



ADANI TOTAL GAS LIMITED

QUALITY, HEALTH, SAFETY AND ENVIRONMENT

QUALITY, HEALTH, SAFETY AND ENVIRONMENTAL – APEX MANUAL

Doc No: AGL/QHSE/AM

| | Prepared By: | Approved By: | Issued By: |
|--------------------|--|--------------|--------------|
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| Signature: | JS/HS/RG | PKG | PKG |
| Date: | 01.06.2020 | 01.06.2020 | 01.06.2020 |

ABBREVIATIONS

| | | |
|-------------|----|---|
| ATGL | -- | Adani Total Gas Ltd. |
| ISO | -- | International Organizations for Standardization |
| CCOE / PESO | -- | Chief Controller of Explosives/Petroleum & Explosives Safety Organization |
| DCTM | -- | Department Core Team Member |
| HSEC | -- | Health, Safety & Environmental Committee |
| OISD | -- | Oil Industry Safety Directorate |
| IMS | -- | Integrated Management System |
| QHSE | -- | Quality, Health Safety and Environment |
| QMS | -- | Quality Management System |
| EMS | -- | Environment Management System |
| OH&SMS | -- | Occupational Health & Safety Management System |
| MR | -- | Management Representative |
| HOD | -- | Head of Department |
| AM | -- | Apex Manual |
| SP | -- | System Procedure |
| OP | -- | Operational Procedure |
| OCP | -- | Operating Control Procedure |
| WI | -- | Work Instruction |
| RD | -- | Reference Documents |
| AVP | -- | Associate Vice President |

| | | |
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| | | |
|---------|----|---|
| Tech. | -- | Technical |
| PNG | -- | Piped Natural Gas |
| CNG | -- | Compressed Natural Gas |
| ANNEX | -- | Annexure |
| GPCB | -- | Gujarat Pollution Control Board |
| HIRA | -- | Hazard Identification & Risk Assessment |
| MOC | -- | Management of Change |
| PPE | -- | Personal Protective Equipment |
| ERDMP | -- | Emergency Response and Disaster Management Plan |
| MGT | -- | Management (Leadership Management) |
| E&P | -- | Engineering & Projects Dept. |
| HRM | -- | Human Resource Dept. |
| F&A | -- | Finance & Accounts |
| MAT | -- | Purchase & Stores |
| O&M | -- | Operation & Maintenance Department |
| MNT | -- | Maintenance Section Of O&M Dept. |
| CNG O&M | -- | CNG Section Of O&M Dept. |
| OPN | -- | Operation Section Of O&M Dept. |
| DOM | -- | Domestic Construction Dept. |
| Dept. | -- | Department |

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1. Scope

1.1 Approval

| PREPARED BY | DESIGNATION | SIGNATURE | DATE |
|--------------|-------------|-----------|------------|
| Jignesh Shah | Manager | JHS | 01-06-2020 |

| APPROVED BY | DESIGNATION | SIGNATURE | DATE |
|--------------------|-----------------|-----------|------------|
| Pranab Kumar Ghosh | HEAD - HSE & AI | PKG | 01-06-2020 |

| ISSUES BY | DESIGNATION | SIGNATURE | DATE |
|--------------------|-----------------|-----------|------------|
| Pranab Kumar Ghosh | HEAD - HSE & AI | PKG | 01-06-2020 |

1.2 Amendment Sheet of Apex Manual

This QHSE Manual has prepared by QHSE – IMS COORDINATOR and approved by Business HSE Head

The amendment(s) will be recorded by the QHSE - MR and controlled copy holders will be informed for replacing the modified pages/ Documents.

The custodian of controlled copy will replace the amendments and dispose the obsolete copy through environment friendly appropriate means.

Records of such amendments are as follows:

[illegible]

1.3 Authorization of Apex Manual

This Document is written as per the requirements of ISO 9001:2015 International Standards for Quality Management Systems, ISO 14001:2015 Environment Management System and ISO 45001:2018 Standard for Occupational Health & Safety Management System. This document is the QHSE Manual for the Company and describes the Policies, Objectives and IMS Planning with reference to procedures and processes.

The documented system follows the process approach as defined within the International Standards and is based on the Plan-Do-Check-Act methodology and risk-based thinking for continual improvement. Customer Satisfaction, Environmental Protection and providing Safe and Healthy work culture are the drive for improvement programs. Key operation processes & services, support functions and their controls are referred in this document.

The Quality Management Principles viz. Customer Focus, Leadership, Engagement of People, Process Approach, Improvement, and Evidence based Decision Making and relationship Management is reflected within defined systems. Risks related to Quality, Health, Safety and Environment have been assessed as per internal systems and controls have been defined accordingly.

The system has inbuilt capabilities for planning, operating, and controlling processes to arrive at products or results as per planned arrangements. Monitoring and measurement activities carried at appropriate stages to endorse compliance with customer requirements, applicable regulations, concerns of the interested parties and progress on improvement programs.

The management and work force are committed to meet the QHSE management system requirements by implementing this documented system in the best spirit and improve on it by periodic reviews.

This manual is released under the authorization of the undersigned and no changes are to be made unless otherwise reviewed by the QHSE – MR. This manual is the property of Adani Total Gas Ltd. and contains vital information restricting its circulation. Read-only copies will be available at Portal in PDF File.

Date: 01ST June 2020

Associate Vice President
(Head HSE)

1.4 IMS Manual Controlling and Distribution

QHSE - MR is authorized by Business HSE Head to carry out the activities of preparing, issuing, maintaining, and up-dating of this QHSE Manual.

The distribution of the Manual and the amendment(s) are controlled and this activity is carried out by QHSE – MR.

The Original Copy will bear the signatures of the approving and issuing authority in original. Controlled copies in PC/Server are available as 'Read Only/ pdf' files and password protected. The matter updated will be highlighted with "bold" font.

Additional copies of the Manual, required by external agencies, if any, will be issued by QHSE – MR and such copies of the Manual issued will be stamped/ watermark as "UNCONTROLLED". These uncontrolled copies do not come under the purview of Adani Total Gas Limited QHSE management system, however it is for reference purpose only.

Distribution for controlled copies of QHSE - Manual is as under:

| SR. NO | MANUAL HOLDER | Control Mechanism |
|---------------|------------------------|--|
| 01 | QHSE – MR | Soft Copy – Master Copy (.pdf) |
| 02 | CEO | Soft Copy – Controlled Copy Read Only (.pdf) |
| 03 | All Departments & HODs | Soft Copy - Controlled Copy Read Only (.pdf) |

Note:

QHSE Manual, objectives & Targets, SP, OP and Formats in electronic format shall be accessible through Adani Gas Portal to all users through following path:

Log on to Adani Portal and click on QHSE Document tab as below:



MR (QHSE) shall be the only authorized person to undertake any change/modification in this QHSE Manual and Procedures.

All documents have been reviewed for incorporation of changes if any. Wherever changes were required, we have made the changes.

1.5 About Adani Total Gas Limited.

Adani Total Gas is developing City Gas Distribution (CGD) Networks to supply the Piped Natural Gas (PNG) to the Industrial, Commercial, Domestic (residential) and Compressed Natural Gas (CNG) to the transport sector. Natural Gas is a convenient, reliable and environment friendly fuel that allows consumers to enjoy a high level of safety, convenience and economic efficiency.

AGL has JV with India's biggest downstream player (Indian Oil) as well as with one of the world's leading International Oil Company (TOTAL).

The company has already set up city gas distribution networks in Ahmedabad, Vadodara in Gujarat, Faridabad in Haryana and Khurja in Uttar Pradesh. With the recently concluded CGD bid rounds, Adani Gas Limited and Indian Oil Adani Gas Pvt Ltd (JV Partner) would expand its presence in 38 Geographical Areas present in 71 districts spread over 15 states of India and covering about 8 % of its population.

Adani Gas Limited has successfully implemented City Gas Distribution (CGD) projects in Ahmedabad, Vadodara, Faridabad and Khurja. It has also started project work in new Geographical areas.

AGL has substantial operational experience in the natural gas sector:

- Laid over 7,600 kms of pipelines
- Over 0.44 million domestic PNG customers served
- 134 CNG stations serving over 0.5 million vehicles per day

Adani Gas ensures 100% automated supervision of its assets in all operational CGD network in all GAs through SCADA.

Adani Gas Receives Golden Peacock HR Excellence Award 2020

For more information please refer out website – www.adanigas.com

2. Normative References

The following documents, in whole or in part, are normatively referred in this QHSE manual and are indispensable for its application. For undated references, the latest edition of the referenced document (including any amendments) applies.

| STANDARD CODE | STANDARD NAME |
|----------------|---|
| ISO 9000:2015 | Quality Management systems – Fundamentals and vocabulary |
| ISO 14004:2015 | Environment Management System-Guidelines on principles, system & support techniques |
| ISO 19001:2018 | Guidelines for auditing management systems |
| ISO 45001:2018 | Occupational health and safety management systems |

3. Terms and Definitions

Terms and definitions are given as per the reference standard ISO 14001 ver. 2015 EMS and ISO 45001 ver. 2018 OHSMS. In addition, terms and definitions used in Adani Total Gas Ltd. are also applies.

3.1 Terms

| Sr. No. | Term | Definition |
|---------|-----------------------|--|
| 1 | Process | A set of interrelated or interacting activities which transforms inputs to outputs. |
| 2 | Product | Result of a process and includes services. |
| 3 | Auditor | Person with the competence to conduct audit. |
| 4 | Management System | System to establish policy and objectives and to achieve those objectives |
| 5 | Customer Satisfaction | Customer perception of the degree to which customer requirements have been fulfilled. |
| 6 | Risk | Effect of Uncertainty on an expected result |
| 7 | Procedure | Specified way to carry out an activity or process. |
| 8 | Conformity | Fulfillment of a requirement. |
| 9 | Corrective Action | Action to eliminate the cause(s) of a nonconformity or an incident and to prevent recurrence |
| 10 | Correction | Action to eliminate a detected non conformity. |
| 11 | Concession | Permission to use or release a product or service that does not conform to specified requirements. |

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| Sr. No. | Term | Definition |
|---------|-----------------------------|--|
| 12 | Context of the organization | Business environment combination of internal and external factors and conditions that can have an effect on an organization approach to its product, Service and investment and interested parties |
| 13 | Strategy | Planned activities to achieve an objective |
| 14 | Innovation | Process resulting in a new or substantially changed object |
| 15 | Knowledge | Available collection of information being a justified belief and having a high certainty to be true |
| 16 | Objective evidence | Data supporting the existence or verify something. |
| 17 | Infrastructure | System of facilities, equipment and services needed for the operation of the organization. |
| 18 | Characteristic | Distinguishing feature |
| 19 | Work environment | Set of conditions under which work is performed. |
| 20 | Effectiveness | Extent to which planned activities are realized and planned results are achieved. |
| 21 | Continual Improvement | Recurring activity to increase the ability to fulfill requirements. It's a process of enhancing the system to achieve improvements in overall performance in line with the organization's policy. The process need not take place in all areas of activity simultaneously. |
| 22 | Environment | Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation. Surroundings in this context extend from within an organization to the global system. |
| 23 | Environmental Impact | Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities. |
| 24 | Objectives | Overall goals, arising from the HSE Policy, that an organization sets itself to achieve, and which is qualified where practicable in terms of QHSE performance. |
| 25 | Audit | A systematic and documented examination of objectively obtaining and evaluating evidence to determine whether an organization's activities and related results conforms to the planned arrangements and audit criteria set by the organization, and whether these arrangements are |

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| Sr. No. | Term | Definition |
|---------|-------------------------|---|
| | | implemented effectively as suitable to the organizations policy. It includes further communication of the results of this process to management |
| 26 | EHS Performance | Measurable results of the EHS, related to an organizations control of its environmental aspects, health and safety risks based on its Health Safety and Environment Policy, objectives and targets. |
| 27 | Policy | Intentions and direction of an organization (3.1), as formally expressed by its top management |
| 28 | OHS Policy | Policy to prevent work-related injury and ill health to workers and to provide a safe and healthy workplace |
| 29 | Targets | Detailed performance requirement, quantified where practicable, applicable to the organization or parts thereof, that arises from the EHS objectives and that needs to be set and met in order to achieve those objectives. |
| 30 | Organization | Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration. |
| 31 | Prevention of pollution | Use of processes, practices, materials that avoid, reduce or control pollution, which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution. |
| 32 | Non-Conformance | Non fulfillment of requirement. Any deviation from work standards, practices, procedures, regulations, management systems performance etc. which could directly or indirectly lead to product failure, deviations form documented system, injury, illness, property damage, damage to environment or combination of these |
| 33 | Boundary | Physical or site limits and/or organizational limits as defined by the organization. |
| 34 | Scope | Extent of activities, facilities and decisions which the organization addresses through an EHS, which can Include several boundaries |
| 35 | Top management | Person or group of people who directs and controls an organization at the highest level. |

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| Sr. No. | Term | Definition |
|---------|------------------------------|---|
| 36 | Documented Information | Information required be controlling and maintaining by an organization and the medium on which it is contained. |
| 37 | Hazard | Source with a potential to cause injury and ill health |
| 38 | OH&S risk | Combination of the likelihood of occurrence of a work-related hazardous event or exposure(s) and the severity of injury and ill health (3.18) that can be caused by the event or exposure(s) |
| 39 | OH&S opportunity | Circumstance or set of circumstances that can lead to improvement of OH&S performance |
| 40 | Injury and ill health | Adverse effect on the physical, mental or cognitive condition of a person |
| 41 | Occupational Health & Safety | Conditions and factors that affect, or could affect, the health and safety of employees or other workers (including temporary workers and contractor personnel), visitors, or any other person in the workplace |
| 42 | OHS Management System | Part of an organization's management system used to develop and implement its OH&S policy and manage its OH&S risks |
| 43 | OHS Performance | Measurable results of an organization's management and its OH&S risks |
| 44 | OH&S management system | Management system or part of a management system used to achieve the OH&S policy |
| 45 | Risk – OHSMS | Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or ill health that can be caused by the event or exposure(s) |
| 46 | Risk Assessment | Process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable |
| 47 | Work Place | Place under the control of the organization where a person needs to be or to go for work purposes |
| 48 | Interested Party – EMS | Person or group that can affect, be affected by, or perceive itself to be affected by a decision or activity. |
| 49 | Interested Party – OHSMS | Person or organization (3.1) that can affect, be affected by, or perceive itself to be affected by a decision or activity |

| Sr. No. | Term | Definition |
|---------|---------------------|---|
| 50 | Work Environment | Set of conditions under which work is performed |
| 51 | Accident | Undesired event giving rise to death, ill health, injury, damage or other loss. |
| 52 | Incident | Occurrence arising out of, or in the course of, work that could or does result in injury and ill health |
| 53 | Organization | Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives |
| 54 | Employees (Workers) | Person performing work or work-related activities that are under the control of the organization |
| 55 | Participant | Involvement in decision-making |
| 56 | Consultation | Seeking views before making a decision |
| 57 | Contractor | External organization providing services to the organization in accordance with agreed specifications, terms and conditions |
| 58 | Outsource | Make an arrangement where an external organization performs part of an organization's function or process |

Note: Please refer standards of ISO and Cover Page for terms and definition

4. Context of the Organization

4.1 Understanding the Organizations and its Context

Adani Total Gas Ltd. has established, implemented and maintained documented information of external and internal issues "MGT 219 - Context of the Organization" that are relevant to its purpose, strategic direction and affect our ability to achieved intended outcome of QHSE management system and satisfy our customers & stake holders, as well as factors that may adversely affect the stability of our processes, or our QHSE management system integrity.

