Environmental, Health & Safety Management System Manual

LG/EHS/A/01

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History of Revisions

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00	01.09.2012	New	First Issue
01	12.12.2012	Abbreviations	Updated Abbreviations
		Chapter 3	Updated Definitions
		Chapter 5	Updated revised EHS Policy

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ABBREVIATIONS

LG - LODHA GROUP
MD - Managing Director
COO - Chief Operating Officer
EHS - Environment Health and Safety
EHSMS - Environment Health and Safety Management System
OHSAS - Occupational Health Safety Auditing System
EHS - Environment Health and Safety
HIRAC - Hazard Identification Risk Assessment and Control measures
EIAC - Environmental Impact Assessment and Control
DMP - Disaster Management Plan
EPRP - Emergency Preparedness and Response Plan
NC - Non Conformity
CAPA - Corrective Action and Preventive Action
RoR - Register of Regulation
MA - Management Appointee
MR - Management Representative
HR - Human Resource
ADM - Administration
P&D - Planning & Design
ENGG - Engineering
PROC - Procurement
CONTR - Contract
PROJ - Project
OCP - Operational Control Procedure
P - Procedure
R - Register
F - Format

1.0 ORGANIZATION PROFILE

Established in 1980, LODHA GROUP is a premier real estate developer headquartered in Mumbai. The Group is currently developing in Mumbai, Thane, Pune and Hyderabad making it one of the largest developers in the country. The group is now expanding into Western and Southern India. In addition, it works with leading financial Institutions, designers and product manufacturers to bring together the most premium products for its customers.

The Group focuses on development of residences and office spaces in various formats including standalone projects, IT campuses, weekend retreats and townships. From luxury garden residences in South Mumbai to large integrated townships in the suburbs, the group caters to diverse consumer needs across all segments. The Group currently employs over 3000 professionals. With a vision to build better lives, LODHA GROUP exceeds the expectations of customers through innovative, world-class solutions, thereby creating value and at the most opportune moment. The LODHA GROUP Group seeks to build a Better Life for its customers by leveraging its core strengths – the 5 Ls of Leadership, Luxury, Lifestyle, Location and Legacy - to create landmarks of exemplary quality and design that conform to the highest standards of international living with all EHS confirmations

2.0 PURPOSE, SCOPE AND APPLICATION

The Environment Health and Safety Management System (EHSMS), based on international standard BS OHSAS 18001:2007 has been established to achieve and demonstrate sound Environment health and safety performance by controlling EHS risks, consistent with organizations EHS policy and objectives.

EHSMS is part of LODHA GROUP's overall management system and includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources needed for the continual improvement of EHS performance and the assurance of conformity to policy set in this regard.

Conformity to the BS OHSAS 18001:2007 standard is integrated entirely and no exclusions are contemplated. However with respect to policy, though the organization has adopted an integrated Environment Health & Safety Policy, statements pertaining only to EHS are under the purview of the EHSMS established.

LODHA GROUP has adopted and implemented EHSMS towards construction of its entire range of products (residential, commercial and integrated township) in India including relevant Corporate Functions (Engineering, Planning & Design, Administration, Human Resources, Finance, Internal Audit, and Procurement & Contracts).

Currently, EHSMS is being implemented at LODHA GROUP- Corporate office, World One Project and New Cuffe Parade Project. Subsequently, EHSMS will be implemented across all projects.

3.0 DEFINITIONS

a. Audit

Systematic, independent and documented process for obtaining "audit evidence" and evaluating it objectively to determine the extent to which "audit criteria" are fulfilled

b. Acceptable Risk

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

c. Continual Improvement

Recurring process of enhancing the EHS management system in order to achieve improvements in overall EHS performance consistent with the organization's EHS Policy

d. Correction

Action to eliminate the determine non conformity.

e. Corrective Action

Action to eliminate the cause of a detected nonconformity or other undesirable situation

f. Document

Information and its supporting medium

g. Hazard

Source, situation, or act with a potential for harm in terms of human injury or ill health or a combination of these

h. Hazard identification

Process of recognizing that a hazard exists and defining its characteristics

i. Ill health

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

j. Incident

Work related event in which an injury or ill health or fatality had occurred, or could have occurred

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

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

k. Interested Party

Person or group, inside or outside the workplace, concerned with or affected by the OH&S performance of an organization

l. Nonconformity

Non – fulfillment of a requirement

m. Environment Health & Safety

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

n. EHS Management System

Part of an organization's management system used to develop and implement its EHS policy and manage its EHS risks

o. EHS Objectives

EHS goal, in terms of EHS performance, that an organization sets itself to achieve

p. EHS Performance

Measurable results of an organization's management of its EHS Risks

q. EHS Policy

Overall intentions and direction of an organization related to its EHS performance as formally expressed by top management

r. Organization

Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own function and administration

