforge shall determine and plan to achieve its EHS objectives by:



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- what shall be done;
- what resources shall be required;
- who shall be responsible;
- when it shall be completed; and
- how the results shall be evaluated.

Coforge ensures that EHS Management Programs are planned and implemented to achieve the documented Objectives and Targets.

Management Program is an action plan with details like responsibility, means and time frame by which they are to be achieved. The programme is constantly reviewed, updated and revised.

Whenever a new project is undertaken which can result in new/modified activities, products or services, the management program(s) shall be suitably amended to take care of the identified requirements.

These program(s) provide the following details:

- The designation of responsibilities for achieving objectives and targets at each relevant function & levels of organization
- The means & time-frame by which they are to be achieved.
- The potential resources to be invested and benefits associated with the program(s).

These programs are also reviewed at regular intervals.

Status of the objectives and management programs are reviewed periodically and discussed during (MRM) Management review meetings.

## 7 Support

### 7.1 Resources

The overall responsibility for the effective deployment of the EHS Management System rests with the MR & Top Management. They shall be responsible for making appropriate resources available for establishing & maintaining EHS management system in a timely & efficient manner.

Management has ensured the availability of resources essential to establish, implement, maintain and improve the EHS Management System.

Personnel who are managing, performing and verifying the EHS activities including audits are identified and adequately trained for their activities.

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Equipment and instruments needed for performing work and verification are identified, procured and procedures are laid down to ensure that these equipment and instruments are in fit condition to carry out the work and verification activities

Resource requirements include Human Resources, Infrastructure Resources, Work Environmental and Support Services needed are determined, reviewed and provided.

Coforge determines and provides the resources needed:

- To establish, implement, operate, monitor, review, maintain and improve the effectiveness of EHS management system.
- To ensure provision of resources required for meeting customer requirements
- Existing and future requirements based on the demands and business development perception of the management.
- Legal, Statutory & Regulatory requirements applicable
- Adequate integration of the EHS requirements in to the organizations business Processes
- Ensuring that the EHS achieves its intended outcomes.
- Communicating the importance of effective management and of conforming to EHS requirements.

Resources and budget approval from the management is through the annual business plan.

Any requirements for human resources are reviewed and approved and recruitment is done accordingly by HR department who shall be also be responsible for providing any requisite training to the people as per the identified training needs.

Coforge ensures that personnel performing work are competent on the basis of appropriate education, training, skills and experience. Detailed Job Description and the Desired Competence levels for the various Role Profiles are maintained as per the defined criteria and continual enhancement of the competence through training.

## 7.2. Competence

Coforge shall ensure necessary competence of person working on its behalf. Competence requirements will be considered while recruiting, training and developing future skills and abilities of persons working for or on behalf of the organization.

Personnel performing work affecting environmental, health & safety aspects performance and compliance obligations are competent on the basis of appropriate education, training, skills and experience.

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Competency level requirements are identified in each department. The competence of the personnel is also identified through their knowledge, skills and experience.

Competency will be considered in selecting contractors and others working for or on behalf of the organization.

While assigning personnel for a specific job, it is required to determine the necessary competence for personnel performing work affecting EHS performance.

Taking into account the existing competence of people, training needs associated with environmental aspects & occupational health & safety hazards and EHS management system.

Training programs shall be conducted to improve competency of persons working for or on behalf of organization. Training Effectiveness shall be evaluated.

### 7.3. Awareness

Coforge shall aim at making persons working for it or on its behalf (e.g. contractors) of:

- The importance of conforming to EHS policy.
- Ensure that its personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the EMS objectives.
- The relation of their work to significant environmental aspects impacts, OH&S hazards and associated risks.
- Their responsibilities & contributions to the effectiveness of the EHS Management System
- Benefits of improved EHS Performance
- Fulfilment of compliance obligations
- Implications of non-conformance with EHS Management system requirements

Coforge shall:

- Identify training needs based on organizational needs, technology changes, process changes, personnel changes, the training needs will be identified from time to time.
- Provide training or take other actions to satisfy these needs, evaluate training provided and maintain documented information
- Evaluate the effectiveness of the actions taken,
- Involve its work force in identifying the risks and in developing the effective processes that can help promote a better work place culture and encourages work force involvement in improvement actions

In addition, it is ensured that the awareness on common programs / initiatives is provided to employees with relevance and importance of their activities and their contribution to the achievement of the EHS Policy and objectives. Awareness is given to all on the consequences of not meeting the EHS requirements.

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## 7.4. Communication

### 7.4.1 General

Management ensures to communicate with all impacted parties on issues relating to EHS policy of the organization and also on issues relating to EHS hazards and risk as it would impact them.

Mechanism has been established to ensure that there is a structured communication within the organization and also with the external contractors, visitors and other stake holders on issues relating to communications relevant to the EHS management system, including:

- on what it will communicate;
- when to communicate;
- with whom to communicate;
- how to communicate.

While establishing its communication process (es), Coforge shall:

- take into account its compliance obligations;
- ensure that environmental, health and safety information communicated is consistent with information generated within EHS management system, and is reliable.

Coforge shall respond to relevant communications on its EHS management system.

Coforge shall retain documented information as evidence of its communications, as appropriate.

### 7.4.2 Internal Communication

Communication of MR as the key contact for all issues relating to EHS is sent to all employees within the scope through official circulars.

The Coforge uses its Intranet service to make EHS related documentation and information available to the employees.

Method of internal communication includes:

- Intranet website
- Notice board
- Celebrations e.g. Environment day on 5th June, National Safety Day 4<sup>th</sup> March etc.
- Slogan and Poster, competitions
- Display of policy, performances results etc.
- Meeting/Performance review at various levels
- Customer Enquires, Feedback and Complaints

Suggestions are collected from the employees.

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EHS Policy is displayed at the reception and within the organization and is made available to public on demand.

The Management of Coforge has ensured to involve all the key stake holders within the organizational framework toward establishing, maintaining, reviewing, reporting incidents and continually improving the EHS Management Systems for entity under the scope of deployment. Participation of all is also sought on changes that may impact the EHS deployed.

