

**First Edition**

## Integrated Management System (IMS) Manual

According to ISO 9001: 2015, ISO 14001: 2015 & ISO 37001: 2016

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# BIHAR RAJYA BEEJ NIGAM LIMITED

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# BIHAR RAJYA BEEJ NIGAM LIMITED

## Ownership Declaration

This document and the information contained herein are the sole property of Bihar Rajya Beej Nigam Limited, located at 6<sup>th</sup> Floor, Pant Bhawan, Nehru Path, Patna- 800001. This is the first issue of this document on Integrated Management Systems (IMS), prepared for simultaneous implementation of three management systems, namely ISO 9001:2015 Quality Management Systems, ISO 14001:2015 Environmental Management Systems and ISO 37001: 2016 Anti-Bribery Management System in the organization.

Bihar Rajya Beej Nigam Limited **in this document is referred as "BRBN"**.

This document has been issued to you on account of your official association with the organization. It must be returned, if this official association ceases, to the Managing Director of the organization. If you feel that any change or correction is required in any of the contents of the document, please contact the Senior Quality Control Officer. Please do not make any amendment/revision to this document on your own.

The content(s) of this document shall not be reproduced in whole or in parts, in any form whatsoever, without the formal consent of the undersigned or his designated authority.

## Authorization

1. The Managing Director (MD) is representing Top Management of the organization and has the responsibility for implementation of the IMS according to ISO 9001:2015, ISO 14001:2015 and ISO 37001: 2016 in the organization. He is also responsible for establishment and maintenance of IMS including approval, amend or revise any relevant document.
2. Director Administration shall chair the meetings of Management Review Committee of IMS and submit the record of proceedings to MD for approval. Actions for necessary improvements shall thereafter be taken. MD shall also approve any relevant document including the IMS Policy. Director Administration shall assist MD with regards to implementation of IMS in the Organization.
3. The Senior Quality Control Officer shall be the IMS Coordinator in the Organization and assist the MD and Director Administration in implementation of IMS in the Organization. All documents with respect to IMS shall be prepared under his supervision and issued by him.

Place: Patna

Date:

Managing Director



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## Amendments

Section/Clause/ Page No.	Amendment details	Date	Approval (Signature of MD)



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## Distribution of Apex Document

The Controlled Copies of this document have been distributed to persons as mentioned in the following Table:

Copy Holder	Copy No.
Managing Director	2
Director Administration	3
Chief of Processing	4
Chief of Marketing	5
Chief of Production	6
Chief of Finance	7
Company Secretary	8
Sr Quality Control Officer- IMS Coordinator	Master Copy
Regional Manager cum plant in charge	9

**Note:** Uncontrolled Copy of this “Apex Document for IMS” will be issued to customers and Certification Body, if required. However, such document will not be subject to updating.



# BIHAR RAJYA BEEJ NIGAM LIMITED

## Section 1: Introduction

Bihar Rajya Beej Nigam Limited (BRBN) established in the year 1977 under company act 1956. Bihar Rajya Beej Nigam is a subsidiary of department of agriculture, Government of Bihar. The main objective of founding of the company is to fulfil the need of quality seed requirement of the state. Bihar Rajya Beej Nigam engaged in production, processing and marketing of seed through its five regional offices cum processing plant located in five different district of Bihar namely, Kudra in Kaimur district, Sherghati in Gaya district, Hajipur in Vaishali district, Begusarai in Begusarai district and Bhagalpur in Bhagalpur district whereas its head office is situated in state capital Patna. Seed production work of Bihar Rajya Beej Nigam is carried out by the seed producer farmers as well as by government seed multiplication farm (SMF). Raw seeds from farmers and seed multiplication farms collected at the regional office level as well as at designated place decided by the management. The collected raw seed being processed at its processing plant. Seed also send to seed testing laboratory for quality analysis of the raw and processed seed. After getting successful report from the laboratory processed seed sent to different sale centre and dealer point for selling of seed among the farmers of the state. The organisation has fully equipped infrastructure with manpower in place for production, processing and marketing of seed. BRBN uses the fully equipped seed testing laboratory of Department of Agriculture, Government of Bihar, for testing of quality of seed i.e. germination capability or viability and physical purity of the seed in all the stages i.e. from raw seed collection till marketing of seed. The organisation is founded by the act of state legislation and having all the statutory requirement.

In BRBN many variety of different crops seed grown by its producer farmers and state seed multiplication farms. Some variety age less than 10 years and some variety more than 10 years. BRBN always adopt the newly released variety in their production chain. BRBN also keeping in view the nutritional aspect of people, so micro-nutrient fortified seed is also grown and distributed among the farmers. BRBN also adopted organic method of seed production to avoid the heavy metal and pesticide residue loaded crops.

BRBN designing and developing packaging material according to the need and requirement of the crops seed and season. Keeping in view the market need, packaging material developed in such a way that looks attractive and appealing. Seed related information is written on the bags. BRBN developed own software for capturing all the information related to production, processing and marketing of seeds online. BRBN update its software and website as per the requirement. BRBN get real time data from all sources.

BRBN also develop software related to customer complaints and customer satisfaction survey. Customer lodge their complaint and satisfaction survey through online platform.

The organisation processing plants are located in an eco-friendly premise, surrounded by plant and tree. In processing plant premise there is park with lush green grasses for aesthetic purposes.

The organisation is committed to provide the quality seed to the farmers of the state this means organisation is quality conscious and socially responsible organisation. The aim of the organisation is to continuously improve the quality of its product and services according to the ISO 9001:2015, ISO 14001:2015 & ISO 37001:2016 standard. For attaining this objective organisation shall establish and implement the ISO 9001:2015 (Quality Management System), ISO 14001:2015 (Environment Management System) & ISO 37001:2016 (Anti-Bribery Management System).

## Section 2





# BIHAR RAJYA BEEJ NIGAM LIMITED

## QUALITY, ENVIRONMENTAL AND ANTI-BRIBERY POLICY

We, Bihar Rajya Beej Nigam Limited, are engaged in Production, Processing and Marketing of Quality Seeds according to the requirements of State. We have adopted Integrated Management Systems (IMS) based on ISO 9001:2015, ISO 14001:2015 and ISO 37001: 2016. We, on the basis of our decided strategy for continual improvement in our IMS, are committed to:

- Develop Quality, Environmental and Anti-bribery Objectives and monitor and measure our performance to achieve sustainable, continual improvement.
- Conduct our businesses with protection of environment including prevention of pollution and prohibit bribery
- Enhance customer satisfaction while meeting all applicable legal and other requirements, anti-bribery laws and compliance obligations.
- Encourage raising concern in good faith without fear of reprisal.
- Ensure the authority and independence of the Anti-Bribery Compliance Function and **make** all employees and business associates **aware** about the consequences of the breach of this Policy

Patna

Date:

Managing Director



## Section 3: Referred standards

The following standards have been used as reference during the preparation of this document:

- ISO 9000:2015 QMS- Fundamentals and vocabulary
- ISO 9001:2015 QMS – Requirements
- ISO 10002: Quality Management - Customer satisfaction – guidelines for complaint handling in organization
- ISO 14001:2015 EMS – Requirements with guidance for use
- ISO 14004:2016 EMS - General guidelines on implementation
- ISO 31000:2009 Risk management – Principles and guidelines and
- ISO 31010:2009 Risk management – Risk assessment techniques
- ISO 37001: 2016- ABMS- Requirements with guidance for use
- ISO 19600: 2014 – Compliance Management System



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## Section 4 Context of the Organization

### 4.1 Understanding the organization and its context

- i) Bihar Rajya Beej Nigam Limited (BRBN) established in the year 1977 under company act 1956. Bihar Rajya Beej Nigam is a subsidiary of department of agriculture, Government of Bihar. The main objective of founding of the company is to fulfil the need of quality seed requirement of the state. Bihar Rajya Beej Nigam engaged in production, processing and marketing of seed through its five regional offices cum processing plant located in five different district of Bihar namely, Kudra in Kaimur district, Sherghati in Gaya district, Hajipur in Vaishali district, Begusarai in Begusarai district and Bhagalpur in Bhagalpur district whereas its head office is situated in state capital - 6<sup>TH</sup> Floor, Pant Bhawan, Nehru Path, Patna-800001 (BIHAR)
- ii) The activities relating to customer related services are coordinated by the Head Office located in Patna and supported by the regional offices situated at 5 different districts of Bihar as indicated above.
- iii) The external and internal issues have been determined, those are relevant to the purpose of the organization and its strategic direction and that could affect its ability to achieve the intended results of its IMS. PEST and SWOT analysis have carried out to identify the External and Internal issues respectively.

