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PACKAGES CONVERTORS LIMITED (Lahore)

INTEGRATED MANAGEMENT SYSTEM MANUAL



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GENERAL

0.1 Purpose

The purpose of this manual is to describe the Integrated Management System of Packages, and to provide general policy guidance on all activities relating to its implementation and maintenance. Another purpose of this manual is to enable presentation of the Integrated Management System to our customers and to inform them about energy conservation and energy management activities and specific controls which are implemented to assure safe operations regarding environment and IMS, regulatory compliance, measures taken to prevent accidents and non-conformances, and to consistently work in a sustainable manner so that the health & environmental concerns of all interested parties can be safeguarded.

The IMS Manual is the policy level document and refers to other supporting documents that describe procedures and work practices.

This IMS Manual is the statement of Packages Convertors Limited that its documented IMS Management System conforms to the requirements of **ISO 50001, ISO 45001 & ISO 14001** and other implemented Management systems i.e. **BRC, HALAL, FSC COC**.

0.2 Scope, Functional Boundaries and Extent of Control

Following are the functional boundaries of Packages Ltd. that come under the scope of OHSAS ISO 45001 & ISO 14001:2015.

Departments	Nature of Department (Production/Support/Utility)	Activities	Extent of Control (Full/Partial)
Supply Chain	Support	<ol style="list-style-type: none"> 1. Procurement 2. Raw Material Stores 3. Finished Goods Stores 	Full
Business Unit Flexible (BUFP)	Production	<ol style="list-style-type: none"> 1. Extrusion 2. Printing 3. Lamination 4. Slitting and Packing 	Full
Business Unit Folding Carton (BUFC)	Production	<ol style="list-style-type: none"> 1. Printing 2. Cutting & Creasing 3. Folding & Gluing 4. Paper Cup Making 	Partial (Source of Pulp is not in control)
Business Unit Consumer Product (BUCP)	Production	<ol style="list-style-type: none"> 1. Tissue Manufacturing 2. Tissue Conversion 3. Effluent 	Partial (Source of Pulp is not in control. Also Effluent Water is not in control after



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		Treatment and Discharge	it is treated and discharged)
Business Unit Mechanical Fabrication (BUMF)	Production/Support	1. Design and Fabrication	Full
HVAC	Utility	1. Air Conditioning 2. Compressed Air Supply	Full
Power House	Utility	1. Electricity Generation 2. Steam Generation 3. Waste Water Discharge	Partial (Waste Water is not in control after it is discharged)
Admin	Support	1. Overall Security 2. Transport 3. Roads, Gardens, Mosque, Irshad Hall and Gym Administration	Full
Industrial Relations (IR)	Support	1. Legal Compliance 2. Worker Welfare	Full
Human Resource (HR)	Support	1. Hiring 2. Compensation and Benefits 3. Career Guidance	Full
Manufacturing Excellence (ManEx)	Support	1. EMS, OHSAS, FSSC, FSC CoC, Halal Certifications Compliance 2. Testings and Inspections 3. Internal Audit of the Systems 4. Ensuring Workers Health and Safety 5. TPM	Full

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Following are the functional boundaries of Packages Ltd. that come under the scope of ISO 50001:2018

Departments	Nature of Department (Production/Support/Utility)	Activities	Extent of Control (Full/Partial)
Business Unit Flexible (BUFP)	Production	<ol style="list-style-type: none"> 1. Extrusion 2. Printing 3. Lamination 4. Slitting and Packing 	Full
Business Unit Folding Carton (BUFC)	Production	<ol style="list-style-type: none"> 1. Printing 2. Cutting & Creasing 3. Folding & Gluing 4. Paper Cup Making 	Partial (Source of Pulp is not in control)
Business Unit Consumer Product (BUCP)	Production	<ol style="list-style-type: none"> 1. Tissue Manufacturing 2. Tissue Conversion 	Partial (Source of Pulp is not in control. Also Effluent Water is not in control after it is treated and discharged)
HVAC	Utility	<ol style="list-style-type: none"> 1. Air Conditioning 2. Compressed Air Supply 	Full
Power House	Utility	<ol style="list-style-type: none"> 1. Electricity Generation 2. Steam Generation 3. Waste Water Discharge 	Partial (Waste Water is not in control after it is discharged)
Supply Chain	Support	<ol style="list-style-type: none"> 1. Procurement 2. Raw Material Stores 3. Finished Goods Stores 	Full
Industrial Relations (IR)	Support	<ol style="list-style-type: none"> 1. Legal Compliance 2. Worker Welfare 	Full
		6. EMS, OHSAS,	

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Manufacturing Excellence (ManEx)	Support	FSSC, FSC CoC, Halal Certifications Compliance 7. Testings and Inspections 8. Internal Audit of the Systems 9. Ensuring Workers Health and Safety 10. TPM	Full
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0.3 Interested Parties (Only for ISO 14001 and ISO 45001)

Interested Party	Need	Expectation	Compliance Obligation (Yes/No)
Employees/Workers	They work in a safe and healthy environment and consider energy conservation during their work	Packages Ltd. will take all measures to ensure that all its workers/employees work in a safe, healthy and environmentally friendly atmosphere.	Yes
Customers	The product is made in a safe environment and delivered on time without any compromise in quality. Also, energy aspect is considered while making the product.	The product is made in a highly safe and healthy environment and the operation required to manufacture the product must not have adverse effects on the environment and workers health. Also, energy aspect is considered while making the product.	Yes
Nearby Community	Residential Areas stay safe from all safety and environmental aspects of Packages Ltd.	Packages Ltd. will take all possible steps to ensure that the nearby community and residential areas are not affected by its operations e.g. Fire, Gaseous Emissions, Noise, Waste Water Discharge etc.	Yes
		Packages Ltd. will take all	