Employees' representatives from various processes including the subcontractors are part of the core group. These representatives do undertake the issues relating to their teams and also involve them in the development, deployment and maintenance of EHSMS.

In addition, other consultants and industry experts are invited to help improve the EHSMS compliance and continual improvement.

All employees, including the subcontract part time and casual employees and visitors and vendors are made aware of their roles to ensure that they become a part of the initiative to make the work environment safe and healthier at the same time also ensuring that the product and processes of Coforge do not adversely impact the environment.

#### 7.4.3 External Communication

Mechanism has been established to ensure that there is structured communication with the external contractors, visitors and other stake holders on issues relating to them.

Mechanism has also been established to receive, update and communicate any changes from external agencies to all relevant impacted parties.

Information is also circulated to other external agencies as on demand basis.

All communication with the interested parties such as regulatory and statutory (Environment, safety, product, service related), NGOs etc. is taken as External communication and is dealt by MR.

Records of such communication are maintained with respective facility managers. In case some significant environmental aspects are to be communicated externally, MR, and HOD(s) shall decide on the type and method of communication and document the decision and get it rectified post facto in the Management Review

**Reference: EHS/CP/01**

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## 7.5 Documented Information

### 7.5.1 General

Coforge Environment, Health and Safety management system shall include:

- Documented information required by this International Standard; and
- Documented information determined by the organization as being necessary for the effectiveness of EHS management system.

The documentation structure of the Coforge EHS management System comprises of EHS Manual, Policy & Objectives, Standard Operating Procedure(s), Guidelines, Occupational Control Procedure(s), Work Instructions, Formats Compliance Records, Standards, and Circulars, Internal and External communications and their records. Wherever applicable, international standards have been used to guide our process documentation.

The documentation principle followed at Coforge is to keep the documentation proportional to the level of complexity of the operation.

When creating and updating documented information the following shall be ensured:

- Identification and description of the documents like name, date, numbers & creator name.
- Format: structure, language and media; and
- Review and approval for suitability and adequacy.

### **Document and Data Approval and Issue**

- Documents are maintained as hard copy or electronic media, or both. Documents are legible, retrievable, and stored safely to protect them from damage, loss and deterioration during their period of retention. Obsolete documents required for legal/archival purpose are identified and maintained in an archival directory/folder to prevent inadvertent use.
- Documents and data are maintained by MR. Before issue, controlled documents and data are reviewed and approved for adequacy by designated personnel.
- MR or person designated as document control coordinator is responsible for announcing EHS-Management System changes to all employees. The announcement can be made by posting news items on the Coforge Intranet & associated locations, mailing group heads, or by any other suitable means.

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- MR ensures that the latest versions of EHS-Management System Documentation required for reference by employees are maintained and made available in “Read Only” version for all employees on shared Folder.

### **Document and Data Changes**

- Changes in subsequent document versions are identified, reviewed and approved by the same functions/organizations that conducted the original review. Document change history shows the changes and change status.

### **Manual**

- This is the apex document, which describes the policies and personnel responsible for implementing them. This Environment, Health and Safety Management System Manual reflects management’s intent in establishing a comprehensive system ensuring safeguard of interest of all stakeholders.
- This document is for the benefit of internal users who need to practice it and for authorized external users who want to know about the EHS Management System (EHSMS) being practised at Coforge.
- This manual is classified as an internal document, and all the employees (full time, part time and subcontract) are authorized to access this document, any changes to the integrity of this document has to be recorded.

### **Processes**

- This defines ‘how’ specific tasks are to be carried out, personnel responsible for carrying out the tasks and the inputs and outputs. Processes are supported by various Standards and Guidelines.

### **Standards and Guidelines**

- Standards are the rules, conventions and practices that need to be followed while carrying out a task.
- Guidelines are suggestions which help in carrying out a task efficiently and are not mandatory.

### **Formats / Checklists**

- Formats / Checklists are documents used during and after a task are carried out to verify its completeness.

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### 7.5.2 Creating & Updating

At Coforge four levels of documentation have been developed for the EHS management system. All EHS documentation is listed in EHS Master List with revision numbers and retention periods where relevant. The EHS document master list also records storage locations and document retention periods, all important documents include both hard and electronic copies.

1. **Level 1: EHS Manual:** - describes the core elements of the EHS and their interaction. It outlines the structure of the document used in the EHS Management System.
2. **Level 2: EHS Management System Procedures:** - describe how various requirements of ISO 14001:2015 & ISO: 45001:2018 are implemented. These procedures also make reference to Operational Control Procedures, Work Instructions, wherever applicable.
3. **Level 3: Operational Control Procedures:** address individual operations affecting occupational health, monitoring plans, address the method of monitoring the various characteristics, which affect the occupational health and environment
4. **Level 4: Formats and Records:** used for conveying and recording data affecting the occupational health & Environment.

### 7.5.3 Control of Documented Information

For documents and information management to ensure effective and quick identification, collection, retrieval, indexing, retention and disposition of pertinent EHS management system information.

Documents are maintained as hard copy or electronic media, or both. Documents are legible, retrievable, and stored safely to protect them from damage, loss and deterioration during their period of retention.

Obsolete documents required for legal/archival purpose are identified and maintained in an archival directory/folder to prevent inadvertent use. Documents and data are maintained by MR before issue, controlled documents and data are reviewed and approved for adequacy by designated personnel.

MR ensures that the latest versions of EHS Manual, EHS Procedure manual, evacuation plan, ERT and sample copy of EAA, HIRA, and EMP & HSMP as required for reference by employees are maintained and made available in "Read Only" version for all employees.

**Reference: EHS/P/03**



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## 8 Operation

### 8.1 Operation Planning and Control.

Coforge has identified and planned those operations and activities that are associated with the environment, energy efficiency & safety and internal performance criteria have been developed for the same.

The Operational controls are implemented and maintained to ensure that adequate controls are in place relating to purchased goods, equipment and services. Controls shall also be extended to subcontract and visitors related activities.