Here, Organization means LODHA GROUP.
The organization and LODHA GROUP are used interchangeably in this document.

s. Preventive Action

Action to eliminate the cause of a potential nonconformity or other undesirable potential situation

t. Procedure

Specified way to carry out an activity or a process

u. Record

Document stating results achieved or providing evidence of activities performed

v. Risk

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

w. Risk Assessment

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

x. Workplace

Any physical location in which work related activities are performed under the control of the organization

NOTE When giving consideration to what constitutes a workplace, the organization should take into account the OH&S effects on personnel who are, for example, travelling or in transit (e.g.

driving, flying, on boats or trains), working at the premises of a client or customer, or working at home.

4.0 EHS MANAGEMENT SYSTEM REQUIREMENTS

4.1 General

Considering the outcomes of initial EHS review, LODHA GROUP has established, documented, implemented, and maintained EHS Management System in accordance with the requirements of OHSAS 18001: 2007. The Organization intends to continually improve its EHSMS.

The Organization has defined and documented the scope of its EHSMS in chapter 2.0.

The requirements of EHSMS and mechanism to fulfill these requirements as determined by the organization are documented here under chapter 4.2 to 4.6.

4.2 EHS Policy

Managing Director has approved and authorized LODHA GROUP's Environment, Health & Safety Policy (EHS Policy) considering the requirements as stipulated by OHSAS 18001:2007, legal and other requirements, and mission, vision, core values and beliefs of the organization with respect to Environmental, Health & Safety performance. EHS Policy duly authorized by MD is enclosed under chapter 5.0, Enclosure-I.

The documented EHS policy has been made available to all employees and stake holders. The intent of policy is explained to all employees & contractors through induction, discussions, training programs, display and other means as deemed appropriate. The EHS Policy has been displayed conspicuously for interested parties in project sites and corporate office

In order to ensure relevance and appropriateness of the policy, the organization intends to review its EHS Policy periodically as per the established procedure.
In line with EHS Policy, LODHA GROUP has established the corporate EHS objective as given below:

Continually improve EHS management to attain and maintain the level of "Zero Accident and Zero Hospitalization"

LODHA GROUP envisages achieving the corporate EHS objective by formulating and implementing appropriate objectives and programs (technically feasible, economically viable and commercially suitable) at relevant levels in the related domain as listed below but not limited to:

a. Application of safety engineering – elimination or substitution of risk
b. Inculcating safety culture – safety consciousness and accountability to safety
c. Ensuring competency – blending knowledge and skill
d. Effective engagement of stakeholders – participation, consultation and involvement

4.3 PLANNING

4.3.1 Hazard Identification, Risk Assessment and Determining Controls

LODHA GROUP has adopted a specific methodology for hazard identification and risk assessment that provides for proactive approach with respect to its scope, nature and timing. The methodology facilitates identification, prioritization and documentation of risks and the application of appropriate controls.

Applying this methodology, specially trained EHS Core Groups undertook Hazard Identification, Risk Assessment and Control (HIRAC) exercise for all project activities and corporate functions and prepared HIRAC Register LG/EHS/R/01 the Organization has determined EHS controls keeping in view the result of HIRAC.

For ongoing hazard identification, risk assessment, and control; the organization has established, implemented and maintained a documented procedure LG/EHS/P/01**.** The procedure addresses such requirements as stipulated under clause 4.3.1 of OHSAS Standard and provides for mechanism to manage the changes and keep the HIRAC Register up-to-date.

The Organization has taken into account EHS risk and determined controls for establishing, implementing and maintaining EHS Management System.

4.3.2 Legal and Other Requirements

LODHA GROUP has established, implemented and maintained a documented procedure LG/EHS/P/02 for identifying and accessing legal and other requirements that are applicable to it.

In accordance with the set procedure, the organization has identified EHS legal requirements as applicable to its processes and activities and other requirements to which it subscribes. A Register of Regulation, LG/EHS/F/01, listing identified legal and other requirements has been prepared. The applicable legal and other requirements have been taken into account in establishing, implementing and maintaining its EHS management system.

The Register of Regulation is kept up-dated as per the set procedure LG/EHS/P/02

The Organization communicates relevant information on legal and other requirements to employees, contractors and other interested parties as per the set procedure LG/EHS/P/02.

4.3.3 Objectives and Program(s)

Where practicable, measurable EHS objectives consistent with EHS Policy and Corporate EHS Objective have been established, implemented and maintained at relevant functions and levels. EHS objectives have been documented appropriately.

