

Chromewell Engineering Private Limited

Environmental Management Policy

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1. Document Information:

Document Details		Governance
Policy Owner: EHS Executive	Scope: All Chromewell Engineering manufacturing operations, warehouses, offices, and logistics activities at all owned, leased, and operated sites in Pune and Dewas, India. Covers all environmental aspects and impacts across the product lifecycle including supply chain.	Reviewed & Approved By: CEO & CFO
Secondary Owner: Compliance Executive	Applies To: All employees, contractors, and suppliers. All operations: stamping, welding, forging, assembly, surface treatment, and logistics.	Review Cycle: Annual – Once a year

2. Purpose

Chromewell Engineering Pvt Ltd recognises that our manufacturing operations - pressing, welding, cutting, plating, and surface treatment of automotive parts - generate environmental impacts including energy consumption, greenhouse gas emissions, water use, and chemical and hazardous waste, air emissions, and solid waste. This policy establishes Chromewell's overarching commitment to environmental stewardship across all these dimensions.

This Environmental Management Policy is the umbrella document for Chromewell's Environmental Management System (EMS). It sets the strategic direction and governance principles that are implemented through nine specific sub-policies covering each environmental sustainability issue.

Chromewell exports automotive components to EU and USA markets. Compliance with the EU End-of-Life Vehicles Directive, REACH Regulation, Carbon Border Adjustment Mechanism (CBAM), and the Corporate Sustainability Reporting Directive (CSRD) is both a regulatory requirement. This policy reflects those obligations.

This policy is aligned with:

- ISO 14001:2015 - Environmental Management Systems
- GRI 300 Series - Environmental Standards (GRI 301–308)
- CSRD ESRS E1 (Climate), E2 (Pollution), E3 (Water), E4 (Biodiversity), E5 (Resources)
- UN Sustainable Development Goals - SDG 7 (Clean Energy), SDG 12 (Responsible Consumption), SDG 13 (Climate Action), SDG 15 (Life on Land)
- EU CBAM, REACH Regulation, End-of-Life Vehicles (ELV) Directive 2000/53/EC
- Indian Environment (Protection) Act 1986 and applicable Rules
- Indian Air (Prevention and Control of Pollution) Act 1981
- Indian Water (Prevention and Control of Pollution) Act 1974

3. Scope

This policy applies to:

- All Chromewell Engineering manufacturing, warehouse, logistics, and office operations
- All employees, contractors, temporary workers, and visitors at all Chromewell sites
- All product and service categories including stamped, welded, forged, and assembled automotive components
- Direct supply chain partners - raw material suppliers, tier-1 suppliers, service providers - through the Supplier Code of Conduct
- Smallholder and micro-enterprise suppliers engaged in surface treatment, secondary processing, or material supply, who receive specific capacity-building support under this policy

Environmental sustainability issues covered by this umbrella policy and their specific sub-policies:

- Energy consumption and GHG emissions - Policy CW-ENV-002 and CW-ENV-003
- Water management and stewardship - Policy CW-ENV-004
- Air pollution and environmental compliance - Policy CW-ENV-005
- Hazardous substances and chemicals - Policy CW-ENV-006
- Waste management and circular economy - Policy CW-ENV-007
- Product end-of-life and ELV compliance - Policy CW-ENV-008
- Customer health and safety - Policy CW-ENV-009

4. Key Objectives and Targets

Chromewell Engineering defines overarching environmental objectives at the management system level. Detailed objectives and targets for each sustainability issue are set in the respective sub-policy.

Environmental Issue	Key Objectives	Target (2025–2027)
ISO 14001 Certification	Maintain and continuously improve a certified Environmental Management System across all manufacturing operations.	ISO 14001:2015 certification maintained Annual management review completed Zero major nonconformances in external audits
Compliance	Achieve and maintain 100% compliance with all applicable Indian environmental legislation and international regulations relevant to EU/USA export markets.	Zero environmental regulatory violations Zero statutory notices or prosecution actions Environmental legal register: reviewed quarterly
Aspect & Impact Assessment	Identify and evaluate all significant environmental aspects and impacts across operations annually, using the significance matrix approach required by ISO 14001.	Annual Aspect and Impact Register: 100% of operations covered Significant aspects addressed in environmental objectives New processes assessed before commencement - 100%
Supplier Environmental Performance	Engage and develop direct suppliers - including smallholders and micro-enterprises - on environmental standards, recognising that Chromewell's Scope 3 emissions and material impacts extend through the supply chain.	100% of Tier 1 suppliers sign Environmental Supplier Code of Conduct by December 2026 80% of high-environmental-risk suppliers assessed annually Supplier capacity-building programme for smallholder suppliers: established by December 2025
Environmental Incidents	Prevent environmental incidents through proactive controls. Where incidents occur, investigate promptly and implement root-cause corrective actions.	Environmental incidents: zero significant incidents All minor incidents: root cause analysis within 14 days Recurrence rate: zero for incidents with completed CAPAs
Stakeholder Reporting	Report environmental performance transparently to customers, buyers, regulators, and the public through annual Sustainability Report	Annual Sustainability Report: published aligned to GRI 300 series. CSRD ESRS E1–E5 disclosures: ready by 2027