Based on a detailed EHS risk assessment conducted at the premises in the form of Environment Aspect Analysis (EAA) and the Hazard Identification and Risk Assessment (HIRA) and the subsequent significant aspects and hazards are identified along with their adequate control as required to manage these impacts and risks.

Coforge ensures that the operational controls for such issues are in line with policy, objective and targets. It ensures that they are carried out under specified conditions, by

- a. Defining Criteria for Processes in the procedures.
- b. Implementing the control of these processes in accordance with defined criteria.
- c. Establishing, implementing and maintaining documented procedures & records to the identified significant quality / environmental aspects/ OH&S Hazards of goods and services, which are under indirect control of Coforge control situations where their absence could lead to deviation from the environmental policy and the Objectives and targets,
- d. Keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.
- e. Vendors & contractors are handled as using agreements/ contracts signed with them. Coforge ensures that OH&S Hazards, Environmental Aspects and associated controls are addressed in their agreements.

The operational controls for various parameters affecting the EHS Performance have been included in the system.

The limits specified in the consents / authorizations /licenses/permissions have been taken as the guiding factor in stipulating the operational criteria. Also procedure has been documented to control the activities of suppliers & contractors which have significant influence / impact on EHS performance.

For critical, hazardous materials MSDS have been procured & compliance to the same is ensured through appropriate training/instruction (verbal/written) and audits.

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Detailed Work Instructions have been prepared for the activities having significant environmental aspects and unacceptable hazard to track performance, and effectiveness of relevant operational controls.

Coforge has planned processes and applicable support services taking the following points into consideration:

- Information regarding characteristics of service.
- Availability of required departmental procedures.
- Use of suitable equipment.
- Provision of necessary monitoring and measuring instruments.
- Implementation of the necessary monitoring and measurements.
- The implementation of release, delivery and post-delivery where applicable.
- ISO & EMS aspects.

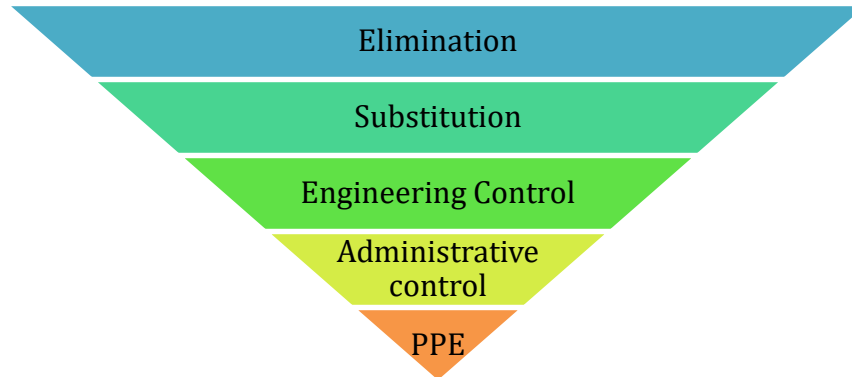
### 8.1.2 Eliminating Hazards & reducing OH&S risks

Coforge will identify all its hazards and investigate options for controlling identified hazards. Coforge will select the controls that are the most feasible, effective, and permanent.

To effectively control and prevent hazards, Coforge will:

- Involve workers, who often have the best understanding of the conditions that create hazards and insights into how they can be controlled
- Identify and evaluate options for controlling hazards, using a "hierarchy of controls."
- Evaluate the effectiveness of existing controls to determine whether they continue to provide protection, or whether different controls may be more effective. Review new technologies for their potential to be more protective, more reliable, or less costly

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**HIERARCHY OF CONTROLS:****8.1.3 Management of change**

Coforge will ensure all new changes like; change in services, infrastructure processes including workplace locations & surrounding, working condition, equipment, work force are considered for effective implementation of environment health safety management system.

**8.1.4 Procurement****8.1.4.1 General**

Coforge will ensure all new product and service before introduced in the system are assessed thoroughly and conforms to Coforge defined criteria. Assessment will be done by competent person and to communicate information relating to product or service. Coforge will identify potential hazards and suitable control measures to protect both workers and contractors.

**8.1.4.2 Contractors**

Coforge will ensure its procurement activity is well coordinated with the it's contractors, in order to identify hazards and to assess and control the EHS risk arising from their activity. Before any new contractors is introduced into the system

Coforge will ensure they pass in Coforge EHS criteria also person deployed at premises is competent in performing that task before being allowed to proceed with their work by verifying past performance records, qualification, training records.

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### 8.1.4.3 Outsourcing

Coforge will ensure that processes and functions which requires outsourcing are in complete controls of Coforge. Detailed analysis will be done to ensure what impacts it will have on organization EHS management system. Before outsourcing any services company will ensure competency of the organization to which services are outsourced.

## 8.2 Emergency Preparedness and response

Coforge has established implemented and maintained procedures to identify potential emergency situations and potential incidents that can have impacts on the environment, Occupational Health & Safety and have clearly defined action plans to respond in such situations.

Emphasis shall be to identify and have proactive controls to prevent or mitigate the associated adverse EHS consequences. It shall also be ensured that interest of relevant interest parties is considered while responding to emergency situations.

After identifying the potential risks/ environmental impacts, Occupational Health or Safety Hazards or emergency situations and past experiences, Coforge has established, implemented and maintained a procedure for responding to actual emergency situations, analyse the risk and take necessary corrective and preventive action(s) taken to prevent its recurrence and incidents and for preventing or mitigating associated adverse environmental impacts or occupational Health & Safety Hazards.

The potential emergency situations & areas have been identified during Identification of Environmental Aspect-Impacts and OHS hazards-risks. Relevant emergency plans have been prepared to identify potential hazards, and response to accidents/ emergency situations, train personnel and for preventing and mitigating the environmental impacts that may be associated with them.

These plans are reviewed at least once in a year and revision of its emergency preparedness and response document(s) is done as required, in particular after the occurrence of incidents or emergency situations, where necessary.

Management shall also ensure that these emergency preparedness plans are tested periodically to ensure their relevance and effectiveness, should there be actual need for the same.