External issues – **PEST** Analysis:

<b>Political Factors:</b> 1. Different government scheme policy 2. Subsidy on product 3. Employment law; 4. Environmental regulations.	<b>Economic factors:</b> 1. High fluctuation of price of raw seed 2. Competitive pricing of product on offer to compete with peer group
<b>Social Factors:</b> 1. Change in food habit and demand for more fine quality product; 2. Brand and company image.	<b>Technological Factors:</b> 1. Impact of internet (Online Sales); 2. Innovation 3. Speed of Technology Transfer; 4. Introduction of new high quality product

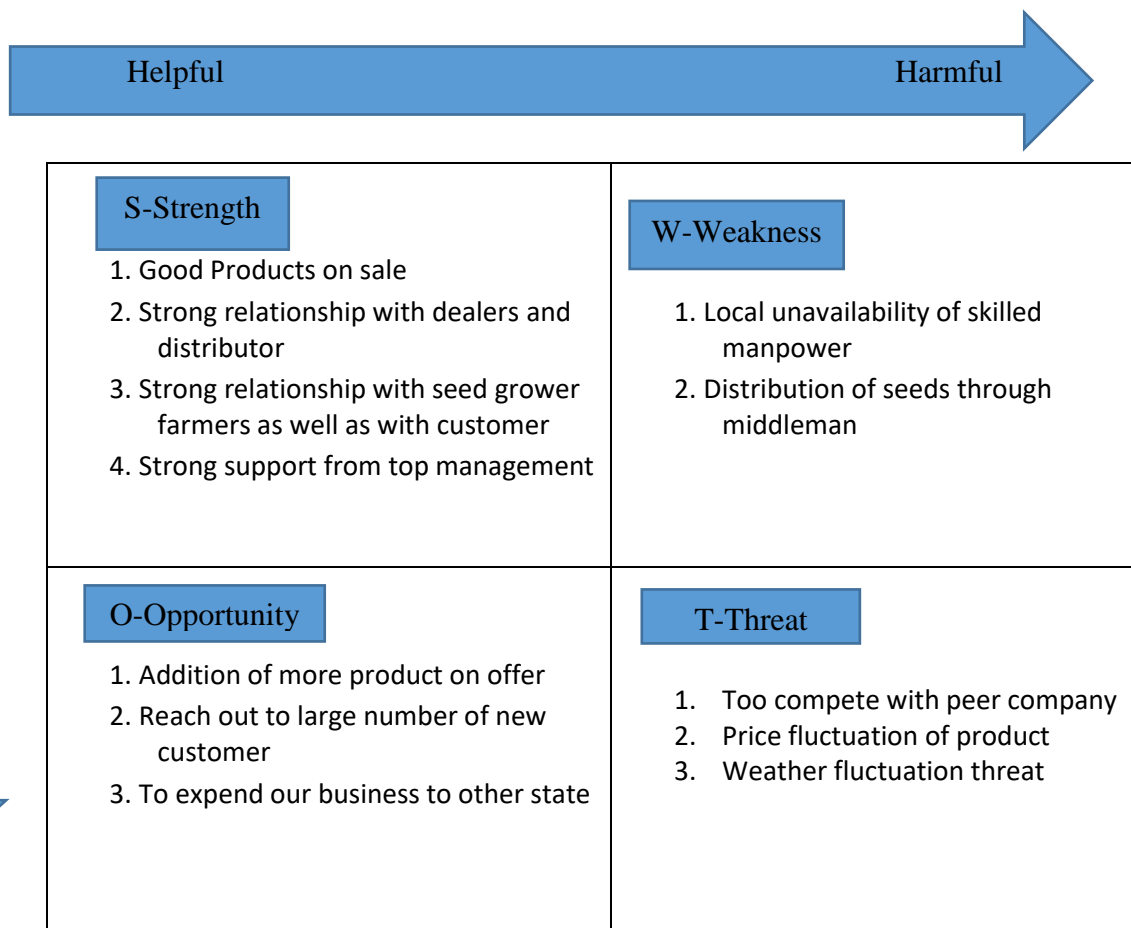
In addition to above External issues may be related to Environment and Legal as follows-

Environmental	Natural calamity like excessive rain or no rain Storing of seeds in godam
Legal	Compliance of statutory and regulatory requirements



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Internal issues- **SWOT** analysis



It is maintained as documented information and subject to periodic monitoring, review.

## 4.2 Understanding the needs and expectations of interested parties

- The organization has identified the interested parties and their requirements as relevant to IMS. These are being maintained as documented information and subject to monitor and periodic review.
- Applicable statutory and regulatory requirements have been identified, including Licenses/Consents, Anti-bribery laws and other compliance obligations as necessary for products and service delivery. The availability of relevant information is ensured. It has been determined how these requirements apply in maintaining and updating the statutory, regulatory and other requirements to which the organization subscribes and under obligations for adherence and compliance and reporting to various agencies as required. A Legal Register is maintained, containing details of all applicable statutory and regulatory requirements. A file for licenses and consents is also maintained.



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- iii) Communication of relevant information on applicable legal and other requirements to employees as necessary are ensured. The record of accidents and incidents in the organization, including environmental hazards, if any, are also maintained.

Interested parties	Need and Expectation
Top Management	Business growth, Optimum utilization of resources deployed, Cost minimization and sustained profitability
Government and Regulatory bodies	Fulfilment of target given by the Government Legal compliance of all Statutory and Regulatory requirements
Producer Farmers and seed multiplication farms	Proper guidance/training, information on types of seeds, availability of seeds, provision of infrastructure as necessary, timely payment
Customer (Farmers)	Consistent quality of seeds, optimal price, timely availability, technical support when necessary
Supplier and other service provider	Regular order, timely payment, effective communication channel, support
Employee	Professional development, guidance/training employment security, good working relationships and environment.
Bank	Timely disposal of financial instrument
Society	Minimal environmental impact, production of micro nutrient fortified seeds in order to grow nutritious crops, reasonable price

## 4.3 Determining Scope of Quality Management Systems (QMS) and Environmental Management System (EMS) and Anti-bribery Management System

- i) The boundaries and applicability of IMS have been determined by the organization, taking into consideration the context of the organization, which includes its physical boundaries, activities, functions, products and services, the applicable external and internal issues; the needs and expectations of the interested parties including the external providers; the applicable compliance obligations and its authority and ability to exercise the controls and influence. Accordingly, the scope of QMS is documented as follows:
- ii) Production, Processing and Marketing of seeds performed by Bihar Rajya Beej Nigam Limited at Head Office located at 6<sup>TH</sup> Floor, Pant Bhawan, Nehru Path, Patna-800001 (BIHAR) , excluding clause 8.3, 8.5.1 (f) and 8.5.3 of IS/ISO 9001:2015.

