

SUMMARY OF ETGMS POLICY AND ITS COMPLIANCE

ETG'S Integrated Management System (ETGMS) was introduced in 2011, it standardises all Group operational processes and practices in line with applicable ISO, IFC standards and ("AfDB") Operational Safeguards (OS) and fully comply with international standards and the legal requirements of the host countries within which we operate.

I] ETG'S INTEGRATED MANAGEMENT SYSTEM (ETGMS) POLICY

[as per ISO 9001, ISO 22000/HACCP, ISO 14001, ISO 50001, OHSAS 18001, SA 8000, IFC PERFORMANCE and AfDB OPERATIONAL STANDARDS]

We at EXPORT TRADING GROUP (ETG) are leading value chain manager of agricultural products and related materials to the customers with a mission of making difference to the society through creation of value, will

- strive to play a key role in enhancing the growth through effective marketing of its locally produced agricultural products and related materials,
- strive for continual improvement in our Quality, Food Safety, Environment, Energy, Occupational Health and Safety, Social Accountability management system performance as an integral part of management philosophy and
- maintain safe and healthy working environment in all the activities of trading, storage, processing of agricultural products and related materials business.

We commit ourselves:

- To comply with all the relevant national and international legal, customer and stakeholders' requirements;
- To provide the consumer with safe and quality food products with hygiene by fulfilling the highest standards of cleanliness, personal hygiene, housekeeping, effective supply chain management;
- To reduce incidents, ill human health, prevent hazards, minimize risks and monitor occupational health parameters of employees;
- To effectively and efficiently utilize resources like electricity, oil and water by upgrading technology and by optimising the site operating parameters on a continual basis;
- To strive for reduction of wastewater, noise, solid and hazardous wastes and maintaining air emissions within limits;
- To support the purchase of energy efficient / environment friendly / safest products and services, design for energy efficiency, environment, social, health and safety performance improvement during construction, installation and also land acquisition and resettlement;
- To train and motivate employees and non-employee workers on system related matters and make them responsible for our system performance;
- To comply the social standard requirements by not engaging the child and forced / compulsory workers, improving the health / safety, allowing workers for freedom of association and right to collective bargaining, not showing any discrimination, establishing the disciplinary practices, maintain working hours, giving sufficient remuneration according to the work, engaging applicable stakeholders, monitoring of supplier and contractor social performance;
- Continually improve the Integrated Management System (ETGMS) by establishing measurable objectives and targets, conducting periodic internal audit and regularly reviewing the systems performance and initiating the appropriate correction, corrective action and preventive actions;
- To improve the living standards of the neighbouring community and protect cultural heritage.

A handwritten signature in black ink, appearing to read 'Mahesh R. Patel', is written over a horizontal line.

Mahesh R. Patel, Chairman, ETG

Date: **1st December 2011**

Our above ETGMS policy suggest to provide for the creation of a safe and healthy workplace and a clean environment for employees and the community. It aims at maintaining international standards in warehouse and processing, designs of facilities, equipment selection, and operations.

Regular performance review meetings are held to monitor our progress against continual ETGMS improvement programs.

II] ENVIRONMENTAL AND SOCIAL ASSESSMENT (E & S)

- ETG Sustainability Team assesses periodically assesses all facilities as per ETGMS Procedures towards continual improvement i.e.
 - Document No. ETG/EAEUR&HIRAC/P-01 Environmental Aspects, Hazard Identification, Risk Assessment & Control with established significant selection criteria.
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- E & S assessment for green projects or old project taken over is being done either by Internal ETG Sustainability Team / External Consultants as per laws of land requirements based on the type of operations / boundaries / location.

III] E & S MANAGEMENT PROGRAM

- Based on internal / external experts' E & S assessment, ETG site team will work for further improvement program to minimize or eradicate those impacts / risks.
- This Action Plan cum E & S Management Program is also part of our operational ISO standards requirements.

IV] ORGANISATIONAL CAPACITY

- ETG appointed competent / qualified / experienced team members for all operations / supporting functions.
- Current ETG Sustainability function is managed by competent team (around 20 Sustainability Members / Site ETGMS Coordinators) and supervised by experienced / qualified Head.

