



HPL ADDITIVES LIMITED

ENVIRONMENTAL POLICY

Foundations of Environmental Policy

Renewable Resources

Promotes the use of energy sources that are naturally replenished.



Sustainable Practices

Emphasizes the adoption of methods that minimize environmental harm.

Waste Reduction

Encourages strategies to minimize waste generation.



Resource Protection

Focuses on safeguarding natural resources for future use.

Ecological Balance

Aims to maintain harmony within ecosystems.



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Document No.: HPL/ENV/POL/01

Issue Date: 01/04/2025

Issue No.: 01

Revision No.: 02

1) Introduction

HPL Additives Limited (“HPL”) is committed to responsible chemistry. We will prevent pollution, conserve resources, and continually reduce the environmental footprint of our products and operations—from R&D and scale-up through manufacturing, logistics, and downstream use—while protecting the health and safety of workers, neighbors, and customers.

2) Scope

This Policy applies to all HPL facilities (Faridabad and Derabassi), employees, contract and temporary workers, logistics partners operating on our sites, and Tier-1 suppliers who support HPL’s products and services. It extends to product stewardship and the communities in which we operate.

3) Environmental Commitment

HPL will:

- 3.1 Comply & exceed: Meet all applicable Indian and global environmental laws (e.g., EP Act, Air/Water Acts, Hazardous & Other Wastes Rules, MSIHC Rules) and strive to exceed them through best available techniques (BAT).
- 3.2 Integrate Process Safety: Embed PSM elements (HAZOP/HIRA, MOC, PTW, relief systems, emergency response) to minimize loss of primary containment for high-hazard chemistries (e.g., hydrazine and derivatives, azo-initiators, solvents).
- 3.3 Decarbonize & save energy: Improve energy efficiency and increase low-carbon electricity procurement.
- 3.4 Control air emissions: Reduce VOCs, NOx, SOx, particulate matter with engineered controls and real-time monitoring.
- 3.5 Manage materials & hazardous waste: Substitute hazardous substances where feasible; rigorously segregate, store, label, transport, and dispose as per law; maximize recovery and recycling.
- 3.6 Water stewardship: Cut freshwater withdrawal intensity; maximize recycle/reuse; ensure compliant effluent treatment and safe discharge.
- 3.7 Biodiversity & land: Prevent contamination, manage spills, and minimize habitat disturbance around our sites.
- 3.8 Product stewardship: Maintain REACH/CLP/TSCA-aligned SDS and labels; provide safe-use guidance; enable container/packaging recovery with authorized partners.
- 3.9 Green design & R&D: Use green chemistry principles in new product/process development and during technology scale-up.
- 3.10 Transparency & engagement: Train all on-site workers, engage communities and authorities, and report progress through our ESG disclosures.

4) Quantitative Targets (Baseline: FY 2024–25 unless noted)

Energy & Climate

1. Reduce energy intensity by 2% by FY 2026–27 (GJ/ton product).



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2. Cut Scope 1+2 GHG intensity by 2% by FY 2026–27; develop a Scope 3 screening by FY 2025–26 and set targets by FY 2026–27.
3. Achieve ≥2% annual electricity from renewable/low-carbon sources by FY 2026–27.

Air Emissions

- Reduce total VOC emissions (kg/ton product) by 2% by FY 2026–27 via capture, adopting effective condensation, and leak detection & repair (LDAR) by ensuring enhance closed loop operations.
- Reduce NOx/SOx/PM (stack + fugitive, normalized) by 2% by FY 2026–27.

Water

- Reduce freshwater withdrawal intensity by 12% by FY 2026–27; maintain 100% compliance with effluent norms; ≥30% treated water reuse at each site.

Waste & Circularity

- Reduce hazardous waste intensity by 2%; increase recycling/recovery rate to ≥50% for recyclable streams by FY 2026–27.
- Achieve 100% compliant storage (SPCC/bunding), manifesting, and authorized co-processing/disposal for hazardous wastes.

Compliance & Incidents

- Maintain Zero major environmental non-compliances and Zero significant spills/LOPC (Tier-1) each year.
- Close 100% environmental CAPAs within 90 days.