The following requirements will not be applicable to the scope of QMS of the Organization:

Clause of IS/ISO 9001:2015	Justification for exclusion
8.3	The organization produce and process the seeds as per the standard agricultural practice or as per customer requirements. The organization does not carry out any design and development activity in connection with its activities. Hence, this clause is not applicable.
8.5.1 f)	There is no such product output that cannot be verified by subsequent



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	monitoring or measurement, therefore this clause is also not applicable.
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*iii) The scope for EMS shall be as follows:*

All activities performed at Bihar Rajya Beej Nigam Limited concerning Production, Processing and Marketing of seeds performed at Head Office located at 6<sup>TH</sup> Floor, Pant Bhawan, Nehru Path, Patna-800001 (BIHAR)

*iv) The scope of ABMS shall be as follows-*

“Prevention, detection and response to bribery for all activities concerning Production, Processing and Marketing of seeds performed by Bihar Rajya Beej Nigam Limited at Head Office located at 6<sup>TH</sup> Floor, Pant Bhawan, Nehru Path, Patna-800001 (BIHAR)

## 4.4 Integrated Management System (IMS)

The Organization has established, implemented, maintaining and continually improving an IMS taking simultaneously into consideration the requirements of IS/ISO 9001:2015, IS/ISO 14001:2015 and IS/ISO 37001: 2016. The Organization has determined the processes needed as follows:

- i) The sequence and interaction of the processes to convert the inputs into outputs for achieving the desired output with the requirements of the IMS are given at Annex I. The different processes in the HQ has been identified as follows-
  - 1) Administration 2) Production 3) Processing 4) Quality Control 5) Legal 6) Marketing and 7) Finance.
- ii) The criteria and methods (including monitoring, measurements and related performance indicators) for ensuring effective operation and control of the processes have been determined and under application as at Annexes I.
- iii) The resource requirements have been elaborated under Section 7 Support whereas the responsibilities and authorities as assigned with respect to the determined processes have been included under Section 5 Leadership.
- iv) The risks and opportunities associated with QMS and EMS have been addressed under Section 6 Planning.
- v) Environmental aspects and associated impacts have also been determined and documented under Section 6. The EMS has been established, implemented, maintained for continual improvement to achieve the intended outcomes including enhancing its environmental performance. This has been done taking into consideration of the knowledge gained with respect to context of the organization and the needs and expectations of interested parties.
- vi) Bribery risk assessment has been carried out in order to prohibit bribery and documented under Cl 4.5.
- vii) Evaluation of the processes and performance has been addressed under **Section 9** and implementation of changes as may be required under **Section 6** for effecting improvement in the IMS.
- viii) The knowledge gained in sections 4.1 and 4.2 have been considered when establishing and maintaining the IMS.
- ix) Organization is promoting a closed-loop control architecture that establishes, documents, implements, maintains, reviews and improves management strategies and objectives in the company, within the context of its overall business and operational activities and which address



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the specific requirements of ISO 37001:2016 standard. The main objectives of ABMS is to prevent bribery under these following contexts:

- \* Bribery by the organization, BRBN;
- \* Bribery by its personnel acting on its behalf or for its benefit;
- \* Bribery by its business associates acting on its behalf or for its benefit;

Understanding the difficulties in preventing, detecting and responding to bribes, the overall intent of this document is that the Top Management of BRBN have a genuine commitment and intent to implement measures within the organization that are designed to tackle bribery in relation to our business or activities. These measures are appropriate to the bribery risks and have a reasonable chance of being successful in their aim of preventing, detecting and responding to bribery.

In general, there is an awareness and understanding amongst all for managing the interrelated processes of this system, thus contributing to the organization's effectiveness and efficiency in achieving the intended results.

- i) This document and other documents of IMS and Organization's business processes constitute the documented information about IMS established, implemented, maintained for continual improvement by the organization. The documented information is maintained also to provide evidence in support that processes are being carried out as planned.

## 4.5 Bribery Risk Assessment

BRBN has developed a bribery risk assessment methodology for identifying, analysing and prioritizing the assessed bribery risks, at various levels/functions in the company. This is done with due consideration of the external and internal issues, the scope and coverage of the ABMS, and also the needs and expectations of the stakeholders. The intention of this assessment is for preventing, detecting and responding to bribery incidents and achieving continual improvement of the system.

The bribery risk assessment is done as per the procedure developed for Bribery Risk Assessment.

BRBN has planned to undertake review of bribery risk assessment twice in a financial year, preferably in the first and sixth month of the financial year, so that changes and new information can be properly addressed in the event of any significant changes to the structure or activities of the organization during the previous year.



## Section 5 Leadership

### 5.1 Leadership and commitment

**5.1.1 (CI 5.1.1 of ISO 9001: 2015 and CI 5.1 of ISO 14001: 2015)** The Managing Director provides the leadership with respect to the implementation of IMS and demonstrates commitment of the top management to the development and promoting continual improvement in the IMS through overseeing the activities of the organization, conducting management reviews in a planned manner. The Director Administration is responsible for:

- i) taking accountability for effectiveness of IMS; and
- ii) defining, documenting and establishing Quality and Environmental Policy and Objectives, compatible with context and strategic direction of the organization for implementation of IMS.
- iii) ensuring that the IMS are integrated into the Organization's business processes;
- iv) promoting the use of process approach and risk-based thinking;
- v) ensuring that resources needed for the IMS are available;
- vi) communicating the importance of effective IMS and need for conforming to the specified requirements;
- vii) ensuring that IMS achieve the respective intended results; and
- viii) engaging, directing and supporting persons to contribute to the effectiveness of the IMS including supporting relevant personnel to demonstrate responsible leadership in their respective areas of working.

#### 5.1.1 (CI 5.1.1 of ISO37001: 2016)

BRBN does not have a separate Governing body for ABMS, however Top Management carries out the activities as required for implementation of ABMS. They demonstrate leadership and commitment to establishing a culture of integrity, transparency, openness and compliance towards this ABMS by -

- a. Approving the Anti-Bribery Policy;
- b. Overseeing the activities, processes and the adequacy and effectiveness of this management system;
- c. Ensuring that the ABMS policy, objectives and targets are compatible with the strategic direction of the BRBN and that the key processes of all activities are integrated with the requirements of this management system;
- d. Ensuring that the required resources for the effective implementation of the management system are made available and properly allocated;
- e. Reviewing the Policy, objectives, the information of the content, operation and effectiveness of this ABMS annually.





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## 5.1.2 Customer focus

(5.1.2 of ISO 9001:2015)

Top management ensures that customer and applicable statutory and regulatory requirements are determined and consistently met with focus on enhancing customer satisfaction. These have been appropriately addressed under Section 8 and other sections of this document. The risk and opportunities that can affect conformity of the products and services and the ability of enhancing customer satisfaction have been determined as recorded under Section 6 of this document. The relevant issues emanating out of the risk – opportunity analysis have also been appropriately addressed under various sections of this document. In order to satisfy the customer's needs and expectations the management:

- i) identifies customers requirements;
- ii) translates the identified needs and expectations into requirements;
- iii) communicates the requirements throughout the Organization;
- iv) has focus on process improvement to ensure enhanced customer's satisfaction;
- v) seeks feedback from customer and to take action accordingly; and
- vi) to discuss customer's feed back in the management review meeting.

## 5.1.2 Top Management (Cl 5.1.2 of ISO 37001: 2016)

The Managing Director, BRBN is the representative of Top Management for IMS which includes ABMS. He demonstrates leadership and commitment towards this ABMS by -

- a. Ensuring that this management system, including policy and objectives, is established, implemented, maintained and reviewed to adequately cover all bribery risks;
- b. Ensuring the integration of the ABMS requirements into the core business processes of BRBN;
- c. Optimally utilizing the resources and ensuring the integration of the requirements of this management system into the key business processes of BRBN;
- d. Communicating the anti-bribery policy and the importance and conformance of having an effective ABMS, both internally and externally;
- e. Ensuring that the ABMS is appropriately designed to achieve its objectives with an intention of promoting continual improvement;
- f. Directing and supporting personnel to contribute to the effectiveness of the system and to demonstrate their leadership in preventing and detecting bribery in their respective roles;
- g. Promoting an appropriate anti-bribery culture within the organization by encouraging the use of reporting procedures for suspected and actual bribery;
- h. Ensuring that no person suffers retaliation, discrimination or disciplinary action for reports made in good faith, or on the basis of a reasonable belief of violation or suspected violation of the anti-bribery policy, or for refusing to engage in bribery.
- i. At a planned interval review the effectiveness on the content and operation of the ABMS and of any allegations of bribery.
- j. Approving the formation of Anti-Bribery Compliance Team.