EHS risks and applicable legal and other requirements have been duly considered while establishing EHS objectives. The organization has also taken into account the available technological options, its business requirements and the views of the interested parties including its commitment to the prevention of injury and ill health and continual improvement.

Specific program including assignment of responsibility and authority, time frame, resources needed etc. has been established, implemented and maintained for each objective.

The organization contemplates ongoing establishment, review and updating of EHS objectives and program at regular and planned interval as per set procedure LG/EHS/P/03.

4.4 IMPLEMENTATION AND OPERATION

4.4.1 Resources, Roles, Responsibility, Accountability and Authority

At LODHA GROUP, top management takes ultimate responsibility for EHS management system. Top management demonstrates its commitment by:

a. Ensuring the availability of MOST EFFECTIVE resources essential to establish, implement, maintain and improve the EHS management system. Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.

b. Defining roles, allocating responsibilities and accountabilities, and delegating authorities, to facilitate effective EHS management. Defined roles, responsibilities, accountabilities and authorities are documented and communicated.

The Managing Director has appointed EHS Head as the Management Appointee with specific responsibility for EHS, irrespective of other responsibilities, and with defined roles and authority for:

a. Ensuring that the EHS management system is established implemented and maintained in accordance with OHSAS Standard.

b. Ensuring that reports on the performance of the EHS management system are presented to the top management for review and used as a basis for improvement of EHS management system.

The Organization has communicated the identity of the Management Appointee to all persons under its control.

The organization Structure of LODHA GROUP indicating functional demarcation and line of reporting is enclosed under chapter 5.0, Enclosure II. The EHS Authority & Responsibility Matrix is enclosed under chapter 5.0, Enclosure III.

4.4.2 Competence, Training and Awareness

The Organization ensures that all person(s) under its control performing tasks that can impact on EHS are competent. Competency is determined on the basis of appropriate education, training or experience and assured through the human resources acquisition and development processes. The records relevant to the competency of individual employee are maintained by the HR Department.

The organization has established implemented and maintained procedure LG/EHS/P/04**,** for enhancing the competence, training and awareness.

a. For identifying training needs associated with its EHS risks and EHS management system, EHS department provides training or taking other action to meet these needs, evaluating the effectiveness of the training or action taken, and retaining associated records.

b. For creating awareness amongst persons working under its control on

- The EHS consequences, actual or potential of their work activities, their behavior, and the EHS benefits of improved personal performance,
- Their roles, responsibilities and importance in achieving conformity to EHS Policy and procedures and to the requirements of EHS Management System including emergency preparedness and response requirements.
- The potential consequences of departures from specified procedures.

Training procedure LG/EHS/P/04 takes into account differing levels of responsibility, ability, language, skills, literacy and risk.

4.4.3 Communication, Participation and Consultation

With regards to its EHS hazards and EHS management system, Lodha has established, implemented, and maintained procedure LG/EHS/P/05 for effective communication, participation and consultation.

For communication:

a. Internal communication among the various levels and functions of the organization

b. Communication with contractors and other visitors to the work place

c. Receiving, documenting, and responding to relevant communication from external interested parties

For Participation and consultation:

a. Participation of workers by their appropriate involvement in HIRAC, incident investigation, development and review of EHS Policy and objectives

b. Consultation where there are any changes that affect their EHS

c. Representation on EHS matters

d. Consultation with contractors where there are changes that affect their EHS

The set procedure LG/EHS/P/05 also describes ways to inform workers about arrangements for their participation including their representatives on EHS matters. The procedure further contemplates consultation with relevant external interested parties, as appropriate, about pertinent EHS matters.

4.4.4 Documentation

EHS Management system documentation of LODHA GROUP consists of:

a. Environmental, Health & Safety (EHS) Policy

b. EHS Manual – defines scope of EHSMS, describes elements of EHSMS and their interaction (The present document) and provide reference to related documents

c. Procedures – includes procedures as mandated by OHSAS Standard, and Operational Control Procedures developed as control measures against identified unacceptable risks

d. Work Instructions – includes simplified and focused instruction for specific works/instruments

e. Formats – for records

f. Records – as necessary to demonstrate effective planning, operation and control of processes that relates to the management of its EHS risks

g. Other documents – includes guidelines, Online observation and compliance form, floor wise observation form, checklist, project safety plan, and emergency response plan

EHSMS documents are organized into four tiers. The documents become more specific down the tiers. Tier wise list of document and its main reference is summarized as under.