Adani Total Gas Ltd. has list out issues and their effects (positive & negative) relevant to the QHSE management system in the defined document MGT 219 – Context of the organization.

- **Internal issues:** Adani Total Gas Ltd. has identified internal issues related to values, culture, knowledge, skill development, legal requirements, and performance of the organization.
- **External issues:** Adani Total Gas Ltd. has identified External issues related to legal, technology upgradation, competitive, market, cultural, social, and economic environments, whether international, national, regional or local of the organization.

Adani Total Gas Ltd. has reviewed and monitored MGT-219: Context and related internal & external issues at once in year and the changes should be discussed in the Management review meeting.

The output from this activity has maintained as input evidence to the consideration of risks & opportunities, and the actions that we take to address them. Refer to section 6.1 for more information about the risk & opportunity management frame work.

External and internal Issues has determined and maintained as information through brainstorming, past experience, suggestion/ complaints from interested parties, waste management facilities, trends of resource consumption, conducting interviews with relevant people and/or organizations, human behavior, the design of work areas, processes, installations, machinery / equipment, operating, condition of facility including infrastructure fitness and reviewing of QHSE non conformities has considered during determination of external - internal issue.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|-----------------------------|
| 01 | MGT 219 | Context of the Organization |

4.2 Understanding the Needs and Expectation of Workers and Other IP

Adani Total Gas Ltd. has determined:

- I. The Interested parties, in addition to workers and their needs and expectations are relevant to the QHSE management system
- II. The relevant needs and expectation of workers and other interested parties
- III. Workers and other Interested parties' need and expectations become its compliance obligations

Interested parties included but not limited in Adani Total Gas Ltd.:

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- **Internal Interested parties:** Management, Head Office, Group Companies, Adani Total Gas Ltd. others site, Internal process /Departments, Employees (Workers), etc.
- **External Interested parties:** Customer, Supplier, Neighboring industries, Governing Authorities, Service Provider, Transporter, Public, etc.

Adani Total Gas Ltd. has used mode of identify needs and expectation of workers and other Interested Parties below as appropriate:

- Reviewing of Information of IP, Based on Experience with IP, Communication, and participation with IP.
- Consulting with business partners/workers.

Adani Total Gas Ltd. has reviewed & monitored the needs and expectations of workers and other interested parties' at once in year and changes should be discussed in the Management review meeting.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|---------------|---|
| 01 | MGT220 | Needs & Expectation of Interested Parties and Workers |

4.3 Determining Scope of IMS

Adani Total Gas Ltd. has considered the external & internal issues, needs and expectation of IP, compliance obligations, planned or preferred work-related activities and physical boundary while determination of the boundaries & scope of ISO 9001 Ver. 2015 QMS, ISO 14001 ver. 2015 EMS and ISO 45001 ver. 2018 OH&SMS certifications.

Adani Total Gas Ltd. is in the business of Installation, Operation and Maintenance for:

- Transport and Supply of Natural Gas to Domestic, Commercial and Industrial User, and
- Dispensing natural gas into vehicle's by CNG stations

Scope and Scope Boundary of ISO 9001 Ver. 2015 QMS, ISO 14001 ver. 2015 EMS and ISO 45001 ver. 2018 OH&SMS as below:

Scope Statement:

- ***NATURAL GAS DISTRIBUTION THROUGH PIPELINES TO DOMESTIC, COMMERCIAL AND INDUSTRIAL CUSTOMERS & CNG STATIONS AT AHMEDABAD AND VADODARA***

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- **INSTALLATION, COMMISSIONING, OPERATION AND MAINTENANCE OF GAS SUPPLY EQUIPMENT & PIPELINES**
- **NG TRANSPORTATION THROUGH PIPELINES AT AHMEDABAD AND VADODARA.**

Scope Boundary:

Boundary defined for certification is applicable as per the Network diagram of Adani Total Gas Ltd.

Exclusions: (for 9001:2015)

| ISO 9001:2015 Clause No. | Title | Justifications |
|-----------------------------|----------------------|--|
| 8.3 | Design & development | Adani Total Gas Ltd. is into business of receiving, transportation, and distribution of Natural Gas hence design & development of product & service is not applicable. |

Scope is available for interested parties through sharing of QHSE Manual as & when required/ demanded by interested parties, also ISO certificate available on www.adanigas.com.

4.4 Integrated Management System

Adani Total Gas Ltd. has established implemented, maintained & continually improved QHSE management system. Adani Total Gas Ltd. has adopted PDCA (Plan-Do-Check-Act) methodology for implement process-based approach and continual improvement.

To achieve the intended outcomes, including enhancing its QHSE performance, the Adani Total Gas Ltd. has established, implemented, maintained and continually improved QHSE management system including the processes needed and their interaction in accordance with the ISO 9001 ver. 2015, ISO 14001 ver. 2015 and ISO 45001 ver. 2018.

Adani Total Gas Ltd. has:

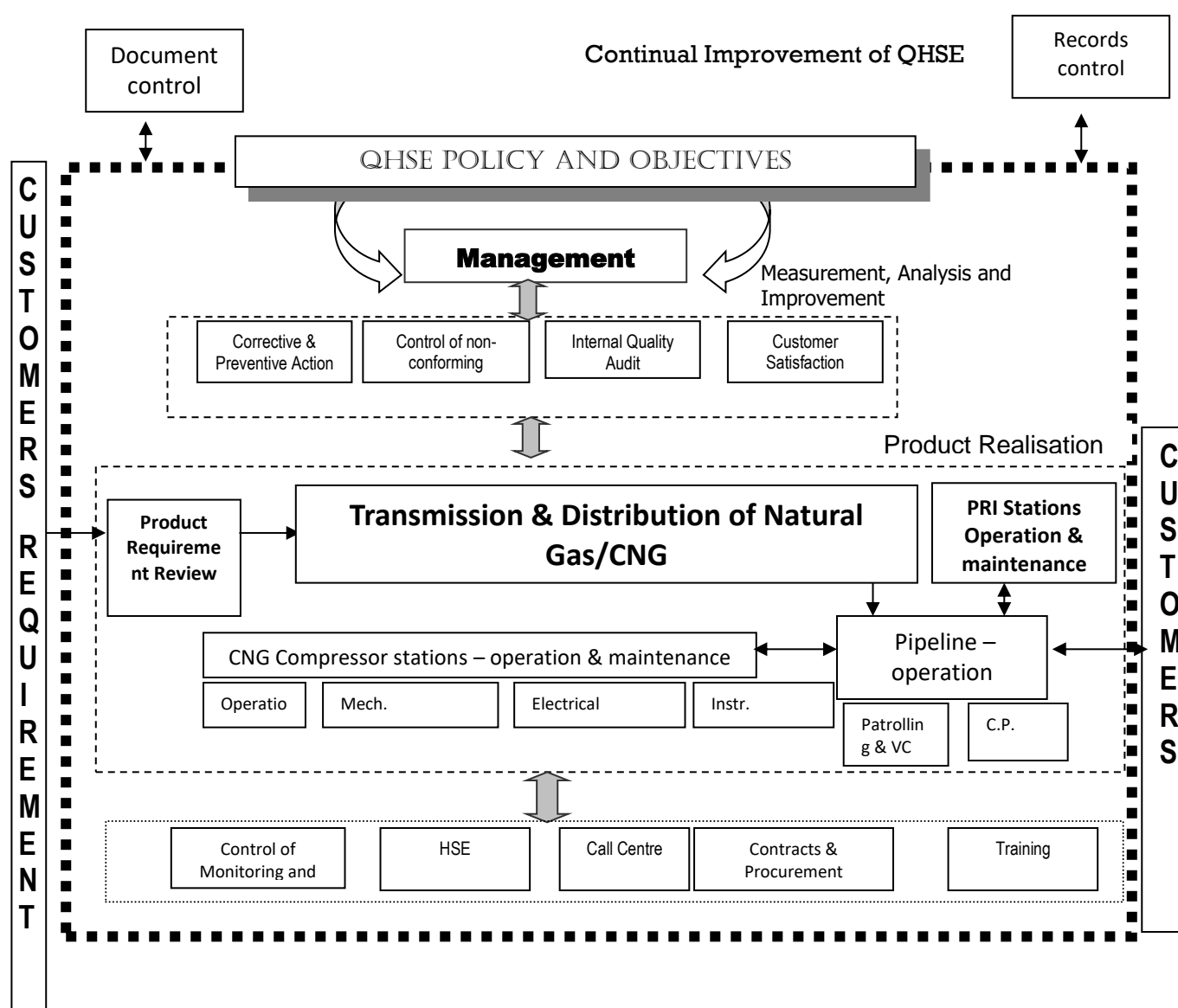
- a) Determined the inputs required and the outputs expected from these processes in the MGT-221: process chart of each functional processes including applicable means, issues, performance indicators which is output of process and same review and effectively implemented and operations & control of the processes
- b) Determined the sequence and interaction of these processes in the process interaction chart and covered all process applicable to Adani Total Gas Ltd.
- c) Determined the requirements and resources needed for these processes and ensure their availability periodically and also adequacy verified in the Management review meeting;
- d) Assigned designation wise responsibilities and authorities for these processes;
- e) Addressed the risks and opportunities as determined in accordance with the requirements;
- f) Evaluated these processes and implement any changes needed to ensure that these processes achieve their intended results;
- g) Improved the processes and the QHSE management system, including enhancing its QHSE performance, the organization shall establish, implement, maintain, and continually improve QHSE management system.
- h) Considered the knowledge gained in organizational context and needs and expectation of interested parties when establishing and maintaining the QHSE management system.
- i) Determined the requirements of this International Standard in order to achieve continual improvement of its QHSE performance.

For adapting to changing circumstances, Adani Total Gas Ltd. will periodically review and evaluate its QHSE documented information and its compliance are implemented and maintained to identify the opportunities for continual improvement.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|-------------------|
| 01 | MGT 221 | Process Mapping |

QHSE Management System: Interaction of Processes



5. Leadership

5.1 Leadership and Commitment

5.1.1 General

Adani Total Gas Ltd. always demonstrates its leadership and commitment towards sustainable QHSE management system. It also meets to the expectations of its stakeholders & customers by providing accountability, communicating organization requirements, establishing the QHSE Policy and QHSE objectives, conducting management review meeting and ensuring the availability of necessary resources.

- a) GA Head is accountable for the effectiveness of the QHSE management system. GA Head had appointed QHSE – IMS COORDINATOR for the effective implementation of QHSE management system. Internal audit and management review meeting should be carried out on periodically to ensure and verify the effectiveness of QHSE management system to achieve intended results.
- b) Management review meeting should be carried out for ensuring the established QHSE Policy and objectives are compatible with the context and strategic direction. It also reviewed QHSE policy, objectives, internal and external issues, risk & opportunity to take necessary action for continual improvements
- c) Management has ensured that business process and QHSE management system synchronized through QHSE objectives and targets. (QHSE objectives and targets. e.g. Business strategy or goals, Annual Business Plan (ABP), KPI (Key Performance Indicators).
- d) Adani Total Gas Ltd. has ensured adequacy allocated or available resources through MRM, Daily Meeting, and yearly budget. In case, additional resources are required, GA Head should review and provide the same as per requirement.
- e) Concerned HODs should be communicated the importance of effective QHSE management system and confirming its requirements through meeting, internal communication (emails, circulars, etc.) and trainings.
- f) Adani Total Gas Ltd. has conducted periodically internal audit and management review meeting for ensuring that the QHSE management system achieves its intended result.
- g) Adani Total Gas Ltd. engaged person by induction, directing them through internal/ external training, meetings, informing vision and mission of the organization and supporting persons by understanding their needs and expectation to maintain the effectiveness of the QHSE management system.
- h) Promoting the use of process approach and risk based thinking and continual improvement through training, lesson learned from failure, corrective action, non-conformity generation and change management.

- i) Functional HODs has to take responsibilities as leader of own function/ process, they have to effectively establish, implemented, monitored and maintained QHSE management system in own area. Adani Total Gas Ltd. is committed to support for effective QHSE management system.
- j) Management is developing, leading and promoting a culture in the organization that supports the intended outcomes of the QHSE management system through involvement and participation of all level workers including non-managerial workers.
- k) Management has positively responded to direct approach for resolve concern of workers and established safety committee for protecting workers from reprisals when reporting incidents, hazards, risks and opportunities.
- l) GA Head and HSE head ensure that the established and implemented a procedure for consultation and participation of workers.
- m) Director and GA Head has supported to the establishment and functioning of safety committee (Health and safety committees).
- n) GA Head is responsible and accountable for the prevention of work-related injury and ill health as well as the provision of safe and healthy workplaces and activities.
- o) Adani Total Gas Ltd. is promoting improvement through training, appreciation, and reward & recognition.

QHSE - MR is responsible, authorize and accountable to ensured that QHSE management system has established, implemented and maintained in accordance with the ISO 9001 Ver. 2015, ISO 14001 Ver. 2015 and ISO 45001 Ver. 2018 Requirements.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------------|--|
| 01 | Not Applicable | Adani Total Gas Ltd. business strategy/ Annual Business Plan |
| 02 | Not Applicable | Adani Total Gas Ltd. - Safety Committee Meeting |
| 03 | Not Applicable | Organization Chart |
| 04 | Not Applicable | Roles, Responsibility and Authority |

5.1.2 Customer Focus

Adani Total Gas Ltd. demonstrates leadership and commitment with respect to customer focus by ensuring that:

- a) Adani Total Gas Ltd. is engaged in:
 - a. NATURAL GAS DISTRIBUTION THROUGH PIPELINES TO DOMESTIC, COMMERCIAL AND INDUSTRIAL CUSTOMERS & CNG STATIONS
 - b. INSTALLATION, COMMISSIONING, OPERATION AND MAINTENANCE OF GAS SUPPLY EQUIPMENT & PIPELINES
 - c. NG TRANSPORTATION THROUGH PIPELINES
- b) Adani Total Gas Ltd. has established customer care (customercare.gas@adani.com) and appointed nodal officer (nodalofficer.gas@adani.com) for support to the customer in case of any implication or suggestions for improvements.
- c) All care is taken to ensure that Customer or their representatives are briefed upon the organizations Quality, Environment and Health & Safety requirements and their suggestions are included after consideration in the review meetings. The review meetings ensure discussions related to Customer's and interested party requirements, expectations and their satisfaction. Decisions such taken are communicated to respective functions to make them aware of customer's needs & expectations and concerns of interested parties.
- d) Customer and applicable statutory and regulatory requirements are determined, understood and consistently met.
- e) Customers are regularly approached to understand their needs & expectations and improvise on the system for achieving enhances customer satisfaction.
- f) The risks and opportunities that can affect conformity of products and services and the ability to enhance customer satisfaction are determined and addressed in the risk & opportunity register.
- g) All care is taken to ensure that Customer or their representatives are briefed upon the organizations QHSE requirements and their suggestions are included after consideration in the review meetings.

