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A. COMPANY INTRODUCTION

AXISCADES is one of India's leading technology solutions providers, catering to the futuristic needs of Aerospace, Defence, Heavy Engineering, Automotive and Industrial Production sectors.

AXISCADES, a unified brand represents combined entity providing Engineering Services, Offsets and Strategic Technologies.

These companies provide cutting edge technology solutions, addressing the business needs across domains, at every stage of product life-cycle development.

With over two decades of experience in engineering excellence and unparalleled domain expertise, and passion to challenge the status quo, we are best suited to become the first choice partners to global OEMs across the world.

The culture of innovation inherent in our DNA, ensures that we are at the vanguard in taking initiatives to break new grounds in technology solutions, By Design. It is our abiding endeavour to create new intellectual property by investing in research and development work.

Our proprietary business methodology AXCELERATE, which seamlessly integrates the three pillars of people, process, and solutions, equips us and by extension our customers a functional model which streamlines efficiency and enhances performance.

Headquartered in Bangalore AXISCADES has 12 offices worldwide including North America, Europe, and Asia.

1. CONTEXT OF ORGANISATION

1.1 Understanding the Organization and its Context

AXISCADES determines external and internal issues that are relevant to its purpose and its strategic direction and that affect its ability to achieve the intended results of its Environment Management System.

Understanding the organisation's context involves the review and definition of the environmental conditions capable of affecting or being affected by the organisation's operations. This review consists of:

- Determining the external issues that could affect or be affected by the organisation's products throughout their life cycle. Determining the external issues is carried out through analysis of all Political, Economic, and Social, Technological, Environmental and Legal issues as a minimum.
- Defining the internal characteristics of the organisation that could affect the ability of the EMS to achieve its intended outcomes. Determining the internal issues is carried out through



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analysis of the organisation’s strategic direction, products, services, processes, activities, culture and capabilities and any other internal issues deemed relevant.

- Developing a list of opportunities based on these issues which are to be included in the setting of objectives and targets.

1.2 Understanding the Needs and Expectations of Interested Parties

Due to their effect or potential effect on the organization’s ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements, the organization determines.

- the interested parties that are relevant to the environment management system.
- The requirements of these interested parties that are relevant to the environment management system.
- Which of these needs and expectations should become compliance obligations for the AXISCADES EMS.
- In Consultation with employees, shareholder/owners, customers, visitors, neighbours, authoritative bodies/regulators, parent company, suppliers and partners, insurers, business groups, emergency services and as necessary to identify their requirements.
- The nature of the requirements of each – i.e., is it a regulatory requirement, a voluntary agreement, an expressed view of a customer or neighbour, etc.

AXISCADES interested parties are outlined and reviewed as part of our Context of the Organization Planning process. Interested parties and their requirements are identified below:

1.3 Determining the Scope of the Environmental Management System

AXISCADES has determined the scope of Environment Management System considering interests of stakeholders, and its products and services, with respect to:

1.3.1 Scope statement

Providing engineering services and solutions for various domains



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Department managers to help define, implement, and maintain the procedures required by this manual and to ensure all processes conform to these requirements. All the employees are responsible of all employees to follow procedures that implement these policies.

1.4 Environmental Management System and its Processes

1.4.1 Establish EMS

AXISCADES has established, implemented, maintained, and continually improved Environment Management System as defined in this Manual with reference to the ISO 14001:2015. The EMS also addresses applicable statutory, regulatory EMS and customer requirements.

This is in line with the overall goal of providing a sound basis for effective and responsible management of the environment and to provide a safe and healthy workplace for employees, neighbours, contractors, and visitors.

2. LEADERSHIP

2.1 Leadership and Commitment

AXISCADES top management demonstrates to ensure that it can demonstrate leadership for the environmental management system at the most senior level within the organisation covered by the current scope of registration.

Duties/responsibilities of top management in relation to the EMS:

Accountable for the effectiveness of the EMS, by:

- Chairing of regular EMS meetings and Annual Management Review Meetings at which the Environmental Objectives are set and agreed.
- Setting, agreeing, and reviewing environmental objectives and targets.
- Communicating environmental objectives to employees and contractors.
- Being present for external EMS audits, opening and closing meetings.
- Ensure the Environmental Policy and environmental objectives are in place and are compatible with the organisation's context and strategic direction.
- Ensure EMS requirements are integrated into the organisation's business processes, where possible.
- Considering environmental issues in the change management process for example when moving into new markets, new product development etc.
- Ensure sufficient resources, including support and training are available to effectively implement the EMS.

- Communicate the importance of effective environmental management and of conforming to the EMS requirements.
- Ensure the EMS achieves its intended outcomes and objectives.
- Directs and supports management and employees as necessary to contribute to the effectiveness of the EMS.
- Promote continual improvement.
- Where the above tasks are delegated, top management remains accountable for ensuring they are performed.

2.2 Environmental Policy

Establishing the Environmental Policy:

AXISCADES has framed Environmental Policy. The management ensures that this policy is understood, implemented, and followed by all employees of the organization. Environmental policy specifies, purpose and context of the organization by supporting its strategic direction, a commitment to satisfy applicable requirements and continual improvement of the environment management system. The Environmental Policy provides a framework for setting the environmental objectives.