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Auditing Bodies (e.g. SGS)	Packages Ltd. will fulfil all the requirements of the standard ISO 14001:2015, ISO 18001:2007 and ISO 50001:2011	possible measures to show compliance with the standard ISO 14001:2015, ISO 18001:2007 and ISO 50001: 2011 will close all the non conformities highlighted previously and will make efforts towards continual improvement in order to enhance its environmental performance	Yes
Government Bodies	Successful implementation of environmental laws enforced by Pakistan Environmental Protection Agency (PEPA), Safety laws covered in Factories Act 1934 or any law related to Energy.	Packages Convertors Limited will ensure that all its operations having an impact on environment must be controlled and all emission values must be within the Legal Limits identified by Punjab Environment Quality Standards (PEQS). It also has to fulfil all the Legal Requirements binding on it through Pakistan Environmental Protection Agency (PEPA) or Factories Act 1934 or any other law related to energy.	Yes
Suppliers/Vendors	Suppliers/vendors provide the material/service on time fulfilling all the Environment related requirements of Packages Ltd as well as they must consider energy aspect while making the product	Packages Convertors Limited will ensure to inform the suppliers that they will be partially evaluated on the basis of the effect of their products on the environment and energy and will also inform them about the requirements they need to fulfil	No
Contractors	They work in a safe and healthy environment and fulfil all the safety	Packages Ltd. and Contractor Company will both take all measures to	No

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	and environment and energy related requirements of the organisation	ensure that all its contractors work in a safe, healthy and environmentally friendly atmosphere.	
Financial Bodies e.g. IFC, Banks etc.	Any Financial Loan given to the company is used in activities carried out in a safe and environment friendly manner.	Company to ensure compliance to all applicable local regulations and standards of Financial Bodies (if applicable)	Yes

0.4 Internal and External Issues (Only for ISO 14001 and ISO 45001)

External Issues:

1. Packages Convertors Limited is located in a highly populated area. Therefore it has to ensure that the nearby community is not affected by:

External Issues	Interested Parties	Opportunities	Risk	Prevention Control
Gaseous Emissions from its operations e.g. Boilers, Oil Heaters etc.	a. Neighbourhood community b. Regulatory Authority c. Financial Bodies e.g. IFC, Banks etc.	Engaging Community and being socially and environmentally friendly will help promote good name of the organisation	Legal Action Protest from neighbouring community	Frequent monitoring and timely maintenance
Noise generated from its operations	a. Neighbourhood community b. Regulatory Authority	Engaging Community and being socially and environmentally friendly will help promote good name of the organisation. If no complaints are received continuity of operations can be ensured Authority shall	Legal Action	Frequent monitoring, application of Management of change system. Acting promptly upon any customer complains.

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		also approve of being environmentally friendly organisation		
Waste Water Discharge into Satukatla and Hudiarra Drain	a. Neighbourhood community b. Regulatory Authority c. Financial Bodies e.g. IFC, Banks etc.	If no complaints are received continuity of operations can be ensured Authority shall also approve of being environmentally friendly organisation	Legal Action	Frequent monitoring and timely maintenance
Any sort of Gas Leakage	a. Neighbourhood community b. Regulatory Authority	Safe continuity of operations Good name in community	Risk of Major accident	Frequent monitoring of systems and ensuring timely corrective actions
Solid Waste Disposal	a. Regulatory Authority b. Customers c. Financial Bodies e.g. IFC, Banks etc.	Ensuring clean and green supply chain for customer, being responsible player in market	Risk of legal action if not disposed in ethical way	Ensuring safe disposal of all sorts of solid waste and promoting recycling wherever possible.

Packages Convertors Limited has to ensure that all its operations having an impact on environment must be controlled and all emission values must be within the Legal Limits identified by Punjab Environment Quality Standards (PEQS). It also has to fulfil all the Legal Requirements binding on it through Pakistan Environmental Protection Agency (PEPA).



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Internal Issues:

Internal Issues	Interested Parties	Opportunities	Risk	Prevention Control
Packages Convertors Limited has to ensure that its effluent water is treated before discharge in to the Main Drain Channel so that the Effluent Water does not affect the ground water and nearby community and also the discharge values remain within the limits of PEQS	Employees Near by Community	Abiding by the law, Promoting Environmentally friendly notion Emerging as a clean green market player and building a good business for customers	Legal Action, Reaction from Community	Frequent monitoring and timely maintenance
Packages Convertors Limited uses different solvents for printing purpose and it have to ensure that its workers are not affected by the VOCs and also that its VOC values remain within the range of PEQS and OSHA.	Employees & Management	Continuity of Operations, by ensuring good health and wellbeing of employees Low employee turnover Ensuring safe and healthier supply chain for all major customers.	Affect on business continuity and high employee turn over	Regular monitoring and provision of Exhaust ventilation across all areas with high VOCs.
Packages Convertors Limited has to	Employees & Management	Continuity of Operations, by	Effect on business	Frequent Mock drills to ensure



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ensure that it has an emergency response plan in place to tackle any sort of emergency e.g. Chemical Spillage, Gas Leakage etc.		ensuring good health and wellbeing of employees Low employee turnover Ensuring safe and healthier supply chain for all major customers.	continuity and employee high turn over, Loss of asset, Damaged Commercial name/repute	safe operations for entire work force including management
Packages Convertors Limited has areas where workers are exposed to High Noise and it has to ensure to lower their risk of hearing loss.	Employees & Management	Continuity of Operations, by ensuring good health and wellbeing of employees Low employee turnover Ensuring safe and healthier supply chain for all major customers.	Greater number of ill or hearing-impaired workforce over a longer period.	Provision of PPEs where working in high noise areas is inevitable.
Packages Convertors Limited also has some hazardous waste material and it has made a procedure for handling the hazardous waste and it has to ensure that the hazardous waste is handled as per the defined procedure.	Employees & Management	Continuity of Operations, by ensuring good health and wellbeing of employees Low employee turnover Ensuring safe and healthier supply chain for all major customers.	Legal Action and higher employee turnover rate	Packages Convertors Limited has made a procedure for handling the hazardous waste and it has to ensure that the hazardous waste is handled as per the defined procedure.