Test/ mock drills are carried out at specified intervals in accordance with the emergency plan.

Emergency plan includes all relevant details including internal/external communications. The causes of occurrence of the emergency are analysed and a report is prepared specifying preventive measures to be taken for non-recurrence of the incident/accident.

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Emphasis shall be to identify and have proactive controls to prevent or mitigate the associated adverse environment, Occupational Health & Safety consequences. It shall also be ensured that interest of relevant interest parties is considered while responding to emergency situations.

**Reference:**

- **Emergency Preparedness Plan**
- **Mock Drill Report**
- **Incident and Accident Report**

## 9 Performance Evaluation

### 9.1. Monitoring, measurement, analysis and evaluation

#### 9.1.1 General

Procedure shall be established, implemented and maintained to monitor and measure the EHS performance on a regular basis. The focus shall be to ensure both Qualitative and Quantitative measures as appropriate to the organization.

The controls shall be identified and deployed in accordance the EHS risk and the same shall be monitored to ensure effectiveness of control in managing EHS objectives, targets and risks.

The monitoring and measurement controls shall be defined, be proactive in nature and implemented to ensure EHS programs (EMPs and HSMPs) are achieved along with operational control. It shall also be ensured that the learning from the cases of ill health, incidents (including accidents and near miss cases) and other historical evidences of deficient EHS performance are recorded; analysed and suitable corrective and preventive actions are executed to avoid occurrence and or reoccurrence.

Any equipment needed to monitor or measure performance shall be provided and processes relating to ensure calibration and effective maintenance of these equipment shall be available. Records for calibration and maintenance of such equipment shall be retained and reviewed.

Coforge has established, implemented and maintains procedures to monitor and measure, on a regular basis, the characteristics of operations that have significant environmental or health & safety impacts and quality. The controls shall be identified and deployed in accordance with the environment, health and safety risks and the same shall be monitored to ensure effectiveness of control in managing environment, health and safety objectives targets and risks.

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In order to verify that the operations are in conformance with the organizations EHS Policy and objectives and targets, key characteristics of the operations, maintenance, energy utilization, utilities like - air, water, and power, noise, lux, work zone air quality, health are tracked for their performance.

Any equipment needed to monitor or measure performance shall be provided and processes relating to ensure calibration and effective maintenance of these equipment shall be available. Documented information for calibration and maintenance of such equipment shall be retained and reviewed.

### 9.1.2. Evaluation of compliance

Consistent with the management's commitment to compliance, a procedure shall be implemented and maintained for periodically evaluating compliance with applicable legal requirements. A legal register shall keep the list of all the records essential to demonstrate such compliance.

Compliance to requirements other than the legal mandates pertaining to EHS, whenever applicable, shall also be maintained, evaluated and records retained for such evaluations.

## 9.2 Internal Audit

### 9.2.1 General

Coforge shall conduct internal audits at least twice a year to provide information on whether EHS management system conforms to:

- the organization's own requirements; and
- the requirements of this International Standard;
- is effectively implemented and maintained.

### 9.2.2 Internal Audit Programme:

Coforge shall:

- plan, establish, implement and maintain an audit programme(s), including the frequency, methods, responsibilities, planning requirements and reporting.

The audit programme(s) shall:

- take into consideration the importance of the processes concerned and the results of previous audits;
- define the audit criteria and scope for each audit;
- select auditors and conduct audits that ensure objectivity and the impartiality of the audit process;

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- ensure that the results of the audits are reported to relevant management; and
- retain documented information as evidence of the audit programme(s) and the audit results

Internal EHS audits are performed to verify the effectiveness of the EHS Management system. Trained personnel who are functionally independent and/or organizationally separate from the area being audited conduct internal audits.

All results are documented and reviewed with management of the area audited. Results are also an integral part of executive management reviews. Corrective action is taken on non-compliance found during the audits. Follow-up audits are performed to verify the effectiveness of corrective actions taken.

An audit program is being planned, taking into consideration the status and importance of the processes and areas to be audited, as well as the results of previous audits.

Internal Audit Findings are recorded in Internal Audit Finding Report.

The actions are taken without undue delay to eliminate non-conformities and their causes which continually improve the system of the Coforge.

Management personnel responsible for the area / activity / process showing deficiencies / deviation are required to take corrective action, which is subsequently re-audited to verify, if required

MR along with core team members review the audit findings and ensure effective implementation and maintenance of the EHS Management System.

**Reference: EHS/P/04**

### 9.3 Management Review

Management conducts a review of the EHSMS to ensure that ISO 14001:2015 and ISO 45001:2018 requirements are met, and the EHSMS continues to be suitable and effective at least once in six months.

The following are discussed in these meetings:

- Follow-up actions from previous reviews
- Changes in:

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- external and internal issues that are relevant to the environmental management system;
- the needs and expectations of interested parties, including compliance obligations;
- its significant environmental aspects;
- risks and opportunities;
  
- information on the organization's environmental performance, including trends in:
  - nonconformities and corrective actions;
  - monitoring and measurement results;
  - fulfilment of its compliance obligations;
  
- audit results;
- adequacy of resources;
- relevant communication(s) from interested parties, including complaints;
- Opportunities for continual improvement.
- Opportunities for improvement and need for change to EHS Management System including the EHS policy and Objectives
- Results of internal audits and evaluation of compliance with applicable legal and other requirements
- The result of participation and consultation
- Relevant communication from external interested parties including complaints, if any.
- EHS performance of the organization
- Extent to which the objectives have been met.
- Status of Incident investigations, preventive and corrective actions
- Changing circumstances including development of legal and other requirements related to EHS.
- Recommendation for improvements

The outcome of the review is in the form of minutes of meeting containing action items & decisions related to:

- Continual Improvement of the effectiveness of EHS,
- EHS policy and objectives improvement
- Other elements of EHS management system.
- conclusions on the continuing suitability, adequacy and effectiveness of the environmental management system;
- decisions related to continual improvement opportunities;



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- decisions related to any need for changes to the environmental management system, including
- resources;
- actions, if needed, when environmental objectives have not been achieved;
- opportunities to improve integration of the environmental management system with other business processes, if needed;
- any implications for the strategic direction of the organization.