Tier	Name of Document	Based on requirement of
I	a. EHS Policy b. Apex Manual	OHSAS 18001:2007
II	a. Mandatory EHS Procedures b. Operational Control Procedures c. Guidelines d. Work Instructions	EHSMS Manual
III	a. Emergency Preparedness Response Plan b. Project EHS Plan c. Checklist	Tier II documents
IV	d. Formats & Records	Tier II & III documents

4.4.5 Control of documents

The Organization has established, implemented and maintained a documented procedure LG/EHS/P/06 for controlling EHSMS documents as listed at section 4.4.4. The procedure defines the controls needed to:

a. Approve documents for adequacy prior to issue

b. Review and update as necessary and re-approve documents

c. Ensure that changes and the current revision status of documents are identified

d. Ensure that relevant versions of applicable documents are available at points of use

e. Ensure that documents remain legible and readily identifiable

f. Ensure that documents of external origin are identified and their distribution controlled

g. Prevent the unintended use of obsolete documents and to apply suitable identification to them if they are retained for any purpose

4.4.6 Operational Control

Using the HIRAC process, LODHA GROUP has determined the operations and activities where implementation of controls is necessary to manage the EHS risks. For these operations and activities, the organization has implemented and maintained operational control procedures / guidelines / work instructions / checklists as appropriate and integrated them into overall EHSMS and online EHSMIS (Management information System).

The established control covers situations and operating criteria where their absence could lead to deviations from the EHS Policy and objectives.

Management of change is interwoven with EHSMS. The result/ effect of change on hazards/risks are determined by Hazard Identification, Risk Assessment and Control process as per procedure LG/EHS/P/01 Controls as necessitated by HIRAC are established and implemented.

The procedure LG/EHS/P/07 describes necessary elements and structure of operational controls to ensure effectiveness and uniformity of Operational Control Procedures established.

4.4.7 Emergency Preparedness and Response

LODHA GROUP has established, implemented and maintained a documented procedure LG/EHS/P/08 to provide a basis/ framework for establishment, implementation, periodic testing,

review and up-gradation of location specific Emergency Preparedness and Response Plan, also called as Disaster Management Plan.

In accordance with the prescribed framework, an Emergency Preparedness and Response Plans have been prepared and implemented at Head Office and Project Sites to prevent or mitigate associated adverse EHS consequences.

Emergency Preparedness and Response Plan is communicated and explained to all employees.

4.5 CHECKING AND CORRECTIVE ACTION

4.5.1 Performance Measurement and Monitoring

LODHA GROUP has established implemented and maintained documented procedure LG/EHS/P/09 to monitor and measure (both proactive and reactive) EHS performance on a regular basis. The procedure incorporates such elements as required by OHSAS Standard and provides for mechanism recording of data and results of monitoring and measurement sufficient to facilitate subsequent corrective action and preventive action analysis for improving the effectiveness of controls (for health as well as safety)

The Organization ensures that equipments used to monitor or measure EHS performance, are calibrated and maintained by the owner/ supplier of the equipments as per the manufacturer's instructions.

A copy of records of calibration and maintenance are obtained and maintained by the project site.

4.5.2 Evaluation of Compliance

Consistent with its commitment (as stated in EHS Policy) to comply with legal and other EHS requirements, LODHA GROUP has established, implemented and maintained documented procedure LG/EHS/P/02 for periodical evaluation of compliance with legal and other EHS requirements.

Records of the results of the periodic evaluations are maintained accordingly.

4.5.3 Incident Investigation, Nonconformity, Corrective Action and Preventive Action

4.5.3.1 Incident Investigation

LODHA GROUP has established, implemented and maintained a documented procedure LG/EHS/P/10 to report, record, investigate and analyze incidents in order to:

a. Determine the root causes of the incident

b. Determine corrective action and preventive action for prevention of recurrence

c. Identify opportunity for continual improvement

d. Communicate the result of such investigations

This Procedure provides for investigation in a timely manner. The results of incident investigation are documented and maintained as per procedure LG/EHS/P/10

Any identified need for corrective action and preventive action are dealt with in accordance with the established procedure LG/EHS/P/11, as mentioned in chapter 4.5.3.2.

4.5.3.2 Nonconformity, Corrective Action and Preventive Action

The Organization has established, implemented and maintained a documented procedure LG/EHS/P/11 for dealing with actual and potential nonconformity and for taking corrective actions and preventive actions.

The procedure incorporates such elements as required by clause 4.5.3.2 of OHSAS Standard and provides for mechanism to ensure:

a. Corrective action or preventive action taken to eliminate the causes of actual and potential nonconformity are appropriate to the magnitude of problems and commensurate with the EHS risks encountered

b. Proposed actions are taken through HIRAC where corrective action or preventive action identifies new or changed hazards or the need for new or changed controls

c. Necessary changes arising from corrective action and preventive action are made to the EHSMS documentation

4.5.4 Control of Records

LODHA GROUP establishes and maintains record as necessary to demonstrate conformity to the requirements of its EHS management system and OHSAS Standard, and the results achieved.

