Chromewell Engineering Private Limited

Customer Health & Safety Policy

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1. Document Information:

Document Details		Governance
Policy Owner: Quality Manager	**Scope:** All automotive parts and components manufactured and supplied by Chromewell Engineering. Covers product safety, conformance, chemical substance compliance, and communication of health and safety information to customers, vehicle manufacturers, and end consumers.	**Reviewed & Approved By:** CEO & CFO
Secondary Owner: EHS Executive	**Applies To:** All product families supplied to OEM vehicle manufacturers, Tier 1 automotive suppliers, aftermarket customers, and through the supply chain to end-vehicle owners and mechanics.	**Review Cycle:** Annual – Once a year

2. Purpose

Chromewell Engineering Pvt Ltd manufactures safety-critical and non-safety-critical automotive components including body structure components. The health and safety of vehicle occupants, mechanics, and end consumers depends in part on the quality, conformance, and material safety of these components.

This policy establishes Chromewell's commitment to manufacturing products that are safe for their intended use, free from prohibited hazardous substances, accurately labelled, and supported by appropriate product safety information communicated throughout the supply chain and to end users.

This policy is aligned with:

- GRI 416: Customer Health and Safety (2016) - product health and safety assessment and incidents
- IATF 16949 - Automotive Quality Management System Standard
- ISO 9001:2015 - Quality Management Systems
- EU General Product Safety Regulation (GPSR) - Regulation (EU) 2023/988
- EU REACH Regulation - consumer article substance communication
- CSRD ESRS S4 - Consumers and End-Users (product safety and access to information)
- Indian Bureau of Indian Standards (BIS) - automotive component certification requirements

3. Scope

This policy covers all aspects of customer health and safety relevant to Chromewell's products:

- Product conformance and safety: dimensional accuracy, material specification compliance, and performance within design tolerance
- Restricted substance communication: SVHC notification, ELV compliance declarations, and safety data sheet provision for chemical-containing products
- Product safety information: technical specifications, installation guidance, and safe use information provided to customers
- Non-conforming product control: prevention of defective or non-conforming parts reaching the customer
- Product incident management: recall, investigation, and corrective action for any product that causes or risks causing harm

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.

Customer Health & Safety Issue	Key Objectives	Target
Product Safety and Conformance	Ensure all Chromewell products meet customer drawings, specifications, and applicable safety standards before despatch. Zero defective parts reach the customer.	Customer Parts Per Million (PPM) defect rate: ≤ 50 ppm by 2026; ≤ 25 ppm by 2028 Zero safety-critical product recalls attributed to Chromewell manufacturing defects Internal first-pass quality yield: ≥ 98% by 2027
Substance Safety Communication	Communicate chemical substance information - SVHC presence, ELV compliance status, and Safety Data Sheets - to all customers as required by REACH, ELV Directive, and OEM customer requirements.	SVHC notification to EU customers: within 45 days of identification Annual substance compliance declaration: issued to all EU OEM customers SDS provision: 100% of customers receiving chemical-containing products

Non-Conforming Product Control	Prevent the inadvertent release of non-conforming products to customers through documented inspection, test, and approval processes.	Non-conforming product escape rate: zero critical defects (safety and dimensional) 100% of concessions formally approved by customer before despatch First Article Inspection (PPAP): completed for 100% of new parts before mass production
Customer Feedback and Complaints	Respond to all customer product safety complaints and non-conformances promptly, with root cause analysis and permanent corrective action.	Customer complaints: 100% acknowledged within 48 hours. Root cause analysis (8D): submitted within 10 working days of complaint 8D closure: within 30 working days Recurrence rate: zero for complaints with completed corrective actions
Product Safety Information	Provide accurate, clear product specification and safe handling information to all customers and, where relevant, to downstream users.	Product technical datasheets: available for 100% of active part numbers Installation and handling guidance: provided for safety-critical components Customer satisfaction survey on product information quality: conducted annually
Smallholder Supplier Quality	Ensure that materials and services provided by smallholder suppliers - surface treatment, secondary processing - meet quality and safety standards before incorporation in customer parts.	Incoming inspection from smallholder suppliers: 100% of designated critical characteristics Supplier non-conformances: addressed with CAPA within 30 days Smallholder supplier quality rating: reviewed quarterly

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 product safety recalls or regulatory action. Approves product safety investment and quality system upgrades.
Quality Manager	Primary Owner (R)	Quality	Day-to-day ownership of product safety and conformance: incoming inspection, in-process

			quality, final inspection, PPAP, customer complaint management, 8D investigations, and IMDS.
EHS Executive	Secondary Owner (R)	EHS / Operations	Manages substance safety information (SDS), SVHC communication, and process control for chemical-related product risks.
Head of Compliance	Consulted (C)	Compliance	Manages REACH Article 33 SVHC customer notification, EU GPSR compliance, BIS certification maintenance, and regulatory product safety obligations.
Compliance Executive	Consulted (C)	Compliance	Manages GRI 416 / CSRD ESRS S4 customer health and safety reporting.
Operations Manager	Consulted (C)	Operations & Production	Ensures production processes maintain conformance to customer specifications. Supports in-process quality controls and non-conforming product segregation.
Sales / Customer Relations	Consulted (C)	Sales	Primary interface with OEM customers on quality matters. Communicates customer complaints to Quality Manager. Ensures customer-specific requirements are understood by production and quality teams.