0.5 Issue and Control of IMS Manual



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- This document may be changed at any time whenever a need so arises, or Organizational scope is changed after approval from Man-Ex head by Manager/AM (EHS)
- Compliance with the requirements of this IMS Manual and its referenced documents is mandatory on everyone within the scope of PACKAGES CONVERTORS LIMITED IMS management System.

0.6 Definitions & Abbreviations

Accident	<p>An accident is an incident which has given rise to injury, ill health or fatality or loss of property/damage due to natural or other disasters (Fire, Earthquake, spillage, Gas release etc.)</p> <p>Accident / Recordable Incident is categorized as follows:</p> <p>LTA: A lost time accident is a recordable/reportable incident in which an employee is not able to return to within 24 hours or is assigned restricted work on the day or shift following the incident. Restricted work case is not yet followed</p> <p>MTC: A Medical Treatment Case is any recordable/reportable injury that involves neither Lost Workdays nor Restricted Work days, but which requires treatment by experts outside factory premises i.e. complete hospitalization with medical care. The prescription of an antibiotic is considered medical treatment.</p> <p>First Aid: Injury resulting from work that does not include medical treatment as per OSHA.</p> <p>Fatality (death) – A work-related injury resulting in the death of the employee, even if death did not occur immediately.</p>
Fire Near Miss	Smoke/spark with no evidence of flames or fire.
Recordable injuries	Major Injuries that are beyond First aid but includes medical treatment, LTA's or any significant injury.
Recordable Accidents	All recordable injuries + Fire incidents.
Non-recordable Accidents	Non-significant injuries i.e. Minor injuries (All First aid cases)
Pollution Prevention	Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse impact.



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PACKAGES CONVERTORS LIMITED	Packages Convertors Limited Lahore
Audit	A systematic, independent and documented process for obtaining “audit evidence” and evaluating it’s objectively to determine the extent to which the audit criteria are fulfilled.
Continual Improvement	Process of enhancing the IMS management system, to achieve improvement in overall IMS performance in line with the IMS policy.
Corrective Action	Actions to eliminate the cause of detected nonconformity or other undesirable situation.
Hazard	Source or situation, or act with a potential for harm in terms of human injury or ill health, damage to property, damage to the work place environment, or a combination of these.
Hazard Identification	Process of recognizing that a hazard exists and defining its characteristics.
Interested parties	Individuals or groups concerned with or affected by the IMS performance of an organization.
ISO	International Organization for Standardization.
Management Review	A formal evaluation by senior management of the status and adequacy of the IMS Management System.
NCR	Non-conformity Report.
Non-conformance or non-conformity	Any deviation from the work standards, practices, procedures, regulations, management system performance etc, that could either directly or indirectly lead to injury or illness or property damage.
Objectives	Goals, in terms of IMS performance which an organization sets itself to achieve.
Occupational Health & Safety	Conditions and factors that affect the well being of employees, temporary workers, contractor personnel, visitors and any other person in the workplace.
IMS	Integrated Management System (ISO 18001:2007, ISO 14001:2015, ISO 50001:2011)



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Preventive action	Action taken to eliminate the causes of potential non-conformances in order to prevent their occurrence.
Risk	Combination of likelihood and consequence (s) of a specified hazardous event occurring.
Safety	Freedom from unacceptable risk of harm.
Acceptable Risk	Risk that has been reduced to a level that can be tolerated by the organization having regard to its legal obligations and its own IMS policy
Risk Assessment	Overall process of evaluating the risk arising from hazards taking into account the adequacy of any existing controls and deciding whether or not the risk is acceptable.
Environment	Surrounding in which an organization operates , including air, water, land, natural resources, flora, fauna, humans and their interactions.
Environmental Aspect	Element of an organization's activities or products or services That can interact with environments.
Environmental Impacts	Any change to the environment whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects.
IMS Targets	Detailed and quantifiable performance requirement, applicable to the Organization or parts thereof, that arises from the IMS objectives.
PDCA	Plan, Do, Check and Act
Boundaries	Physical or Site Limits and/or organizational limits as defined by the organization.
Energy	Capacity of a system to produce external activity or perform work e.g. Electricity, fuels, steam, heat, compressed air, water, natural gas etc.
Energy Baseline (EnB)	Quantitative reference(s) providing a basis for comparison of energy performance (reflects a specified period of time)
Energy Consumption	Quantity of energy applied
Energy Efficiency	Ratio or other quantitative relationship between an output of performance, service, goods or energy , and an input of energy
Energy Management	Set of interrelated or interacting elements to establish an energy policy and

