



CHEMICAL SUBSTANCE MANAGEMENT AND HAZARDOUS SUBSTANCE TESTING POLICY

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Version: 1.0

Effective Date: 01 April 2024

Approved By: Managing Director

1. Purpose

KSH Automotive Private Limited is committed to ensuring the safe, responsible, and environmentally sound management of chemical substances used throughout its operations. This policy establishes a systematic approach to identifying, evaluating, handling, storing, transporting, testing, and disposing of chemical substances and hazardous materials to minimize risks to human health, workplace safety, and the environment.

The Company recognizes its responsibility to comply with applicable legal requirements, customer-specific standards, and international best practices relating to chemical substance management and hazardous substance control.

2. Scope

This policy applies to:

- All employees, contractors, consultants, and visitors.
- All manufacturing facilities, warehouses, laboratories, utility areas, and offices.
- All chemical substances, hazardous materials, oils, lubricants, solvents, paints, coatings, cleaning agents, gases, and other regulated substances used, stored, transported, or disposed of by the Company.
- Suppliers, contractors, and service providers handling chemicals on behalf of KSH Automotive.



3. Policy Statement

KSH Automotive is committed to:

- Managing chemical substances safely throughout their lifecycle.
- Preventing harm to employees, contractors, communities, and the environment.
- Ensuring compliance with applicable laws, regulations, customer requirements, and international standards.
- Reducing the use of hazardous substances wherever technically and economically feasible.
- Promoting substitution of hazardous chemicals with safer alternatives.
- Maintaining accurate chemical inventories and Safety Data Sheets (SDS).
- Conducting hazardous substance testing to ensure product and process compliance.
- Preventing chemical spills, leaks, releases, and environmental contamination.
- Continuously improving chemical management systems and practices.

4. Objectives

The Company shall strive to:

4.1 Regulatory Compliance

- Comply with all applicable regulations governing chemical management and hazardous substances.
- Meet customer-specific requirements relating to restricted and prohibited substances.
- Maintain necessary permits, licenses, and approvals.

4.2 Risk Reduction

- Identify and assess chemical-related hazards.
- Implement controls to minimize risks to health, safety, and the environment.
- Eliminate or reduce hazardous chemical exposure.

4.3 Hazardous Substance Control

- Monitor the use of restricted substances.



- Prevent unauthorized procurement or use of prohibited materials.
- Promote environmentally preferable alternatives.

4.4 Product Compliance

- Ensure products comply with applicable hazardous substance restrictions.
- Conduct periodic testing and verification.
- Maintain traceability and documentation.

4.5 Environmental Protection

- Prevent pollution arising from chemical storage, handling, and disposal.
- Ensure proper treatment and disposal of hazardous waste.
- Protect soil, water, and air from contamination.

5. Chemical Substance Management Principles

The Company shall adopt the following principles:

Identify

Identify all chemical substances used within operations.

Assess

Assess potential health, safety, environmental, and regulatory risks.

Control

Implement appropriate controls for handling, storage, use, and disposal.

Monitor

Regularly monitor compliance and chemical usage.

Improve

Continuously improve chemical management practices.



6. Chemical Inventory Management

KSH Automotive shall:

- Maintain an up-to-date Chemical Register.
- Record chemical names, quantities, storage locations, hazards, and usage.
- Periodically review inventory levels.
- Eliminate obsolete or unnecessary chemicals.
- Ensure proper labeling of all chemical containers.

7. Hazardous Substance Testing and Compliance

To ensure product and process compliance, the Company shall:

- Conduct testing of raw materials, components, and finished products where applicable.
- Verify compliance with customer and regulatory requirements.
- Monitor restricted substances listed under applicable regulations.
- Obtain declarations and compliance certificates from suppliers.
- Conduct third-party laboratory testing when required.

The Company shall support compliance with relevant requirements including:

- RoHS (Restriction of Hazardous Substances)
- REACH (Registration, Evaluation, Authorization and Restriction of Chemicals)
- ELV (End-of-Life Vehicle Directive)
- Customer-specific environmental requirements
- Applicable national environmental regulations

8. Safe Handling of Chemicals

All personnel handling chemicals shall:

- Follow approved operating procedures.
- Use required Personal Protective Equipment (PPE).



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Email: kshhr@saehani.com

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- Understand hazards associated with chemicals being handled.
- Follow emergency response instructions.
- Participate in required training programs.

9. Chemical Storage Requirements

Chemical storage areas shall:

- Be clearly identified and secured.
- Have adequate ventilation.
- Be protected from unauthorized access.
- Include secondary containment where required.
- Segregate incompatible chemicals.
- Display hazard warning signs.
- Maintain spill response equipment.

10. Safety Data Sheets (SDS)

The Company shall ensure:

- Current SDS are available for all chemicals.
- SDS are accessible to employees at all times.
- Employees are trained on SDS interpretation and usage.
- SDS records are maintained and periodically reviewed.

11. Chemical Transportation

The Company shall:

- Ensure chemicals are transported safely.
- Use approved containers and packaging.
- Comply with applicable transportation regulations.



- Prevent spills, leaks, and accidents during movement.

12. Spill Prevention and Emergency Response

KSH Automotive shall maintain procedures for:

- Chemical spill prevention.
- Leak detection and reporting.
- Emergency containment and cleanup.
- Incident investigation and corrective actions.
- Notification to authorities where required.

Emergency response equipment shall be readily available in relevant areas.

13. Hazardous Waste Management

The Company shall:

- Segregate hazardous waste from general waste.
- Store hazardous waste safely.
- Dispose of hazardous waste through authorized agencies.
- Maintain disposal records and manifests.
- Comply with applicable waste management regulations.

14. Roles and Responsibilities

Managing Director

- Approve this policy.



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- Provide resources for implementation.

EHS Department

- Maintain chemical management systems.
- Monitor compliance and testing activities.
- Conduct audits and inspections.
- Coordinate emergency preparedness activities.

Purchase Department

- Procure approved chemicals only.
- Obtain SDS and compliance declarations from suppliers.

Department Heads

- Ensure safe use and storage of chemicals.
- Implement operational controls.

Employees

- Follow chemical safety requirements.
- Use PPE correctly.
- Report unsafe conditions and incidents.

Contractors

- Comply with Company chemical management requirements.
- Provide required documentation for chemicals brought onto site.

15. Training and Awareness

The Company shall conduct periodic training on:

- Chemical hazards.



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- SDS interpretation.
- Safe handling practices.
- Spill response procedures.
- Hazardous waste management.
- Regulatory compliance requirements.

16. Monitoring and Audits

Periodic evaluations shall include:

- Chemical inventory reviews.
- Storage inspections.
- Compliance audits.
- Hazardous substance testing results.
- Incident investigations.
- Supplier compliance assessments.

17. Continuous Improvement

KSH Automotive is committed to:

- Reducing hazardous substance usage.
- Promoting safer chemical alternatives.
- Enhancing employee awareness.
- Improving compliance monitoring systems.
- Adopting best practices in chemical management.



KSH Automotive Pvt. Ltd.

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18. Policy Review

This policy shall be reviewed annually or whenever significant changes occur in:

- Regulatory requirements.
- Operational activities.
- Customer requirements.
- Chemical usage patterns.
- Environmental or safety risks.

For KSH Automotive Private Limited

A handwritten signature in black ink, appearing to read 'Yongsung Kim', is placed over a white rectangular background.

Mr.Yongsung Kim
Managing Director

A large, light green, semi-transparent watermark of the KSH logo is centered in the background of the page, behind the signature and name.