

ENVIRONMENTAL MANAGEMENT POLICY AND MANAGEMENT PROGRAM

1.0 POLICY GENERAL STATEMENT

Krystalline Salt Limited recognizes and commits to protecting and managing the environment as an integral part in our business. We aim to uphold the fundamental right of every citizen in accessing a clean and healthy environment for the improvement of their well-being, through effective and sufficient environmental management systems. Our systems are incorporated to ensure safe working conditions for every employee and to uphold conformity to environmental legislations and particularly Environmental Quality Standards as stipulated by the Environmental Management and Coordination Act 1999.

In order to achieve the highest level of environmental management standards, we are committed to:

1. Meeting all legal and statutory requirement as a minimum standard.
2. Ensuring sustainable and effective management of waste through application of the waste management principles.
3. Integrating cleaner production methods in an effort to curb the production of Greenhouse Gases.
4. Promoting conservation of energy and raw materials
5. Developing and implementing a comprehensive Waste Management Plan for all our processes
6. Engaging in tree planting activities in an effort to increase the forest cover within the areas we operate in.



7. Engaging in Environmental Corporate Social Responsibility activities to improve the welfare of the community.
8. Providing training, information and education to all employees to promote and develop environmentally conscious beings.
9. Ensuring a safe and healthy working environment for all employees through the identification and management of inherent and residual hazards and risks.
10. Establishing and upholding continuous communications with employees and relevant stakeholders for purposes of reinforcing this policy.
11. Setting targets and objectives to develop a culture of continuous improvement.
12. Eliminating or reducing the impacts of our activities on the environment by closely monitoring all the environmental vital indicators of change
13. Ensuring compliance to our occupational health and safety and fire safety policies
14. Ensuring adequate resources and facilities are made available as is reasonably practicable to ensure implementation of this policy.
15. Maintaining a comprehensive Environmental Management Program as a standard guideline to our commitment.

 Signed: _____


(Managing Director)

Date: 10/01/2019

2.0 ORGANIZATION AND RESPONSIBILITIES

Management

The management is responsible to ensuring that:

- The right health and safety policy is put in place.
- Adequate budget is set for the implementation of the policy.
- The right organizational structure is in place for the implementation of the policy.
- Competent people are employed.
- Workers, clients and visitors comply to the set policy through visible leadership

Compliance Officers

The compliance officers are in-charge of overall environmental coordination within the company. He/she is mandated to:

- Providing advice and guidance on environmental standards as per the legal and statutory requirements.
- Ensuring complete compliance to all relevant legal and statutory requirements as required.
- Overseeing and Coordinating the various inter-departmental environmental activities and compliance related matters.
- Ensuring the regulating bodies, our partners and where necessary the local community are updated and informed on the progresses made by the company towards compliance to Environmental regulations.
- Identifying and providing instruction, information and coordinate training environmental management principles
- Promoting a positive safe and healthy environmental culture within the company.
- Developing and implementing the policy.
- Monitoring environmental performance of the company.

Heads of Departments/Supervisors /Shift in charge

These are responsible for the management of the environment within their Departments or areas of work by:

- Ensure that high standards of housekeeping are implemented within their areas of operation.
- Ensure that the environmental policy is implemented within their departments.
- Promote a positive safe and healthy environment.
- Encourage efficient resource use to minimize waste production.
- Promoting a positive healthy and safe environmental management culture.
- Taking all appropriate measures to prevent environmental degradation in their departments.
- Monitoring their environmental performance to ensure that safe environmental conditions are maintained.
- Ensuring their employees are trained as per the identified training needs.
- Ensuring environmental degradation or contamination incidents are reported and engage in their investigations.

Health and Safety Committee

The committee is formed as an obligation to the OSHA Act 2007 under Sec.9. Their responsibilities are not only limited to health and safety but also include Environmental obligations. The responsibilities of the Committee include:

- Ensuring overall housekeeping around the workplace through conducting regular inspections around the workplace,
- Taking part in inspection, investigations and making recommendations of environmental incidents and complaints within their departments,
- Providing relevant information on environmental matters affecting workers to the management.
- Training of employees as per the training programs of the Departments as a means of providing information on environmental management to the workers
- Identifying environmental hazards within their departments and making appropriate recommendations to the management
- Advising on the adequacy or otherwise of environmental management arrangements and measures for particular hazardous work or activities

- Maintaining effective communication channels between the management and the workers
- Organizing activities or programs for the promotion environmental management culture within the Departments.

Employees

Every employee has the responsibility to:

- Ensure high standards of cleanliness and housekeeping within their area of work is maintained.
- Adhere to all standards, protocols and procedures laid out in the workplace in relation to the environmental management.
- Avoid any activity that may pose environmental risk
- Co-operating with the management for reasons of environmental management.
- Reporting to the supervisor or person-in-charge any situation which he or she has deemed to be a hazard (even after correcting the situation).
- Complying with all laid out regulations and policies pertaining to environmental management around the workplace.

Clients, Contractors and Visitors

Contractors, clients and visitors should:

- Take reasonable care to ensure their activities do not cause environmental degradation or contamination.
- Co-operate with the management for reasons of environmental management.
- Report to the persons-in-charge any situation which he or she has deemed to be a hazard (even after correcting the situation).
- Comply with all laid out regulations and policies pertaining to environmental management around the workplace.

3.0 ENVIRONMENTAL MANAGEMENT PROGRAM

We commit to attaining and observing all environmental quality standards as stipulated by law. To achieve this we shall put the below arrangements in place to integrate all the environmental management components.

3.1. Waste Management

As Krystalline, we adhere to all policies relating to waste management. We are committed to eliminating waste generated from our processes, however for the residual waste we keenly implement the Waste Management Principles i.e. Reduce, Reuse and Recycle. The Environmental Management (Waste Management) Regulations of 2006 are our guidelines

Segregation: We are committed to proper segregation by provision of various waste bins strategically placed within our premises.

