Chromewell Engineering Private Limited

Pollution Prevention & Environmental Compliance Policy

POLICY NO: CW-ENV-005 | VERSION: 4.0

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1. Document Information:

Document Details		Governance
Policy Owner: EHS Executive	**Scope:** All air emissions, noise, odour, soil contamination, and environmental discharge from Chromewell Engineering's manufacturing operations. Includes process emissions from welding, grinding, surface treatment, and painting.	**Reviewed & Approved By:** CEO & CFO
Secondary Owner: Compliance Executive	**Applies To:** All manufacturing processes generating air emissions: welding fumes, grinding dust, VOCs from surface treatment, compressor exhaust, and generator exhaust.	**Review Cycle:** Annual – Once a year

2. Purpose

Chromewell Engineering Pvt Ltd's manufacturing operations - welding, grinding, surface treatment and painting - generate air emissions including welding fumes (containing metal oxides), grinding particulates, VOCs from solvents and surface treatment chemicals, and generator exhaust. These emissions affect both the health of workers (addressed in Policy CW-HSW-001) and the quality of the surrounding environment.

This policy establishes Chromewell's commitment to preventing pollution at source, installing appropriate controls for residual emissions, and maintaining full compliance with all applicable Indian environmental regulations and the pollution standards required by EU and USA customers.

This policy is aligned with:

- GRI 305: Emissions (2016) - air pollutants (NO_x, SO_x, PM, VOCs) and GRI 306: Waste
- CSRD ESRS E2 - Pollution (air, water, soil emissions, and pollution prevention)
- ISO 14001:2015 - Environmental Management Systems (pollution prevention clause 6.1)
- Indian Air (Prevention and Control of Pollution) Act 1981 - Consent to Operate
- Indian Environment (Protection) Act 1986 - Emission Standards
- Maharashtra Pollution Control Board (MHPCB) stack emission and ambient air quality standards

3. Scope

This policy covers all pollution pathways from Chromewell's operations:

- Air emissions: stack emissions from furnaces and generators, fugitive dust from grinding and welding fumes, VOC emissions from surface treatment
- Noise pollution: mechanical noise from presses, compressors, and generators affecting the site boundary and neighbouring community
- Odour: from chemical surface treatment, quenching, and paint/coating operations
- Soil and groundwater: chemical storage, fuel tanks, and surface treatment chemical risks
- Light pollution: night-shift operations affecting surrounding residential areas

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.

Pollution Issue	Key Objectives	Target
Stack Emissions - Furnaces & Generators	Ensure all combustion stack emissions from heat treatment equipment, and diesel generators meet MHPCB standards for PM, NO_x, SO_x, and CO always.	Zero MHPCB stack emission exceedances Stack emissions: tested annually by NABL-accredited laboratory Generator emission standards: compliant with CPCB DG set norms
Welding Fume & Grinding Dust Control	Eliminate or reduce welding fume and grinding particulate emissions through engineering controls, ensuring worker health protection and environmental compliance simultaneously.	Local exhaust ventilation (LEV): installed at 100% of welding and grinding stations by December 2026 Ambient PM levels at site boundary: within MHPCB National Ambient Air Quality Standards LEV effectiveness: tested annually
VOC Emissions from Surface Treatment	Minimise VOC emissions from surface treatment chemicals, solvents, and coating operations through substitution, process enclosure, and abatement equipment.	VOC emissions: inventoried annually High-VOC solvents: substituted with low-VOC or water-based alternatives where technically feasible - 100% assessed by December 2025

		Solvent recovery or destruction efficiency: ≥ 90% for remaining high-VOC processes by 2027
Noise Management	Manage noise at the site boundary to protect neighbouring residential areas, in compliance with MHPCB ambient noise standards for industrial zones.	Site boundary noise: within MHPCB ambient noise standards (industrial zone: 75 dB(A) day / 70 dB(A) night) Annual noise survey at site boundary: to be completed each April Noise reduction measures for exceedances: implemented within 90 days
Soil and Groundwater Protection	Prevent soil and groundwater contamination from chemical storage, fuel storage, and surface treatment operations through secondary containment, and leak detection.	Zero soil or groundwater contamination incidents 100% of chemical and fuel storage areas with secondary containment bunding.
Legal Compliance - All Pollution Pathways	Maintain 100% compliance with all MHPCB Consent to Operate conditions and applicable CPCB emission standards.	Zero MHPCB Consent conditions violated Consent to Operate: renewed before expiry, 100% Environmental compliance audit: conducted annually

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. Escalation authority for MHPCB notices or significant pollution incidents. Approves capital investment for pollution control equipment.
EHS Executive	**Primary Owner (R)**	EHS / Operations	Manages air emission monitoring, noise surveys, MHPCB compliance, stack emission testing, LEV maintenance, chemical bunding inspections, and environmental incident response.
Compliance Executive	**Secondary Owner (R)**	Compliance	Manages GRI 305/306 air pollutant reporting, CSRD ESRS E2 disclosures, and customer environmental questionnaires.
Operations Manager	**Consulted (C)**	Operations & Production	Ensures pollution controls are operating correctly on the shop floor. Reports equipment malfunctions affecting emissions immediately.