5. Governance and Allocation of Responsibilities

Clear accountability is assigned at every level of Chromewell Engineering's ESG Governance Structure. The table uses a RACI framework (Accountable, Responsible, Consulted, Informed).

Role / Designation	RACI Level	Department	Key Responsibilities Under This Policy
CEO/CFO	Accountable (A)	Executive	Final approval of this policy and all environmental sub-policies. Sets environmental commitment at Board level. Receives annual environmental performance report. Escalation authority for significant incidents or regulatory violations.
EHS Executive	Primary Owner (R)	EHS / Operations	Day-to-day ownership of the Environmental Management System. Maintains ISO 14001 certification. Manages environmental aspect and impact register, legal compliance register, incident investigation, and environmental KPI tracking.
Compliance Executive	Secondary Owner (R)	Compliance	Aligns EMS with GRI 300s, and CSRD ESRS E1–E5. Manages, CBAM reporting, sustainability report environmental sections, and customer environmental questionnaires.
Operations Manager	Consulted (C)	Operations & Production	Implements environmental controls on the shop floor. Ensures production teams comply with environmental procedures. Participates in environmental audits. Identifies improvement opportunities in manufacturing processes.
Purchase Manager	Consulted (C)	Procurement & Supply Chain	Ensures environmental criteria are embedded in supplier selection and evaluation. Manages supplier environmental assessments. Supports smallholder supplier capacity building.
Head of Compliance	Consulted (C)	Compliance	Maintains environmental legal register. Advises on Indian environmental law, EU REACH, ELV Directive, CBAM, and CSRD obligations. Manages regulatory correspondence.
All Employees	Informed (I)	All Functions	Informed of environmental policy and their responsibilities. Required to report environmental incidents, spills, or near misses immediately to the Head of EHS.

RACI: A = Accountable (signs off, one person only) · R = Responsible (does the work) · C = Consulted (input required) · I = Informed (kept in loop).

6. Policy Commitments

6.1 Environmental Management System (ISO 14001)

- Chromewell maintains and continuously improves its Environmental Management System certified to ISO 14001:2015
- An annual environmental management review is conducted by the Managing Director with the EHS Executive and Compliance Executive
- Significant environmental aspects and impacts are identified, evaluated, and addressed in site-specific environmental objectives

- Environmental objectives are set annually, monitored quarterly, and reported to the ESG Steering Committee

6.2 Compliance and Regulatory Obligations

- Chromewell maintains a live environmental legal register covering all applicable Indian environmental legislation and relevant international regulations
- The legal register is reviewed quarterly for new or amended legislation; relevant changes are communicated to operational teams within 30 days
- Compliance obligations specific to EU/USA export markets - REACH, ELV Directive, CBAM, CSRD - are tracked and managed by the Head of Compliance with the Compliance Executive.

6.3 Smallholder and Micro-Enterprise Supplier Support

Chromewell's supply chain includes smallholder workshops and micro-enterprises engaged in surface treatment, electroplating, and secondary processing. These suppliers face specific challenges in meeting environmental standards due to limited technical capacity and resources. Chromewell commits to:

- Mapping all smallholder and micro-enterprise suppliers by environmental risk level annually
- Providing practical capacity-building support - site visits, training, process guidance - to high-risk smallholder suppliers rather than simply imposing compliance requirements
- Setting realistic improvement timelines with smallholder suppliers, documented in supplier development plans
- Including smallholder environmental performance in supplier scorecards, with a development-first approach before discontinuing relationships

6.4 Environmental Incident Prevention and Response

- All potential environmental incidents - spills, leaks, abnormal emissions, and waste mismanagement - are identified in the aspect and impact register and addressed with preventive controls
- All actual environmental incidents are reported immediately, investigated within 14 days using root cause analysis, and corrected
- Major environmental incidents are notified to the relevant regulatory authority as required by law

6.5 Transparent Reporting

- Environmental performance data is published annually in the Chromewell Sustainability Report aligned to GRI 300 series
- Customer environmental questionnaires - from OEM buyers, EU importers, and USA retailers - are responded to within the agreed timeframe

7. KPI Monitoring and Reporting

The following KPIs are tracked by the ESG Working Group, reported quarterly to the ESG Steering Committee, and published annually in the Chromewell Sustainability Report