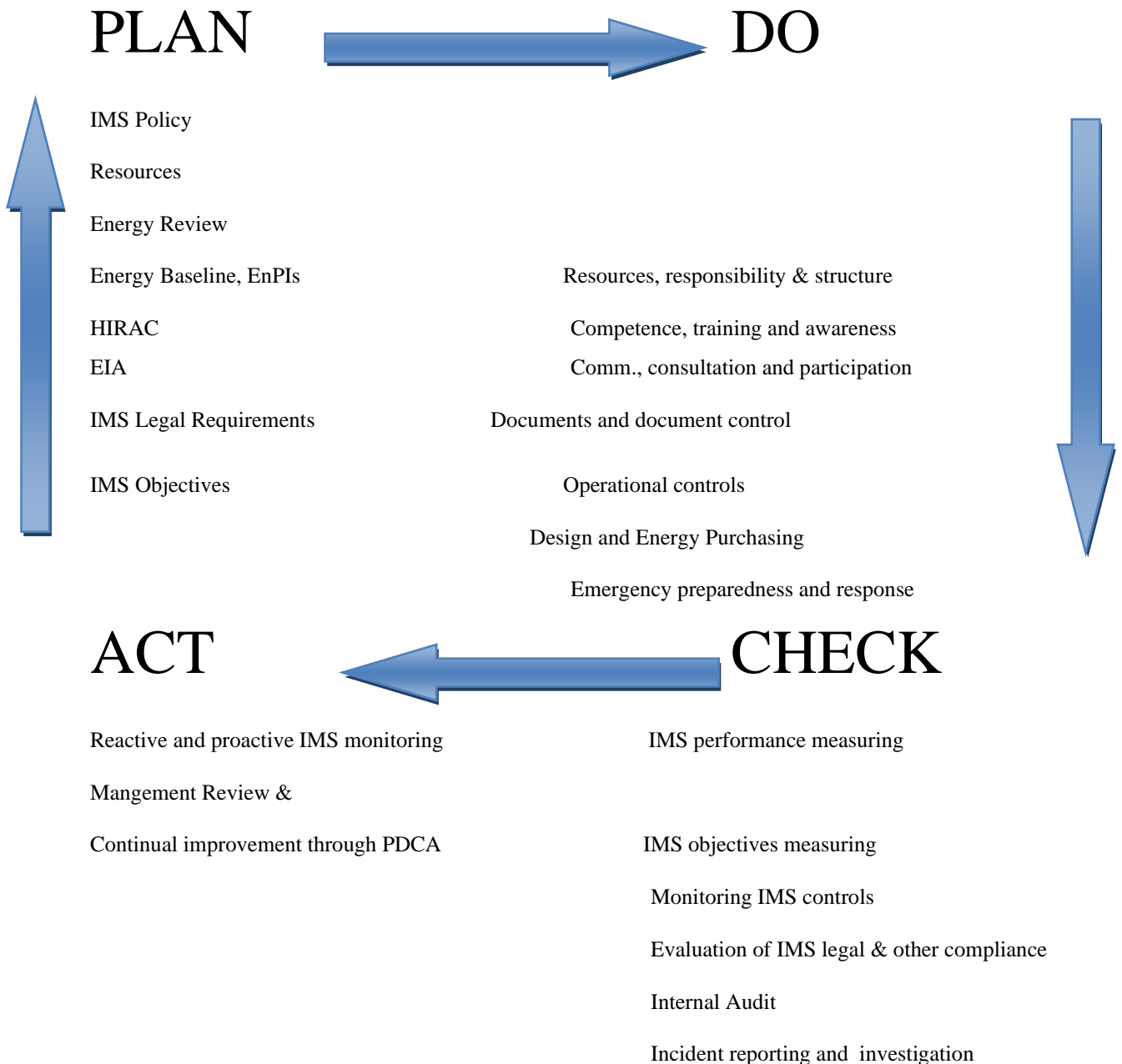
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System (EnMs)	energy objectives, and processes and procedures to achieve those objectives
Energy Performance Indicator (En-PI)	Quantitative value or measure of energy performance, as defined by the organisation
Energy Review	Determination of organization's energy performance based on data and other information, leading to identification of opportunities for improvement
Energy Services	Activities and their Results related to the provision and/or use of energy
Energy Use	Manner or kind of application of energy e.g. Ventilation, Lighting, cooling, production lines etc.
Significant Energy Use (SEU)	Energy Use accounting for substantial energy consumption and/or offering considerable potential for energy performance improvement (criteria to be determined by the organization)
Static Factor	Identified factor that significantly impacts energy performance and does not routinely change.
Relevant Variable	Quantifiable factor that significantly impacts energy performance
Normalization	Modification of data to account for changes to enable comparison of energy performance under equivalent conditions
Competence	Ability to apply knowledge and skills to achieve intended results
TRIR	TOTAL RECORDABLE INJURY RATE
TRIR	TOTAL RECORDABLE INCIDENT RATE (INCIDENT INCLUDES FIRE AS WELL)

1.0 IMS PROCESSES AND THEIR INTERACTIONS:

- 1.1. PACKAGES CONVERTORS LIMITED follow a PDCA cycle for establishing and implementing its IMS system. Planning feeds into the Implementation process, which is measured and monitored in order to cause actions for continual improvement?

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Corrective and preventive actions

Use of data and control of record


1.2. **PLANNING:**

The following processes represent the PLANNING element of the IMS PDCA cycle:

- a. IMS Policy
- b. Hazard Identification, Risk assessment and determination of Controls.
- c. Resources
- d. Energy Review
- e. Interested Parties
- f. Internal/External Issues
- g. Environmental Aspects
- h. Identification of Legal and other requirements
- i. Establishment of IMS Objectives, targets and their programs

1.3. **IMPLEMENTATION (DO):** The following processes represent the IMPLEMENTATION element of the IMS PDCA cycle:

- a. Resources, responsibility, IMS structure
- b. Competence, training and awareness
- c. Communication, consultation and participation
- d. Documents and document control
- e. Design and Energy Purchasing
- f. Operational controls

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- g. Emergency preparedness and response
- h. Significant Energy Users (SEUs)
- i. Energy Baselines (EnB)


1.4. **MEASURING, MONITORING, CHECKING (CHECK):**

The following processes represent the MEASURING, MONITORING and CHECKING element of the IMS PDCA cycle:

- a. IMS performance measuring
- b. IMS objectives measuring
- c. Monitoring IMS controls
- d. Evaluation of IMS legal & other compliance
- e. Internal Audit
- f. Incident reporting and investigation
- g. Corrective and preventive actions
- h. Use of data and control of records

1.5 **MANAGEMENT REVIEW (ACT):**

- a. Reactive and proactive IMS monitoring
- b. Continual improvement through PDCA


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1.0 IMS Policy


IMS Policy has been established and approved by Head of Packaging and Head of Consumer Product. The energy policy will be reviewed annually during management review. In case of any major changes in the system, energy policy may be reviewed before annual review.

PACKAGES CONVERTORS LIMITED

IMS Policy



INTEGRATED MANAGEMENT SYSTEMS POLICY


December 2021

Packages Limited

Packages Limited is committed to producing quality products through responsible sourcing conforming to customers' requirements by creating value for the customers through our products and services.