Reduce: We shall employ various means to reduce the amount of waste generated from our processes.

Reuse: Throughout the production phases, we shall deliberately re-use bi-products and by products to minimize wastage. These products are always useful in another process.

Recycle: The residual wastes after reduction and reuse shall either be recycled within our systems or be disposed to NEMA Licensed waste recyclers.

Disposal: For the wastes that cannot be further recovered or recycled, such we shall dispose through NEMA Licensed waste disposers

Waste Management Plan, Inventory and Tracking System

We shall develop a comprehensive waste management plan for all the wastes generated from our processes. Similarly, we shall keep and maintain records of the amount of wastes generated from the various processes. A tracking system shall also be maintained for the re-used, recycled and disposed wastes to ensure all is done in accordance to the regulations and the Plan.

3.2 Water Management

To effectively manage water throughout our processes, the available Acts and legislations regulating water use and disposal are our minimal standards of compliance. The company shall strive to:

- Invest in rain water harvesting techniques within the company.
- Conserve by monitoring water use in every sector/department
- Adopt recycling techniques for water such as use of brine in washing salt
- Increase underground water recharge by minimizing discharge and increasing land cover
- Promote a conservation culture among employees
- Monitor the quality of water regularly

3.3 Air Quality Management

We shall adhere to the Environmental Management (Air Quality) Regulations by ensuring:

- Prevention of air pollution by employing scrubber systems in our chimneys
- Use cleaner forms of sources of energy
- Conducting regular monitoring of air quality, stack emissions and dust to ensure that they conform to the stipulated standards.

3.4 Soil Quality Management

We shall conduct periodic testing and analysis of soil within and away from the salt works. This shall form part of the parameters we use to monitor the impacts of our activities on the environment.

3.5. Cleaner Energy Initiatives

Climate change is a continuous emerging issue in our global society. As part of the Climate Change Act, 2016, we aim to reduce our carbon footprint and contribute to the global commitment of reducing global warming. This we shall achieve through:

- Incorporating green energy in our production cycle.
- Adopting recycling techniques to minimize on waste production.
- Promote afforestation activities through out-grower programs

- Encourage landscaping activities within the company for both environmental and aesthetic purposes.
- Invest in cleaner energy facilities like solar systems
- Promote use of cleaner energy facilities among our employees e.g by gifting our staff with energy saving jikos and solar lamps.

3.6. Housekeeping

As part of our culture, we shall commit to the 5's strategy to improve and sustain housekeeping within our departments. We shall ensure that high standards of general cleanliness are conformed to within each department.

Further, we shall:

- Provide suitable and sufficient dust bins at designated areas within our premises
- Ensure that waste is collected and disposed as per the Waste Management Regulations, 2006
- Ensure our workplaces are kept clean and in orderly manner at all times without obstructing exit routes and the provided safety equipment.
- Ensure our premises are fumigated regularly to control pests, insects and birds.

3.7. Evaluation and Monitoring

The company's administrative structure shall provide an internal control mechanism to identify and mitigate activities that are prone to cause negative environmental impacts. This is done through conducting periodic evaluations within our premises. Aside from the internal controls, we shall also comply to all the legal means of monitoring environmental parameters which include but not limited to;

- Annual Environmental Audits
- Environmental Impact Assessments and Initial Audits for new projects
- Occupational Safety and Health Audit
- Fire and Safety audit.
- Risk Assessments.

- Noise Survey.
- Effluent and soil Analysis
- Ambient air quality monitoring
- Ground water monitoring

The recommendations made from these audits/inspections and surveys shall be incorporated into the Company's Action Plan for effective implementation.

3.8. Use of Personal Protective Equipment

We understand that use of Personal Protective Equipment is the last resort in controlling hazards and associated risks within our environs. As per our PPE Issuance and Replacement Policy, all employees shall be issued with the appropriate PPE as per the hazards identified in their area of work. This is meant to protect them from the residual hazards and risks after all the controls have been implemented.

3.9. Community Welfare

We recognize the fact that our operations have an impact within the communities we operate within. We are committed to developing strong relationships with the local communities. We shall remain sensitive to the needs and concerns of local communities and other stakeholders.

To achieve this, we shall:

- Encourage the participation of local communities through the Corporate Social Responsibility Committee and even the entire community prior to commencement of new projects through EIA
- Develop and maintain community relations management procedures and channels through the CSR Committee and KAM Liaison Office
- Initiate Corporate Social Responsibility projects that will benefit the local community environmentally and improve their welfare
- Impact positively on the lives of the locals by promoting enhanced business opportunities, work skills and increased awareness of local community and cross cultural issues.

3.10. Communication and Consultation

We value communication between the management, the employees, local community, visitors, contractors and clients.

We shall employ various means of communication which will include but not limited to direct consultation or communication through the Health and Safety Committee members, CSR Committee members, stakeholders consultation forums, internal memos, departmental training sessions, signages , notices and handbooks.

All employees, clients and visitors are expected to pay attention and adhere to the signages and notice boards in their environment.

3.11. Sustainability and Supervision

The management is committed to engaging competent staff and providing appropriate training, knowledge, experience and other skills necessary to ensure sustainability of milestones achieved. This is achieved through the scheduled monthly Departmental training sessions, kaizen workshops and other trainings on a need basis.

As discussed earlier, the line supervisors, Heads of Departments , Health and Safety Committee and Compliance Department have various responsibilities in ensuring implementation of this program. The management shall avail all the necessary resources to enable every individual carry out their responsibilities.

3.12. Review Program

This policy shall be reviewed annually through consultation of all the stakeholders.