Adani Total Gas Ltd. management has ensured that customer satisfaction is a continuous focus of our efforts through management review meeting and customer requirements communicate with the employees.

Environmental aspect and Hazards & risks related to all identified processes are identified and related controls and applicable requirements and suggestions are compiled for maintain enhancing customer satisfaction.

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|---|
| 01 | MGT 220 | Needs & Expectation of Interested Parties |
| 02 | MGT 222 | Risk & Opportunity Register |
| 03 | SP 18 | Procedure for Corrective Action |

5.2 QHSE Policy

The Chief Executive Officer (CEO) of Adani Total Gas Ltd. has signed the QHSE Policy and GA Head set the Objectives with the help of QHSE – IMS COORDINATOR and Functional Heads as appropriate. QHSE Policy provides a framework for setting the OH&S objectives.

QHSE Policy has been established, implemented and maintained includes a commitment to continual improvement, consultation and participation of workers, provide safe and healthy working conditions for the prevention of work related injury and ill health and is appropriate to the purpose, size and context of the organization and to the specific nature and supports its strategic direction of its risk opportunities, significant environment aspects, OH&S risks and OH&S opportunities, needs and expectations of interested parties and applicable requirements.

QHSE Policy has been regularly reviewed by the management to reinforce its importance to the organization's success in meeting its commercial and legal obligations.

QHSE – IMS COORDINATOR has communicated the QHSE Policy to all the employees and contract workers in the organization to ensure the effectiveness of its implementation.

- Policies communicated within organization through training, displaying in prominent location in English as well as local languages if required for easy understanding.

It is ensured that everyone has understood, implemented and maintained the same at all levels of the organization.

QHSE Policy is available with QHSE - MR/HSE Manager as and when demanded by interested parties will be provided.

IMS COORDINATOR also ensures that the policy is made available to the interested parties & public by display at main entry gate and available on website.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|-------------|-------------------|
| 01 | Annexure-01 | QHSE Policy |

5.3 Organizational Roles, Responsibilities and Authorities

GA Head/ Asset Head / Functional heads are representing the leader for QHSE management system. The leaders are responsible for an effective implementation of QHSE management system. It is also evaluated; monitored and analyzed the intended outcomes of QHSE management system. Functional Heads thereafter verbally communicate the responsibilities and authorities down the line. Responsibilities at each level including worker for those aspects of occupational, health and safety has documented in the Job Description/ appointment letter.

GA Head/ Functional Heads are authorized to ensure QHSE conformance to the ISO 9001 Ver. 2015, ISO 14001 Ver. 2015 and ISO 45001 Ver. 2018 requirements. Functional heads have appointed designated representative for establish, implement, maintain and improve effective QHSE management system.

Top management has assigned the responsibility and authority to QHSE - MR for:

- a) Ensuring that the QHSE conforms to the requirements of this QHSE management system standards;
- b) Ensuring that the processes are delivering their intended outputs;
- c) Reporting on the performance of the QHSE management system and on opportunities for improvement to top management;
- d) Ensuring the promotion of customer focus throughout the organization;
- e) Ensuring that the integrity of the QHSE management system is maintained when changes to the QHSE management system are planned and implemented.

Adani Total Gas Ltd. organizational structure, the responsibilities and authorities has defined of personnel who manage, perform, and verify work affecting the QHSE activities of Natural gas distribution through pipelines to domestic, commercial and industrial customers & CNG stations, Installation, commissioning, operation and maintenance of gas supply equipment & pipelines and NG transportation through pipelines.

If the authorized person is not available, the authority shall be assigned to next higher level or a person designated by the GA Head, till it is re-delegated.

GA Head has ensured that the Functional/ Designation wise responsibilities and authorities are assigned and communicated at all level within the organization and maintained as documented information.

It is the responsibility of the functional head to identify additional resource requirements in their respective functional areas and obtain approval during the management review meeting or on a case-to-case basis. The CEO/ GA Head is the final decision-making authority in cases of required necessary resources.

GA Head has appointed QHSE - MR with specific responsibility of IMS like ensuring IMS management establish, implement and maintained as per requirements and QHSE performance are reported to the management in the MRM.

5.4 Consultation and Participation of Workers

Adani Total Gas Ltd. has established, implemented and maintained a SP—32 Procedure for consultation and participation of workers at all applicable levels and functions, and, where they exist, workers' representatives, in the development, planning, implementation, performance evaluation and actions for improvement of the QHSE management system.

Adani Total Gas Ltd. has established, implemented, and maintained a procedure(s) for:

- a) A participation of worker by their:
 - Appropriate involvement in hazard identification, risk assessment and determination of controls;
 - Appropriate involvement in incident investigation;
 - Involvement in development and review of OH&S policies and objectives;
 - Consultation where there are any changes that affect their OH&S;
 - Representation on OH&S matters.

Workers/Staff/Officers have been informed about their role/participation arrangements, including who is their representative(s) on OH&S matters/through trainings/awareness programs/communication matrix/circulars/shop floor meetings/safety celebration/ISO library.

- b) Consultation with contractors where there are changes that affect their OH&S.

Adani Total Gas Ltd. has ensured that relevant external interested parties are consulted about pertinent OH&S matters, as appropriate. It is done through website, purchase orders and pamphlets, visitor guideline.

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Safety committee has been formed which represent as workers, which meets periodically for effective employees' participation of areas of safety concern. Worker representative is elected by workers for effective consultation and participation of workers. Workers definition considered as a Non-Managerial Workers for Adani Total Gas Ltd.

Adani Total Gas Ltd. management has established personnel policies for employees (Managerial and Non-Managerial) as below:

| Sr. No. | Policy Name | Purpose | Language | Availability / Location |
|---------|---|--|-----------------------------|-------------------------|
| 1 | Whistle Blower | Committed to complying with all applicable laws that protect employees against unlawful discrimination or retaliation as a result of their disclosure or reporting of questionable or illegal acts by AGL or its agents. | Eng., | Adani Enterprise Portal |
| 2 | Code of Conduct | To Sets forth legal & ethical standards that apply to all employees of Adani Total Gas Ltd. | Eng., | |
| 3 | Sexual Harassment Policy POSH Policy | To Prevention and Redress of Sexual Harassment at Workplace | Eng., Gujarati, Hindi | |

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|--|
| 01 | SP-32 | Procedure for Participation and Consultation |

6. Planning

6.1 Action to address Risk & Opportunities

6.1.1 General

Adani Total Gas Ltd. has established, implemented and maintained the SP34 – Risk management procedure needed to meet the actions required to address QHSE risk and opportunities.

Adani Total Gas Ltd. has considered Issues related to organizational context, Needs & expectation of interested parties, scope of management system, significant environmental aspects and compliance obligations and other issues and requirements while determining risk and opportunities.

The purpose of determining risk & opportunities is to:

- Give assurance that the QHSE management system can achieve its intended outcomes
- Prevent or reduce undesired effects, emergency situation, potential external environmental conditions which can affect the organization
- Achieve continual improvement

When determining the risks and opportunities to the OH&S management system and its intended outcomes that need to be addressed, the organization has taken into account:

- Hazards
- OH&S Risk and Other Risk
- OH&S Opportunity and Other Opportunity
- Legal and Other requirements

Adani Total Gas Ltd., in its planning process(es), has determined and assessed the risks and opportunities that are relevant to the intended outcomes of the QHSE management system associated with changes in the organization, its processes or the QHSE management system. In the case of planned changes, permanent or temporary, this assessment shall be undertaken before the change is implemented.

Adani Total Gas Ltd. has maintained documented information of its;

- Risks and opportunities that need to be addressed;
- Processes needed to address risk and opportunities, environment aspect, compliance obligation and management program to the extent necessary

Adani Total Gas Ltd. has established, implemented and maintained a procedure(s) for the risk opportunity and determination of necessary controls.

Adani Total Gas Ltd. has established actions to address risks and opportunities. Adani Total Gas Ltd. has also integrated and implemented these actions into QHSE management system and ensures effectiveness of these actions through periodic evaluation.

Actions taken to address risks and opportunities should be proportionate to the potential impact on the conformity of products and services.

Options to address risks can include avoiding risk, taking risk in order to pursue an opportunity, eliminating the risk source, changing the likelihood or consequences, sharing the risk, or retaining risk by informed decision.

Opportunities can lead to the adoption of new practices, launching new products/services, opening new markets, addressing new customers, building partnerships, using new technology and other desirable and viable possibilities to address the organization's or its customers' needs.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|------------------------------------|
| 01 | SP34 | Procedure for QHSE Risk Management |

6.1.2 Environmental Aspect & OHS Risk and Opportunity

Adani Total Gas Ltd. has determined the environmental aspects of its activities, products and services that it can control and those that it can influence, and their associated environmental impacts, considering a life cycle perspective.

Adani Total Gas Ltd. has considered change including planned or new developments and new or modified activities, product and services, proposed changes to in the organization, its activities, or materials, emergency situations while identification and assessment of environment aspect impact register.

Adani Total Gas Ltd. has determined those aspects that have or can have significant environment impacts, i.e. significant environmental aspects, by using established criteria. Adani Total Gas Ltd. has communicated its significant environmental aspects among the various levels and functions of the **Adani Total Gas Ltd.**, as appropriate.

Adani Total Gas Ltd. has established, implemented, and maintained a SP30 - procedure(s) for the Environmental Aspect & Impact Assessment, determination of necessary controls as per standard hierarchy.

Adani Total Gas Ltd. has maintained documented information and keeps the results of environment aspect impact and determined controls up to date.

Adani Total Gas Ltd. has maintained documented information of environmental aspects ref **"SP30 - Procedure for Environmental Aspect & Impact Assessment and Hazard Identification & risk assessment"**:

- a) environmental aspects and associated environmental impacts;
- b) criteria used to determine its significant environmental aspects;
- c) Significant environmental aspects.

Significant environmental aspects can result in risks and opportunities associated with either adverse environmental impacts (threats) or beneficial environmental impact (opportunity).

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|--|
| 01 | SP30 | Procedure for Environment Aspect & Impact Assessment and Hazard Identification & risk assessment |
| 02 | SP34 | Procedure for QHSE Risk Management |
| 03 | --- | Product Life Cycle Perspective |

6.1.2.1 Hazard Identification

Adani Total Gas Ltd. has established, implemented and maintained the procedure "SP30: Procedure for Environmental Aspect & Impact Assessment and Hazard Identification & risk assessment" for ongoing and proactive hazard identification, considering the requirements. ISO 45001 Ver. 2018 requirements as defined in the standard has reviewed and documented in the procedure SP30: Procedure for Environmental Aspect & Impact Assessment and Hazard Identification & risk assessment for effectively implementation of OHS Management System.

Adani Total Gas Ltd. has participated of workers while hazard identification through interaction and practical exercise as part of trainings and knowledge. A change in information about hazards has to be communicated to the concern workers as appropriate.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|-------------------|
|---------|----------|-------------------|

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| | | |
|----|------|--|
| 01 | SP30 | Procedure for Environmental Aspect & Impact Assessment and Hazard Identification & risk assessment |
|----|------|--|

6.1.2.2 Assessment of OHS Risk and Other Risk

Adani Total Gas Ltd. has established, implemented and maintained the procedure for assessment of OHS risk from the identified hazards with considering effectiveness of existing controls.

Adani Total Gas Ltd. has established, implemented and maintained the procedure for determined and assessment of other OHS risk related to the establishment, implementation, operation and maintenance of the QHSE management system.

Adani Total Gas Ltd. has defined methodology (ies) and criteria for the assessment of OH&S risks with respect to their scope, nature, and timing to ensure they are proactive rather than reactive and are used in a systematic way.

Adani Total Gas Ltd. has maintained and retained information on the methodology (ies) and criteria of OHS risk and others risk.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|--|
| 01 | SP30 | Procedure for Environmental Aspect & Impact Assessment and Hazard Identification & risk assessment |
| 01 | SP34 | Procedure for QHSE Risk Management |

6.1.2.3 Assessment of OHS Opportunity and Other Opportunity

Adani Total Gas Ltd. has established, implemented and maintained the procedure for assess OH&S opportunities and other opportunities to enhance OH&S performance and improve OHS management system while taking into account planned changes to the organization, its policies, processes or its activities and:

- Opportunities to adapt work, work organization and work environment to workers;
- Opportunities to eliminate hazards and reduce OH&S risks;

OH&S risks and OH&S opportunities can result in other risks and other opportunities to the organization

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Adani Total Gas Ltd. has to maintained and retained documented information's on methodology (ies) & criteria of OHS Opportunities and others opportunities.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|------------------------------------|
| 01 | SP 34 | Procedure for QHSE Risk Management |

6.1.3 Compliance Obligations

Adani Total Gas Ltd. has established, implemented and maintained the procedure "SP27: Procedure for Identification & Evaluation of Compliance Obligations" (Legal & Other Requirements) as applicable to the QHSE management system.

Adani Total Gas Ltd. has determined and accessed to up - to date register of regulations "ROR1: Legal Register of HSE Legislation".

SP27: Procedure for Identification & Evaluation of Compliance Obligations has included identification of compliance obligation those are applicable to Environmental aspects and OH&S risks, Product conformance or Customer Requirements and others QHSE management system requirement.

Adani Total Gas Ltd. has communicated relevant information on compliance obligations to persons working under the control of the organization, and other relevant interested parties as appropriate including governing agency like:

- PNGRB
- Gujarat Pollution Control Board
- Central Pollution Control Board
- Ministry of Environment and Forests
- PESO authority
- Other governing authority like Municipal corporations, Gram Panchyat, GIDC associations, etc.
- Corporate office
- Environmental Legislation Update News Letter of QHSE Management System (Quarterly)
- Directorate of Industrial Safety & Health
- Other sources, as applicable.