Relevant output from such reviews shall be maintained and made available for communication and consultation.

**Reference: EHS/P/06**

## 10 Improvement

### 10.1 General

The organization shall determine opportunities for improvement as a result of monitoring and measurement, internal audits and management reviews and implement necessary actions to achieve the intended outcomes of its environmental management system.

### 10.2 Incident Investigation, Non Conformance, Corrective and Preventive Action

Incidents are reported, recorded and analysed in a particular format. Supervisors are made responsible for reporting and recording incidences while Facility Managers, regional managers and designated committee does the analysis of incidences.

Non-conformances in EHS are identified through evaluation of EHS performances, legal audits, internal audits, incidents and accidents and employee feedback, customer or regulatory authority complaints, observations etc.

Correction measures are initiated by the concerned department & follow up action is ensured. In case of an emergency, corrective action is initiated as per the on-site emergency plan.

Through corrective action following is ensured:

- a. The effective handling of complaints and reports of EHS non-conformities.

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- b. Investigation of the root cause of non-conformities relating to EMS and recording the results of the investigation.
- c. Determination of corrective action needed to eliminate the cause of non-conformities.
- d. Application of controls to ensure that corrective action is taken and it is effective.
- e. Initiation of preventive action and application of controls to ensure that it is effective in preventing the potential environmental impacts.
- f. Ensuring that relevant information on actions taken is submitted for management review.

**Non Conformance:**

Non-conformances are identified through performance evaluation, legal audits, internal audits, incidents and accidents and employee feedback, customer or regulatory authority complaints, observations during daily processes etc.

Non-conformance may occur from the following sources (but not limited to):

- Exceeding prescribed limits of aspects like emission concentration & sewage discharge limits.
- Incidents causing Health or Safety Issues.
- Non-compliance with procedures.

Sources of Information (but not limited to):

- Internal & External Audit
- Complaints from interested parties
- Monitoring and measurement of significant environmental aspects.

Coforge shall ensure through appropriate controls or through monitoring that no Deviating / Non-conforming product / Service is released to the customer(s). In case there is a non-conformance is performance from contractual / regulatory requirements identified during normal operations (through alerts), the deviation shall be logged as a ticket and immediate actions shall be taken to ensure restoration of the services to the desired level of performance and then take corrective appropriate actions to avoid its reoccurrence.

A documented procedure is established for Non Conformance, Corrective and Preventive Actions. Records of identification and disposition of non-conformances shall be maintained.

Root Cause Analysis shall be carried out for such cases of deviations and adequate actions as applicable shall be executed to avoid any reoccurrence. Where the corrective / preventive action identifies new or changed hazard, or need for changed

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**Corrective action**

In order to prevent recurrence of detected nonconformities and undesired events by eliminating their causes, the concerned process in-charge as appropriate, takes corrective action commensurate with their effects.

Documented procedure defines requirements for:

- Reviewing the undesired events and non-conformities (including customer complaints and determining their causes),
- Evaluating the need for action,
- Determining and implementing the action needed,
- Recording and reviewing the results of action.

**Preventive action**

In order to prevent occurrence of potential non-conformities and undesired events by eliminating their causes, the concerned process in-charge as appropriate, takes corrective action commensurate with their effects.

Documented procedure defines requirements for

- Evaluating the need for action,
- Determining and implementing the action needed,
- Recording the results of action(s).
- Reviewing the effectiveness of preventive action taken.

**Reference: EHS/P/05**

Procedure, as defined in the EHS manual are also applicable to identify actual or potential non-conformance and take suitable corrective and preventive actions to correct non-conformance and to mitigate their effect on EHS requirements. Non conformity other than the quality aspect is mitigated through the method mentioned in procedure.

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### 10.3. Continual Improvement

Coforge EHS continual improvement to increase the effectiveness of integrated management system through use of EHS policy, objectives, audit results, analysis of data, corrective and preventive actions risk assessment, recommendations from interested parties and management reviews.

These improvements range from small step improvements to companywide improvements which include changes in flow, service delivery process, and service characteristics within the frame work of company/legal/ regulatory/statutory guidelines.

Continual Review and tracking of Identified and documented Functional objectives and revision of the target values towards improved performance targets shall ensure identification and successful completion of the improvement Project

Coforge is committed to observe transparency and consistency in all its operations. In order to maintain integrity & efficiency of the organization, various measures awareness training(s) are organized periodically.

Leadership Team of Coforge is committed to development and implementation of Integrated Management System and in continually improving its effectiveness. Various systems and procedures established under the Integrated Management System emphasize organizational commitment for meeting customer, interested parties and legal /statutory / regulatory /contractual requirements.