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## 5.2 Quality, Environmental and Anti-bribery Policy

The Managing Director of the Organization has established the Quality, Environmental and Anti-bribery Policy of the organization and documented, as given on Sec 2, page 8 of this Document that:

- a) is appropriate to the purpose and context of the organization, supporting its strategic direction
- b) provides a framework for setting the objectives
- c) includes a commitment to satisfy applicable requirements, anti-bribery laws
- d) satisfy the IMS requirements
- e) includes a commitment to continual improvement of this IMS

The Policy, maintained as documented information, will be reviewed, need based, to check its adequacy with the IMS of the organization vis-a-vis changing circumstances and any emerging scenario. It will be maintained with such amendments/revisions as may be necessary without compromising the integrity of the IMS. The QUALITY, ENVIRONMENTAL AND ANTI-BRIBERY Policy has been communicated to employees of the organization and other stakeholders for its effective implementation. It will be made available to other interested parties and public.

## 5.3 Organizational roles, responsibilities and authorities

(5.3 of ISO 9001:2015 & ISO 14001:2015 and 5.3 & 5.3.1 of ISO 37001: 2016))

- i) The Organizational Structure is given at Annex II.
- ii) The Managing Director, representing the Top Management of the Organization, is responsible to oversee implementation of the IMS of the organization. The other responsibilities of MD are given under Annex III.
- iii) The Senior Quality Control Officer has been appointed as Coordinator for establishment, implementation and maintaining IMS in addition to his other duties.
- iv) The roles, responsibilities and authorities of the various key personnel who manage, perform and verify activities having an effect on the identified risks and opportunities, Environmental aspects and Anti-bribery risks have been defined, documented as given at Annex III and communicated to all concerned to facilitate management and control over the IMS and ensuring accountabilities and authorities to act and reporting relationships at all levels of functionaries including sub-contractors and visitors. These responsibilities shall be read with the responsibilities entrusted by the Organization's top management as depicted in Job description Manual. The Responsibility Matrix is given at Annex IV.
- v) The organization has also a procedure to monitor and communicate any changes in designated responsibilities and authorities and also ensure response in a timely and effective manner to changing or unusual circumstances or events.
- vi) The management shall ensure need based availability of resources like man power, specialized skills, infrastructure, technology and financial resources to establish, implement, maintain and improve the Integrated Management System.

### 5.3.2 Anti-bribery Compliance function (Cl 5.3.2 of ISO 37001: 2016)

Managing Director, BRBN approves the formation of an Anti-Bribery Compliance Team (ABCT) to perform the duty of the Anti-bribery compliance function for the organization. This is a Team of multi-disciplinary executives headed by a senior management personnel. All the team members have



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the appropriate competence, status, authority and independence for their roles and responsibilities of the above function. Depending on the magnitude of the bribery risks of BRBN, it has been decided that no external persons are included in this team.

Head, ABCT has direct access to the Top Management. Head, ABCT appropriately reports on the performance of this ABMS and other issues related to bribery to the Top Management in order to avoid miscommunication of the relevant bribery related information

The primary responsibility of the Team is overseeing the design and implementation of the ABMS that conforms to the requirements of this international standard. They do not have the direct responsibility for the anti-bribery performance of the organization and compliance with the applicable laws for anti-corruption and anti-bribery. The performance of this ABMS is the responsibility of all personnel of BRBN. The Team also provides advice, support and guidance to personnel for the implementation of ABMS and all issues relating to bribery.

### **5.3.3 Delegated Decision-making (Cl 5.3.3 of ISO 370001: 2016)**

Top Management delegates the authority to ABCT for making the decision in relation to which there is more than a low risk of bribery. However the organization has established and maintained a decision making process or set of controls which requires that the decision process and the level of authority of the decision makers are appropriate and free of actual or potential conflicts of interest. Top management ensures that these processes are reviewed periodically preferably twice in a year as part of the roles and responsibilities for implementation and compliance with ABMS.



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## Section 6: Planning

### 6.1 Actions to address risks and opportunities

**6.1.1** The context of the Organization, needs and expectations of interested parties and the requirements of 6.1.1 of all three standards have been taken into consideration in determining the risks and opportunities that need to be addressed relevant to conformity of products and services and enhancement of customer satisfaction and assure that Environmental and Anti-bribery Management system achieve their intended outcome. The effectiveness of action will be evaluated based on the performance of the organization, feedbacks from customer and other sources or annual/bi-annual review of the performance of the organization to achieve the respective objectives.

**6.1.1.1** The relevant external and internal issues, which include the environmental conditions, sources of bribery being affected by or capable of affecting the performance of the organization and the needs and expectations of the interested parties have been considered for determination of risk-opportunity. While carrying out the exercise, the scope of all three systems; environmental aspects determined through aspect – impact analysis, compliance obligations, Bribery risk assessment and related issues have also been considered. The determination of environmental and bribery risks have been done to give assurance that IMS can achieve the intended outcomes; prevent or reduce undesired effects, including the potential for external environmental conditions, bribery, other related issues that may affect the organization to achieve continual improvement. The effectiveness of action will be evaluated based on feedbacks from customer and interested parties (if any), complaints from any source or bi-annual review of the performance of the organization to enhance customer satisfaction, protection of environment, prohibition of bribery and improvement and other related requirements.

A “Procedure for Determination of Risks and Opportunities” for IMS has been developed considering context of the organization including products and services, business requirements and environmental and anti-bribery performance. The risk – opportunity analysis includes mitigation and contingency planning, integrating with the IMS and maintained as information in a Risk Register. The approaches for determination of risks and opportunities for the IMS are explained in the following paragraphs.

**6.1.1.2** The context of the Organization and the needs and expectations of interested parties have been taken into consideration in determining the risks and opportunities that need to be addressed to:

- a) give assurance that IMS can achieve the intended result;
- b) enhance desirable effect;
- c) prevent or reduce undesired effect relevant to IMS policy and objectives
- d) enhancement of customer satisfaction and
- e) achieve continual improvement.

**6.1.1.3** While carrying out the above exercise, all applicable statutory and regulatory requirements, anti-bribery laws and other compliance obligations as necessary for production, service delivery, prevention of pollution, prohibit bribery have been done. The management decides how the determined requirements apply in maintaining and updating the legal and other requirements to



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which the organization subscribes and is under obligations for adherence, compliance and reporting to various agencies, and also to maintain these as documented information with provision for review and updating, based on changing circumstances, a pre-requisite for the IMS. A Legal Register is maintained containing the details of all applicable statutory and regulatory requirements and anti-bribery laws. A file for licenses and consents is also maintained. Communication of relevant information on legal and other requirements to employees as necessary are ensured.

## **6.1.2 Environmental aspects (6.1.2 of ISO 14001:2015)**

The environmental aspects has been identified, commencing with production, processing and marketing of seeds, that it can control and those it can influence, taking into account changes, planned or new developments, or new or modified activities, products and services, abnormal conditions and reasonably emergency situations. The significant environmental aspects, those have or can have significant impact (s) on the environment, also been determined considering the life cycle perspective of products. This documented information shall be kept updated. This information has been communicated to appropriate level of functions. The identification of environmental aspects, determination of associated environmental impacts including those having significant environmental impacts including any changes or modifications in products and services has been done according to "Procedure for Determination of Environmental Aspects" and the information is documented in Register for Environmental Aspects - Impacts.

## **6.1.3 Compliance obligations (6.1.3 of ISO 14001:2015)**

The following procedure is followed for identifying statutory and regulatory and other requirements, as a pre-requisite of the implementation of IMS as applicable to risks associated with products and services, hazards, environmental aspects of activities, bribery risk. Company Secretary has identified the applicable Acts, Rules, Regulations, Orders, Notifications, Licenses/Consents and other compliance obligations as necessary for production and service delivery. The higher authorities provides assistance to the Company Secretary for ensuring availability of information, determining how these requirements apply in maintaining and updating the legal and other requirements to which the Organization subscribes and is under obligations for adherence and their compliance and reporting to various agencies, also to maintain it as documented information with provision for review and updating, based on changing circumstances. Communication of relevant information on legal and other requirements to employees as necessary are ensured. A Legal Register is maintained, containing the entire details of all applicable statutory and regulatory requirements and anti-bribery laws A file for licenses and consents is also maintained.

