

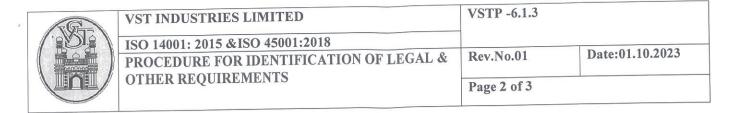
VST INDUSTRIES LIMITED ISO 14001: 2015 &ISO 45001:2018 PROCEDURE FOR IDENTIFICATION OF LEGAL & OTHER REQUIREMENTS

ENVIRONME &SAFETY PR	NTAL, HEALTH COCEDURES
Rev.No.01	Date:01.10.2023
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PROCEDURE FOR	IDENTIFICATION O	ELECAL COTTER	DECTURE
	IDENTIFICATION OF	LEGAL &OTHER	REQUIREMENTS
Rev.No	Date	Brief description	of Revision
00	01.06.2004	First Issue	
01	01.12.2020		
02	01.10.2023	Review as per A	WS -water stewardship requirements
03	01.10.2023	Review as per A	WS certification audit finding closure
Prepared & Issued By			
		Approved By	6.1 - 5
Name	P.KISHORE KUMAR	Name	S.RANGARAO
Designation	MANAGER (EHS)	Designation	DGM (TECHNICAL)



Objective 1.0

To identify and update the legal and other requirements applicable for occupational Health, Safety and Environmental management, water stewardship and communicate the same to all projectsites.

2.0

This procedure covers all activities performed at head office and all plants of VST.

3.0 Responsibility

Manager (EHS) is responsible for identification of related Acts/Rules/Regulations & other compliance obligations Applicable to VST operations.

Concerned Heads of Departments (HODs)/ Functional heads are responsible for respective compliances keeping in consideration applicable legal & other requirements.

Procedure 4.0

Manager (EHS) is responsible for updating and keeping the records of all applicable legislations and regulations and communicates to relevant persons He is also responsible for identifying the applicable legal requirements of the State and Central Governments and ensures compliance

Identification of Legal &otherRequirements 4.1

- Manager(EHS)toorganizeforidentificationofapplicablelegislative,regulatoryandother requirements 4.1.1 by assessing the information obtained from
 - > Central pollution Control board &Local pollution control Board Acts, rules, regulations and notifications
 - Confederation of Indian Industries (CII), guide on environmental legislation for updates
 - Consents/Authorizations/Licenses obtained under various acts
 - > Discussions with safety &Environmental professional during meetings, seminars and conferences
 - > EHSrelatedLegislativeandotherbookslikefactoriesactetc.,andotherpublications
 - > Meetings with regulatory officials
 - Information received from industrial associations and also interacting/hiring professional services
 - Meeting with construction engineers to bring in clarity on other requirements viz VSTP policy guidelines
- The applicable legal and other functional requirements shall be listed in the Register of Regulations 4.1.2 (ROR) and maintained by manager (EHS)
- The ROR to contain the list of competent persons and their responsibilities as 4.1.3 stipulated in regulatory requirements and also their responsibilities



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- 4.1.4 Manager(EHS) to ensurethatalltherelevantpermits/consents/licenses/authorizationsareavailable and renewed
- 4.1.5 Manager(EHS) to communicate the legal and other applicable requirements including specific conditions, if any, to the concerned persons.
- 4.1.6 Manager(EHS) to identify local applicable regulations specific to the location of the site and update site ROR and send copy to Head, EHS for the purpose of updating ROR
- 4.1.7Head, SCM to ensure that whenever any item/service is purchased or subcontracted the applicable legal requirements shall be clearly spelt out in the purchase order/sub-contractor order. The indented to ensure communication of such requirements in the indent clearly
- 4.1.8Manager EHS to communicate Non-Compliance with respect to legal & other requirements to management and advise concerned to take necessary corrective action immediately. The non compliances are also communicated to the stakeholders by publishing in the website under the AWS page. For any such non compliances, proper root cause analysis with corrective actions are initiated & documented by the EHS MANAGER in coordination with the respective responsible designatory.
- 4.1.9 Other Compliance obligations also include other interested party requirements related to its environmental management system which the organization has to or chooses to adopt. These includes, if Applicable:
- agreements with community groups (locals) or non-governmental organizations;
- agreements with public authorities or customers or other stake holders;
- organizational requirements (management);
- voluntary principles or codes of practice;
- voluntary labelling or environmental commitments;
- obligations arising under contractual arrangements with the organization (suppliers);
- Relevant organizational or industry standards.
- Voluntary certifications (ISO 14001, ISO 45001, AWS etc)

4.2 Updating of ROR

- 4.2.1 Manager EHS to assess the revisions, new additions/deletions to various legislative regulatory and other requirements based on the information received from sources listed under clause 4.1.1 at least once in six months and update ROR
- 4.2.2 Manager EHS to ensure that concerned departments are communicated/informed about the changes for ensuring compliance to the revised ROR
- 4.2.3 Functional head concerned to ensure that whenever there is a change in the process, technology and equipment they all meet the EHS regulatory guidelines applicable before procurement and installations at works.

VST INDUSTRIES LIMITED TOOPRAN SITE

Date:30.05.2023

CAPA FOR NON COMPLIANCE

Root Cause, Corrective Action and Preventive Action

Document Evidence	1.Half yearly Ground water submission report to ground water department, Medak 2.Ground water Annual Monitoring plan 2023-2024												
Actual date of closing	30.05.2023												
Preventive Action	Will revew the WLTA Act and water quality requirements and update the same with all requirements												
Corrective Action	As per Ground water NOC Conditions we made a ground water annual monitoring plan and complied the monitoring of all 5nos wells once in a month wef May 2023 internally with our ground water level instrument and by a third party once in six months and completed ground water quality analysis once in six months with covering all parameters asper IS 10500:2012 by a third party and half yearly ground water compliance report was also submitted to ground water department, Medak												
Root	Lack of awareness												
Description of Non Compliance	Monthly level monitoring of observation wells and reporting shall be compiled to Ground Water department as per NOC.												
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Document Evidence	1.Ground water Annual Monitoring plan 2023-2024 2.Enclosure of Wells water quality reports along with Half yearly Ground water submission report to ground water department, Medak									1.Photographs of the pipeline system from toilet to STP																				
Actual date of closing	23.05.2023													30.05.2023																
Preventive Action	Will revew the	complete wells	water quality	requirements and	udpate the same	with all	requirements							Periodic and in	20	cond	and ouner	11	suc	ensure the	compliance									
Corrective Action	As per Ground water NOC	Conditions we made a ground	water annual monitoring plan	and complied ground water	quality analysis once in six		parameters asper IS	10500:2012 by a third party	and enclosed all wells water	quality reports along with half	yearly ground water	ance	water department, Medak	As per the TSPCB CFO		piping system from tollet at	gate no.2 to STP and pumping	the domestic sewage to STP	and after treatment the water	is being used for gardening										
Root	Lack of	awareness			1100000									Due to	oversight															
Description of	Water quality	monitoring of	observation wells	(twice in a year) as	per NOC.									As per Consent for	Operation, the site	should treat the		CH CO	wastewater in STP	and utilize the STP	treated water in	gardening. At plant	entry gate, site has	installed soak pit	for sewage system	instead of	combining the	discharge of same	with the plant STP.	
Sno	2													m																

(S.RANGA RAO)
HEAD-ENGINEERING