The Organization is committed to achieving these goals by proactively:


- Exhibiting leadership and commitment towards implementing this policy across all our operations.
- Allocating appropriate sustainable resources for compliance with applicable management standards and establishing individual accountability to comply with these requirements.
- Developing an effective Management System to prevent customer complaints, incidents/accidents, ill-health and pollution, while reducing waste, eliminating hazards and mitigating environmental and social impacts.
- Creating a safe and work-friendly environment for all stakeholders with due participation and commitment from everyone. Safety shall always take the highest priority in all situations.
- Improving our Product Quality continually through innovations, process optimizations, and risk identification.
- Ensuring that all food-related packaging material is produced, stored, and delivered in safe and hygienic conditions as per relevant requirements. Where applicable, we will ensure supply of Halal Packaging material and consumer products with effective communication on Halal/food issues with suppliers, customers, and relevant interested parties in the food chain.
- Improving our energy performance by avoiding energy and utilities' wastage, optimum consumption, supporting the purchase of energy-efficient products, services, and designing for improvement in energy performance where applicable.
- Leading by example and committing to reducing our carbon and water footprint to an optimum level where possible.
- Setting objectives and targets that are monitored regularly to review our Management Systems and ensure that these objectives are aligned with organizational context.
- Ensuring the needs and expectations of our customers and other interested parties are met.
- Ensuring compliance with all applicable legal, statutory and regulatory requirements.
- Ensuring continual improvement as a result of formal internal/external audits and management reviews, which are conducted at least once a year for applicable standards.
- Improving the competency and skills of our people at all levels through adequate information sharing, training and supervision provided to ensure that all organizational needs are met.
- Ensuring all stakeholders have access and understanding of the IMS policy (made publicly available), relevant procedures and supporting documentation, through training and provision of information.


This is our long-term commitment and we shall continually strive to improve our policies, procedures, programs, systems and standards.


Syed Hyder Ali
Chief Executive & Managing Director

مربوط انتظامی نظام کی پالیسی





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3.0 Hazard Identification, Risk assessment and determining of controls.

In line with the IMS policy, PACKAGES CONVERTORS LIMITED carries out hazard identification, risk assessment and determination of controls for all activities and locations within its scope on an on-going basis.

The IMS risks are evaluated for:

- Routine, non-routine and emergency activities.
- Activities of all personnel having access to work place.
- Facilities, infrastructure, whether provided by PACKAGES CONVERTORS LIMITED or others.
- Human behaviour and capabilities.
- Hazards outside the workplace capable of adversely affecting the IMS of persons working for PACKAGES CONVERTORS LIMITED.
- Changes or proposed changes and modifications to IMS
- Legal considerations.


A documented procedure IMS-IP-P-01 defines the methodology for IMS risk assessment process. The procedure also addresses:

- Scope, nature and timing of risk assessment.
- Classification of risks and identification of those that are to be eliminated or controlled.
- Provision of inputs for determination of facility requirements, identification of training needs and development of operational control.
- Review of risks to keep them current and up to date.

The results of Risk assessment provide key inputs into establishing,

Implementing, monitoring and improving the IMS system at PACKAGES CONVERTORS LIMITED.

The strategy for risk reduction follows the following hierarchy:

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- a. Elimination
- b. Substitution
- c. Engineering controls
- d. Administrative controls
- e. PPEs

3.0 (b) Environmental Aspects & Impacts Determination & Target setting

The overall responsibility of the procedure lies with the Man-Ex. However, the divisional managers and the departmental in-charges are responsible for the implementation of this procedure in their departments. A documented procedure ESPIP/4.3/01 defines the methodology, frequency and responsible designations for this assessment.

The procedure also addresses:


- Process flow diagrams showing all the inputs and outputs
- Determination of significant environmental aspects
- Objectives and Targets Setting
- Development of Environmental Management programs to mitigate environmental impacts of aspects

These documents are developed by the departments after following the procedure IMS-IP-P-01. The environmental records are thus developed that are approved by the departmental heads and the divisional heads and are controlled. Environmental records to be uploaded on intranet through the permission of MR.

a. (c) Energy Review

The overall responsibility of the procedure lies with the Energy Team Member from ManEx. Each department's Energy Team is responsible for conducting Energy Review. Energy Review includes:

- Identification of Current Energy Sources
- Evaluation of past and present energy use and consumption
- Rating Criteria of Energy Sources

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- Identification of Significant energy Users (SEUs)
- Significance Criteria for Energy Sources
- Personnel working on SEUs
- Identification and Prioritization of improvement in energy performance.

The energy review shall be updated after every 6 months as well as in response to major changes in facilities, equipment, systems or processes.

Energy Review has been recorded in the Document **EnMs-ManEx-F-01**.

3.0 (d) Energy Baseline

The overall responsibility of the procedure lies with the Energy Team Member from ManEx. Each Department's Energy Team is responsible for establishing an energy baseline using the information in the initial energy review. Overall, **past one year energy consumption** is set as the energy baseline against which energy performance shall be measured. For example, energy performance of 2017 shall be measured against the energy performance in 2016.

Along with this, changes in the energy baseline shall only be made if EnPIs of the department no longer reflect its energy use and consumption or there has been a major change to the static factors.

Energy Baseline has been established in the document **EnMs-ManEx-F-03**.


Reference Procedure:

IMS-IP-P-01 Environmental Aspect and OHS Risks determination and target setting

4.0 LEGAL & OTHER REQUIREMENTS

The PACKAGES CONVERTORS LIMITED management ensures the compliance of IMS laws, regulations and applicable regulatory requirements by:

- Identification and assessment of legal and regulatory requirements applicable to environment, health and safety.
- updating the legal requirements
- Communication of legal / regulatory requirements to relevant functions / levels within the organization and interested parties.

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5.0 OBJECTIVES AND TARGETS

Manex Manager ensures that IMS objectives and targets are established, planned and documented at each relevant functions and levels within the organisation, which are consistent with the corporate IMS Policies, including commitment to the prevention of pollution, incidents, accidents. Along with this it includes commitment to focus on energy conservation and energy management as well as continual improvement.


While establishing the objectives and targets the following are considered:

Legal and other requirements, significant IMS hazards and risks, significant environmental aspects, significant energy users (SEUs), Energy Performance, opportunities to improve energy performance, technological options, financial, operational and business requirements and views of interested parties.

The progress of the objectives is monitored and reviewed by the top management in the management review meeting.