## **6.1.4 Planning action (6.1.4 of ISO 14001:2015)**

The organization has planned actions to address its significant environmental aspects, compliance obligations, risks and opportunities and developed control measures to address environmental aspects. These have been drawn in such a manner so as to integrate and implement the actions into its IMS and other business processes.



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## 6.2 Quality, Environmental and Anti-bribery Objectives

**6.2.1** The objectives have been established for relevant functions, levels and processes needed for IMS. The significant environmental aspects, associated compliance obligations and risks and opportunities have been considered. The objectives are:

- i) consistent with the Quality, Environmental and Anti-bribery Policy;
- ii) are measurable;
- iii) taking into account applicable requirements;
- iv) relevant to conformity of products and services and enhancement of customer satisfaction;
- v) monitored;
- vi) communicated to all concerned;

BRBN Top Management set **objectives and Targets** as follows

- i) BRBN would reach out to majority of the farmers of the state with different product and services.
- ii) Venture for open marketing of their product and services after fulfilling the demand of State Government agriculture scheme
- iii) Addition of product on continuous basis and expansion of business even outside the state
- iv) Carrying out business without impacting environment and without any extra unaccounted cost.
- v) Induct an Ant-bribery culture within the organization and implement appropriate controls in order to increase the chance of detecting bribery and reduce its incidence at the first place
- vi) Committed for continual improvement in product and service

### Department wise Objective

#### Production

- i) To produce high quantity of quality seed and procure that seed
- ii) To produce & procure more than five lakh quintal of certified seeds
- iii) Follow the practice which will have lesser impact on the environment
- iv) Hassle free and transparent transaction during purchase and procurement of seed

#### Processing

- i) Increase the overall processing capacity to meet the future requirement of processed seed.
- ii) To minimise the losses during processing and lower quantity of undersize.
- iii) Efficient and optimal utilization of machinery and plant and transporting to minimize the gaseous emission.
- iv) There would be hassle free and transparent transaction of all the activity.”

#### Marketing





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- i) To establish a strong network of dealer, distributor and suppliers of seed.
- ii) To reach out to the dealer and distributor in neighbouring state to expand the business.
- iii) Transportation of seed shall be through shortest possible route to minimise the gaseous emission and protect the environment.
- iv) To aim at minimization of electricity consumption
- v) To aim at minimization of paper consumption
- vi) There would be hassle free and transparent transaction of all activity

## Quality Control

- i) High quality assurance to each and every product.
- ii) 100% scrutiny of Test reports supplied by approved outside laboratory.
- iii) Constructive suggestion would be extended to each department for managing and maintaining quality of product and services.
- iv) To aim at minimization of electricity consumption
- v) To aim at minimization of paper consumption
- vi) There would be hassle free and transparent transaction of all activity

## Account/Finance/Administration

- i) Maintaining strong relation with different department and stakeholder for timely disposal of back end work.
- ii) Extend all possible help to all the concerned.
- iii) Optimal utilisation of the utilities to protect the environment.
- iv) There would be hassle free and transparent transaction of all the activity.

The objectives as set shall be reviewed periodically and updated.

### 6.2.2 Planning action to achieve the objectives

Planning is done in order to achieve IMS objectives, by determining the current status, further actions need to be taken, requirement of resources, assigning responsibilities, fixing targets and time period including performance indicators. Programmes, operational control procedures, safe operating procedures have been drawn to address products and services, significant environmental aspects, associated with risks and compliance obligations. The actions have been drawn in such a manner so as to integrate and implement them for IMS and other business processes for meeting the objectives. Evaluations of results, including indicators for monitoring progress towards achieving the measurable objectives.

### 6.3 Planning of changes

(6.3 of ISO 9001:2015)

The changes in QMS shall be done in a planned manner, taking into consideration the:

- a) purpose of changes and their potential consequences;
- b) integrity of the QMS;
- c) availability of resources; and
- d) allocation or reallocation of responsibilities and authorities.



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## Section 7: Support (7 of ISO 9001:2015 and ISO 14001:2015)

### 7.1 Resources

**7.1.1** The Organization determines and provides need based resources namely financial, manpower, infrastructural, material and other resources necessary for establishment, implementation, maintenance of IMS and its continual improvement considering:

- a) the capabilities of, and constraints on, existing internal resources; and
- b) what needs to be obtained from external providers.

### 7.1.2 People (7.1.2 of ISO 9001:2015)

- i) The requirements of people have been determined based on different activities of the organization. People have been accordingly employed for effective implementation of the management systems and for operation and control of the various processes.
- ii) All works are performed under supervision of the managerial and supervisory personnel. The work outputs of such persons are continuously monitored, being critical activities having direct effect on end product output in terms of quality and quantity and identified significant environmental aspects and training needs are determined. Therefore, in informal manner, continual development of skill and performance of employee and outsourced persons are done. Training by competent person/agency are organized. Evaluation of training effectiveness is also done. . Records are maintained.

### 7.1.3 Infrastructure (7.1.3 of ISO 9001:2015)

The necessary infrastructural requirements, namely buildings, machinery, monitoring and measuring set up, maintenance facility, information and communication technology are being made available vis-a-vis the planning for the different activities of the organization including production, processing and marketing of seeds in order to achieve intended goals.

All equipment / machines is properly placed at their designated places. Equipment manual provided by supplier (manufacturer) are readily available to personnel as and when required.

All equipment is uniquely identified for effective traceability. If equipment is in parts, each of its part is uniquely identified in a manner that it remains traceable to the main equipment.

Maintenance in-charge develops Preventive maintenance plan for equipment based on frequency defined by the original equipment manufacturer.

In case of breakdown of any equipment it will go through the corrective maintenance process. The equipment user informs the maintenance section. In response Maintenance In-charge assesses the work order and job nature is identified which can be of two types;

**Major:** Maintenance is carried out according to the nature of problem and machine/equipment is tagged as “Under Maintenance” and time frame of machine maintenance is given to user section. Maintenance department carries out maintenance activities and transfer the machine/equipment to user section control after completing the maintenance.

**Minor:** In case of minor issues, maintenance department fix the problems on the spot.





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## 7.1.4 Environment for the operation of processes (7.1.4 of ISO 9001:2015)

The organization has determined and provided necessary environment and maintaining it for operation of its processes and for achieving the desired output and also maintain the suitable environment in respect of social, psychological and physical.

BRBN facility are maintained sufficiently clean and orderly to prevent the contamination and to facilitate the efficiency of BRBN Operations.

Housekeeping as a minimum includes following activities:

- Sweeping and mopping of floor
- Cleaning of windows, ceiling fans and tube lights
- Cleaning of Spills immediately
- Emptying trash cans

Admin is responsible through janitorial staff for housekeeping of halls, corridors and offices. On daily basis cleaning activities are recorded on housekeeping and lavatory inspections sheets that are pasted at the gate of relevant area.

## 7.1.5 Monitoring and measuring resources (7.1.5 of ISO 9001:2015)

- i) The organization got the seeds tested from State Seed Testing Laboratory for the requisite parameter on receipt of the seeds from farmer after production and after processing at their own processing plant.

## 7.1.6 Organizational knowledge (7.1.6 of ISO 9001:2015)

The organization has the required knowledge and experience for processing and marketing of seeds. Standard guidelines are available in order to carry out the different activities and people have been made aware about the guidelines and different working activities through induction training.

In case of any changes knowledge is acquired through available literature on the subject, internet etc and used along with the existing knowledge in order to cope up with the changes.