Product Stewardship

- 100% SDS and labels aligned to GHS/REACH/CLP for all active SKUs by FY 2025–26; customer safe-use guidance issued for all hydrazine/azo products.
- Implement container take-back with authorized partners covering ≥50% of eligible volumes by FY 2026–27.

5) Action Framework

1. Governance & risk: An Environmental Steering Committee (Head–EHS chair; members from Manufacturing, R&D, QA/Reg, Procurement, CSR/ESG, Legal) will review risks, targets, and resources quarterly.
2. Engineering controls: Install closed-loop transfer, mechanical seals, secondary containment, condensers and continuous emission monitoring where applicable.
3. LDAR & integrity: Site-wide LDAR programs; periodic integrity testing of tanks, reactors, and piping; rigorous MOC for changes.
4. Water & effluent: Optimize ZLD/ETP performance, recycle treated water, and protect stormwater.



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5. Waste hierarchy: Prevent > reduce > reuse > recycle > recover > dispose; qualify authorized recyclers/co-processors; track cradle-to-grave.
6. Green chemistry & procurement: Prioritize safer solvents/reagents; supplier screening for environmental compliance; require incident notification and CAPA.
7. Emergency preparedness: Scenario-based drills (spill/fire/toxic release); mutual aid with local responders; verified spill kits and containment plans.
8. Training & competency: Role-based environmental and PSM training for all employees as per TNI and on-site contractors at induction and annually.

6) Roles & Responsibilities

1. Board/MD: Oversight and resourcing.
2. Head-EHS (Policy Owner): Deploy Policy, track KPIs, ensure audits/assurance, and report to leadership.
3. Site Safety Personnel: Execute programs, maintain permits, ensure monitoring & reporting, manage emergencies.
4. Manufacturing & Maintenance: Operate as per SOPs; maintain equipment integrity; promptly report deviations/spills.
5. R&D/Technology: Apply green chemistry; conduct environmental risk reviews during scale-up.
6. Procurement/Logistics: Enforce Supplier Code and transport compliance.
7. All employees & on-site contractors: Follow procedures, use controls/PPE, and report concerns immediately.

7) Monitoring & Reporting

1. KPIs: Energy/GHG and water intensity, VOC/NOx/SOx/PM, hazardous waste ratio, compliance events, LOPC, LDAR leak counts, CAPA closure days, SDS coverage.
2. Audits: Internal audits twice yearly; legal registers kept current; supplier audits risk-based.
3. Disclosure: Summarize performance in ESG/Sustainability reports and site postings.

8) Communication & Transparency

1. Publish this Policy on intranet and site notice boards (English, Hindi, Punjabi).
2. Train all relevant personnel annually; communicate incident learnings.
3. Provide customers with up-to-date SDS, labels, and safe-use/transport guidance.



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9) Continuous Improvement

1. Conduct annual management reviews; benchmark against industry best practices; invest in BAT where material; capture lessons from incidents and near misses into procedures and design.

10) SDGs Advanced by this Policy

1. SDG 3 (Health & Well-Being)
2. SDG 6 (Clean Water)
3. SDG 7 (Clean Energy)
4. SDG 9 (Industry/Innovation)
5. SDG 12 (Responsible Consumption & Production)
6. SDG 13 (Climate Action)
7. SDG 14/15 (Life Below Water/On Land)
8. SDG 17 (Partnerships)



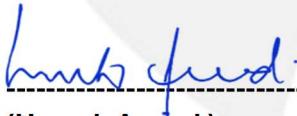
11) Review

Owner: Head-EHS

Last Review: 01.04.2025

Next Review: 31.03.2026

This Policy will be updated for legal/permit changes, audit findings, technology upgrades, and stakeholder feedback.


(Umesh Anand)

Managing Director



Date: Tuesday, 1st April, 2025

Place: Faridabad, Haryana, India

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Employee Acknowledgement – Environmental Policy

I acknowledge that I have received, read, and understood HPL Additives Limited's Environmental Policy and will comply with its provisions, including lawful operations, resource conservation, spill prevention, emissions and waste controls, and prompt reporting of concerns without fear of retaliation.

Employee Name: Bhaskar Somal Signature: Date: 02-04-2025