The organization has established implemented and maintained documented procedure LG/EHS/P/06, for identification, storage, protection, retrieval, retention and disposal of records.

The documented procedure includes provision to ensure that records remain legible, identifiable and traceable throughout the retention period.

4.5.5 Internal Audit

LODHA GROUP ensures that internal audits of EHSMS are conducted quarterly to:

a. Determine whether the EHS management system
    i. Conforms to planned arrangements for EHS management, including requirements of OHSAS Standard;
    ii. Has been properly implemented and maintained; and
    iii. Is effective in meeting the organization's policy and objectives
b. Provides information on the results of audits to management

The organization plans, establishes, implements and maintains Audit Programs keeping in view the results of risk assessments and the results of previous audits.

A documented Audit Procedure LG/EHS/P/11 has been established, implemented and maintained for periodic internal audit. The procedure addresses:

a. The responsibilities, competencies, and requirements for planning and conducting audits, reporting results and retaining associated records;

b. The determination of audit criteria, scope, frequency and methods; and

c. Objectivity and impartiality of the audit process in selection of auditors and conduct of audit.

4.6 Management Review

LODHA GROUP's EHS Management System is reviewed annually by Managing Director & COO as per established and documented procedure LG/EHS/P/12 to ensure its continuing suitability, adequacy and effectiveness.

The procedure incorporates such elements as required by clause 4.6 of OHSAS Standard and provides for mechanism to:

a. Assess opportunities for improvement and the need for change to the EHSMS including EHS policy and EHS objectives.
b. Make available the relevant outputs from management review for communication and consultation.

Records of Management Review is generated and maintained as per procedure LG/EHS/P/12.

5.0 Enclosures

Enclosure I	:	EHS Policy
Enclosure II	:	LODHA GROUP's Organization Structure
Enclosure III	:	EHS- Authority & Responsibility Matrix
Enclosure V	:	List of EHS Procedures & Relevant Formats
Enclosure V	:	Appointment notification of "Management Appointee"

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Enclosure I : EHS Policy

LODHA
BUILDING A BETTER LIFE

EHS POLICY

The Management philosophy at Lodha Group incorporates Environment, Health & Safety excellence as a core value. Along with our customers, contractors and suppliers, we share a vision of performing our operations in such a way as to avoid injury, ill health and adverse environmental impacts. The management of Lodha Group is committed to playing an active role in order to realize the following EHS principles:

- The continuous improvement of environment, health and safety protection (EHS) is an integral part of our business. To achieve this, we set measurable goals and monitor our performance against those goals. The EHS solutions should always be achieved in a progressive and effective way to ensure and strengthen positive safety culture in the organization.
- Everyone working under the Lodha Group umbrella shall be acquainted with the company guidelines and must accept responsibility through pre-emptive action and planning. This is also a requirement for contractors and vendors, who work for Lodha Group.
- We shall conduct our work in a manner that ensures the well-being of all employees, contractors, sub contractors, neighbors and the general public. We shall provide the necessary training and education to enable our employees to understand and perform their duties and comprehend their responsibilities.
- We shall implement mechanisms to communicate with, and obtain input from, employees, customers, contractors and other interested parties subject to the improvement of EHS Management System of Lodha Group.
- We shall strive to comply with applicable legal and other requirements, latest International Industry standard requirements such as OHSAS 18001, ISO 14001 and ISO 9001 as well as apply our own "best practice" standards.

At Lodha Group the above EHS principles stand as a solid foundation to which all of our activities stem from. Adherence to the environment, health and safety practices in the company will be held in the highest regard.