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Adani Total Gas Ltd. has maintained and retained ROR1: Legal Register of HSE Legislation and Legatrix Software for compliance obligations and has ensured that it is updated to reflect any changes.

Legal requirements and other requirements can result in risks and opportunities to the organization.

Update the register whenever there is information on new obligations applicable to the site within two weeks of receipt of such information collected from the above sources and convey this information to HODs of concerned departments.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|---|
| 01 | SP27 | Identification & Evaluation of Compliance Obligations |
| 02 | ROR1 | Legal Register of HSE Legislation |
| 03 | Software | Legatrix |

6.1.4 Planning Action

Adani Total Gas Ltd. has established, implemented, and maintained action plans for achieving intended outcome of QHSE management system.

Adani Total Gas Ltd. has planned:

- a) to take action to address/ prepare its
 1. Significant environmental aspects <Environmental Aspect & Impact>
 2. Not acceptable risk <Hazard Identification risk assessment>
 3. Compliance obligations <Legal Register>
 4. Risks and opportunities identified. <QHSE Risk Register and Register of Opportunity>
 5. Achieving objectives and targets <QHSE Objectives, targets and Management Program>
 6. ERDMP (Emergency Response and Disaster Management Plan)
- b) How to:
 1. Integrate and implement the action into QHSE processes or other business processes;
 2. Evaluate the effectiveness of these actions.

Adani Total Gas Ltd. has considered the hierarchy of controls and outputs from the QHSE management system when planning to take action.

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When planning these actions, the Adani Total Gas Ltd. has considered its best practices, technological options, and its financial, operational and business requirements.

Action plan has included:

- Designation of responsibility
- The means and time frame by which individual targets will be achieved
- A statement of the method by which an improvement in QHSE performance shall be verified
- A statement of the method of verifying the results.

Adani Total Gas Ltd. is maintained documented of defined action plan and reviewed at defined intervals.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|--|
| 01 | SP30 | Procedure for Environmental Aspect & Impact Assessment & Identification of Hazard & Risk Control Model |
| 02 | SP34 | QHSE Risk Management |

6.2 QHSE objectives and planning to achieve them

Adani Total Gas Ltd. has established IMS Objectives at relevant functions and level, taking organizations significant environmental aspects & hazards, OHS risks; and associated compliances obligations, and considering its risk and opportunities. These objectives are prepared in line of company's commitment to its IMS policy and conforming to ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 requirements.

QHSE objectives have documented in line with:

- a) Consistent with the QHSE Policy
- b) Measurable or capable of performance evaluation;
- c) Take into account
 - a. Applicable requirements;
 - b. The results of the assessment of risks and opportunities
 - c. The results of consultation with workers (Non-managerial), and, where they exist, workers' representatives;
- d) Relevant to conformity of products and services and to enhancement of customer satisfaction;
- e) Monitored;
- f) Communicated;
- g) Updated as appropriate.

Adani Total Gas Ltd. has maintained documented information on the quality, environmental, health safety objectives. **Adani Total Gas Ltd.** has developed QHSE Action Plan (QMS, EMS and OH&SMS) for every Objective.

Planning how to achieve its quality, environmental health safety objectives has to be considered as:

- a) Targeted values defined for Objectives (To be Achieved)
- b) Required Necessary resources shall be provided by management (Man, Machine, Materials, Money, Methodology, etc.)
- c) Defined responsibility for designated person to achieve the objectives
- d) Time line for achieving objectives defined.
- e) Adequate action for achieving the objectives results defined and documented.

When establishing and reviewing its objectives, an organization shall take into account the legal requirements and other requirements, to which the organization subscribes, and its OH&S risks. It shall also consider its technological options, its financial, operational and business requirements, and the views of relevant interested parties.

QHSE – IMS COORDINATOR is responsible to present the progress on QHSE Action Plan in Management review meeting. GA Head is authorized to review, approve and redefine the QHSE Management plans/ program.

IMS Objectives, Targets and Programs: Adani Total Gas Ltd. has communicated quality, health & safety, and environmental objectives to the all concern personnel including workers. There are targets associated with each of these objectives. Action plan have been developed to serve a mechanism to help meet the specific targets that have been set.

For new developments, separate QHSE Management Program (MP's) should be established wherever the modification introduces significantly different environmental aspect, hazards and risks.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|--|
| 01 | SP19 | Procedure for performance measurement and monitoring |
| 02 | SP28 | Procedure for Objective and Program |
| 03 | MGT223 | Action Plan |

6.3 Planning to Changes

Adani Total Gas Ltd. has established SP23: procedure of management of change for changes to the QHSE management system in planned manner.

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The Adani Total Gas Ltd. has considered:

- a) Purpose of the changes and their potential risk and opportunities (Consequences);
- b) Integrity with the QHSE management system.
- c) Appropriate resources required.

When determining environmental aspects & hazard identification and risk assessment, the Adani Total Gas Ltd. has considered:

- a) Change including planned or new developments and new or modified activities, product and services; proposed changes to in the organization, its activities, or materials.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|---|
| 01 | SP23 | Procedure for Management of Change |
| 02 | SP30 | Procedure for Environmental Aspect & Impact Assessment and Hazard Identification & Risk Control Model |

7. Support

7.1 Resources

7.1.1 General

Adani Total Gas Ltd. has determined and provided the resources needed for the establishment, implementation, maintenance, and continual improvement of the QHSE management system through process chart and flow diagram, QHSE common procedure and quality plan as required.

Specific resources if required for meeting customer requirements are reviewed to enhance customer satisfaction, control of environmental parameters or OH&S concerns affecting the performance of the QHSE management system.

Adequacy/ availability of resources is reviewed during Management Review Meetings, Customer Complaints, Internal Audits; Training needs and review of legislations essential to establish, implement, maintain and improve the QHSE management system (Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.)

7.1.2 People

Adani Total Gas Ltd. has determined and provides the persons necessary for the effective implementation of its QHSE management system and for the operation and control of its processes.

Adani Total Gas Ltd. has determined and provided the resources like competent personnel, proper working environment and adequate infrastructure needed to implement and maintain IMS and continually improve its effectiveness. Equipment and instruments needed for work and verification are identified, procured and procedures are laid down to ensure that the same are in fit condition for carrying out work and verification activities

Adani Total Gas Ltd. has considered:

- a) The Company has identified the competence level required for the personnel carrying out the activities in different areas of technical, commercial and administrative departments. The "Job Description / Competence for all functions have been defined on the basis of requirements related to appropriate education, training skills and experience for the specific jobs. Hence the personnel performing such work which affects confirming to product shall be competent on the basis of appropriate education, training, skills and experience. Job descriptions are also used for identifying the training needs of the personnel to make them competent to do their activities;
- b) What needs to be obtained from external providers
- c) Ensuring the availability of resources essential to establish, implement, maintain and improve the QHSE management system (Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.);

HOD identify the resources required for implementing, performing and verification activities related to the companies IMS wherever required. These are further examined, reviewed and provided as and when required, to enhance customer satisfaction by meeting customer requirements. These resources are identified at the time of planning for product realization and periodically reviewed. Necessary identified resources are planned and provided to meet the requirements. **Adani Total Gas Ltd. has** determined and provided the persons necessary for the effective implementation of its QHSE management system and for the operation and control of its processes.

7.1.3 Infrastructure

Adani Total Gas Ltd. has determined, provided, and maintained the infrastructure necessary for the operation of its processes and to achieve conformity of products and services.

Adani Total Gas Ltd. has provided the identified infrastructure needed to achieve conformity to product requirements.

Adani Total Gas Ltd. has established a **SP-14: Procedure for maintenance** for maintaining the infrastructure including MS and PE pipe Network, City Gate Station, District Regulating Stations (Industrial and Domestic), Metering, Skids and CNG compressor and associated equipment's, Buildings and associated utilities, Equipment, including hardware and software, Transportation resources, Information and communication technology, instruments and materials by conducting preventive and break-down maintenance in order to ensure their continuing suitability. The data related to maintenance is analyzed and maintenance objectives have been framed for continual improvements.

The necessary resources including trained personnel for management, performance of work and verification activities, Buildings and associated utilities, Equipment, including hardware and software, Transportation resources, Information and communication technology, instruments and materials have been identified and provided for Technological concerns are evaluated while provisioning for such resources.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|----------------|-----------------|---|
| 01 | SP14 | Procedure for Maintenance |
| 02 | SP25 | Procedure for Preventive Maintenance of Domestic Connection |

7.1.4 Environment for the Operation of Processes

Adani Total Gas Ltd. has determined, provided, and maintained the infrastructure and facility necessary for the operation of its processes and to achieve conformity of products and services.

Adani Total Gas Ltd. has determined, provided, and maintained the environment necessary for the operation of its processes and to achieve conformity of products and services.

A suitable environment can be a combination of human and physical factors, such as:

- a) Social environment providing through employee screening by security and HRA function. (e.g. non-discriminatory, calm, non-confrontational);
- b) Psychological environment providing through stress-reducing, burnout prevention, emotionally protective);
- c) Physical environment providing through Adequate measures are taken for suitable working conditions like temperature, heat, humidity, light level monitoring and compliance, airflow through AHU system, noise controlling or reducing building and facilities.

Continuous attention is given to housekeeping and removal of waste/rejections from work areas.

Operation and Maintenance waste effecting the environment is treated before release or disposed appropriately. These factors can differ substantially depending on the products and services provided.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|-------------------------------|
| 01 | SP20 | Procedure for HS&E Management |

7.1.5 Monitoring and Measuring Resources

A list of instruments/equipment's, which affect the product/process quality, environmental parameters and OH&S is made and taken up for calibration. The equipment brought under calibration procedure are calibrated as per periodicity decided, against certified equipment's with a known valid relationship to national / International Standards.

Adani Total Gas Ltd. has determined and provided the resources needed to ensure valid and reliable results when monitoring or measuring is used to verify the conformity of products and services to requirements.

Adani Total Gas Ltd. has ensured that the resources provided:

- a) Are suitable for the specific type of monitoring and measurement activities being undertaken by define the process for calibration / verification, detail of equipment type, frequency of checks and acceptance criteria;
- b) Are maintained to ensure their continuing fitness for their purpose by in-time calibration, reviewing of error found while calibration reports and damage free.

Adani Total Gas Ltd. has retained appropriate documented information as evidence of fitness for purpose of the monitoring and measurement resources. (Ref. QMS Clause No.: 7.1.5.1 - Monitoring and measuring resources (General))

When measurement traceability is a requirement, or is considered by the organization to be an essential part of providing confidence in the validity of measurement results, measuring equipment shall be:

- a) Calibrated or verified, or both, at specified intervals, or prior to use, against measurement standards traceable to international or national measurement standards; when no such standards exist, the basis used for calibration or verification shall be retained as documented information;
- b) Employees concerned are trained to ensure accurate & safe handling of equipment, so as to prevent them from adjustment, which would invalidate the calibration settings.
- c) Where equipment is found out of calibration the previous result of immediate past operation is re verified till such time of conformance is recorded.
- d) Calibrated equipment's are safeguarded and protected from damage and deterioration during handling, maintenance and storage that would invalidate the calibration status and subsequent measurement results.

(Ref. QMS Clause No.: 7.1.5.2 – Measurement Traceability)

Adani Total Gas Ltd. has determined the monitoring and measurement resources needed to provide evidence of conformity of products and process requirements w.r.t QHSE management system including compliance to legal and other requirements.

The organization is ensuring proper control, calibration and maintenance of monitoring and measuring equipment's used to demonstrate conformance to specified product requirements, operational control criteria and monitoring and measurement of key characteristics of environmental performance and OH&S performance

Adani Total Gas Ltd. have determined if the validity of previous measurement results has been adversely affected when measuring equipment is found to be unfit for its intended purpose and have taken appropriate action as necessary.

- The equipment brought under calibration procedure are calibrated as per periodicity decided, against certified equipment's with a known valid relationship to National / International Standards as MASTER equipment's and used to calibrate other equipment. Measuring equipment are adjusted or re-adjusted as necessary
- Where equipment's are calibrated by external agency, the supplier is evaluated, selected for his performance & monitored as per documents.
- Software used for monitoring & measuring processes are assessed to their ability to satisfy the intended application of verification prior to initial use and reconfirmed as necessary.
- Records of calibration of this equipment's are maintained.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|--|
| 01 | SP15 | Procedure for Calibration of Instrument |
| 02 | SP19 | Procedure for Performance Monitoring and Measurement |

7.1.6 Organizational Knowledge

Adani Total Gas Ltd. has developed **ISO Library** on intranet and – E Vidyalaya Portal Used for Adani Competitive Development and HSE Training Module and Adani Total Gas Ltd. Library which is used as organizational knowledge. Adani Total Gas Ltd. has developed online web for communicating knowledge for the departmental activities, process and more. Every employee has accessed to the portal.

Lessons learnt from failures and successful projects can be captured and communicated to concerned persons.

Adani Total Gas Ltd. has determined maintained and available organizational knowledge with consideration as below:

- a) Learning from failures, near miss situations and successes;
- b) Gathering knowledge from customers, external providers and partners;
- c) Capturing knowledge that exists within the organization.
e.g. through mentoring, succession planning;
- d) Benchmarking;
- e) An intranet, libraries, awareness sessions, newsletters, etc.

This knowledge has been maintained and be made available to the extent necessary.

When addressing changing needs and trends, the Adani Total Gas Ltd. has considered its current knowledge and determine how to acquire or access any necessary additional knowledge and required updates.

Organizational Knowledge Matrix

| Sr. no. | Type of Knowledge | Repository | Type | Access to |
|---------|--|----------------------------------|------------------------------|-----------------------|
| 1 | Adani Group Competency Training | E - Vidyalaya | Portal | All Dept. |
| 2 | QHSE MANUAL for QMS, EMS and OH&SMS | MR | Portal, Data base | All Dept. – Read Only |
| 3 | Adani OHS Safety Module | E - Vidyalaya | Portal, Data base | All Dept. |
| 4 | Applicable Legal and Other Requirement | Legatrix | Portal, Data base | Concern Person |
| 5 | Adani Business Strategy and Awareness | Library | Case Study / Theisis / Books | All Dept. |
| 6 | QHSE Documents (Including Procedures, Formats, List, etc.) | MR | Portal, Data base | All Dept. – Read Only |
| 7 | Organizational level and departmental level Key Performance Indication/ Objectives | Respective Head/ MR | Portal, Data Base | All Dept. – Read Only |
| 8 | Training Material | HR | HR Database | All Dept. |
| 9 | Human resources data base and Skill repository | HR | Portal and data base | HR Dept. |
| 10 | Customer Complaints and Feedback | CRM | Data Base | CRM Dept. |
| 11 | Exchange of Knowledge and information | Meetings, newsletters, trainings | Data base | All Dept. |
| 12 | Change Management | Functional Head | Database | All Dept. |

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| | | | | |
|----|--|----------------------|----------|-----------|
| 13 | Company Initiatives , Directives Process Improvement initiatives | MR / Functional Head | Database | All Dept. |
| 14 | Company policies updates through E Mail | Communication Mail | Database | All Dept. |

7.2 Competency

Adani Total Gas Ltd. has defined procedure SP 05 - Procedure for safety and technical competency training for provide training or takes other actions to achieve the necessary competence and evaluates the effectiveness of the actions taken.