Environmental Policy

We commit to **SUSTAIN** global biodiversity through:

- S**afeguard environment through prevention of pollution and minimize consumption of resources
- U**nderstand and assess the impact of our services on environment and plan for reduction of pollution
- S**ustainable waste management through minimizing waste-to-landfill and enhancing biodiversity in AXISCADES premises
- T**rainning on environmental requirements to all internal employees and communicate with employees, vendors, suppliers, contractors, other interested parties and encourage them to participate and contribute
- A**dhere and comply with all environmental laws, regulations, codes of practice and directives, as applicable
- I**ntegrate EMS standards with business strategy and continually improve upon the environmental management system to enhance environment performance
- N**ecessitate of benchmarking on the tools/methods/practices across industry to meet the standards





Arun Krishnamurthi
 CEO & Managing Director

Communicating the Environmental Policy:

The Environmental policy is disseminated to every employee.

- During induction

- During Quality, ISO 14001:2015 trainings
- By displaying the Environmental policy at vantage positions in the company premises
- EMS policy at AXISCADES site
- available to relevant interested parties, as appropriate

The Environmental Policy is reviewed at least annually once.

3. PLANING

3.1 Actions to Address Risks and Opportunities

3.1.1 General

When planning for the environment management system, the AXISCADES considers

- To plan, implement and maintain a process to meet the requirements of clause 6.1 considering the context of the organisation and scope of the EMS.
- To determine the risks and opportunities associated with environmental aspects, compliance obligations and the context of organisation.
- To give assurance that the EMS can achieve its intended outcomes.
- To prevent or reduce undesired effects, including the potential for external environmental conditions to affect the organisation.

AXISCADES has established the Risk Management Process which ensures the actions to address the risk and Opportunities, integrate and implement the actions into its Environment Management System process, and to evaluate the effectiveness of the actions identified through evaluation of residual risks. Risks and opportunities are managed as per Enterprise Risk Management process.

- Risks and opportunities are determined regarding:
 - Environmental aspects, including emergency situations.
 - Compliance obligations.
 - Any other issues and requirements identified in the 4.1.
 - From this, a list of risks and opportunities is established.
 - Past impacts and incidents should be considered when establishing aspects.
 - Future aspects should also be considered, such as an extension, new production line, new effluent treatment plant etc.
- From this list, EMS objectives and targets are set accordingly along with processes and timeframes outlining how and when they will be achieved.
- The Annual Management Review assesses the performance of the EMS against its agreed objectives for the previous year.



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- Relevant personnel are informed of their duties to ensure the EMS achieves these objectives.

3.1.2 Environmental Aspects

Environmental aspects and possible environmental impacts are determined by the Cross Functional Team for EMS in combination with Top Management. This is carried by examination of the inputs and outputs of the existing activities from a life-cycle perspective by:

- An examination of legislative and regulatory requirements.
- Physical inspection of the activity.
- Studying and monitoring data of inputs/outputs (e.g., water and energy usage, yields).
- Consultation with employees, authorities, industry experts, landlords.
- Examination of any complaints, corrective action requests, non-conformances and observations raised because of internal and external audits.
- Any other suitable method.

The possible aspects and impacts of new activities are examined during the planning phase of that activity, with consideration of the life-cycle stages which can be influenced by the organisation.

3.1.3 Compliance Obligations

AXISCADES ensures that it identifies and has access to environmental legislation, regulations and standards related to these environmental aspects which it can control or be expected to have a significant influence on that applies to its operations.

A register of relevant legislation is maintained and updated considering any legislative developments, including revisions and obsolescence. Any changes that need to be made to the documented procedures will be communicated via the Management Review mechanism and/or the Document control mechanism.

3.1.4 Planning Action

AXISCADES to take actions to adequately address:

- Significant environmental aspects
- Compliance obligations
- Risks and opportunities
- To ensure the actions are integrated into the EMS processes and business processes where possible.
- To evaluate the effectiveness of these actions



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All significant Environmental Impacts (significant risks) as identified in the Register of Aspects have an Environmental Objective dedicated to the continual improvement of that impact and a manager assigned to its success.

It is facilitated through the Management Review meetings and through the adherence to procedures outlined in the Environmental Procedures. Operational activities have been identified with specific controls.

External environmental conditions such as floods, storms, draught etc. which have the capacity to affect out environmental impact negatively are planned for accordingly with the Business Continuity Plan.

All opportunities as identified in the 4.1 have an Environmental Objective/Strategy dedicated to the investigation / implementation of that opportunity in the Environmental Objectives spreadsheet and assigned to its success.

4. SUPPORT

4.1 Resources

AXISCADES determines and provides resources needed for the establishment, implementation, maintenance, and continual improvement of the environment management system considering the capabilities of and constraints on existing internal resources and what needs to be obtained from external providers.

The resources required to achieve environmental objectives, are determined at the EMS Management Review, and are specified in the Environmental Objectives, along with the intended date of achievement.