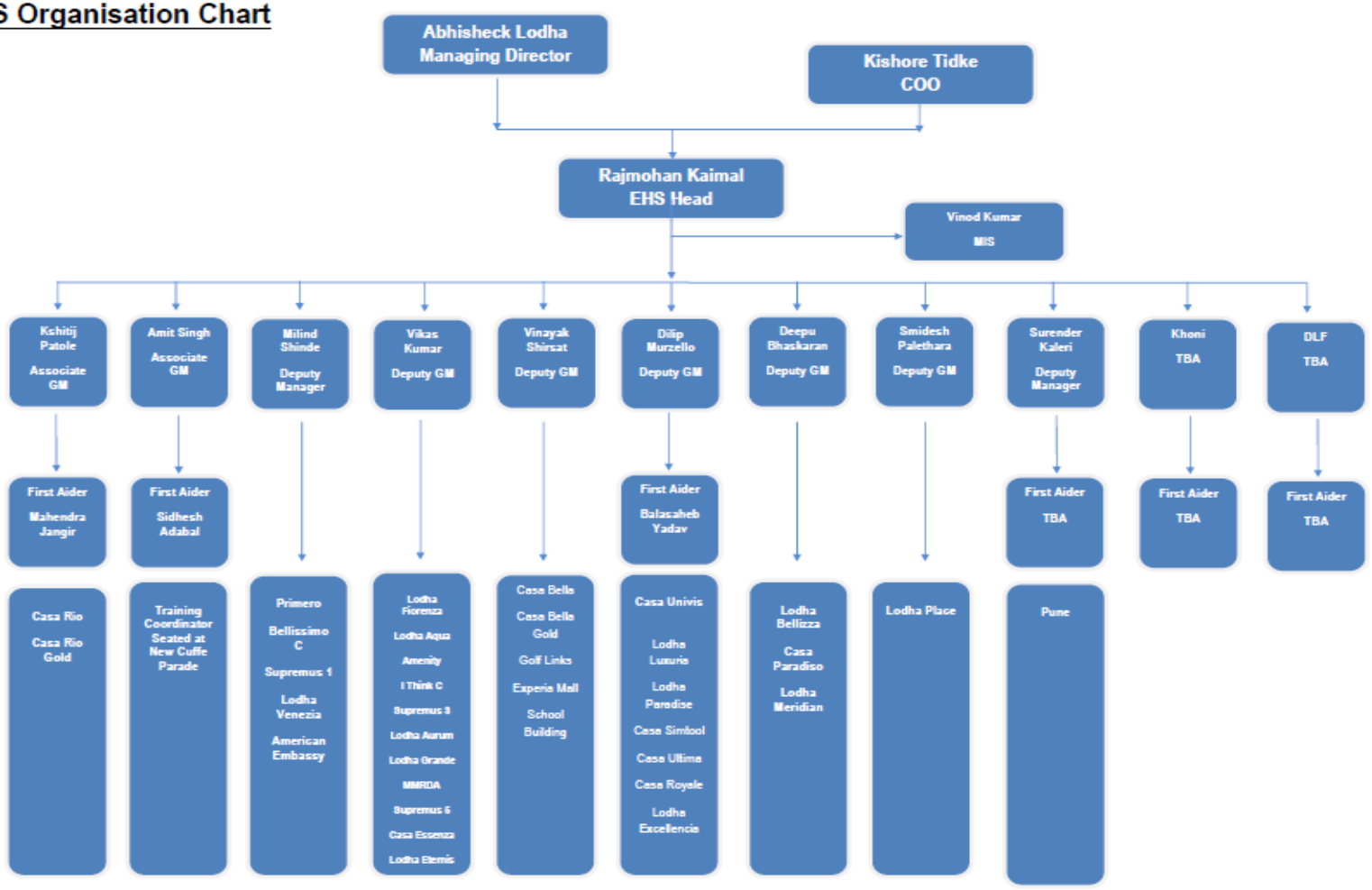
Abhisheck Lodha
Managing Director

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Enclosure II : THDC's Organization Structure

EHS Organisation Chart



Note: Corporate EHS Head is the Management Appointee as per clause no. 4.4.1 of OHSAS 18001:2007