Every Process Owners and Management/ HR Function have determined the necessary competence for site personnel including workers performing work under its control that affects or can affect its QHSE performance and its ability to fulfill its compliance obligation and effectiveness of QHSE management system;

Yearly Appraisals are taken for individuals by Department Heads and further reviewed by GA Head for establishing right levels of competencies. Head- HR & Admin is responsible for planning and arranging training.GA Head has ensured that site personnel including workers are competent (including the ability to identify hazards) on the basis of appropriate education, training or experience.

Adani Total Gas Ltd. has considered differing levels of responsibility, ability, language skills and literacy, and risk. Safety & Environment related training to employees is provided by HSE Department. Head HSE also plans and arranges training for contract workers, contractors and customers.

Adani Total Gas Ltd. has retained appropriate documented information as evidence of competence of site personnel including workers.

Applicable actions can include, for example, the provision of training to, the mentoring of, or the reassignment of currently employed persons, or the hiring or contracting of competent persons.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|--|
| 01 | SOP 05 | Procedure for safety and technical competency training |
| 02 | HRM 204 | Training Record |

7.3 Awareness

It is ensured that employees and members at each relevant function and all level employees are aware of:

- a) QHSE Policy and its importance, QHSE procedures and its requirements.
- b) Relevant IMS Objectives
- c) Their contribution to the effectiveness of the QHSE management system including the benefits of improved QHSE performance;
- d) Significant Aspects, hazards and assessment and /or control of associated OHS risks, opportunity & actions determined and incidents and the outcomes of investigations that are relevant to them.
- e) The implications and potential consequences of not conforming with the **QHSE management system requirements**, including not fulfilling the organizations compliance obligation including customer requirements;
- f) Their roles and responsibilities and importance in achieving conformity to the QHSE Policy and procedures and to the requirements of the QHSE management system, including emergency preparedness and response requirements
- g) The potential consequences of departure from specified procedures.
- h) The importance of conformity with the QHSE Policy, procedures and with the requirements
- i) The ability to remove themselves from work situations that they consider present an imminent and serious danger to their life or health, as well as the arrangements for protecting them from undue consequences for doing so.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|----------------|-----------------|--|
| 01 | SOP 05 | Procedure for safety and technical competency training |

7.4 Communication

Adani Total Gas Ltd. has established, implemented, and maintained the procedure SP-32 internal and external communications aligned with QHSE Management System.

Adani Total Gas Ltd. have adequate infrastructural facility like Intercom, Walky-Talky, and Public Address System etc. for effective communication.

Individual Functional heads that the team meets every day to discuss the requirement of the day and interchange information related to the QHSE management system requirements

The GA Head meets Functional Heads to discuss the operation and distribution schedules and where required the relevant information is passed to concerned officials.

Adani Total Gas Ltd. has identified respective diversity aspect through analysis and prepared effective communication mechanism respect to the IMS matters for the sustain QHSE performance. Diversity aspects. e.g. gender, language, culture, literacy, disability.

When established its communication processes, the organization have:

1. Take into account its compliance obligation;
2. Ensure that IMS information communication is consistent with information generated within the IMS, and is reliable.

Adani Total Gas Ltd. has respond to relevant communication and retained documented information as evidence of its communications, as appropriate.

In-charge-Commercial is responsible for providing information to the potential customers about the availability of gas. The supply is done after entering into a contract agreement in which gas specification/other stated/implied requirements are detailed out.

Depending upon the supply quantity agreement & the future expansion plan of a particular, suitability Gas meters are installed at customers' premise to measure the quantities of gas supplied to them. Gas meters are calibrated at defined interval and as when required basis to identify measurement uncertainty for further action. The calibration records are jointly signed by Adani Total Gas Ltd. representative and customers' representatives and records are maintained.

Any changes in the supply of gas quantity due to non-availability of gas from supplier or due to emergency situation in the pipeline system/compressor failure, the same is immediately communicated to the customers through telephone/SMS and subsequently confirmed through written communication.

Customer's feedback about product/services is received through customer visit report/complaints. Call center is responsible for receiving, analyzing and responding the status of action being taken or to be taken.

Customer complaints are handled through the corrective action system described in MNT05. Customer comments and concerns are discussed during management reviews meeting.

In case of CNG, complaints related to availability of sufficient pressure & others are recorded and actions are taken to ensure availability of sufficient pressure. Here CNG users (mainly vehicle owners) are not a customer of Adani Total Gas Ltd. only and hence Adani Total Gas Ltd. is not providing any customers number to identify them as a customer.

Notice Boards and Display boards are put up at strategic locations to act as a medium for communicating various information's to the employees. Adani Total Gas Ltd. have adequate infrastructure facility like local intranet network and mail facility etc. for effective electronic communication for External as well as Internal Communication like Same time, Local News Agency/ Media for External Communication

Safety committee meeting is organized to consult and communicate QHSE management system related information to and from employees including workers. Site briefing and tool box talks are used to consult and communicate with contractors and vendors at the work place.

Adani Total Gas Ltd. has decided that it will not communicate externally about its significant aspects and OHS matters until not demanded.

Internal Communication

| Sr. No | Communication Matter (Topic) | Communication by | Communication Through | Communication To | Communication Frequency |
|--------|------------------------------|------------------|----------------------------|------------------|-------------------------|
| 1. | QHSE Policy | MR/HSE | Display / Leaflet/Training | All Employee | Continues |

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| | | | | | |
|-----|---|-----------------------------|--|-----------------------|----------------------------------|
| 2. | QHSE Objective | Process Owner | Objective Sheet | Concern Employee | Yearly |
| 3. | Significant Environmental Aspect Impact | Process Owner | Environment Aspect Impact Register | All Process Employee | Yearly / Process Modification |
| 4. | Occupational Hazard and Relevant Risk | Process Owner / HSE Manager | Hazard Identification and Risk assessment Register | All Process Employee | Yearly / Process Modification |
| 5. | Not acceptable QHSE Risk | Process Owner | Risk and Opportunity Register | All Process Employee | Yearly / Process Modification |
| 6. | Standard Procedure | MR | Documented Procedure | Concern Process Owner | As & when require |
| 7. | Emergency awareness | HSE Manager | Mock Drill, Training, Onsite Emergency Plan | All Employees | As & When Necessary / Quarterly |
| 8. | Issues affect to Organization's Performance | MR / Process owner | Context & their issues register | All Employees | As & When Req. / Yearly |
| 9. | Requirement of IP | MR / Process owner | N&E of IP register | All Employees | As & When Req. / Yearly |
| 10. | Internal audit results | MR / Process owner | By Email/ Internal Audit Report circular/ Safety Committee meeting | Concern Employees | After Internal Audit/ During MRM |
| 11. | Internal audit results | MR / Process owner | By Email/ Internal Audit Report circular/ Safety Committee meeting | Concern Employees | After MRM |

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| | | | | | |
|-----|--------------------------------|-------------------------------|---|----------------------|-------|
| 12. | Incident related information's | HSE Manager/ Process owner | Training/ TBT/ Report/ Circular/ Safety Committee meeting | Concern Employees | Event |
|-----|--------------------------------|-------------------------------|---|----------------------|-------|

External Communication

| Sr. No | Communication Matter (Topic) | Communication by | Communication Through | Communication To | Communication Frequency |
|--------|------------------------------|---|-----------------------------|-------------------------|-----------------------------|
| 1. | QHSE Policy | MR / Management | Web | External IP / Providers | As & When Demanded |
| 2. | QHSE Performance | Management | Annual Report | Stakeholders | Yearly |
| 3. | Emergency awareness | HSE Manager | EHS Guideline Verbally | Visitor | As & When Necessary |
| 4. | EHS Guideline | Purchase | EHS Guideline / Mail / PO | External Providers | Every PO |
| 5. | Legal Compliance | MR / HSE Manager/ Assigned In Charge | Legal Register / Legal Data | Govt. Authorities | As & When Required |
| 6. | Customer Complaint Resolve | CRM | Mail / Telephonic | Customer | As & When Customer Received |
| 7. | Qty. of Delivery of NG | MCR | Mail | Supplier (GSPC / GAIL) | Daily |
| 8. | Billing Details | Billing Department | Mail | Customer | As per defined frequency |

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|---|
| 01 | SP32 | Procedure for Participation and Consultation |
| 02 | SP06 | Guidelines for Contract Administration & Review |

7.5 Documented Information

7.5.1 General

Adani Total Gas Ltd. has included:

- a) Documented information required by this ISO 9001: 2015, ISO 14001: 2015 and ISO 45001: 2018 Management System Standards.
 - QHSE Manual including QHSE Policy
 - IMS Common procedures, departmental procedure & Work instruction and records
 - Documents, including records, determined by the Adani Total Gas Ltd. to be necessary to ensure the effective planning, operation, and control of its processes.
 - Reference to Corporate documents such as Standards, Guideline, template, directives, etc.
 - Management systems requirements imposed by the applicable regulatory or statutory requirement.
- b) Documented information determined by the organization as being necessary for the effectiveness of the QHSE management system.

The structure IMS documents:

Level - 01: QHSE MANUAL (QHSE Policy)

Level - 02: SP – Standard Procedures (QHSE Common Procedure)

Level - 03: Guideline (Including Dept. Work Instructions/ Operational Procedures/ Emergency Plan, etc.)

Level - 04: FRM - Template (Forms, Formats, Register, Checklist, etc.)

Level I: QHSE Manual

QHSE Manual describes how Adani Total Gas Ltd. meets the requirements of QMS, EMS & OHSMS.

QHSE manual includes:

- The scope of the QHSE management system and justification for any exclusion
- References to documented procedures (SPs/OPs)
- A description of the interaction between elements of the quality management system

Level II: System Procedures

Each SP is documented in line with the related clausal requirement of QHSE management system and stated QHSE Policy.

Level III: Operating Procedures / Work Instructions / Drawings / Emergency Response Plan and any documents in instruction form.

Each OP/WI/Guidelines are documented for detailing the activities affecting QHSE management system as referred in respective SP. Wherever applicable, the related Forms/Formats are cross referred in the respective OP/WI and made available at appropriate workplace. The effective implementation of each OP/WI is the responsibility of concerned HOD. Network drawings are prepared, updated and are made available at the respective workplace for use.

Level IV: Formats/records

Each format is designed to accommodate all facts/information made during observation sufficient to provide evidence that the activity performed or results achieved.

The level of documentation to support the QHSE management system is based on customer's requirements, as well as the skills, methods, training required by the personnel responsible for the performed work.

Above documented information for a QHSE management system defined as per:

- The size of Adani Total Gas Ltd. and its type of activities, processes, products and services;
- The complexity of processes and their interactions;
- The competence of persons.

7.5.2 Creating and Updating

Adani Total Gas Ltd. has established, implemented, and maintained a procedure SP-02 Guideline for Maintaining Documented Information for the maintained documented information.

Adani Total Gas Ltd. is creating and updating documented information with identification and description, format & Media and review & approval of suitability and adequacy.

Documented information of external origin determined by the organization to be necessary for the planning and operation of the IMS has identified as appropriate and controlled. External origin documents are identified and controlled by respective HODs and maintained the status, External documents such as customer / end-user specifications, material specifications, standards, codes etc.

7.5.3 Control of Documented Information

Adani Total Gas Ltd. has established, implemented and maintained a procedure SP-03 for the retained documented information. which include all system related records to remain legible, readily identifiable and retrievable, Records are identified, stored, protected, retrievable during their retention and disposition, the documented procedures include approval of recorded results before official release, records are available for review and/or release by/released to customers and regulatory authorities in accordance with contract or statutory and regulatory requirements etc.

The QHSE – IMS COORDINATOR is responsible for coordinating the maintenance of the IMS related records.

In case of retention if not defined for retained documented information has to be considered 3 years. Burning/ shredding disposition method has to be used for the retained documented information after retention period over.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|--|
| 01 | SP02 | Guideline for Maintaining Documented Information |
| 02 | SP03 | Retain Documented Information |

8. Operation

8.1 Operation Planning and Control

8.1.1 General

Adani Total Gas Ltd. has planned, established, implemented, controlled and maintained the procedure SP-04 needed to meet the QHSE management system requirements for the provision of products and services, and to implement the actions determined in planning, action to address the risk and opportunities and environmental aspect, OH&S hazard(s) and risk by:

- a) Determining the requirements for the products and services;
- b) establishing criteria for:
 - Processes – Quality Plan/ Specification defined as in-process stage and Acceptance criteria of Installation, Commissioning, Operation and Maintenance of Gas Supply Equipment & Pipelines and Natural Gas Transportation and Distribution are prepared, approval is taken from Vice President and circulated to all concerned for implementation (Ref.Doc. E&P103, E&P104 E&P105 **E&P106**)

and required verifications, validations, monitoring, inspection and test activities are defined as specific for product acceptance.

- c) Determining the resources needed to achieve conformity to the product and service requirements related QHSE performance;
- d) Implementing control of the processes in accordance with the stipulated operating criteria;
 - a. Control Can include elimination, substitute, engineering, procedures and administrative individually or in combination.
 - b. where their absence could lead to deviations from the QHSE Policy and objectives
- e) Determining, maintaining and retaining documented information to the extent necessary:
 - To have confidence that the processes have been carried out as planned;
 - To demonstrate the conformity of products and services to their requirements.
- f) Adapting work to workers through providing safe work environments, managing motivational activities, fit for use equipment's, machineries & infrastructures and Trainings.

The output of this planning shall be suitable for the organization's operations.

Adani Total Gas Ltd. has ensured that outsourced processes are governed through comprehensive planning process under various consideration. Details of individual outsourced processes are available in respective departments. The type and extent of control or influence to be applied to the processes have been defined within the QHSE management system. Adani Total Gas Ltd. has ensured that outsourced processes are controlled or influenced by organization.

Adani Total Gas Ltd. has maintained documented information to the extent necessary to have confidence that the processes have been carried out as planned.

Consistent with a life cycle perspective, the Adani Total Gas Ltd. has established and maintained SP-30 procedures related to the identified significant environmental aspects and OH&S hazards / risks and communicating relevant procedures and requirements to suppliers and contractors / visitors.

Consistent with a life cycle perspective, the Adani Total Gas Ltd. has considered the need to provide information about potential significant environmental impacts associated with the delivery, use, end-of-life treatment and final disposal of its products and services.