V] COMMUNITY ENGAGEMENT

- ETG works with community and all facilities are nearby farm gate level to improve farmers living styles in respective rural areas of African Countries.
- All our site heads / country heads are meeting as well as engaging relevant community people / stakeholders while planning new activities and same is being started to record and reporting is being done annually by respective country head / site head.
- Current ETG Sustainability function is managed by competent team (around 20 Sustainability Members / Site trained ETGMS Coordinators) and supervised by experienced / qualified Head.

VI] MONITORING AND REPORTING

- Safety data, energy consumption, legal compliances are being reported to ETG Sustainability Team on monthly basis by all site head / ETGMS coordinators and supervised by respective Country Sustainability Members.
- ETG Sustainability Team prepare monthly summary report and share to Senior Management Team for further their information and further action, if required.
- In case of reportable accident / fatal accident, immediate reporting to sustainability will be done by site head / country head. Sustainability Head will further report to relevant external stakeholders based on the requirements.
- Annual Sustainability Report cum IFC Annual Monitoring Report is being done past 5 years and same will be done in every year based on the requirements.

VII] CODE OF CONDUCT

- The Code of Conduct, document no. OCP 0003 is applicable for all ETG suppliers, contractors and visitors, the key points of the ETG Code of Conduct is below:
 - Men or woman below the age of 18 years and above the age of 65 years are not permitted to engage in contractual work.
 - **No children shall be allowed to enter the workplace.**
 - Female workers are not allowed to work at height and other high-risk areas.
 - No original certificates / original documents / deposits of workers / staffs shall be retained.
 - Workers / Committee members are freely to be allowed to bargain their social requirements / genuine problems / remuneration.
 - Working Hours / Remunerations to be followed as per local legal requirements to meet worker's basic need requirements.
 - Disciplinary practices to be followed as per local legal requirements.
 - All workmen / employees shall be screened before engaging them on the job. Physical fitness of the person to certain jobs like working at height or other dangerous locations to be ensured before engaging the person on work. The final decision lies with the site management to reject any person on the ground of physical fitness.
 - Smoking / Sewing of sewing gum or Tobacco is strictly prohibited at workplace and ETG's Customers/ Suppliers Premises.
 - Sub-contractors shall ensure adequate supervision at the workplace. They shall ensure that all workmen / employees working under them shall be safe at all time and not create any hazard to themselves or to co-workers.
 - Nobody is allowed to work without wearing a safety helmet, wherever necessary. Chinstrap of safety helmet shall be always on and secured.



- No one is allowed to work at 2-meter height or higher heights without wearing prescribed safety harness with the lanyard of harness anchored to firm support preferably at shoulder level.
- No one is allowed to enter into workplace and work on site without adequate foot protection.
- Usage of eye protection shall be ensured when workmen / employees are engaged for grinding, chipping, welding, gas-cutting and dust generated areas.
- All Personal Protective Equipment (PPE) like shoes, helmet, safety harness etc. shall be arranged before starting the job as per recommendation of Site Admin / ETGMS Coordinator. PPE non-compliance may attract penalty.
- All excavated pits shall be barricaded and these barricades are to be maintained until the backfilling is done. Safe approach shall be ensured into every excavation.
- Adequate illumination at the workplace shall be ensured before starting any work at night time.
- All the dangerous moving parts of the portable / fixed machinery in use shall be adequately guarded.
- Ladders being used at site shall be adequately secured at bottom and top. Ladders shall not be used as work platforms.
- Assembly zones and dismantling zones shall be barricaded and a signalman has to be posted to ensure that nobody stands under suspended load.
- Horseplay is prohibited at the workplace. Running at the site is completely prohibited, except in case of emergency.
- Materials shall not be thrown from heights.
- Other than the electricians with red helmet no one is allowed to carry out electrical connections, repairs on electrical equipment or other jobs related thereto.
- Power supply shall be taken through RCCB of 30 mA sensitivity with safe plug top.
- Insertion of bare wires for tapping power from the electrical sockets is prohibited.
- All major, minor accidents and near misses have to be reported to the Site Engineer / Site Admin / ETGMS Coordinator to enable the management to take necessary steps to avoid recurrence.
- All scaffoldings / work-platforms shall be strong enough to take the expected load. The width of the working platform and fall protection arrangements shall be maintained as per recommendation of Site Admin / ETGMS Coordinator.
- All tools and tackles shall be inspected for use. Defects to be reported immediately. No lifting tackle to be used unless it is certified by the concerned official.
- Good housekeeping to be maintained. Passages shall not be blocked with materials. Materials like bricks shall not be stacked more than 1.5m height.
- Debris, scrap and other materials shall be cleared from the workplace prescheduled times and at the time of closing of work every day. Scrap bins provided at the site must be used.
- Sub-contractors shall ensure that all their workmen are following safety practices while traveling in the company's transport and staying at company's accommodations.
- Adequate firefighting equipment shall be made available at workplace and persons are to be trained in firefighting techniques with the co-ordination of Site Admin / ETGMS Coordinator.