Enclosure III : EHS- RRA&A Matrix

EHS- AUTHORITY & RESPONSIBILITY MATRIX

EHS Authority Matrix

Clause No.	Clause of ISO 14001:2004 & OHSAS 18001:2007	MD	COO	Head Procurement	Head Contracts	VP / GM Projects	Head Quality	Head EHS / Area Manager EHS	Head Asset Mgmt.	Head HR	Project Manager	Manager - EHS
4.1	General Requirements	ADC	ADC	AIC	AKL	AID	AIC	AID	AIC	AKL	AID	AIC
4.2	EHS Policy	ADC	ADC	AIC	AIC	AIC	AIC	AIC, AID, AFD	AIC	AIC	AIC	AIC
4.3	Planning	AKC	AKC	AIC	AIC	ADC	AID/AIC	AID	AIC	AFP	ADC.AIC	AIC
4.3.1	Planning for Hazard identification, Risk assessment & Risk control	AKC	AKC	AKL	AKL	AFP	AIC	AFD, AID	AKL	AKL	AIC	AIC
4.3.2	legal and other requirements	AKC	AKC	AIC	AFP	AIC	AIC	AID	AFP	AKL	AIC	AIC,AFD
4.3.3	EHS Objectives	AKC	AKC	AKC	AKL	AIC	AIC	AIC	AIC	AFP	AIC	AIC
4.3.4	EHS Management Programs	AKC	AKC	AFP	AKL	AIC	AIC	AIC	AIC	AKL	AIC	AIC
4.4	Implementation & Operation	ADC	ADC	AFP	AKL	AIC	AKL	AIC	AIC,AKL	AKL	AIC	AIC
4.4.1	Structure & Responsibility	ADC	ADC	AKL	AKL	AIC	AKC	AIC	AIC	AIC	AIC	AFD
4.4.2	Training, Awareness & Competence	AKC	AKC	AKL	AKL	AFP	AIC, AFC, AFD	AIC,AKC	AKL	AFC, AID AKC	AKL	AIC
4.4.3	Consultation and communication	ADC	ADC	AFP	AKL	ADC	AIC/AKC	AIC	ADL	AFP	ADC	AFP,AIC
4.4.4 & 4.4.5	Documentation /Document and data control	ADC	ADC	AFP	AFP	AFP	AFP	AFD	AFP	AFP	AFP	AID,AIC
4.4.6	Operational Control	ADC	ADC	AFP	AKL	AIC	AKL	AKC, AFD, AFP	AFP	AKC	AIC	AFD,AIC
4.4.7	Emergency Preparedness & Response	ADC	ADC	AFP	AKL	ADC	AFP	AFP	AKC	AFP	AKL	AIC
4.5	Checking & Corrective action	AKC	AKC	ADL	AKL	ADC	ADL	AFP	ADL	AFP	ADC	AFD,AIC
4.5.1	Performance Measurement & monitoring	AKC	AKC	AFP	AKL	AKL	AIC	AKL	AIC	AKL	AKL	AIC
4.5.2	Incidence, non conformance & corrective & preventive action	AKC	AKC	AIC	AKL	ADC	ADL	AFP	AIC	AFP	ADC	AFD,AIC
4.5.3	Records & Records Management	ADC	ADC	AKL	AKL	ADC	AID	ADC, AIC, AFP, AKC	AFP	AFP	ADC	AIC
4.5.4	Audit	AKC	AKC	AKL	AKL	AKC	AFP	ADC	AKC	AKL	AKC	AIC
4.6	Management Review	ADC	ADC	AIC	AIC	AIC	AIC	AIC	AIC	AIC	AIC	AFP,AKL

Where ADC – Authority to Decide Completely; ADL – Authority Limited as may be specified in the documented procedure; AIC – Authority to implement completely; AKL – Authority to information limited as per documented procedure; AKC – Authority to get complete information; AID – Authority to get implemented completed as per documented procedure; AFD – Authority to demand and get facilitation completely as per responsibility matrix; AFP – Authority to provide facilitation completely as per responsibility matrix.

EHS Responsibility Matrix

Clause No.	Clause of ISO 14001:2004 & OHSAS 18001:2007	MD	COO	Head Procurement	Head Contracts	VP / GM Projects	Head Quality	Head EHS / Area Manager EHS	Head Asset Mgmt.	Head HR	Project Manager	Manager - EHS
4.1	General Requirements	D	D	I	K	I	I	I	I	K	I	I
4.2	EHS Policy	D	D	I	I	I	I	I	I	I	I	I
4.3	Planning	D	D	I	K	D	I	D	I	F	I	I
4.3.1	Planning for Hazard identification, Risk assessment &Risk control	K	K	K	K	F	I,K	I,F	K	K	I,F	I,F
4.3.2	legal and other requirements	D	D	I	F	I	I	I	F	K	I	I,F
4.3.3	EHS Objectives	D	D	K	K	I	I	I	I	F	D	I
4.3.4	EHS Management Programs	D	D	F	K	I	I	I	I	K	I	I
4.4	Implementation & Operation	D	D	F	K	I, K	I,K	I,K	I,K	K	I,K	I
4.4.1	Structure &Responsibility	D	D	K	K	I	I	I	I	I	D	I,F
4.4.2	Training, Awareness & Competence	K	K	K	K	F	I,K	I,K	K	D,I,F,K	I,K	I
4.4.3	Consultation and communication	D	D	F	K	D	K	I	D	F	D	I,F
4.4.4 & 4.4.5	Documentation /Document and data control	D	D	F	F	F	F	D	F	F	F	I
4.4.6	Operational Control	D	D	F	K	I	K	F	F	K	I	I,F
4.4.7	Emergency Preparedness &Response	D	D	F	K	D	F	F	K	F	D	I
4.5	Checking &Corrective action	D	D	D	K	D	D	F	D	F	D	I
4.5.1	Performance Measurement & monitoring	K	K	I	K	K	I	D	I	K	I,K	I
4.5.2	Incidence, non conformance & corrective &preventive action	K	K	I	K	D	D	F	I	F	D	I
4.5.3	Records &Records Management	K	K	K	K	D,K	D,I,K	D,I,F,K	F	F	D,I	I
4.5.4	Audit	K	K	K	K	K	F	D	K	K	K	I
4.6	Management Review	D	D	I	I	I	I	I	I	I	I	K,F