			Participates in pollution prevention improvement plans.
Head of Compliance	**Consulted (C)**	Compliance	Manages MHPCB Consent to Operate renewal and conditions. Responds to regulatory correspondence. Advises on CPCB norms and amendment updates.
Maintenance Manager	**Consulted (C)**	Maintenance	Maintains LEV systems, stack emission controls, bunding integrity, and noise barriers in operational condition. Reports defects affecting environmental performance.

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 Pollution Prevention Hierarchy

Chromewell applies a pollution prevention hierarchy in the following order:

- Prevention at source - substitute processes and materials to avoid pollution generation
- Reduction - minimise emissions through process optimisation and good housekeeping
- Control - install engineering controls (LEV, enclosures, scrubbers, noise barriers)
- Monitoring and compliance - verify performance against regulatory limits
- Incident response - contain, investigate, and remediate any releases

6.2 Air Emission Controls and Monitoring

- Stack emissions from all furnaces and generators are tested annually by a NABL-accredited laboratory; results are submitted to MHPCB
- Local exhaust ventilation systems are installed at all welding and grinding stations and maintained per manufacturer specifications
- LEV performance is verified by air flow measurement annually; defective systems are repaired within 7 days
- A VOC emissions inventory is prepared annually; high-VOC solvents are assessed for substitution with lower-VOC alternatives
- Fugitive dust from operations is controlled through enclosure and bag-filter dust collectors

6.3 Noise Management

- An annual noise survey is conducted at the site boundary and at sensitive receptor locations (residential areas within 500m)
- Where noise exceeds MHPCB ambient standards, noise reduction measures - acoustic barriers, equipment enclosures, timing controls - are implemented within 90 days
- New equipment with significant noise output is assessed before procurement; noise specifications are included in purchase requirements

6.4 Soil and Groundwater Protection

- All chemical storage areas have secondary containment bunding capable of containing 110% of the largest vessel volume
- Fuel and chemical storage tanks are integrity-tested every five years
- Spill response kits are maintained at all chemical storage and use locations; all relevant employees are trained in spill response
- A soil and groundwater baseline assessment is completed for the site to enable detection of any future contamination.

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
MHPCB Consent Compliance	Zero exceedances	Consent conditions / MHPCB records	Quarterly	EHS Executive
Stack Emission Tests - All Parameters	Within MHPCB limits	NABL lab test reports	Annual	EHS Executive
LEV Systems Operational	100%	Maintenance records	Monthly	Maintenance
Site Boundary Noise Compliance	Within MHPCB ambient limits	Annual noise survey	Annual	EHS Executive
VOC Substitution Assessments Completed	100% of high-VOC processes	EHS records	Annual	EHS Executive
Chemical / Fuel Bunding Integrity	100% of storage areas	Monthly inspection	Monthly	EHS Executive
Environmental Pollution Incidents	Zero significant incidents	Incident log	Immediate	EHS Executive
MHPCB Consent to Operate	Valid always	Consent certificate	Annual	Head of Compliance

8. Policy Review Mechanism

Reviewed annually every April by Head of EHS with CEO approval. Interim review triggered by: MHPCB notice, significant emission incident, new CPCB emission standard, or ISO 14001 audit finding.

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	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

9. Compliance, Non-Conformance, and Disciplinary Action

- Operating without a valid MHPCB Consent to Operate or exceeding consent conditions constitutes a regulatory offence; the Head of Compliance is informed immediately
- Deliberate pollution - bypassing ETPs, discharging untreated effluent, or tampering with monitoring equipment - is gross misconduct and grounds for immediate termination
- Concerns are reported through Policy CW-ETH-004 - Whistleblower Protection & Speak-Up Policy
- “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 policies:

- CW-ENV-001 - Environmental Management Policy
- CW-ENV-004 - Water Stewardship Policy
- CW-ENV-006 - Hazardous Substances, Chemicals & REACH Compliance Policy
- CW-ENV-007 - Waste Management & Circular Economy Policy
- CW-HSW-001 - Employee Health, Safety & Wellbeing Policy (worker exposure limits)

External standards:

- Indian Air (Prevention and Control of Pollution) Act 1981
- Indian Environment (Protection) Act 1986 - Emission Standards
- CPCB National Ambient Air Quality Standards and Stack Emission Standards
- Maharashtra Pollution Control Board Consent Conditions
- GRI 305: Emissions (2016) and GRI 306: Waste
- CSRD ESRS E2 - Pollution
- ISO 14001:2015 - Clause 6.1 (Actions to address risks and opportunities - pollution prevention)

11. Formal Approval and Sign-Off

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

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

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.