Reference Documents

IMS Objectives and targets Ref # (IMS-IP-F-01)

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6.0 IMS MANAGEMENT PROGRAMMES

After establishing objectives, the Manager EHS ensures its planning is formally documented in form of IMS Management Programs. The programs specify responsibility at relevant function and level, means and time frame for the achievement of objectives.


The Manager EHS ensures that these programs are amended as a result of new developments and changes in activities/processes and operating requirements.

The Manager EHS ensures that relevant targets have been transformed into specific “Management Programs” or specific action plan.

The management Programs to accomplish IMS objectives are monitored on on-going basis.

Reference Documents

IMS Management Programs Ref # (IMS-IP-F-01)

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7.0 STRUCTURE & RESPONSIBILITY


- The top management defines an IMS organisation that can accomplish all tasks relating to IMS Management System.
- For the purpose of PACKAGES CONVERTORS LIMITED IMS, top management comprises of the following designations:
 - i. HOP
 - ii. Manager Man-Ex
 - iii. Technical Services Manager (TSM) specifically for EnMs
 - iv. Manager / AM EHS
 - v. Departmental Heads / BU Heads
 - vi. Management Representative (IMS) / SHEQ Co-ordinators

The Top Management has the authority and responsibility for:

- Defining, and documenting IMS Policy and objectives.
- Defining scope and boundaries of IMS along with responsibility, authority and interrelationship of personnel.
- Providing resources.
- Appointing Management Representative (s)
- Reviewing the IMS for its continuing suitability and effectiveness.
- Ensuring that results are measured and monitored at determined intervals.
- Ensuring that Energy Performance Indicators (EnPIs) are appropriate to the organization.
- Considering Energy Performance in long term planning.

7.1 Responsibility and authority

The responsibility and authority of all personnel who manage / perform and verify work have been defined, documented and maintained with HR Manager.


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Manager ManEx/EHS

- Ensuring that IMS management system is established, implemented, maintained and continually improved in accordance with **ISO 45001, EnMs ISO 50001:2018 and EMS ISO 14001: 2015.**
- Identify Persons, authorised by an appropriate level of management, to work in support of IMS Activities.
- Ensure that planning of IMS activities is designed to support the organization's IMS Policy.
- Reporting to the top management (for review), on the performance of the IMS management system and as a basis for its improvement.
- Define and communicate responsibilities and authorities in order to facilitate Effective IMS Performance.
- Determine Criteria and Methods needed to ensure that both the operation and control of IMS are effective
- Promote awareness of the IMS Policy and objectives at all levels of the organization.
- Carries out data analysis and trend monitoring of IMS performance.
- He also highlights the potential high-risk activities and ensure plans are there to either remove these or reduce their impact/Risk. Also, He highlights significant energy use and ensures that plans are there to gradually improve energy performance.

Departmental Coordinators for IMS Activities:

- a. Participation from all levels of the organisation on IMS issues, procedures, and policies.
- b. Awareness about relevant IMS controls established by PACKAGES CONVERTORS LIMITED.
- c. Identification of IMS concerns of the respective area, unsafe practices, significant energy use and housekeeping issues.
- d. Participation in matters relating to IMS policies and procedures
- e. Necessary corrective and preventive actions on identified IMS problems / concerns to eliminate or minimise the risks and to control losses.

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- f. Continual improvement of IMS Management System through effective participation and feedback from employees.
- g. Each department is represented by IMS coordinator.
- h. To carry out hazard identification and risk assessment of respective departments.
- i. To act as experts and facilitators on the issues of IMS for each department.
- j. However, for EnMs ISO 50001:2018, energy team from each department has been made which consists of one **Energy Representative** and one **Energy Leader** and both are reporting to the Departmental Head. Energy Representative will be coordinating with Energy Team Member from ManEx in the EnMs system implementation and will be developing and maintaining all documentation at department's end. Energy Leader will be overall responsible for ensuring and maintaining energy performance and meeting set energy objectives and targets.


8.0 TRAINING, AWARENESS & COMPETENCE

IMS MR and HR Manager share various responsibilities for controlling training relating to IMS at PACKAGES CONVERTORS LIMITED. A documented procedure IMS-IP-P-06 has been established for training, awareness and competence of all those personnel whose job may have an impact on IMS. The procedure defines mechanism for:

- Minimum competence criteria of personnel, based on appropriate education, training, skills and experience.
- Identifying training needs of employees, related to Energy, Environment, Safety and Health.
- Planning and providing appropriate training.
- Maintaining training records.
- Ensuring that employees are aware of importance of their conformance to IMS policy, procedures and requirements.
- Ensuring that employees are aware of actual and potential IMS consequences and the benefits of improved personal performance.
- Ensuring that employees are aware of their roles and responsibilities regarding IMS management system including significant energy use (SEU), energy performance, emergency preparedness and response requirements. (and the potential consequences of departure from the specified procedures.)

8.1 Classification of Training

PACKAGES CONVERTORS LIMITED is committed to provide a complete range of training required by its employees to perform their assigned responsibilities. This includes:

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- Orientation training to new employees
- Induction to contractor staff and visitor
- Job related training,
- IMS training which may include, audit training, actual or potential significant IMS risks and aspects, IMS policies, objectives and targets, relevant procedures, energy performance, emergency preparedness, PTW, including consequences of violating any procedure etc.

8.2 Reference Procedure

This policy is supported by:

- IMS-IP-P-05..... Competence, training and awareness

9.0 CONSULTATION & COMMUNICATION

9.1 Internal Communication


IMS communication within PACKAGES CONVERTORS LIMITED takes place at many platforms that include employees, managers, Manex and Top management. These platforms are as follows;

- Training and/or awareness sessions.
- Use of display boards or posters
- Distribution of leaflets or IMS policies, objectives / targets, plans, instruction or procedures.
- Reporting hazards and incidents.
- Employee Announcements on Emails
- Sub Keh do Portal on Intranet
- Pink Slips for Safety
- Green Slips for Energy
- Receiving measuring and monitoring reports
- Management Review Meetings

Employee participation and consultation on IMS matters is ensured through Departmental IMS Coordinators.