## 7.2 Competence

The organization has determined the necessary competence of persons doing work under its control that affects the performance and effectiveness of the IMS, as follows:

- i) The organization ensures that these persons are competent on the basis of appropriate education, training or experience. Documented information in respect of requisite qualification and experience vis-à-vis existing qualification and experience is maintained by the Organization.
- ii) Training need is identified by respective Heads of Departments and communicated to Administration department. Necessary training has been imparted to employees for their skill



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enhancement, especially those are associated with core activities like processing and marketing. The effectiveness of training are evaluated. Each individual's performance is observed by the Heads of department. Records are maintained and reviewed for improvements.

- iii) There is also informal system for continuous on-the-job skill development, especially when new seeds are to be developed.

In addition to above BRBN also determines the necessary competence of its employees, deploys them judiciously and effectively, further identifies their training needs and provides necessary developmental trainings so as to achieve Anti-bribery objectives.

In BRBN, only competent persons, who could affect the performance and effectiveness of ABMS are deployed for various jobs. However, if the newly recruited persons are not found competent for a job as per this ABMS requirement, they are either suitably trained in-house within the department or by specific actions of the competent authority. Records of training and/or action are maintained by Administration. In the event of non-compliance of any of the rules, terms and conditions of the service, BRBN reserves the right to initiate and take necessary/appropriate disciplinary actions for the effective implementation of ABMS.

## 7.2.2 Employment Process (CI 7.2.2 of ISO 37001: 2016)

In the event of non-compliance of any of the rules, terms and conditions of the service, BRBN reserves the right to initiate and take necessary/appropriate disciplinary actions for the effective implementation of ABMS.

In relation to all positions which are exposed to more than a low bribery risk, as determined in the bribery risk assessment, and to the anti-bribery compliance function, Organization implements the procedures of due diligence conducted on persons before they are employed, transferred or promoted by the organization.

## 7.3 Awareness (CI 7.3 of ISO 9001: 2015 and ISO 14001: 2015)

### Awareness and Training (CI 7.3 of ISO 37001: 2016)

The organization ensures that persons doing work under its control are aware of:

- a) the Quality, Environmental and Anti-bribery Policy
- b) relevant Quality, Environmental and Anti-bribery Objectives
- c) their contribution to the effectiveness of IMS, including the benefits of improved performance
- d) the implications of not conforming with the IMS requirements

Awareness programmes have been conducted for employees on IMS, the Policy and Objectives. The employees have been explained their involvement and the contributions required for maintaining effectively the management systems and also the implications of not conforming to those. Documented information as evidence is maintained.

Organization strives to provide adequate and appropriate anti-bribery awareness and training to its employees as appropriate to their roles, the risk of bribery to which they are exposed and any changing circumstances. A few thrust points that are usually covered in these trainings are -

1. Anti-Bribery Policy, the implementation of this management system and their duty to comply;
2. The potential consequences or damages which bribery can do to them and to the organization;
3. The events which can lead to bribery while performing their duties and how to identify these;



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4. How to respond to solicitations or offers for bribes and how they can prevent or avoid bribery;
5. Their contribution to the effectiveness of this management system;
6. How and to whom to report any concerns or provide suggestions for improvement of the system;
7. The implications of not conforming to the requirements of this management system.

These thrust points are periodically updated to accommodate any new information or changes to the management system.

The periodicity of such awareness trainings on anti-bribery is decided at the beginning of each financial year by the Head, ABCT, who prepares the annual training calendar and sends it to MD for review and final approval.

## 7.4 Communication

The organization has established, implemented and maintain processes/procedure(s) to ensure that pertinent information relevant to IMS are communicated internally within the organization and externally to interested parties. There are two types of communication practised, namely internal and external communications. The mechanism of ensuring generation and dissemination of reliable information for effective IMS as explained below:

- a) communicating the results from management systems monitoring, audits and management reviews to those within the organization who are responsible for and have a stake in the organization's performance;
- b) receiving, documenting and responding to relevant communication on environmental performance, bribery issues from external interested parties including compliance obligations; and
- c) communicating the relevant information to people outside organization who are likely to be affected;
- d) the subjects, frequency, medium of communication and with whom to communicate; and
- e) retaining documented information as evidence of communication.

### 7.4.1 Internal communication

- i) Need based communication is done internally within the organization, mainly through verbal contact, telephones, emails, inter-office memo, manual delivery of samples etc, depending on the need for disseminating information, instructions. Notice Board is also used as a medium of communication, displaying relevant information so that employees are aware about recent developments.
- ii) The Quality, Environmental and Anti-bribery Policy and Objectives have been communicated to each employee and also shall be made available with Business associates. Suggestions if received from employees are given due importance by the management and taking action on the specific issue.
- iii) Management also ensures that communication takes place regarding the effectiveness of the IMS through awareness programmes, training session and taking post-training feedback.



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- iv) The Quality, Environmental Anti-bribery Policy is communicated to all suppliers, vendors, contractors. The Objectives and Targets are communicated to appropriate levels of personnel depending on the need.
- v) Circulation of relevant documents like Apex Document, IMS procedures, operation control procedures, departmental guidelines, emergency preparedness and response plan, risk analysis report at all functional head levels who in turn communicate these to the subordinate levels in periodic Meetings.
- vi) Records are kept as evidence and also serve as a mode of communication.

## 7.4.2 External Communication

- i) Communication with external interested parties are done need based by different levels of the organization.
- ii) The Company Secretary of the organization will communicate with statutory or regulatory bodies in connection with various licenses, consents, permits etc. The relevant information, data will be provided by the concerned officials.
- iii) The MD or authorized personnel will correspond with Certification Body and with other external parties as when needed.
- iv) Complaints and suggestions when received from external sources including customers on quality, environment or bribery related issues are examined and appropriate remedial action taken. Action shall be initiated to redress the complaint. All actions with respect to handling of complaints are taken in consultation with MD. The concerned Departmental Head shall be responsible for correction, corrective/preventive action.

## 7.5 Documented information

7.5. QMS, EMS and ABMS have been integrated by the Organization and termed as IMS. The IMS is structured to comply in all respects with requirements of the three standards. The “Apex Document on IMS” has been established, implemented and maintained by the organization. This document has been prepared by Senior Quality Control Officer and approved by the Managing Director. In addition, other levels of documentation including procedures, registers, files and records have been prepared based on directions given in the Apex Document. The IMS requirements specified in this document are complementary (not alternative) to all applicable statutory and regulatory requirements and applicable compliance obligations.

### 7.5.2 Creating, updating and control of documented information

A “Procedure for Creating, Updating and Control of Documented Information” has been established and implemented for creation, approval, control, issue and updation of documented information (DI) for IMS following the requirements specified in above mentioned three standards. The procedure contains details necessary for effectiveness of DI, which includes title, numbering system, preparation, review for suitability and adequacy, amendment and revision method etc. DI are kept either on paper or electronic form.

### 7.5.3 Control of Documented Information

The methodology for control of documented information has been given in the procedure mentioned under 7.5.2.



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The documents of external origin are Indian/International Standards, Agricultural journals, copies of legal requirements, licenses, consents etc. Such documents are under control and details are available with respective Departmental Head.

## **Section 8: Operation** (CI 8 of ISO 9001:2015 and ISO 14001:2015)

### **8.1 Operational planning and control**

The Organization plans and develops the processes for meeting its business requirements, IMS requirements, which include amongst others, meeting the customer's needs for conformity of quality, time schedules, resource requirements and life-cycle perspective of the product, implementation of Anti-bribery. The work is done implementing the plans and exercising necessary controls.

- i) While planning, following aspects are taken into consideration:
  - a) The product/service requirements and IMS objectives.
  - b) Risk and opportunity, Environmental Aspect Impact, Anti-bribery risk have been identified and accordingly contingency has been planned.
  - c) The processes, documents and resources required to implement IMS.
  - d) Required verification, monitoring, measurement, inspection and test activities specific to the products to be carried out against defined criteria of product acceptance.
  - e) Records needed to provide evidence that processes and resulting products meet requirements.
- ii) There is no unplanned change in the operations of the organization. Whenever any change is deemed necessary, planning is done with review and approval at appropriate levels of the management. However, while planning for any change, inputs will be introduced in the process to mitigate any adverse effect including the unforeseen aspects.
- iii) The outsourced process, namely procurement of seeds from farmers/ seed multiplication farm, is under control.
- iv) Operating procedures have been documented, established, stipulating operating criteria for those operations and activities that are associated with identified significant hazards and risk in the area of environmental protection and Anti-bribery.
- v) There is no customer property handled or controlled.