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 Product Conformance and Quality Control

- All products are manufactured to customer-approved drawings, specifications, and control plans
- First Article Inspection (PPAP Level 3 or as specified by customer) is completed for all new parts before mass production commencement
- Incoming raw materials and components - including those from smallholder suppliers - are subject to documented incoming inspection or statistical sampling
- Non-conforming products are identified, segregated, and subjected to formal disposition - rework, return to supplier, or scrap - before any parts are released to customers

6.2 Substance Safety Communication

- Chromewell proactively communicates SVHC presence above 0.1% w/w to EU customers within 45 days of identification
- An annual substance compliance declaration confirming ELV Directive compliance is issued to all EU OEM customers
- Safety Data Sheets for products or articles containing chemical substances are provided to customers on request and proactively for safety-critical applications

6.3 Customer Complaint and Product Incident Management

- All customer quality complaints are acknowledged within 48 hours by the Quality Manager
- An 8D root cause analysis is completed within 10 working days of a formal customer complaint
- Permanent corrective actions are implemented within 30 working days and verified for effectiveness
- Where a product safety hazard is identified after despatch, a corrective action is initiated immediately in coordination with the Head of Legal and the affected OEM.

6.4 Smallholder Supplier Quality Management

Chromewell's smallholder suppliers - electroplating, heat treatment, painting - provide services incorporated directly in products supplied to OEM customers. Quality failures at this tier create direct customer health and safety risks:

- All smallholder supplier critical processes are subject to specific incoming inspection or statistical verification before parts are released to next production stage
- Chromewell provides process specification sheets and quality requirement guidance to smallholder suppliers in their local language where needed
- Supplier quality ratings are reviewed quarterly; persistent quality failures trigger formal corrective action with defined resolution timelines

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
Customer PPM Defect Rate	≤ 50 ppm (2026); ≤ 25 ppm (2028)	Customer quality portal / returns	Monthly	Quality Manager
Safety-Critical Product Recalls	Zero	Customer notification records	Immediate	MD / Quality Manager
Customer Complaint Acknowledgement Rate	100% within 48 hours	Quality complaint log	Monthly	Quality Manager
8D Root Cause Analysis Submission	100% within 10 working days	8D tracking system	Monthly	Quality Manager
PPAP Completion for New Parts	100% before mass production	PPAP register	Per launch	Quality Manager
SVHC Notification to EU Customers	100% within 45 days	Legal records	Per event	Head of Compliance
Annual Substance Compliance Declaration	Issued to all EU OEM customers	Legal records	Annual	Head of Compliance
Incoming Inspection Coverage - Smallholder Suppliers	100% critical characteristics	Inspection records	Per batch	Quality Manager
GRI 416 - Product H&S Assessment Coverage	100% of significant product categories	ESG records	Annual	Compliance Executive

8. Policy Review Mechanism

Reviewed annually every April by Quality Manager and Head of Legal with MD approval. Interim review triggered by product recall or safety incident, new OEM customer substance or quality requirement, EU GPSR amendment, or IATF 16949 recertification audit finding.

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

9. Compliance, Non-Conformance, and Disciplinary Action

- Release of non-conforming or restricted-substance-containing parts to a customer is a serious quality and compliance breach subject to disciplinary action up to termination
- Deliberate falsification of inspection or substance compliance records constitutes gross misconduct
- 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-006 - Hazardous Substances, Chemicals & REACH Compliance Policy (SVHC identification)
- CW-ENV-008 - Product End-of-Life & ELV Compliance Policy (ELV restricted substances)
- CW-ENV-001 - Environmental Management Policy
- CW-HSW-001 - Employee Health, Safety & Wellbeing Policy (manufacturing process safety)
- CW-ETH-004 - Whistleblower Protection & Speak-Up Policy

External standards and regulations:

- GRI 416: Customer Health and Safety (2016) - GRI 416-1 and 416-2
- CSRD ESRS S4 - Consumers and End-Users
- EU General Product Safety Regulation (GPSR) - Regulation (EU) 2023/988
- IATF 16949 - Automotive Quality Management System
- ISO 9001:2015 - Quality Management Systems
- EU REACH Regulation - Article 33 (SVHC communication in articles)

- Bureau of Indian Standards (BIS) - applicable automotive component standards

11. Formal Approval and Sign-Off

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

Prepared By	Reviewed By	Approved By
Name: Mr. Vikrant Sathe **Designation:** HOD Quality **Date:** Jan 2026 **Signature:** _____	**Name:** Mr. Kaka Rakhapasre **Designation:** EHS Executive **Date:** Jan 2026 **Signature:** _____	**Name:** Mr. Amardeep Mardhekar **Designation:** CEO **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.