4.2 Competence

AXISCADES determines the necessary competence of person(s) doing work under its control that affects the performance and effectiveness of the environment management system and ensures that these persons are competent based on appropriate education, training, or experience. Where applicable, actions are taken to acquire the necessary competence, and evaluate the effectiveness of the actions taken. Also retain appropriate documented information as evidence of competence.

4.3 Awareness

AXISCADES ensures that persons doing work under the organization's control are aware of the environmental policy, relevant environmental objectives, environmental aspects, and potential impacts associated, their contribution to the effectiveness of the environment management system,



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including the benefits of improved performance. This is done through Employee Induction Training, EMS awareness training etc.

Employees also are made aware of the implications of not conforming with the environment management system requirements, relevant environment management system documented information and changes thereto, their contribution to product or service conformity, their contribution to product safety and the importance of ethical behaviour.

4.4 Communication

4.4.1 Communication General

AXISCADES ensures that communication of EMS is carried out in a systematic approach inclusive of requirements on compliance obligation.

AXISCADES has defined and maintained process of internal and external communications relevant to Environment Management System, it also covers the requirement to document and respond to relevant communications from external interested parties, including.

- On what it will communicate
- When to communicate
- With whom to communicate
- How to communicate

4.4.2 Internal Communication

The key to achieving the goals of internal communication in EMS is to develop a two-way communication pathway “top down” communication from top management, and “bottom-up” communication from engineers who are most familiar with day to day working.

4.4.3 External Communication

When establishing the external communication processes, the internal organizational structure has been considered to ensure communication with the most appropriate levels and functions.

Relevant communication from external interested parties is documented and recorded. The decision to communicate environmental performance information will be evaluated on a case-by-case basis.

5. OPERATIONS

5.1 Operational Planning and Control

Operational planning and controls are methods, systems, processes, and equipment that safeguard the environment. These can be special containers, containment or isolation arrangements, alarms



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and automatic shutdown mechanisms, communication requirements, instructions and procedures, training programs, etc.

AXISCADES has identified and planned those operations that are associated with the identified significant environment aspects consistent with the environmental policy and the objectives and targets to ensure they are carried out under specified conditions. AXISCADES Significant Environmental Aspect List, lists significant environmental aspects and identifies departments responsible for control methods for minimize the impact of the aspects.

5.2 Emergency preparedness and response

AXISCADES is committed to safety and health of all its employees. AXISCADES organization has defined Emergency Preparedness and Response, and this includes procedure that outlines different emergency procedures.

Emergency planning and response procedures have been established to identify potential accidents and emergencies, and to deal with unexpected incidents. Responsibilities and information sources are clearly defined in the relevant procedures, as well as the actions to be followed in the event of an emergency.

In the event of an emergency or accident, the Local ERT team shall report the contents and countermeasures taken to the Emergency Management Team, EMT who shall provide directions for subsequent measures.

Testing of the effectiveness of the plans is undertaken on a periodic basis. Records are maintained to demonstrate the test methods, results and any corrective actions taken to improve the plans.

Each department is responsible for notifying, responding to and reporting emergencies as appropriate.

The Local Environmental ERT team is responsible for coordinating environmental emergencies.

6. Performance Evaluation

6.1 Monitoring, Measurement, Analysis, and Evaluation

Monitoring and measurement are undertaken to track performance, relevant operational controls and conformance with targets and objectives. This is achieved by establishing performance indicators which are objective and verifiable.

Resource usage is monitored in line with objectives and will be baselined to allow future effective performance monitoring.



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AXISCADES utilizes other methods to monitor, measure, analyse and evaluate performance such as Internal Audit, External audit, Complaints, Non-conformances, Emergency response performance, management review and KPIs.

6.1.1 General

AXISCADES has determined the following:

- a) What needs to be monitored and measured?
- b) The methods for monitoring, measurement, analysis, and evaluation, as applicable, to ensure.
- c) Valid results.
- d) The criteria against which the organization will evaluate its environmental performance, and
- e) Appropriate indicators.
- f) When the monitoring and measuring shall be performed.
- g) When the results from monitoring and measurement shall be analysed and evaluated.

6.1.2 Evaluation of Compliance

AXISCADES periodically compares compliance obligations requirements and the actual situation of an organization. To achieve this, an organization has kept an updated list of compliance obligations and compliance obligations requirements. Compliance evaluation is done through below steps.

- Compliance requirements is identified as the metric.
- Metric is tracked monthly basis.
- Conduct audit and evaluate compliance metrics.
- Necessary Changes, if any to the EMS system or training, awareness etc., and continue to monitor and evaluate regularly
- Communicate

The results of an external compliance audit are included as part of the internal audit process, if any, and any actions identified form part of the Environmental Objectives.

Compliance-related non-conformities are analysed and acted upon and are recorded in the non-compliance document.

7. IMPROVEMENT

7.1 Continual Improvement

AXISCADES continually improves the suitability, adequacy, and effectiveness of the environment management system and considers the results of analysis and evaluation, and the outputs from management review, to determine if there are needs or opportunities to be addressed as part of continual improvement. Also, it monitors the implementation of improvement activities and evaluate the effectiveness of the results.