- All unsafe conditions and unsafe acts have to be reported by site Supervisors and then the Site Admin / ETGMS Coordinator personnel shall perform correcting the condition on a priority basis.
- Hydra cranes shall not be engaged for construction activities.
- Other than the driver, nobody is allowed to travel in tractor / tipper / truck.
- Contractor / Sub-contractor shall ensure that all the living rooms and toilets used by them in Workmen dormitory / colony is maintained clean and hygienic. Food and other wastes shall be disposed suitably.
- Personal Protective Equipment rules applicable to a given task must be adhered to at all times.
- No person may work, if under the influence of alcohol or drugs.
- Do not override or interfere with any safety provision.
- All injuries and incidents must be reported.
- Entry to food processing area / production areas is subject to the visitor/contractor complying with the following hygiene rules.
 - Wear Company issued overall and hair net / caps.
 - Use antibacterial hand cleanser and hand wash basin at appropriate points.
 - Remove all jewellery and watches except plain rings and sleeper earrings.
 - No smoking except in designated areas.
 - No drinking or eating (including chewing gum).
 - No nail varnish or false nails.
 - All cuts to be covered with a suitable plaster.
- All visitors/ contractors / suppliers entering the ETG production or storage areas must first complete the last of page this document.



This form has to be completed by all visitors / contractors / suppliers intending to enter food production / food storage areas of the value added processing sites.

IN THE LAST 6 MONTHS HAVE YOU SUFFERED FROM ANY OF THE FOLLOWING CONDITIONS?

- | | |
|----------------------------------|--|
| ➤ Diarrhoea or vomiting | YES <input type="checkbox"/> / NO <input type="checkbox"/> |
| ➤ Food poisoning | YES <input type="checkbox"/> / NO <input type="checkbox"/> |
| ➤ Any Parasitic infection | YES <input type="checkbox"/> / NO <input type="checkbox"/> |
| ➤ Ear, nose or throat infections | YES <input type="checkbox"/> / NO <input type="checkbox"/> |
| ➤ Skin rashes | YES <input type="checkbox"/> / NO <input type="checkbox"/> |
| ➤ Recurring boils | YES <input type="checkbox"/> / NO <input type="checkbox"/> |
| ➤ Typhoid | YES <input type="checkbox"/> / NO <input type="checkbox"/> |
| ➤ Dysentery | YES <input type="checkbox"/> / NO <input type="checkbox"/> |
| ➤ Tuber closes (TB) | YES <input type="checkbox"/> / NO <input type="checkbox"/> |

If visitor/contractor answers YES to any of the questions above entry to food processing / production area shall not be permitted.

Please contact the Food Safety Team Leader / Production Manager for further guidance

We have read all the contents given above / we were explained all the contents given above listing the ETG Code of Conduct to be followed and we understand the requirements.

We shall strictly adhere to all the ETG Management System (ETGMS) norms in all areas of working. We understand complying with the ETGMS norms are mandatory to us.

Date:

Place:

ETG Site In-charge

Visitor/ Supplier / Contractor / Sub-Contractor

Sign or Thumb Impression with Rubber Stamp

Note: *Subcontractors shall be informed of these requirements before awarding work order.*

Site Admin / ETGMS Coordinator may further incorporate site specific Sustainability requirements in this document, if need.

VIII] CONTACT DETAIL FOR SUSTAINABILITY TEAM

- Please contact sustainability@etgworld.com , if any query.