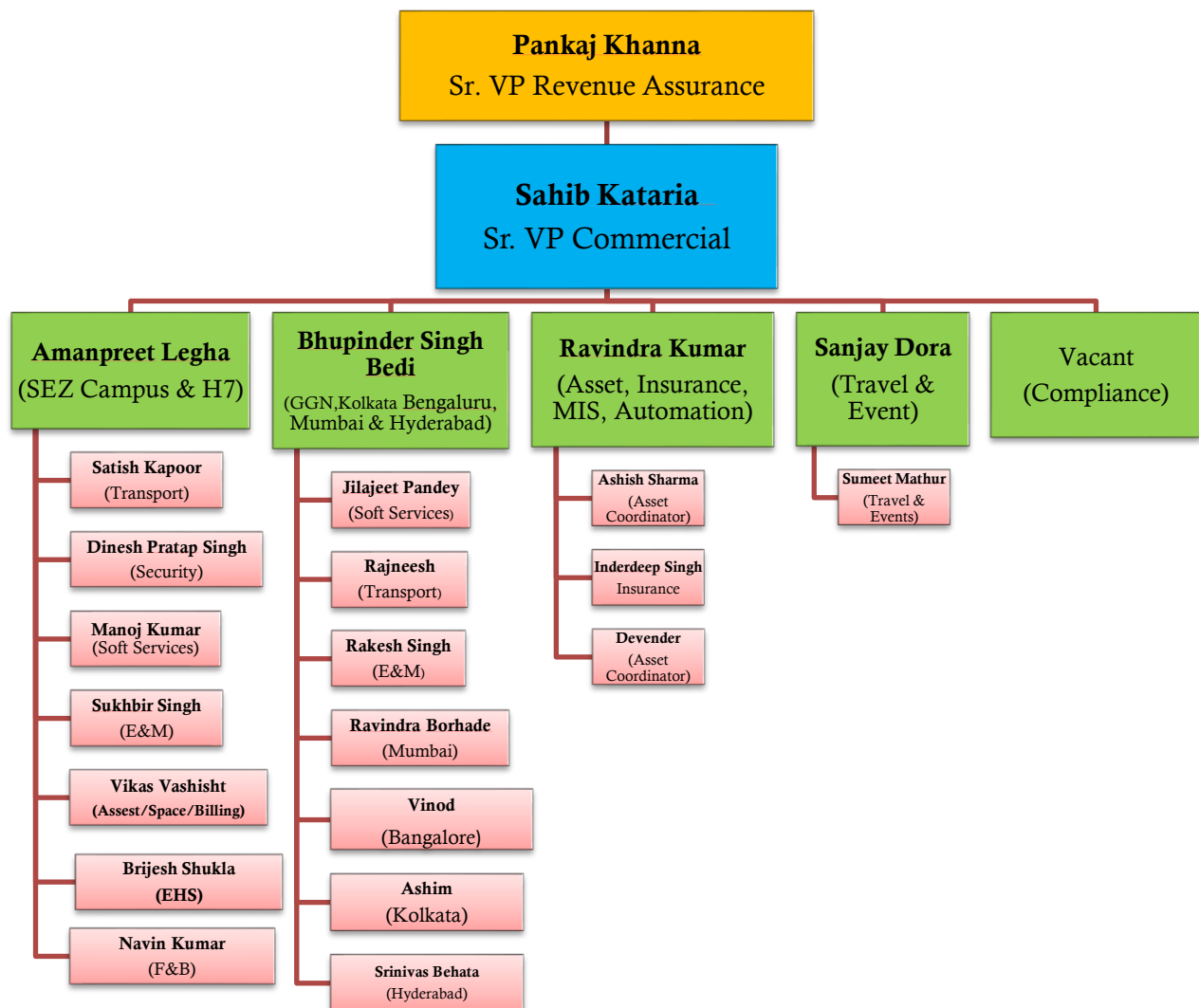
Opportunities for continual improvement and results form a part of management reviews.

Employees are encouraged to participate and provide inputs in process improvement, through various mediums such as:

- Helpdesk
- E-mails
- Review meetings
- Town Hall meetings
- Suggestions

## Appendix A

### ORGANIZATION STRUCTURE



### Mapping with Standard(s)

Section No	Section Description	EMS ISO 14001: 2015		ISO 45001:2018	
		Clause No.	Clause Description	Clause No.	Clause Description
1	Introduction				
2	Scope	1	Scope	1	Scope
3	Terms and Definition	3	Terms and Definition	3	Terms and Definitions
4	Context of the Organization	4	Context of the Organization	4	Context of the Organization
4.1	Understanding the organizations and its context	4.1	Understanding the organizations and its context	4.1	Understanding the organizations and its context
4.2	Understanding the needs and expectations of Interested Parties	4.2	Understanding the needs and expectations of Interested Parties	4.2	Understanding the needs and expectations of Interested Parties
4.3	Determining the scope of EHS Management System	4.3	Determining the scope of Environment Management System	4.3	Determining the scope of Environment Management System
4.4	Environment, Health and Safety Management System	4.4	Environment Management System	4.4	Occupational Health & safety management system
5	Leadership	5	Leadership	5	Leadership & worker participation
5.1	Leadership and Commitment	5.1	Leadership and Commitment	5.1	Leadership and Commitment
5.2	EHS Policy	5.2	Environment Policy	5.2	OHS Policy

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Section No	Section Description	EMS ISO 14001: 2015		ISO 45001:2018	
		Clause No.	Clause Description	Clause No.	Clause Description
5.3	Organizational Roles, Responsibilities and Authorities	5.3	Organizational Roles, Responsibilities and Authorities	5.3	Organizational Roles, Responsibilities and Authorities
				5.4	Consultation & participation of workers
6	Planning	6	Planning	6	Planning
6.1	Actions to address Risk and Opportunities	6.1	Actions to address Risk and Opportunities	6.1	Actions to address risk & opportunities
6.1.1	General	6.1.1	General	6.1.1	General
6.1.2	Environmental Aspects, Health and Safety Hazards	6.1.2	Environmental Aspects	6.1.2	Hazard identification, Risk Assessment and Determining Controls
6.1.3	Compliance Obligation	6.1.3	Compliance Obligation	6.1.3	Determination of Legal and Other Requirements
6.1.4	Planning Actions	6.1.4	Planning Actions	6.1.4	Planning Actions
6.2	EHS Objectives and Planning to achieve them	6.2	Environmental Objectives and Planning to achieve them	6.2	OHS Objectives & Planning to achieve them
6.2.1	EHS Objectives	6.2.1	Environmental Objectives	6.2.1	OH&S Objectives
6.2.2	Planning Actions to achieve EHS Objectives	6.2.2	Planning Actions to achieve Environmental Objectives	6.2.2	Planning to achieve OH&S Objectives