Where appropriate responsibility is denoted by DKIF, limited by delegation of powers / area of control / level of operations.
D – Deciding; K – Knowledge Only; I – Implementing; F – Facilitating

Enclosure IV : List of EHS Procedure & relevant formats

List of Mandatory EHS Procedure and relevant formats

S. No.	Procedure Title	OHSAS Clause Reference	Procedure no.	Format Title	Format No.
1	Procedure for Hazard Identification, Risk Assessment and determining Controls	4.3.1	LG/EHS/P/01	HIRAC	LG/EHS/004/RA
2	Procedure for Legal & other requirements.	4.3.2	LG/EHS/P/02	RoR EHS Legal compliance	LG/EHS/F/01 LG/EHS/F/02
3	Procedure for Objectives & programme(s)	4.3.3	LG/EHS/P/03	EHS Objective(s) & Programme(s)	LG/EHS/F/03
5	Procedure for Competence, training & awareness	4.4.2 4.4.7	LG/EHS/P/04	Training Calendar Training Record Training Feedback	LG/EHS/F/04 EHS/HO/001
6	Procedure for Communication, participation & consultation	4.4.3	LG/EHS/P/05	External comm. Register Safety Committee MOM	LG/EHS/F/05

S. No.	Procedure Title	OHSAS Clause Reference	Procedure no.	Format Title	Related Format No.
7	Procedure for Documentation, Control of documents & Control of records	4.4.5 4.5.4	LG/EHS/P/06	Master list of documents	LG/EHS/F/06
8	Procedure for Operational Control	4.4.6 4.3.1	LG/EHS/P/07		
9	Procedure for Emergency preparedness & response	4.4.7 4.5.3	LG/EHS/P/08	Fire Extinguisher Record First aid Boxes Record Emergency contacts Fire fighting team First Aid Team Rescue Team Mock drill Report	EHS/HO/004 EHS/HO/005 EHS/HO/008 EHS/HO/009 EHS/HO/010 EHS/HO/011 EHS/HO/012
10	Procedure for Performance measurement, monitoring & evaluation of compliance	4.5.1 4.5.2 4.3.2	LG/EHS/P/09	Safety performance record	EHS/HO/023
11	Procedure for Incident Investigation, non-conformity, corrective action & preventive action	4.5.3.1 4.5.3.2	LG/EHS/P/10	Incident Reporting Incident Reporting and Investigation Report	EHS/HO/13 EHS/HO/14

S. No.	Procedure Title	OHSAS Clause Reference	Procedure no.	Format Title	Related Format No.
12	Procedure for Internal Audit, Non-conformity and implementation of corrective action & preventive action	4.5.5 4.5.3.2	LG/EHS/P/11	Annual audit plan Audit schedule List of internal auditors Audit NC report Audit summary report	LG/EHS/F/07 LG/EHS/F/08 LG/EHS/F/09 LG/EHS/F/10 LG/EHS/F/11
13	Procedure for Management Review	4.6 4.4.3	LG/EHS/P/12	MOM	LG/EHS/F/12

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LODHA

BUILDING A BETTER LIFE

Date : 07th November, 2012

Appointment of Management Appointee-EHSMS

&

Appointment of Management Representative-OHSAS 18001-2007

In response to requirement specified under clause 4.4.1, OHSAS 18001 standards for Occupational Health and Safety Management System (OH&SMS), Mr. Kaimal Rajmohan, Head-EHS, LODHA Group is appointed as "Management Appointee-EHSMS (MA)"and Mr. Amit Singh, AGM-EHS appointed as "Management Representative –OHSAS- 18001 -2007(M.R)"with immediate effect. As Management Appointee, he is assigned, over and above his routine responsibilities, the following specific responsibility to;

1. Ensure that OH&SMS is established, implemented and maintained in accordance with OHSAS 18001.
2. Ensure that report on the performance of OH&SMS is presented to top management for review and used as a basis for improvement of OH&SMS.

All concerned at Head Office and site(s) ~~required~~ requested to extend necessary support to Management Appointee & Management Representative towards establishment, implementation and maintenance of OH&SMS as per international standard OHSAS 18001:2007.

Best Regards,

Abhisheck Lodha

Managing Director

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