### **8.2 Requirements for products and services** (CI 8.2 of ISO 9001:2015)

#### **8.2.1 Customer communication**

- i) The Organization effectively communicates with its customers through correspondence, telephone, and electronic media as well individually or through intermediaries.
- ii) Adequate arrangement for communication with the customer with relation to product information, handling of enquiries, contract, orders, complaints and amendments has been made and looked after by the Marketing division. The responses are either on-line or through letter.
- iii) Customer feedback is obtained and analyzed for improvement in the products and services and for enhancing customer satisfaction.

#### **8.2.2 Determining the requirements for products and services**



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The organization ensures that it can meet the claims of the requirements of products and services offered by them and the description of the product (Seeds) shall be explicit including any applicable statutory and regulatory requirements involved for sowing of the seeds.

## 8.2.3 Review of the requirements for products and services

The organization ensures their ability to fulfil the requirements of the product sought by the customer before committing to supply products.

## 8.2.4 Changes to requirements for products and services

When product requirements are changed, the organization ensures that relevant documents are amended and concerned department(s) are made aware about the changes. Documented information in the form of records is maintained about any changes in requirements for products and services.

## 8.3 Design and development of products and services (Cl 8.3 of ISO 9001:2015)

The organization follows the standing agricultural processes for production and processing of seeds, so this clause is not applicable and hence excluded.

## 8.4 Control of externally provided processes, products and services (Cl 8.4 of ISO 9001:2015)

The organization got the seeds procured from the farmers and state government seed multiplication farms tested from the Government approved laboratory and communicate to the farmers in respect of the quality of the seeds and requirement of any further improvement for production of those seeds. Necessary training is also organized for educating the farmers for following the right method for production of seeds.

## 8.5 Production and service provision (Cl 8.5 of ISO 9001:2015)

### 8.5.1 Control of production and service provision

BRBN produce seed through its seed producer's farmers and state government seed multiplication farm. After harvesting, threshing and winnowing and drying of seed at appropriate moisture level, raw seed collection started by BRBN at its designated collection centre. Collected raw seed from farmers and state government seed multiplication farms stored in the storage (godam) with proper care to prevent the attack of insect- pest, disease and maintain the quality of seed.

- i) Raw seed collected at collection centre need to be transported to Processing plant for processing of seed
- ii) Processed seed required to be transported from processing plant to different sale point at different location
- iii) Necessary criteria for processing, acceptances, outputs are available and implemented. Competent persons are available.





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- iv) The processing of seed requires skill, accordingly the workers are trained to suit the technical needs. However, monitoring during processing is involved to minimize the human error and obtain the desired output.
- v) The plant and machinery details and details of utilities are available.
- vi) Necessary infrastructure is available and the environment inside the processing area is conducive for processing of seeds.
- vii) Processed seeds are packed and transported from processing plant to sale point at different location.
- viii) There is no such product output that cannot be verified by subsequent monitoring or measurement, therefore 8.5.1 f) of IS/ISO 9001:2015 has been excluded (details under clause 4.3 Scope is referred).
- ix) Preventive maintenance of machines is necessarily followed as depicted under CI 7.1.3. Therefore, preventive maintenance is also a part of risk assessment and compliance obligation for the organization. Documented information with respect to maintenance schedule of the machines are available with Maintenance Departments.
- x) Operational procedures (OP) have been prepared taking into consideration of life cycle perspectives of products and services and to ensure that all activities carried out in accordance with specified operating conditions/criteria and requirements of environmental management systems according to the international standard.
- xi) Documented information with respect to above requirements are available.

## 8.5.2 Identification and traceability

All equipment is uniquely identified for effective traceability. If equipment is in parts, each of its part is uniquely identified in a manner that it remains traceable to the main equipment.

Processed seed are suitably identified with unique identification to trace back the origin of the seeds.

## 8.5.3 Property belonging to customers or external providers

The infrastructural properties, if any, provided by external providers are kept under safe custody with proper care while under control of the organization.

## 8.5.4 Preservation

Raw seed procured from farmers and state government seed multiplication farms stored in the storage (godam) with proper care to prevent the attack of insect- pest, disease and maintain the quality of seed. Similarly the packed processed seeds are also preserved at the sale point with due care.

## 8.5.5 Post - delivery activities

There is usually no post delivery activity. Feedback from customer is obtained on the supplied processed seeds. However, need based action is taken to meet any such eventuality, such as damage of seeds during transit or on receiving any complaint from customer.

## 8.5.6 Control of changes

Changes shall be reviewed and controlled for production and/or service provision, to the extent necessary when such need arises. However, such changes will be planned and done with the



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approval of the Competent Authority only to ensure continuing conformity with the applicable requirements. Relevant documentation shall be maintained as and when such actions have been undertaken.

## 8.6 Release of products and services

- i) The processed and packed seeds are despatched according to instructions received from the Marketing division at Head Office. Each consignment of products are identified separately and handled accordingly. Inspection and checking are done as per plan before despatch. Relevant documented information in the form of records of despatch is maintained.
- ii) Release of product does not proceed until the planned arrangements for processing and quality control tests have been satisfactorily completed by Quality Control department.

## 8.7 Control of nonconforming outputs (Cl 8.7 of ISO 9001:2015)

- i) The Organization ensures that product which does not conform to product requirements are identified and controlled to prevent unintended use or delivery. There is a procedure defining responsibilities and authorities for dealing with nonconforming product such as elimination of detected nonconformity, authorization of release or acceptance of nonconforming product and precluding original intended use or application of such products, correction of the nonconforming product, corrective action, re-verification and related issues.
- ii) documented information in the form of records are maintained describing the nonconformity, subsequent action taken and identifying the authority taken decision in respect of the authority, including concessions, if any.

## 8.8 Emergency preparedness and response (Cl 8.2 of ISO 14001:2015)

- i) The prime responsibility for implementation and maintenance of actions towards the Organization's emergency preparedness and response plan is with the respective Regional Manager in the processing plant and Director Administration in the Head office. Responsibility also lies with the key personnel involved in the combating exercises during unforeseen emergency incidents.
- ii) The operations and activities having potential for accidents and emergency situations and which have impact on the environment identified during Initial Environmental review.
- iii) Significant situations with potential for loss of life, property, causing health and safety issues, adverse environmental conditions and harm and that could threaten viability of the organization, have been considered, such as fire, electrical accidents or natural disasters, namely flood, earthquake.
- iv) Accidents and incidents those including fire are attended and controlled by Field officer in the processing plant and Public relation officer in the Head office. Employees are being trained for prevention of fires, accidents and emergency situations.





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- v) Procedure for Emergency Preparedness and Response, Doc. BRBN/IMS/Proc/01 has been prepared and maintained to respond to any emergency situation(s). During emergencies the Plan will be activated and record of actions taken is kept. The Plan is periodically tested through mock drills, records kept, reviewed and improved, where necessary by the management.
- vi) Employees are trained on the Emergency Preparedness and user - friendly boards displayed for assembling during emergency.
- vii) First aid facilities are available for assistance. In case of any exigencies arrangement made for transportation to nearby hospital for medical assistance.
- viii) Mitigation actions are also taken after occurrence of any incident.

## **8.2 DUE DILIGENCE** **(CI 8.2 of ISO 37001: 2016)**

BRBN assesses the nature and extent of the moderate, major and high bribery risks in relation to specific transactions, projects, activities, business associates and personnel falling within these categories. This includes any due diligence necessary to obtain sufficient information to assess the bribery risk.

Due diligence is updated as and when required, so that the changes and new information are taken into account.

## **8.3 FINANCIAL CONTROLS** **(CI 8.3 of ISO 37001: 2016)**

All concerned personnel in the Organization implement sufficient financial controls, i.e. the systems and processes to manage its financial transactions in the best possible way and record these transactions accurately, completely and in a timely manner.