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Adani Total Gas Ltd. has provided required suitable PPE's for the personnel safety to safe work of all the employees including non-managerial workers at defined frequency at no cost. PPE's replace in case of damage or not fit for purpose with old one. A contractor/ employer have to be complied of PPE's requirement as per the agreed terms and condition of work order/ contract.

Before starting any new project or modification of existing infrastructure the associated hazards are reviewed for risks and controls are defined before execution of the project or the job. Once the site is mobilized all respective functions i.e. Operation and maintenance processes are intimated and process owners are responsible for related risks and control of aspects.

Risk Assessment and Aspect Impact Analysis of the expansion or project is done by the process owner under whom such project is taking place.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|--|
| 01 | SP29 | Procedure for Operational Control |
| 02 | SP11 | Procedure for Operation PNG |
| 03 | SP12 | Procedure for Operation of CNG Station |
| 04 | SP 04 | Quality Planning |

8.1.2 Eliminating hazards and reducing OH&S Risk

Adani Total Gas Ltd. has established & implemented SP-30 procedures for hazard identification and risk management and determination of prevention control hierarchy. During Plant visit PPE has provided by organization to employee, workman, contract work man, visitor & other interested parties on no cost base.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|--|
| 01 | SP30 | Procedure for Environmental Aspect & Impact Assessment & Identification of Hazard & Risk Control Model |

8.1.3 Management of Change

Adani Total Gas Ltd. has established, implemented, and maintained a SP-23 procedure for the implementation and control of planned temporary and permanent changes that impact QHSE performance. Adani Total Gas Ltd. has control planned changes and reviews the consequences of unintended changes, taking action to mitigate any adverse effect, as necessary.

NOTE: Changes can result in risks and opportunities.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|------------------------------------|
| 01 | SP23 | Procedure for Management of Change |

8.1.4 Procurement, Contractors and Outsourcing

Adani Total Gas Ltd. has established, implemented, and maintained a procedure to control the procurement of products and services in order to ensure their conformity to its QHSE management system.

Adani Total Gas Ltd. has established, implemented and maintained the Standard “ Contractor Safety Management Audit – SRFA (Safety Risk Field Audit)” and communicated with the contractors, to identify hazards and to assess and control the OH&S risks, arising from the:

- a) Contractors’ activities and operations that impact the organization through implementation of the Job Safety Analysis/ Work Permit procedure;
- b) Organization’s activities and operations that impact the contractors’ workers through work permit and contractor safety briefing;
- c) Contractors’ activities and operations that impact other interested parties in the workplace through work permit procedure and isolation of work area.

Adani Total Gas Ltd. has established and implemented Contractor Assessment for the existing contractors as a part of Parivartan program.

Adani Total Gas Ltd. has ensured that the requirements of its QHSE management system are met by contractors and their workers. Adani Total Gas Ltd. has defined and applied occupational health and safety criteria for the selection of contractors in the procurement procedure. It can be helpful to include the occupational health and safety criteria for the selection of contractors in the contractual documents.

Adani Total Gas Ltd. has ensured that outsourced functions and processes are controlled or influenced. Adani Total Gas Ltd. has ensured that its outsourcing arrangements are consistent with legal requirements and other requirements and with achieving the intended outcomes of the QHSE management system. The type and extent of control or influence to be applied to the functions and processes has defined within the QHSE management system. QHSE management system requirements are communicating to relevant suppliers and contractors / visitors.

Coordination with external providers can assist an organization to address any impact of outsourcing activities on the QHSE performance.

In Adani Total Gas Ltd. CNG, PNG project, Steel project, Man Power for Operation, Maintenance. project and administrative activities, utility maintenance, testing, monitoring and calibrations related outsourcing activities are carried out. Adani Total Gas Ltd. is imparting safety training program before execution of such activities as well as QHSE related requirements or instructions shall be communicated to the relevant party through work order before execution of work.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|--------------------------------|
| 01 | --- | Safety Risk field audit - SRFA |

8.2 Emergency Preparedness and Response

Adani Total Gas Ltd. has established, implemented, and maintained the procedure needed to prepare for and respond to potential emergency identified including actions to address risks and opportunities.

Emergency Response and Disaster Management Plan has established as per the norms prescribed by statutory directives and agencies i.e. PNGRB etc.

It is the policy of company to establish and maintain procedures to identify potential hazards and response to incidents, accidents and emergency situations and preventing and mitigating the likelihood of environmental impacts, illness and injury that may be associated with them.

- A. Prepare to respond by planning action to prevent or mitigate adverse environmental impacts and OH&S consequences from emergency situations;
- B. Respond to actual emergency situation as defined
- C. Take action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact and OH&S consequences;
- D. Periodically test (Mock Drill/ demonstration) the planned response actions, where practicable, involving relevant interested parties as appropriate.
- E. Periodically review and revise the processes and planned response actions, in particular after the occurrence of emergency situations or tests;

- F. Provide relevant information and training related to emergency preparedness and response, as appropriate, to relevant interested parties, including emergency services, neighbors and persons working under its control.

Emergency plan is prepared to handle potential emergency situations which identify the list of key personnel involved, details of emergency services, internal and external communication plans, and actions to be taken in different types of emergencies, training plans and testing of effectiveness.

Operating procedures, control and response guidelines to potential emergency situations are defined taking into account incidents arising or likely to arise, as consequence of abnormal operating conditions and or accident and potential emergency situations.

Manager HSE is responsible for implementation, review and update of Emergency Response & Disaster Management Plan (ERDMP) monitoring and reporting emergency preparedness to management and check functioning of environment management system. He is also responsible for carrying out mock drills and preparedness of emergency plans in coordination with Functional head.

Respective HOD identifying the potential emergency situations likely to arise out of various activities and impart training to employees on emergency preparedness in consultation with Manager HSE, GA Head and Management Representative & Appointee.

Adani Total Gas Ltd. has reviewed and revised, where necessary its emergency preparedness and response procedures after the occurrence of incidents or emergency situations.

Emergency Response and Disaster Management Plan (ERDMP) for Onsite first aid and fire safety facilities are available round the clock to ensure timely response to emergencies. Emergency Response and Disaster Management Plan (ERDMP) are updated as per statutory and regulatory requirements i.e. PNGRB requirements.

Classification of emergencies:

Emergencies can be categorized into broad levels on the basis of seriousness and response requirements, namely: –

| Potential emergency | Location |
|----------------------------|---|
| Gas escape | Gas installations & stations PE / Steel Distribution Network High Pressure Distribution Line: |

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| | |
|---|---|
| Fire | Main Pressure Reduction Station (CGS/Compression Station/CPRS/PRS): |
| | PE/Steel Distribution Network: |
| | High pressure distribution Line: |
| Fire | Main Pressure Reduction Station (CGS/Compression Station): |
| | Non - plant buildings & office premises |
| | Evacuation of the premises |
| | Handling General public |
| | Handling Visitors |
| Leakage /spillage of ethyl mercaptan | Dealing with relatives of the injured: |
| | Handling person stuck-up in lift |
| | CGS |

Adani Total Gas Ltd. has maintained and retained documented information on the procedure on the plans for responding potential emergency situations.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|----------------|-----------------|---|
| 01 | HSE102 | Emergency Response and Disaster Management Plan |

8.2.1 Customer Communication

Adani Total Gas Ltd. has reviewed of requirements for the Industrial connection, Domestic connection, Commercial or Non-Commercial Connection.

Adani Total Gas Ltd. has established, implemented and maintained SP-06 procedure for contract review to ensure that the requirements to provide gas connection to customers are defined & understood by the customers, Any difference between the customers' requirements & Adani Total Gas Ltd. has sorted out before entering into the contract and Contract amendment criteria are identified and implemented as & when required

Communication with customers shall include:

Communication with customers shall include:

- a) We Adani Total Gas Ltd. providing information relating to Industrial connection, Domestic connection, Commercial or Non-Commercial Connection through Helpline number / Office assistant/ information template/ web site.
- b) We Adani Total Gas Ltd. handling enquiries by respective discipline sales personnel like Industrial connection, Domestic connection, Commercial or Non-Commercial Connection, they are review and communicate contracts or orders, including changes and same communicate to the customer and project and operation for execution the customer requirements.
- c) We Adani Total Gas Ltd. is obtaining customer feedback relating to Industrial connection, Domestic connection, Commercial or Non-Commercial Connection, including customer complaints; Customer feedback indicating their views regarding to the Industrial connection, Domestic connection, Commercial or Non-Commercial Connection and resolving the customer complaint to their total satisfaction level.
- d) Handling or controlling customer property including acknowledgement slip is signed for conformance of delivery/ order execution as appropriate. Marking, storage, handling, and preservation of customer supplied products follow effectively by concern functions, when relevant.
- e) Commercial & Marketing, Domestic Connection, CNG and PNG function is responsible for establishing specific requirements for contingency action and same communicated to customer, when relevant.
- f) Consistent with a life cycle perspective, Adani Total Gas Ltd. have considered the need to provide information about potential significant environmental impacts associated with the delivery, use, end-of-life treatment, and consumer usage/ disposal of Natural Gas.

Consider the need to provide information about potential significant environmental impacts associated with the transportation or delivery, use, end-of-life treatment

and consumer usage/ disposal of Natural Gas and services for the Industrial connection, Domestic connection, Commercial or Non-Commercial Connection(Life Cycle Perspective).

8.2.2 Determination of Requirements

Adani Total Gas Ltd. has ensured Applicable statutory and regulatory requirements and Adani Total Gas Ltd. necessary requirements including meet the claims such as warranty provisions for the products and services it offers to customer when determining the requirements for the distribution/ supply or dispersing of natural gas to Industrial connection, Domestic connection, Commercial or Non-Commercial Connection to be offered.

8.2.3 Review of Customer Requirements

Adani Total Gas Ltd. has conducted a review before committing to customer for the requirements related to distribution/ supply or dispersing of natural gas to Industrial connection, Domestic connection, Commercial or Non-Commercial Connection.

Adani Total Gas Ltd. has reviewed customer requirements for distribution/ supply or dispersing of natural gas to Industrial connection, Domestic connection, Commercial or Non-Commercial Connection those considering necessary requirements or intended use when known and the company's capacity including delivery and post-delivery and capability to meet the claims for the product and services such as warranty provisions, contractual obligations such as maintenance services, applicable statutory and regulatory requirements compliance and contract or order requirements differing from those previously expressed .

QHSE management System Procedure SP-06; contractor review and administration processing, instructs on how to carry out this review.

Contract review for industrial customers is performed in two parts

- I. Commercial review
- II. Technical review

1. Commercial Review

Marketing survey is conducted to know the quantity of gas required in potential areas. Contract terms, conditions & procedure for providing gas connection are defined and documented. The terms and conditions for providing gas connections are explained to potential / interested customers and their requirements are also understood. Once the requirements are understood, Engineering & Project Group is intimated for the technical review along with the necessary details like the present and the future gas demands. The Commercial Group performs the commercial review.

2. Technical Review:

After receiving intimation from the commercial group, site is visited to assess the capability in terms of availability of gas at specified parameters in that area. Design of the network is also checked to ensure that the existing network can meet the requirement as per documented procedure. After ensuring the specified requirements, commercial group is intimated to proceed further. Engineering & Project Group performs technical review. Wherever required, Operation-PNG is co-ordinate during the review process.

The contract agreement is mutually agreed upon and jointly signed by the customer and authorized person from Adani Total Gas Ltd. after ensuring that the specified requirements are met.

Amendment to a Contract:

Amendment in applicable contract terms & conditions is made by Commercial Group as per terms & conditions specified in agreement & mutually agreed upon by the customers as well as Adani Total Gas Ltd. authorized person. It is to be noted that in case of quantity enhancement/reduction, amendment to a contract is made only after getting design clearance from the Engineering Group. After amendment, Operation-PNG group is intimated about the same

- a) Customer requirements are clearly understood and review activities pertaining to requirements of Enquiries are agreed before their acceptance including ability to meet customer requirements.
- b) It is ensured that the product requirements are defined and reviewed before acceptance.
- c) Any discrepancy is resolved with the customer and such amendments to contract are communicated to all concerned.
- d) Where Customer does not provide with a documented statement of requirements, the same are confirmed by the organization before acceptance.
- Consider the need to provide information about potential significant environmental impacts associated with the transportation or delivery, use, end-of-life treatment and final disposal of its products and services.

Adani Total Gas Ltd. has ensured change in product and services agreement amendment and relevant person are made aware by providing amended agreement copy and same communicate to the customers.

Adani Total Gas Ltd. has retained documented information as per the procedure SP-06; contractor review and administration and COM01 - Procedure for registration of Industrial & Large Commercial Customers, as applicable:

- a) Order detained received Registration Form for Industries & Large commercial and Registration cum Contract-Commercial/Non commercial
- b) New requirements for the Industrial connection, Domestic connection, Commercial or Non-Commercial Connection inquiry records
- c) Customer Feedback/ satisfaction survey report

8.2.4 Changes of Requirements of products and services

Adani Total Gas Ltd. Commercial and marketing function has ensured that relevant documented information is amended, and that relevant persons are made aware of the changed requirements, when the requirements for products and services are changed and same communicate to Adani Total Gas Ltd.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|----------------|-----------------|--|
| 1 | SP 06 | Procedure for Contract review and Administration |

8.3 Design and Development of products and services

For, 9001:2015 this clause is not applicable.

Adani Total Gas Ltd. is into business of receiving, transportation, and distribution of Natural Gas hence clause no. Of ISO 9001: 2015 QMS - 8.3 design & development of product & service is not applicable

8.4 Control of External Providers

8.4.1 General

Adani Total Gas Ltd. has ensured that externally provided processes, products and services conform to requirements.

Adani Total Gas Ltd. has determined the controls to be applied to externally provided processes, products, and services when:

- a) Natural Gas is supplied by external providers M/s. GSPC and M/s. GAIL under a long-term purchase agreement.
- b) Natural Gas Distribution/ supply or dispersing process are not carried out to customer(s) by external providers on behalf of the Adani Total Gas Ltd.;
- c) Adani Total Gas Ltd. has carried out long term contractual agreement with services providers for the Industrial connection, Domestic connection, Commercial or Non-Commercial Connection.
- d) All Gas Station Service are procured under long term agreement.

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- e) Purchasing of spares, consumables, and services from external providers as per the defined procedure SP-08: Purchase specification and SP-09: Purchase Order.
- f) Requirement of product/services is given by user department with specifications if any.
- g) Review of supplier's performance rating is done on an ongoing basis as per SAP system & any discrepancy in goods/services is immediately brought to notice of the supplier.

Adani Total Gas Ltd. has established implemented and maintained procedure SP- 07 for Selection, Evaluation, Re-evaluation, and Performance Rating of External Providers. **Adani Total Gas Ltd.** has retained documented information of these activities and any necessary actions arising from the evaluations.