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Section No	Section Description	EMS ISO 14001: 2015		ISO 45001:2018	
		Clause No.	Clause Description	Clause No.	Clause Description
7	Support	7	Support		
7.1	Resources	7.1	Resources	7.1	Resources
7.2	Competence	7.2	Competence	7.2	Competence
7.3	Awareness	7.3	Awareness	7.3	Awareness
7.4	Communication	7.4	Communication	7.4	Communication
7.4.1	General	7.4.1	General	7.4.1	General
7.4.2	Internal Communication	7.4.2	Internal Communication	7.4.2	Internal Communication
7.4.3	External Communication	7.4.3	External Communication	7.4.3	External Communication
7.5	Documented Information	7.5	Documented Information	7.5	Documented Information
7.5.1	General	7.5.1	General	7.5.1	General
7.5.2	Creating and Updating	7.5.2	Creating and Updating	7.5.2	Creating and Updating
7.5.3	Control of Documented Information	7.5.3	Control of Documented Information	7.5.3	Control of Documented Information
8	Operation	8	Operation	8	Operation
8.1	Operational Planning and Control	8.1	Operational Planning and Control	8.1	Operational Planning and Control
8.1	Operational Planning and Control			8.1.1	General
8.1	Operational Planning and Control			8.1.2	Eliminating hazard and reducing risks
				8.1.3	Management of change



				8.1.4	Procurement
8.2	Emergency Preparedness and Response	8.2	Emergency Preparedness and Response	8.2	Emergency Preparedness and Response
9	Performance Evaluation	9	Performance Evaluation	9	Performance Evaluation
9.1	Monitoring, Measurement, Analysis and Evaluation	9.1	Monitoring, Measurement, Analysis and Evaluation	9.1	Monitoring, Measurement, Analysis and Evaluation
9.1.1	General	9.1.1	General	9.1.1	General
9.1.2	Evaluation of Compliance	9.1.2	Evaluation of Compliance	9.1.2	Evaluation of Compliance
9.2	Internal Audit	9.2	Internal Audit	9.2	Internal Audit
9.2.1	General	9.2.1	General	9.2.1	General
9.2.2	Internal Audit Programme	9.2.2	Internal Audit Programme	9.2.2	Internal Audit Programme
9.3	Management Review	9.3	Management Review	9.3	Management Review
10	Improvement	10	Improvement	10	Improvement
10.1	General	10.1	General	10.1	General
10.2	Non Conformity and Corrective Action	10.2	Non Conformity and Corrective Action	10.2	Non Conformity and Corrective Action
10.2	Continual Improvement	10.3	Continual Improvement	10.3	Continual Improvement

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## ***Appendix C***

### **Environment Health & Safety Policy**

Coforge Limited is committed to protect the environment and safehealth and safety of all its employees & interested parties and reduce any adverse impact due to its operations on the environment.

To accomplish the same Coforge Limited will perform the following activities:

- Educate, train and motivate employees and other interested parties to carry out tasks in a responsible manner to protect the environment, health and safety.
- Ensure all employees are aware of their roles and responsibilities to fulfil and sustain environment, health and safety management system.
- Provide employees with a safe & healthy working environment and take appropriate measures to prevent workplace injuries and illness.
- Work towards enhancing procurement through EHS certified manufacturer.
- Minimize pollution by reducing waste and consumption of resources.
- Deploy processes that foster safety and communicate significant environmental, health and safety hazards to individuals and agencies likely to be affected.
- Meet all applicable environmental, health and safety requirements including legal, regulatory and contractual obligations.
- Establishing goals & objectives in the pursuit of continual improvement of our EHS performance in all activities.
- Ensure consultation and participation of workers.
- Evolve and implement a system of regular EHS audits in order to ensure compliance with the laid down standards, legal requirements and other codes of practice.

**Date: 10.08.2020**

**Kannika Sagar**

**Chief People Officer**

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## ***Appendix D***

<b>Role</b>	<b>Description</b>
Management	<p>Management is responsible for providing the Direction, Resources and Motivation to the team to comply with the defined and documented management system in line with the EHS framework to achieve the organizational</p> <p>Management roles and responsibilities include the following:</p> <ul style="list-style-type: none"><li>• Provide Leadership and Commitment to EHS and support to Management.</li><li>• Overall responsibility for EHS Performance.</li><li>• Conduct Periodic Reviews with MR and Core Group of EHS Management system to ensure adequacy, effectiveness and suitability.</li><li>• Ensure adequate resources for EHS Management System deployment.</li><li>• Approval of EHS Policy and Objectives</li><li>• Approval of EHS Organization and allocation of responsibilities &amp; authorities.</li><li>• Appoint EHS Management Representative and Locational MRs.</li></ul>

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Role	Description
MR	<p>Management Representative is the focal point for the EHS deployment at Coforge and shall be responsible for the Development, Documentation, and Maintenance of the Integrated Management Systems across all location in compliance with the Environment, Health and Safety Management systems.</p> <p>MR responsibilities include the following:</p> <ul style="list-style-type: none"> <li>• He /She shall be responsible for coordinating with the external agencies, effective compliance to the defined and documented Management systems</li> <li>• Conduct of periodic audits</li> <li>• Conduct of Management Review Meetings</li> <li>• Coordination with the Security Core Group for review of all Incidents reported</li> <li>• Ensure effective execution of Emergency response procedure by the ERT when needed</li> <li>• Leadership of the development, implementation and maintenance of EHS Management system at the designated locations</li> <li>• Ensure effective Communication and Awareness regarding EHS across the organization</li> <li>• Monitor Compliance to Legal and other requirements.</li> <li>• Monitor EHS Performance</li> <li>• Control of EHS Documentation across the organization.</li> </ul>

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Role	Description
<p>Locational MR and Document Controller</p>	<p>Locational Management Representative is the focal point for the EHS deployment at Coforge and shall be responsible for the Development, Documentation and Maintenance of the Integrated Management Systems in compliance with the Environment, Health and Safety Management systems at the designated location</p> <p>He /She shall be responsible for effective compliance to the defined and documented Management systems, Conduct of periodic audits.</p> <p>Conduct of Locational Management Review Meetings, coordination with the Security Core Group for review of all Incidents reported and also for ensure effective execution of Emergency response procedure by the ERT when needed.</p> <p>Locational MR(s) shall be responsible for document control of respective locations.</p> <p>Document Controller is responsible for management of document at Intranet and Server.</p> <p>Locational MR’s responsibilities include the following:</p> <ul style="list-style-type: none"> <li>• Conduct of periodic audits</li> <li>• Conduct of Locational Management Review Meetings</li> <li>• Coordination with the Security Core Group for review of all Incidents reported</li> <li>• Ensure effective execution of Emergency Response Procedure by the ERT when needed</li> <li>• Leadership of the development, implementation and maintenance of EHS Management system at the designated locations</li> <li>• Ensure effective Communication and Awareness regarding EHS across the organization</li> <li>• Monitor Compliance to Legal and other requirements.</li> <li>• Monitor EHS Performance and report to MR.</li> <li>• Control of EHS Documentation at the designated location</li> </ul>