9.2 External Communication

Manex (Through HR Manager/HOP) ensures communication with all stake holders (customers, regulatory bodies, suppliers, auditors, government or non government organisations, local municipal authorities etc.) on matters relating to IMS. Any communication or decision made on significant IMS Energy Use/Risks/aspects is recorded in External Communication Folder.

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HOP acts as Corporate Spokesman, from PACKAGES CONVERTORS LIMITED when any communication is required to be established with media.

10.0 DOCUMENTATION

10.1 General Policy

PACKAGES CONVERTORS LIMITED establishes, implements and maintains a documented IMS Management System designed and implemented to fulfil requirements of ISO 45001, EnMs ISO 50001:2018, and EMS ISO 14001:2015 standards.

10.2 IMS Documentation and Structure

The following documentation describes structure of the IMS documents used at PACKAGES CONVERTORS LIMITED:

- i. IMS Policy
- ii. IMS Objectives
- iii. IMS Management System Manual
- iv. IMS Management System Procedures
- v. IMS Management Programmes
- vi. Work Instructions / SOPs
- vii. Document of external origin (such as EnMs ISO 50001:2011, OHSAS 18001, ISO 14001 Laws & Regulations).
- viii. Records

10.3 Work Instructions

These work instructions define specific methods of performing an activity by an individual or workstation or to handle any specific emergency situations (such as fire etc). Can be approved by department Heads.


11.0 DOCUMENT & DATA CONTROL

11.1 General


Man-Ex has the overall responsibility for controlling documents related to IMS Management System at PACKAGES CONVERTORS LIMITED.

PACKAGES CONVERTORS LIMITED have the policy to remove and destroy obsolete documents.

MR interacts with all departmental heads on document control matters.

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11.2 Reference Procedures IMS-IP-P-02..... Control of Documents & Records.

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12.0 OPERATIONAL CONTROL

PACKAGES CONVERTORS LIMITED plans, maintains and controls its activities related to its significant IMS energy use/risks/aspects to ensure that they are carried out under specified conditions. This is done by defining SOPs / procedures that include operating criteria, responsibility for managing the activity, the controls ensured and maintenance requirements.

PACKAGES CONVERTORS LIMITED believes that safe and responsible operation requires effective procedures that are consistently followed by personnel and where their absence could lead to deviations from policy, objectives and targets.

The management of energy use/risk/aspects of these activities is carried out through effective operational controls as defined in the following procedures;

- a. Communicating IMS requirements to suppliers and contractors.
- b. Employees Health Monitoring and first aid Program
- c. PTW
- d. Driving Controls
- e. Chemical Management & MSDS
- f. Fire prevention and Control
- g. Visitor control
- h. Roof mounted cranes
- i. Fork lift
- j. Canteen, foods, Hygiene
- k. Departmental operational control procedures
- l. First aid And Emergency Medical Assistance: The availability of first aid and emergency medical assistance is essential in order to minimize the harmful consequences of injuries and illnesses. PACKAGES CONVERTORS LIMITED has determined the nature of the services needed on the basis of potential seriousness of injuries and the health-hazard exposures that may occur during work. Following arrangements have been made for implementing Health Program at PACKAGES CONVERTORS LIMITED:
 - Adequate training and assignment of emergency responders and first aid personnel.
 - A qualified doctor is available during office hours in the Company Medical Center.
 - In case of any injury or illness requiring hospitalization, the organization provides medical care facility through hospitals / clinics on its panel.
 - PACKAGES CONVERTORS LIMITED employees undergo medical examination once every year for the purpose of Medical Surveillance to identify specific instances of illness or health trends that may suggest an adverse effect from workplace exposures.

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13.0 Design

Packages Convertors Limited shall consider energy performance improvement opportunities and operational control in the design of new, modified and renovated facilities, equipment, systems and processes that can have significant impact on its energy performance.

The results of the energy performance evaluation shall be incorporated where appropriate into the specification, design and procurement activities of the relevant project(s).

The results of the design activity shall be recorded.

See **EnMs-ManEx-F-05** Design and Modification

14.0 Procurement

Packages Convertors Limited will outline a policy that aims for the prevention measures and the actions necessary to ensure the proper and safe selection of equipment's / products which are being procured at Packages Convertors Limited. Also, it will focus on the procurement activities in an energy efficient and environmentally responsible manner and will take energy, environmental, social along with economic factors into consideration when purchasing goods and services.

Packages Convertors Limited will establish and implement a criteria for assessing the safety, environmental affects, energy use, consumption and efficiency when procuring products, equipment and services which are expected to have a significant impact on organization's energy performance.


Packages Convertors Limited will define and document e purchasing specifications relevant to safety, environment, health and energy.

14.0 EMERGENCY PREPAREDNESS AND RESPONSE

PACKAGES CONVERTORS LIMITED has developed Emergency Response System through documented Emergency Management Procedure and Plan to respond to potential accidents and emergencies.

The Emergency Management Plan defines the types of emergencies, emergency organisation, authority and responsibilities, list of key personnel, internal and external communication plans, details of emergency services and information on hazardous materials. The plan also specifies procedures for taking actions in the event of emergencies such as:

- Fire
- Explosion

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- Earthquake
- Flooding / Cyclone
- Chemical and other Spillage
- Gas Leakages

The effectiveness of the Emergency Management Plan and extent of preparedness is tested and reviewed by conducting emergency drills. This also involves all aspects of the emergency management organization, with designated observers and a formal documented feedback for improvements and follow-up responsibility.

The need for changes / revisions to emergency procedure / plan will be reviewed after an accident, emergency or after changes are stipulated as a result of emergency drills.

13.1 Reference Procedure

Emergency Response Procedure/PlanIMS-IP-P-07

ESP/Deptt/4.4.7/1 Departmental Procedure


14.0 PERFORMANCE MEASUREMENT & MONITORING

PACKAGES CONVERTORS LIMITED monitors and measures IMS performance so as to determine compliance with policies, procedures and requirements of the IMS Management System.