8.4.2 Type & Extent of Controls

Adani Total Gas Ltd. has ensured that externally provided processes, products and services do not adversely affect the organization's ability to consistently deliver conforming products and services to its customers.

Adani Total Gas Ltd. is responsible for ensuring that externally provided processes, products and services conform to requirements.

Adani Total Gas Ltd. has considered a potential impact of the externally provided processes, products, and services on the organization's ability to consistently meet customer and applicable statutory and regulatory requirements. Purchase orders indicate description of goods, quality, quantity, and price and delivery schedule of the material to be purchased and as per the Tender requirements.

Adani Total Gas Ltd. has verified Natural Gas quality required as per long term purchase agreement from GSPC/ GAIL through ensure online natural gas quality and review test report as received periodically. **Adani Total Gas Ltd.** has verified of receiving materials and services for facility to Industrial connection, Domestic connection, Commercial or Non-Commercial Connection through inspection and test certificate review as appropriate.

Receiving, Inspection and Testing

- a) For critical items, Quality Assurance Plan (QAP) is prepared, approved and inspection is carried out by Third Party Inspection Agency at Customers premises as per approved QAP to meet the specified requirement. After the receipt of materials, the same is inspected visually to identify damages if any during transportation. It is ensured that the incoming materials are not used / processed until those have been inspected or verified against specified requirements in accordance with approved QAP/documented procedures.
- b) For incoming natural gas, gas sample analysis is carried out by GSPCL & witnessed by Adani Total Gas Ltd. to verify the content of natural gas & its calorific value

against specified permissible limit. In case of deviation (rarely happens) from specified limit, co-ordination is done with gas supplying agencies GSPCL to ensure that specified requirements are met. However, Adani Total Gas Ltd. does not have any authority to reject the incoming natural gas nor have any technology to alter the content of NG. As gas sample analysis is being co-ordinate by Operation Dept.

- c) For the items which are non-critical in nature, inspection is carried out by the user department to identify non-conformances against specified requirement.
- d) Wherever incoming materials are released for urgent installation / maintenance / service purpose prior to verification, in such cases, issued materials are positively identified, recorded and reviewed in order to permit immediate recall and replacement in the event of non-conformity reported by users or E&P, against specified requirements.

Consistent with a life cycle perspective, Adani Total Gas Ltd. have determined its environmental requirements for the procurement of products and services, as appropriate.

8.4.3 Information for External Providers

Adani Total Gas Ltd. has ensured that the requirements and controls it needs for externally provided processes, services, or products, in order to avoid a negative effect on its operations or on customer satisfaction are clearly communicated to external providers.

Adani Total Gas Ltd. has communicated to external providers its requirements for the processes, products and services to be provided.

1. It is essential that all relevant details are clearly stated at the time of ordering; these can include, for example, drawings, catalogue or model numbers, response times, and the required delivery date and place.
2. The information to be submitted to the external provider (e.g. a written purchase order) should be checked prior to issue.

Adani Total Gas Ltd. has communicated to external providers its requirements for the approval of:

1. NG is purchased from GSPC / GAIL under a long-term purchase agreement.
2. Purchasing information has provided with details related to any methods, processes, and equipment that should be used, e.g. certain welding techniques, the use of specific calibrated equipment, or employee uniforms the release of products and services.

Adani Total Gas Ltd. has identified and communicated any specific competence requirements needed for persons from the external provider in the purchase agreement/ work order.

Adani Gas Ltd. has established, communicated and implemented control and monitoring requirements of the external providers' performance.

Adani Total Gas Ltd. has provided information about such arrangements, such as the timing for the inspection by Adani Total Gas Ltd./ Third Party to the verification of project activities and equipment's (such as office space, administrative support or testing facilities) required from the external provider.

Adani Total Gas Ltd. has communicated to external providers its requirements for consistent with a life cycle perspective the relevant environmental requirement to including contractors;

Adani Total Gas Ltd. has communicated to external providers its requirements for consistent with a life cycle perspective consider the need to provide information about potential significant environmental impacts associated with the transportation or delivery of its products and services.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|---|
| 01 | SP06 | Procedure for Contract Review and Administration |
| 02 | SP07 | Procedure for T&C (Selection, Evaluation, Re-evaluation, and Performance Rating |
| 03 | SP08 | Procedure for Purchase Specification |
| 04 | SP09 | Procedure for Purchase Order |

8.5 Operation and Services Provision

8.5.1 Control of production and service provision

Adani Total Gas Ltd. has implemented production and service provision under controlled conditions. Operation and Maintenance for Supply/ Distribution or dispersing of Natural Gas information and appropriate work instructions are established and are communicated to relevant person. Operations and production processes controlling through parameters like pressure, flow, temperature, and quantity of gas are being monitored and controlled as per documented guidelines and are validated where appropriate.

Machines and equipment used in Operation and Maintenance for Supply/ Distribution or dispersing of Natural Gas are maintained fit for used through preventive maintenance and calibration process. Methods for product release and delivery are defined.

Adani Total Gas Ltd. has verified process output based on defined quality plan and verified results based on the inspection and testing hence as such no required for validation or re-validation process.

Processes are controlled by monitoring and measuring various parameters of pipeline system Inspection and testing program for a pipe and network diagram is defined as quality plan or drawings and specifications. Supply/Distribution or dispersing of Natural Gas parameters like pressure, flow, temperature, density, and quantity of gas. Inspection reports are prepared and maintained as evidence that the product has been tested or inspected. The inspection report clearly indicates whether materials/installation is passed or failed.

Infrastructure Maintenance of key CNG compressors, associated equipment's, CP system and MS/PE pipeline system are addressed in Section 7.1.3 of this manual and procedure for SP-14 Maintenance of PNG and CNG stations.

Operation and Maintenance for Supply/ Distribution or dispersing of Natural Gas activities are performed by the skilled and trained operator. Work instructions are given to them for reference to ensure that the same is performed as per specified requirements.

Inbuilt safety features have been incorporated from Engineering, construction, and operation phases. Fire extinguishers provided at various gas installations like MRS/CNG compressor stations are maintained by respective department.

Supply/ Distribution or dispersing of Natural Gas are released for delivery only after all specified activities have been satisfactorily completed and conformity of the product has been verified. For post-delivery activity customer care responsible providing satisfactory services at customer end

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|---|
| 01 | SP11 | Procedure for Operation of PNG |
| 02 | SP12 | Procedure for Operation of CNG |
| 03 | DOM01 | Procedure for Installation of Domestic Connection |
| 04 | COM03 | Procedure for Installation of Commercial/Industrial Connections |

8.5.2 Identification and traceability

Adani Total Gas Ltd. has established, implemented, and maintained procedure – SP-10 for Identification and traceability for installation/ network and Connections (Domestic / Commercial / Non-commercial / Industrial / CNG) and materials.

- Industrial connection, Domestic connection, Commercial or Non-Commercial Connection and CNG connection are given unique customer number to each connection as per the defined procedure SP-10 Identification and traceability.
- Materials are identified with item code and specification as provided by manufacturer. The identification is the same as, or is cross-referenced with, the designations used in drawings, specifications, bills of materials, parts lists, purchase orders, etc.
- Equipment's and machineries are identified with unit identity number and same displayed on it.
- Non-conforming outputs rejected/ faulty/ damaged product, unacceptable material, spares and misc. items are segregated, uniquely identified appropriately for disposal action.
- Waste and scrap are identified with their names in the storage yard.

8.5.3 Property belonging to customers or external providers

Adani Total Gas Ltd. has identified, verify, protect, and safeguard customers' or external providers' property provided for use or incorporation into the products and services.

Adani Total Gas Ltd. has handled, and controlled customer property includes refundable Security deposit to domestic, commercial and industrial customers, meter, and personnel data as submitted for connection.

External provider's property can include materials, components, tools and equipment, intellectual property and personal data. External provider is primary responsible to take care of their property lost, damaged or otherwise found to be unsuitable for use. Adani Total Gas Ltd. has handled and care with property belonging external providers while it is under the organization's control or being used by the organization.

Daily nominations & scheduling is done and is recorded. In case the delivered quantities are less or more than the schedule quantities the same is reported and billing is done as per the terms and conditions of the contract. The gas inducted into the pipeline is delivered to the customers without altering its component neither Adani Total Gas Ltd. has technology to alter the same.

8.5.4 Preservation

Adani Total Gas Ltd. has established procedure SP-16 for receipt, storage and preservation of materials used for networking and installation. The product during

internal processing and delivery to the intended destination in order to maintain confirming to requirements. Adani Total Gas Ltd. has preserved the outputs during production and service provision, to the extent necessary to ensure conformity to requirements.

Adani Total Gas Ltd. has received online NCG/PNG from direct source of M/s. GSPC or M/s. GAIL, hence no preservation requirements have to be complied, however at the point of used/ station Adani Total Gas Ltd. has taken precaution as per the CNG/PNG materials safety data sheet and PNGRB norms.

Precautions are taken at all stages to receiving, handling and distribution of Natural Gas and networking and installation materials from leakages, damage, and deterioration during handling. Handling equipment viz loading arms for receiving the materials are adequately maintained and are safe to use. To ensure MSDS instruction before handling Natural Gas Chemicals for safe handling

Supply and distribution of Natural Gas to the customers through pipeline and Mobile Cascade system. Distribution of PNG monitoring and controlling through process parameters like pressure, flow, velocity and ensure un-interrupted supply of gas to customers. Mobile cascade supply Natural Gas having pressure below 150 Kg/cm² is dispatched to the daughter booster station all statutory and regulatory documents and safety precautions as per the TREM Card and Materials safety data sheet.

AEO (Gas Escape & Emergency Services) function has ensured protect from leakage, spillages and fire during supply/ distribution and dispersing of Natural Gas. AEO function has provided facility to continuity Gas supply by Handling of Gas Escape and complaints handling.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|---------------------|
| 01 | SP-16 | Procedure for Store |

8.5.5 Post-delivery activities

Adani Total Gas Ltd. has provided post-delivery activities like Gas Escape Handling, customer complaints handling, preventive maintenance of gas connection as applicable.

In determining the extent of post-delivery activities that are required, Adani Total Gas Ltd. has considered:

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| | | |
|---|---|---|
| A | Statutory and regulatory requirements | PNGRB Compliance, PESO compliance, GPCB compliance, Municipality & Gram Panchayat requirements, Industrial association, or society requirements. |
| b | The potential undesired consequences associated with its products and services. | AEO (Gas Escape & Emergency Services), Customer Care function performing the job |
| c | The nature, use and intended lifetime of its products and services | Product life cycle |
| d | Customer requirements | Procedure SP-06 for Contract review and administration |
| e | Customer feedback | Procedure SP-06 for Contract review and administration Procedure MNT-06 for Customer Complaints Handling Procedure MNT-03 for Gas Escape Handling |

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|--|
| 01 | SP 06 | SP-06 for Contract review and administration |
| 02 | SP 11 | Procedure for Operation of PNG |
| 03 | SP 12 | Procedure for Operation of CNG |

8.5.6 Control of Changes

Adani Total Gas Ltd. has established implemented and maintained procedure SP-23 management of change for Supply / Distribution or Dispersing of natural gas to the extent necessary to ensure continuing conformity with QHSE requirements.

Adani Total Gas Ltd. has retained documented information describing the results of the review of changes, PNG O&M Head/ CNG O&M Head/ GA Head authorizing the change, and any necessary actions arising from the review.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|-------------------|
|---------|----------|-------------------|

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| | | |
|----|--------|---|
| 01 | SP 13 | Procedure for Inspection |
| 02 | SP 14 | Procedure for Maintenance |
| 03 | SP 23 | Procedure for Management of Change |
| 04 | E&P 01 | Procedure for Installation of MRS |
| 05 | E&P 02 | Procedure for Installation of PE Pipeline |

8.6 Release of product and services

Adani Total Gas Ltd. has implemented planned arrangements, at appropriate stages, to verify that the product and service requirements have been met.

Adani Total Gas Ltd. has verified in-process stages inspection of network pipe lying and installation as per the defined quality plan or drawing specification requirements. After successful completion of in-process inspection, the necessary final inspection / tests as identified in quality assurance plan / documented procedure are carried out and verification results are documented.

The release of natural gas to the customer shall not proceed until the planned arrangements have been satisfactorily completed, unless otherwise approved by a relevant authority and, as applicable, by the customer.

Adani Total Gas Ltd. has verified for satisfactory compliance to the specified requirements before the release of gas connection for actual use by customers. Inspection reports are prepared and maintained as evidence that the product has been tested or inspected. The inspection report clearly indicates whether materials/installation is passed or failed.

Adani Total Gas Ltd. has retained documented information on the release of products and services. The documented information shall include:

- e) Evidence of conformity with the acceptance criteria;
- f) Traceability to the person(s) authorizing the release.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|---------------------------------------|
| 01 | SP 13 | Procedure for Inspection |
| 02 | SP 11 | Procedure for Operation - PNG |
| 03 | SP 12 | Procedure for Operation - CNG station |
| 04 | SP 21 | Procedure for Accounting of Gas |

8.7 Control of non-conforming outputs

Adani Total Gas Ltd. has established, implemented and maintained a procedure SP-22 for control of Non-conforming output.

Nonconforming outputs is identified, documented, evaluated, and prevented from being used or delivered. To prevent nonconforming outputs from unintended use or delivery the outputs are marked with a HOLD level wherever segregation is impractical.

Adani Total Gas Ltd. has deal with nonconforming outputs in one or more of the following ways:

- A. Non-Conforming products are identified, segregated, and held to prevent further use or inclusion with:
- Quality of natural gas does not meet the content and calorific value against the mentioned calorific value the same is reported to the supplier for further action. Adani Total Gas Ltd. have no authority to reject the gas nor alter the composition of the gas.
 - In case of network laying and connection installation, non-conformity is identified through inspection and the same is recorded. The installation is identified and isolation to prevent unintended use or delivery.
 - Materials are verified as per the requirements of QAP (Ref. SP 13) by the TPIA at vendor's premise. If materials are not conforming to specified requirements the same is identified as non-conforming materials.
- B. Personnel are authorized and made responsible to report non-conformities and advise on appropriate measures including acceptance, release or use under concession of the non-conforming product.
- Authority to handle and control non-conforming output by GA Head/ O&M CNG Head/ O&M PNG Head for the quality of natural gas.
 - Authority to handle and control non-conforming output by GA Head/ CNG project Head/ PNG project Head for the network laying and connection installation.
 - Authority to handle and control non-conforming output by GA Head/ User Dept. Head for the materials.
- C. Appropriate actions are taken when non-conforming output is identified after Installation/ connection and supply/ distribution & dispersing of natural gas. When appropriate, corrective actions are implemented to prevent recurrence of identified nonconforming outputs.
- D. Non-confirming products are either reworked or accepted by concession unless otherwise rejected taking action to preclude its original intended use or application, thus ensuring that action taken is appropriate to the effect or potential effect of the non-conformity when the non-conformity when product is detected after delivery or use has started.