KPI / Indicator	Target	Measurement Method	Cadence	Owner
ISO 14001 Certification Status	Maintained (zero lapse)	Certification body records	Annual	EHS Executive
Environmental Compliance	100% (zero violations)	Legal register / audit	Quarterly	EHS Executive
Significant Environmental Aspects Assessed	100% of operations covered	Aspect & Impact Register	Annual	EHS Executive

Environmental Incidents - Significant	Zero	Incident log	Immediate	EHS Executive
Supplier Environmental CoC Signature Rate	100% Tier 1 by Dec 2025	Procurement records	Annual	Purchase Manager
High-Risk Supplier ENV Assessment Rate	80% annually	Supplier assessment register	Annual	Compliance Executive
Smallholder Supplier Support Plan Active	Yes - by Dec 2026	ESG records	Annual	Compliance Executive
Annual Sustainability Report Published	Yes - aligned to GRI 300s	ESG records	Annual	Compliance Executive

8.

9. Policy Review Mechanism

This policy is reviewed annually every April by the EHS Executive and Compliance Executive, with formal approval by the CEO. Interim review is triggered by a significant environmental incident, a major change to applicable environmental legislation, the introduction of a new manufacturing process with significant environmental aspects, findings from an ISO 14001 surveillance audit, or a change in Chromewell's ESG strategy.

Version	Date	Author	Approved By	Summary of Changes
1.0	July 01, 2021	EHS Executive / HR HOD	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Initial issue
2.0	May 03, 2022	EHS Executive / HR HOD Executive	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Minor edits on the Quantitative targets
3.0	June 05, 2025	EHS Executive / HR HOD	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Updated to v3.0: KPI has been revised
4.0	Jan 14,2026	EHS Executive / HR HOD	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Added related policies with clear accountability and ownership

10. Compliance, Non-Conformance, and Disciplinary Action

- Compliance with this policy and all environmental sub-policies is mandatory for all employees, contractors, and site visitors
- Environmental violations are subject to disciplinary action proportionate to severity, including termination for deliberate or grossly negligent acts
- Regulatory violations are reported to the relevant authority as required by law; Chromewell cooperates fully with any inspection or investigation
- Employees who report environmental incidents or non-conformances in good faith are protected from retaliation - see Policy CW-ETH-004
- “Report a concern” form available on ChromeNet as an anonymous grievance redressal mechanism and, we have a dedicated hotline number published on the website to report any concern anonymously.

10. Related Documents and References

Internal environmental sub-policies:




- CW-ENV-002 - Energy & GHG Emissions Reduction Policy
- CW-ENV-003 - Climate Transition Policy
- CW-ENV-004 - Water Stewardship Policy
- CW-ENV-005 - Pollution Prevention & Environmental Compliance Policy
- CW-ENV-006 - Hazardous Substances, Chemicals & REACH Compliance Policy
- CW-ENV-007 - Waste Management & Circular Economy Policy
- CW-ENV-008 - Product End-of-Life & ELV Compliance Policy
- CW-ENV-009 - Customer Health & Safety Policy
- CW-ETH-004 - Whistleblower Protection & Speak-Up Policy

External standards and regulations:

- ISO 14001:2015 - Environmental Management Systems
- GRI 301–308 - Environmental Standards (2016)
- CSRD ESRS E1 (Climate Change), E2 (Pollution), E3 (Water & Marine), E4 (Biodiversity), E5 (Circular Economy)
- Indian Environment (Protection) Act 1986 and Amendment Rules
- Indian Air (Prevention and Control of Pollution) Act 1981
- Indian Water (Prevention and Control of Pollution) Act 1974
- EU REACH Regulation (EC) No 1907/2006
- EU End-of-Life Vehicles Directive 2000/53/EC
- EU Carbon Border Adjustment Mechanism (CBAM) - Regulation (EU) 2023/956

11. Formal Approval and Sign-Off

This policy has been prepared, reviewed, and formally approved:

Prepared By	Reviewed By	Approved By
<p>Name: Mr. Kaka Rakhapasre Designation: EHS Executive Date: Jan 2026 Signature:</p> 	<p>Name: Mr. Sandeep Divekar Designation: HR HOD Date: Jan 2026 Signature:</p> 	<p>Name: Ms. Risha Naik Designation: CFO Date: Jan 2026 Signature:</p> 

FOR FURTHER INFORMATION:

This policy is issued under the authority of the CEO & CFO of Chromewell Engineering Pvt Ltd. It supersedes v3.0 (June 2025). For further information or advice, please contact a Chromewell Finance or Compliance Officer or Chromewell's Board or Directors.