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Role	Description
EHS Core Team	<p>EHS Core Team is cross functional team which is responsible to provide Support for EHS Deployment at the designated location:</p> <p>Responsibilities include the following:</p> <ul style="list-style-type: none"> <li>• Identify, Analyse and Review the EHS related Risks within department.</li> <li>• Ensure that EHS Policy commitments are met at the department level. Identify, document and review Management Programs and implement as per the action plan.</li> <li>• Collect the data and analyse the progress of objectives &amp; targets at department level.</li> <li>• Share the departmental performance of objective, target, Management programme &amp; OCP with MR. Conduct activities for core group meeting</li> <li>• Provide management &amp; technical support for implementation and maintenance of EHS, Control documents related to EHS</li> <li>• Support department for establishing EHS requirements at department level, vendors and contractors level respectively in terms of training, legal awareness &amp; updates and conducting internal audits</li> <li>• Core group is also responsible for incident reporting and analysis.</li> </ul>

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Role	Description
ERT Team Members	<p>ERT team is a cross functional team of employees responsible to assist in the management of Emergency situations including safe evacuation of personnel and assets.</p> <p>Details of ERT responsibilities are defined in emergency management plan</p>
Operations and Maintenance team	<p>All Maintenance schedules and protocols shall be adhered, to ensure the safe and effective performance of the equipment.</p>
Compliance team	<p>Compliance team shall be responsible for ensuring compliance to applicable legal and other requirements. The responsibilities include the following:</p> <ul style="list-style-type: none"> <li>• Identification / Updating of applicable legal, statutory and regulatory requirements for the relevant locations.</li> <li>• Periodic Monitoring of compliance status as per defined checklist.</li> <li>• Maintain records of compliance w.r.t. defined requirements.</li> <li>• Liaison with relevant authorities for submission of compliance reports.</li> <li>• Ensure Testing as per defined frequencies and maintenance of reports.</li> <li>• Intimate and maintain compliance &amp; records for activities related to vendors.</li> </ul>

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Role	Description
Security Agency	<p>Security Agency hired and entrusted with the responsibility for ensuring Physical security of the premises and the Human and material resources therein shall ensure to depute their competent Guards and Supervisors to ensure 24*7 compliance to the defined processes and be vigilant to identify any gaps in the EHS compliances.</p> <p>The responsibilities of security agency include the following:</p> <ul style="list-style-type: none"> <li>• Report any incident which could lead to a potential compromise of the Safety, Security, Compromise of health and a potential Environmental impact</li> <li>• Facilitate evacuation in case of emergency situations</li> <li>• Facilitate conduct of evacuation drills</li> <li>• Awareness and training of security personnel</li> <li>• Compliance to laid down legal and other requirements</li> <li>• Maintain records of material movements</li> <li>• CCTV Monitoring</li> <li>• Maintain equipment related to emergency preparedness</li> <li>• Communication, Awareness and display for emergency preparedness</li> <li>• Conduct Evacuation Drills as per defined frequencies.</li> </ul>



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Role	Description
Transport team	<p>Transport Team shall coordinate with the vendors to ensure compliance to laid down procedures and guidelines and compliance to legal and other requirements.</p> <p>The responsibilities of Transport team include the following:</p> <ul style="list-style-type: none"> <li>• Ensure that vehicles used for official commuting purposes are in good operating conditions to ensure NO negative Environmental impact through a control on any kind of oil leakage and also Air pollution to be under control (through a valid PUC certificate)</li> <li>• Also, it shall be reviewed and ensured that the drivers and vehicles deployed are in safe operating conditions and hold all applicable valid documents and permits / licenses</li> <li>• Compliance to the transport processes shall be the responsibility of the transport team to ensure safety of employee’s especially female employees while travelling in company provided vehicles.</li> <li>• Ensure compliance to applicable legal, statutory, regulatory and contractual requirements</li> <li>• Maintaining Records of Incidents and Accidents – status and actions.</li> </ul>

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Role	Description
Employees	<p>All Employees are required to comply with the generic Do's and Don'ts applicable to them to ensure Health, Safety and overall wellbeing of employees including visitors, vendors and neighbouring Environment.</p> <p>Responsibilities include the following:</p> <ul style="list-style-type: none"> <li>• Comply with laid down EHS Procedures, guidelines and instructions.</li> <li>• Comply with laid down Emergency Procedures and guidelines.</li> <li>• Use of personnel protective equipment and safety systems.</li> <li>• Report EHS Incidents, Hazards or issues.</li> <li>• Participate in Risk Assessment</li> <li>• Not wilfully and recklessly endanger anyone's health and safety.</li> </ul>
HR	<p>HR Team shall be responsible for the following:</p> <ul style="list-style-type: none"> <li>• Compliance to applicable statutory and regulatory requirements.</li> <li>• Facilitate and organize training programs</li> <li>• Maintain Training Records</li> <li>• Organize Induction Training Programs for new joiners.</li> <li>• Organize counselling sessions for employees.</li> </ul>
IT	<p>IT team shall be responsible:</p> <ul style="list-style-type: none"> <li>• to ensure adherence to all applicable EHS Requirements</li> <li>• compliance to applicable legal and other requirements for the activities undertaken by concerned Suppliers.</li> </ul>

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<b>Role</b>	<b>Description</b>
CSO Procurement	CSO Procurement team shall be responsible: <ul style="list-style-type: none"><li>• to ensure adherence to all applicable EHS Requirements</li><li>• compliance to applicable legal and other requirements for the activities undertaken by concerned Suppliers.</li></ul>