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- E. Action regarding non-conformance is taken in accordance with the agreed decision and the appropriate documentation is completed. Corrected product is again evaluated to demonstrate conformity to the requirements.
- F. The disposition decision may be: Rework or Repair, Accept As-it -is, Re-grade, or Scrap.
- G. Adequate records are maintained to provide objective evidence that rectifications are satisfactorily completed, and that re-inspection has been carried out in accordance with documented procedures.

Adani Total Gas Ltd. has taken appropriate action with reference procedure SP-18 correction action based on the nature of the nonconformity and its effect on the conformity of supply/ distribution & dispersing of natural gas, installation, and connection.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|--|
| 01 | SP 22 | Procedure for Control of non-conforming output |
| 02 | SP 18 | Procedure for Corrective action |
| 03 | SP 13 | Procedure for Inspection |

9. Performance Evaluation

9.1 Monitoring, Measurement, Analysis and Evaluation

9.1.1 General

Adani Total Gas Ltd. has established, implemented, and maintained a procedure SP-19 for monitoring, measurement, analysis and evaluation of QHSE performance on the regular basis.

Adani Total Gas Ltd. has defined organizational and department level QHSE objective which are monitored, measured, analyzed, and evaluated as per the QHSE management system requirements.

Adani Total Gas Ltd. has determined Monitoring Measurement, Analysis & Evaluation requirements as per below Table:

| S No | Monitoring | Measurement | Frequency | Analysis | Review and Evaluate | Evidence |
|------|--|-------------|-----------|----------|---------------------|-------------|
| 1. | Context of the organization | -- | Annual | -- | MRM | MRM Records |
| 2. | Needs and expectations Of interested parties | -- | Annual | -- | MRM | MRM Records |

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| | | | | | | |
|-----|-------------------------------|--|--------------------------|----------------------------|---------------------------------|---|
| 3. | Risk & Opportunity | Nos. of Risk | Annual | -- | MRM | MRM Records |
| 4. | Environmental Aspects / HIRA | Nos. of Significant Aspects and not Acceptable Risks | Annual | -- | MRM | MRM Records |
| 5. | Yearly Planning | Objective Monitoring Sheet | Monthly | Objective Sheet | Target v/s achieve | Objective Sheet |
| 6. | Action Plan | Nos. of MP/ IMP | Quarterly | MP Sheet | Target v/s achieve | MP Sheet |
| 7. | Internal Audit | Internal Audit Schedule & Audit Plan | Twice in a calendar Year | Audit Summary | % compliance or non-compliance | Audit Results |
| 8. | Legal Register | Legal Requirement Compliance | Half yearly | Legatrix | Compliance vs Non-Compliance | Legatrix |
| 9. | MRM | Agenda for MRM | Six Monthly | MRM Effectiveness | Agenda for MRM | MRM Records |
| 10. | Customer satisfaction Survey | % Customer Satisfaction | Three years | Customer Feedback | Degree of Customer Satisfaction | Customer Satisfaction Ratio/Feedback Form |
| 11. | Supplier Performance Rating | Grade Performance | Yearly | Performance of Suppliers | SAP | SAP |
| 12. | Contractor performance rating | Grade Performance | Yearly | Performance of Contractors | In MRM | Contractor performance evaluation report |

Adani Total Gas Ltd. has ensured that monitoring and measuring equipment is calibrated or verified as applicable, and is used and maintained as appropriate.

There can be legal requirements or other requirements (e.g. national or international standards) concerning the calibration or verification of monitoring and measuring equipment.

Adani Total Gas Ltd. has retained appropriate documented information:

- As evidence as of the results of monitoring, measurement, analysis, and performance evaluation
- On the maintenance, calibration, or verification of measuring equipment.

Adani Total Gas Ltd. has communicated relevant environmental performance information both internally and externally, as identified in its communicated processes and required by its compliance obligations.

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Note: - Environment, Health & Safety related things are monitored and measured like Air quality, Noise level, Water quality, stack quality, GPCB consent monitoring, health checkup or any legal obligation etc. if any abnormality found in result it shall evaluate and communicated to relevant interested parties.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|---|
| 01 | SP-19 | Procedure for Measurement, Monitoring, Analysis, and evaluation |

9.1.2 Customer Satisfaction/ Evaluation of Compliance

Adani Total Gas Ltd. has monitored customers' perceptions of the degree to which their needs and expectations have been fulfilled.

Adani Total Gas Ltd. has obtained information for the customer perceptions through carrying out periodic customer satisfaction survey. The survey report is compiled, and posts Customer Satisfaction Survey (CSS) action plan is decided based on the priority of the feedback. The survey focuses on the tangible and intangible aspects of our product/services, the responsiveness by the front employees. As a part of survey, suggestion is also sought from the customers for improving the quality of the services.

The extent of the implementation of the Post CSS action plan is reviewed in MRM and necessary actions are decided.

Consistent with its commitment to compliance, Adani Total Gas Ltd. has established, implemented and maintained the procedure SP-27 needed to evaluate fulfillment of its compliance obligation.

The status of compliance w. r. t. QHSE regulatory and other requirements will be carried out by concerned HODs through Legatrix by reviewing the compliance evidences based on Register of QHSE Legislation & other requirements. This evaluation shall include licenses / permits up-dation, reporting of returns, Accident reporting, SHE monitoring, Communications from regulatory authorities / public / impact of new legislation, any other requirement as subscribed by Adani Total Gas Ltd. etc.

The results of the above evaluation in particular non-compliance as identified / concern areas shall be presented / reported by HODs to Adani Total Gas Ltd. QHSE Management review committee for decisions.

Adani Total Gas Ltd. has keep retained documented information maintained of the results of the periodic evaluations and under compliance register as evidence.

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| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|---|
| 01 | SP 27 | Procedure for Identification & Evaluation of Compliance Obligations |
| 02 | SP 19 | Procedure for Performance Measurement and Monitoring |
| 03 | ---- | Customer Satisfaction Survey |

9.1.3 Analysis and evaluation

Adani Total Gas Ltd. has monitored Customers perception for product requirements and communicated appropriately.

Adani Total Gas Ltd. has established system for collecting, analyzing, and evaluating appropriate data and information arising from monitoring and measurement and QHSE performance.

The results of analysis have been used to evaluate:

- Conformity of products and services by CNG and ONG department.
- The degree of customer satisfaction by commercial and marketing department.
- The performance and effectiveness of the by effective internal audit and management review meeting conducting.
- If planning has been implemented effectively by operation and maintenance including PM scheduling and Dispatch Planning
- The effectiveness of actions taken to address risks and opportunities by action plan for mitigating the risk and utilize the opportunities by respective departmental head.
- The performance of external providers through periodic performance rating by material management department, same analyzing results communicate to supplier for further improvements.
- The need for improvements to the QHSE identified through organizational opportunity assessment as per the procedure SP-37 opportunity assessment and review in the periodic management review meeting.

NOTE Methods to analyzed data can include statistical techniques like Charts (Bar Chart, Line Chart, Pi Chart, etc.) Control chart, Pareto chart, Why-Why analysis, QC Tools, MOM, correlation as appropriate to the data.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|-------------------|
|---------|----------|-------------------|

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| | | |
|----|-------|---|
| 01 | SP 27 | Procedure for Identification & Evaluation of Compliance Obligations |
|----|-------|---|

9.2 Internal Audit

Adani Total Gas Ltd. has conducted internal audits **once in a Six Month** to provide information on whether the QHSE management system as per the SP-17 Internal audit procedure.

Adani Total Gas Ltd. has established, implemented and maintained internal audit program, including the frequency, methods, responsibilities, consultation, planning requirements and reporting of its internal audits. When establishing the internal audit program, the organization has taken into consideration the QHSE importance of the process concerned, based on the results of risk assessment of the organization, change affecting the organization and the results of previous audits.

Adani Total Gas Ltd. has retained documented information as evidence of the implementation of the audit program and the audit results.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|------------------------------|
| 01 | SP-17 | Procedure for Internal Audit |

9.3 Management Review

Adani Total Gas Ltd. has established, implemented and maintained SP-01 procedure for management review meeting as per the **QHSE management system requirements**.

Adani Total Gas Ltd. Management has conducted the organization's QHSE management review meeting at twice in a year, to ensure its continuity, suitability, adequacy, and effectiveness. Minutes of Management Review Meetings are maintained as records ensure its continuing suitability, adequacy, effectiveness, and alignment with the strategic direction of the **Adani Total Gas Ltd.**

QHSE - MR is responsible for the coordination of QHSE management review meeting as per the input agenda with reference ISO 9001 QMS, ISO 14001 EMS and ISO 45001 OH&SMS. Concerned HOD's are responsible for execution of output agenda actions decided in the QHSE management system review meeting.

The responsibilities for carrying out the decisions of the committee are assigned during the review. QHSE – MR informs the personnel responsible, follow up and inform the review committee of the status during subsequent meetings.

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Management has communicated the relevant outputs of management reviews to workers, and, where they exist, workers' representatives.

Adani Total Gas Ltd. has retained documented information as evidence of the results of IMS management reviews.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|---------------------------------|
| 01 | SP-01 | Procedure for Management Review |

10. Improvement

10.1 General

Adani Total Gas Ltd. has determined opportunities for improvement and implemented any necessary actions to meet customer requirements and enhance customer satisfaction and to achieve intended outcomes of QHSE management system.

Improvement can include improving products and services to meet requirements as well as to address future needs and expectations, correcting, preventing, or reducing undesired effects and improving the performance, continual improvement program, innovation, adoption new technology and re-organization.

Process and product performance are discussed in the month meeting and decisions are taken for further improvement and trouble shooting.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|---------------------------------|
| 01 | SP-01 | Procedure for Management Review |
| 02 | MGT 222 | Risk and Opportunity Register |
| 03 | MGT 223 | Action Plan |

10.2 Incident, Non-Conformity and Corrective Action

Adani Total Gas Ltd. has established, implemented and maintained the procedure "SP-27: HSE procedure including Incident Management – reporting and investigation" and "SP-18: Corrective Action" for dealing with actual and potential non-conformities and for taking corrective to improve QHSE management system.

Adani Total Gas Ltd. has taken action to eliminate the cause of non-conformity to prevent their reoccurrence. Corrective actions have appropriate to the effects or potential effects of the incidents or nonconformities encountered.

Adani Total Gas Ltd. has retained documented information as evidence of:

- a) HSE 203: Initial incident summary note
- b) HSE 204: Incident Reporting Format
- c) MGT 218: Investigation-Cum-Corrective Action Report
- d) MGT 215: Non-conformity and Corrective Action Report

Adani Total Gas Ltd. has communicated this documented information to relevant workers, and where they exist, workers' representatives, and other relevant interested parties.

The reporting and investigation of incidents without undue delay can enable hazards to be eliminated and associated environmental aspects and risk, OH&S risks to be minimized as soon as possible.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|----------------|-----------------|---|
| 01 | SP 22 | Procedure for Control of Non-Conforming Output |
| 02 | SP 18 | Procedure for Corrective Action |
| 03 | SP 20 | Procedure for HSE management System |
| 04 | SP 35 | Procedure for Incident Investigation |
| 05 | SP 26 | Meter verification for Domestic Customers |
| 06 | SP 33 | Incident Investigation, Non-conformity, Corrective and Preventive Actions |

10.3 Continual Improvement

Adani Total Gas Ltd. has continually improved the suitability, adequacy, and effectiveness of the QHSE management system by:

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Effective Date:
01.06.2020

- Enhancing QHSE Performance, can including QHSE objective and action plan, Internal Audit, Implementing risk and opportunities.
- Promoting a culture that supports an QHSE management system.
- Promoting the participation of workers in implementing actions for the continual improvement of the QHSE management system.
- Communicating the relevant results of continual improvement to workers, and, where they exist, workers' representatives.

Adani Total Gas Ltd. has considered the results of analysis and evaluation, and the outputs from management review, to determine if there are needs or opportunities that have been addressed as part of continual improvement.

Actions taken towards continual improvement are discussed in management review and recorded as an output in the minute of management review meetings.

Reference:

| Sr. No. | Doc. No. | Name of Documents |
|---------|----------|---------------------------------|
| 01 | SP 01 | Procedure for Management Review |
| 02 | MGT 222 | Risk and Opportunity Register |
| 03 | MGT 223 | Management Program |

Annexure – I
QHSE Policy



QUALITY, HEALTH, SAFETY & ENVIRONMENT POLICY

ADANI TOTAL GAS LIMITED (ATGL) is engaged in providing energy solution to the nation with efficient, environment friendly, safe & cost-effective fuel.

"Safety first in everything we do at ATGL" is an integral part of ATGL culture. Safety is not just a priority but is a **pre-condition of employment at ATGL**

ATGL firmly believes that all types of injuries, illness & HSE incidents are preventable.

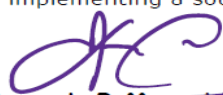
ATGL is committed to ensure continuity of natural gas supply & reliability of services to the customers and also committed to demonstrate continual improvement in our Quality, Occupational Health, Safety & Environmental (QHSE) management performance by:

- Ensuring safe & healthy place to work by identifying, assessing, and reducing QHSE risks to as low as reasonably practicable (ALARP) by applying hierarchy of controls
- Assessing QHSE needs & expectations of Interested Parties and satisfying them with continual improvement effort.
- Adopting and implementing the best available technology and systems from design to the delivery of gas to customers and accessing risk from life cycle perspective
- Integrating QHSE aspects in all our business processes
- Pro-actively complying with all applicable legislation & other requirements.
- Continuously improve our QHSE Management Systems through regular audits and inspection, and ensure its implementation
- Maintaining CGD network integrity in an ongoing and auditable manner.
- Institutionalize practices for sustainable development, pollution prevention, waste avoidance and prevention of injury & ill health.
- Enhancing the competencies and commitment of employees through suitable training programs, involvement, and motivation
- Demonstrating visible leadership at all levels, leaders demonstrate their personal commitment to QHSE to promote Principle of Prevention through consideration of HSE in all decisions
- Proactively report all incidents, investigate root causes and ensure lessons learnt are shared and deployed across the Business
- Setting QHSE objective and targets, monitor progress and continually improve performance.
- Include QHSE performance in the appraisal of staff, evaluation of contractors and rewards accordingly.
- Promote consultation & participation from workers & worker representative in decision making whenever required

We shall make this policy available to all our stakeholders.

I trust each & everyone of you will share the responsibility in implementing a sound QHSE policy and lead by example at all times.

Date: 15.04.2021


Suresh P. Monghani 04.2021
Chief Executive Officer