Verification is done to assess legal and other compliance to IMS requirements

IMS Performance Monitoring & Measurement Procedure has been established which defines mechanism and responsibilities for:

- qualitative and quantitative measures of performance;
- requirements for the monitoring of IMS Objectives;
- proactive measures of performance that monitor compliance with the IMS Management Programmes, operational criteria and applicable legislation and regulatory requirements.
- reactive measures of performance to monitor SEUs, EnPIs, Energy Consumption, accidents, ill health, incidents and other historical evidence of deficient performance.
- Recording of data related to monitoring and measurement.

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14.1 IMS Measurement and Monitoring Records

All inspections are clearly shown on IMS Monitoring & Measurement Plan. The records clearly identify if testing activities compliance to IMS laws, IMS policies & objectives. Where the monitoring results do not meet the defined limits of regulatory standards & performance measures or IMS policies & objectives, the concerned designations take appropriate corrective actions as per defined procedures (IMS-IP-P-08 and IMS-IP-P-09) for control of non-conformance and corrective and preventive actions refer) .

14.2 Reference Procedures

This policy is supported by:

- IMS-IP-P-08 Measurement & Monitoring Procedure
- IMS-IP-P-09 Incident Investigation, Non Conformance, Corrective Action & Preventive Action Procedure

IMS-IP-P-08A Monitoring & measurement (Environment)

IMS-IP-P-08B Departmental Environmental monitoring & measurement plan

15.0 INCIDENT INVESTIGATION & NON-CONFORMANCE

Incidents are reported, investigated, analysed and corrective and preventive actions taken.


MR has the overall responsibility to handle non-conformance related activities and processes at the PACKAGES CONVERTORS LIMITED. Non-conformances (both actual and potential) may be identified in any one of the following situations:

- Violation of any applicable law or regulation, performance standard.
- Failure to meet IMS objectives and targets.
- Complaints from any interested party (customer, consumer, supplier, community, regulatory body, governmental agency, NGO or any other stakeholder)
- IMS Management System Audit
- Detected through monitoring and measurement activities.
- As a result of an accident or incident causing fire, injury, near miss etc.

15.1 Reference Procedures

This policy is supported by:

- IMS-IP-P-08Measurement & Monitoring Procedure.
- IMS-IP-P-09..... Incident Investigation, Non Conformance, Corrective Action & Preventive Action Procedure.

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CORRECTIVE & PREVENTIVE ACTIONS

Corrective and preventive actions are taken on the actual or potential non-conformities related to IMS Management System.

15.2 Corrective Actions

MR ensures implementation of corrective actions as per procedures IMS-IP-P-09. The corrective actions include:

- Investigating the causes of non-conformances.
- Recording the results of investigation.
- Determination of need for actions to avoid re-occurrence(Corrective actions are taken to eliminate the root cause of non-conformances).
- Mitigating the effects of impact, incidents or accident.
- Application of controls to ensure that corrective action is taken and is effective.

15.3 Preventive Actions

Preventive actions refer to methods of preventing potential non-conformances and include the use of appropriate sources of information such as analysis of complaints or feedback from interested parties, data trends and suggestions by employees and customers, results of audits, results of measurement and monitoring. Controls are exercised to ensure that preventive actions taken are effective. The procedure IMS-IP-P-09 defines mechanism for preventive actions.

15.4 Review of Corrective & Preventive actions

Top Management reviews corrective and preventive actions taken including their effectiveness during Management Review meetings. Any changes to the documented procedures resulting from corrective and preventive actions are recorded.


15.5 Reference Procedure

This policy is supported by:

IMS-IP-P-09 Incident Investigation, Non Conformance, Corrective Action
& Preventive Action Procedure.

16.0 Control of Documents & Records

Documents & Records demonstrate compliance to requirements and effective operation of the IMS. The records are legible, identified, indexed, retrievable and stored in suitable environments to protect them from loss or damage. Each procedure identifies the records to be kept, the responsibility for maintaining

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the record and the retention period for each record. Records from suppliers / contractors form a part of this data. 1 year Retention time for all the IMS records/logs will be ensured.

Procedure IMS-IP-P-02 has been established and documented which defines mechanism and responsibilities for the control of documents/records related to IMS Management System.

16.1 Reference Procedures

IMS-IP-P-02..... Control of Documents & Records.

17.0 IMS AUDITS

MR has the responsibility for managing activities relating to internal IMS audits at PACKAGES CONVERTORS LIMITED. Audits are conducted according to a documented procedure IMS-IP-P-10, which clearly outlines the methodology for:

- Competence criteria of auditors
- Audit criteria OHSAS 18001 & ISO 14001 requirements of IMS Management system.
- Planning the audits
- Conducting the audits
- Reporting the audit results
- Corrective actions and follow up of audit findings.
- Review of audit results by top management.


Purpose of Internal Audit is to:

- Ensure conformance to planned arrangements for IMS including the standards OHSAS 18001:2007, EnMs ISO 50001:2018, EMS ISO 14001:2015
- Ensure Conformance to IMS Objectives and Targets
- Ensure that IMS is effectively implemented and maintained and improves energy, environment, health and safety performance.

17.1 Reference Procedure

This policy is supported by:

- IMS-IP-P-11 Internal IMS Audits

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18.0 MANAGEMENT REVIEW

Integrated Management System is reviewed by the Top Management at least once every year in which Top Management discusses:

Key issues related to IMS and the resources required for any initiative relevant to IMS highlighted by the Departmental Heads or centrally by Manufacturing Excellence Department.

Any changes/ addition to activities/ processes or products that may have health, safety and environmental or energy related risk.

Monthly EHS and Energy Statistics

Follow-up actions of previous reviews.

IMS related Concerns among departments and other EHS Performance Indicators and targets.

Review for changes to Policy, Objectives and other elements of IMS Management System.

Recommendations for improvements

Also, some of the IMS related issues are discussed every month in our Monthly Operations Review (MOR) Meeting

The decisions of the management review shall be recorded by the MR as minutes of the meeting.

17.1 Reference Documents and Records.

- Output report / Minutes and decisions of the Management review meeting.... IMS-IP-F-25.