Financial transaction is done duly approved by the designated authority. Independent financial audit is organized once in a year.

## **8.4 NON-FINANCIAL CONTROLS** **(CI 8.4 of ISO 37001: 2016)**

BRBN manages its non-financial controls to ensure that the procurement, operational, commercial and other non-financial aspects of its activities are being properly managed so as to avoid bribery risks. All activities are carried out as per laid down guidelines.

## **8.5 IMPLEMENTATION OF ANTI-BRIBERY CONTROLS BY CONTROLLED ORGANIZATION AND BY BUSINESS ASSOCIATES** **(CI 8.5 of ISO 37001: 2016)**

BRBN is an independent entity and does not have any other organization which is controlled by it.

The Organization determines the controls of anti-bribery needed to manage the relevant bribery risk, if any, available with business associate. The organization has developed a procedure namely 'Procedure for Anti-bribery Control and Commitment' (BRBN/IMS/Proc/07) for the purpose.

## **8.6 ANTI-BRIBERY COMMITMENTS** **(CI 8.6 of ISO 37001: 2016).**



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Commitment is obtained from the Business Associates for preventing bribery in the cases where the transaction/ activities exceeds the low bribery risk. 'Procedure for Anti-bribery Control and Commitment' (BRBN/IMS/Proc/07) has been developed for the purpose.

## **8.7 GIFTS, HOSPITALITY, DONATIONS AND SIMILAR BENEFITS (CI 8.7 of ISO 37001: 2016)**

BRBN has implemented the procedures to prevent the offering, provision or acceptance of gifts, hospitality, donations and similar benefits where the offering, provision or acceptance is or could reasonably be perceived as bribery. The details are given in 'Procedure for Anti-bribery Control and Commitment' (BRBN/IMS/Proc/07). Moreover all employees are bound to follow the 'Bihar Rajya Beej Nigam Seva Shart'.

## **8.8 MANAGING INADEQUACY OF ANTI-BRIBERY CONTROLS (CI 8.8 of ISO 37001: 2016)**

In certain cases, the due diligence conducted on a specific transaction, process, activity or relationship with a business associate may establish a bribery risk that cannot be managed by the existing anti-bribery controls. Under such circumstances BRBN takes steps appropriate to the bribery risks and the nature of the transaction, project, activity or relationship to terminate, discontinue, suspend or withdraw from it as soon as practicable.

## **8.9 RAISING CONCERNS (CI 8.9 of ISO 37001: 2016)**

BRBN implements procedures to encourage and enable persons to report of suspected and actual bribery, any violation or weakness in the ABMS, to the ABCT or to appropriate authority.

The Organization ensures that all personnel are aware of the reporting procedures and are able to use them and are aware of their rights and protections under the procedures. Procedure for Concern Raiser and Investigation (BRBN/IMS/Proc/08) has been developed.

## **8.10 INVESTIGATING AND DEALING WITH BRIBERY (CI 8.10 of ISO 37001: 2016)**

BRBN implements procedures for investigating any incidents or complaints of bribery received from any source, and/or violation of this ABMS. The investigation is carried out by and reported to personnel who are not part of the role or function being investigated.

The complaints and the incidents are received at the Office of Administration and handled as per the guidelines of the organization. Refer Procedure for Concern Raiser and Investigation (BRBN/IMS/Proc/08), further as per Memorandum of Understanding, the organization is bound to follow all rules and regulation formulated by Bihar State Government including 'Bihar Vigilance Investigation cadre Rule'.



## Section 9: Performance evaluation

### 9.1 Monitoring, measurement, analysis and evaluation

BRBN has planned and implemented suitable monitoring, measurement, analysis and improvement processes that are needed to -

- ☐ demonstrate conformity to the product and service requirements,
- ☐ ensure conformity of the IMS, and to
- ☐ continually improve the effectiveness of the IMS.

Some of the methods for monitoring the IMS include the following –

- ☐ effectiveness of awareness trainings on all three systems;
- ☐ monitoring the implemented control measures and IMS objectives;
- ☐ suitability of responsibilities for meeting IMS requirements;
- ☐ effectiveness in of the actions on the received complaints;
- ☐ compliance failures on reported quality, environmental and bribery incidents;
- ☐ instances where internal audits are not performed as scheduled; and
- ☐ instances where IMS objectives are not achieved.

BRBN evaluates the policies, procedures, plans, functioning and effectiveness of this IMS adequately by the following:

- a) Conducting, monitoring and reviewing of the system performance in respect of quality, environment and anti-bribery, status of implementation and the overall system effectiveness - according to Section 9.2 and 9.3 of this manual.
- b) Monitoring the fulfilment of compliance obligations for IMS by the concerned section.
- c) Reporting to the authority regarding findings

Results of monitoring and measurements will be maintained as documented information as evidence and also for facilitating need based corrective and preventive actions, improvements etc.

#### 9.1.2 Customer satisfaction

(CI 9.1.2 of ISO 9001: 2015)

Feedback from customers are collected and used to monitor their perceptions of the extent their needs and expectations have been fulfilled. The In-charge, Sales and Marketing Department reviews the feedback obtained and initiates appropriate actions. The information is used also to determine whether the organization has met customer's requirements. The feedback is obtained in the prescribed format.

#### 9.1.2 Evaluation of compliance



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## **(CI 9.1.2 of ISO 14001:2015)**

Each report/result is evaluated for compliance with the statutory requirements. Correction and corrective action will be taken when any deviation, as compared with consent conditions, is observed in the reported results. Risk based action, as preventive approach will be taken if any experience is gained from other sources or if any change in prescribed requirements takes into effect. Documented information as evidence will be available.

## **9.1.3 Analysis and evaluation**

### **(CI 9.1.3 of ISO 9001:2015)**

The Organization collects data on products and services, results of monitoring and measurements, customer feedback, break-down of machines, competency of personnel etc. to demonstrate the suitability and effectiveness of IMS and to evaluate against the set requirements with respect to quality issues, environmental performances, bribery issues, to ascertain whether efforts are being made for continual improvement in the effectiveness of the integrated management systems.

## **9.2 Internal audit**

- i) The organization conducts internal audits at least once in six months period. The audits are planned taking into consideration the status and importance of the process/area to be audited. The purpose of the audit is to verify the effectiveness of implementation of IMS.
- ii) The audit criteria, scope, frequency and method of audit are defined.
- iii) Objectivity and impartiality of the audit process is ensured through selection of the auditors and conduct of audit. Auditors do not audit their own areas.
- iv) The responsibility and requirements of planning and conduct of audit, reporting results and for maintenance of records are documented.
- v) The detected non-conformities which includes violation of IMS policy, bribery or suspected bribery, non-compliance by Business associates and their causes are eliminated or necessary action taken by the responsible/authorized person without undue delay
- vi) Follow up of any such necessary correction and corrective action includes verification of action taken and reporting of verification results.
- vii) The results of the audit are maintained.
- viii) A Procedure for Internal Audit has been developed.
- ix) Documented information on internal audit is maintained.

## **9.3 Management review/Top Management Review**

### **(CI 9.3 of ISO 9001: 2015 and ISO 14001: 2015 and CI 9.3 & 9.3.1 of ISO 37001: 2016))**

The Management/Top Management Review Committee (MRC), chaired by the Director Administration shall review the integrated management systems once in six months period to ensure its continuing suitability, adequacy and effectiveness. Being a small organization and members of Management, Top Management and Anti-bribery Compliance Team, the whole review including the requirements of ABMS are carried out in the same review covering all agenda points as required in the standard. The review includes assessing opportunities for improvement and the need for changes to the IMS, including the Quality, Environmental and Anti-bribery Policy and Quality, Environmental and Anti-bribery Objectives. The Senior Quality Control Officer as Member Secretary shall convene the meeting of MRC and notify the date of meeting well in advance with approval of



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Director Administration. If the meeting is postponed due to any reason, members shall be informed 24 hours in advance. The members of MRC are:

Director Administration – Chairman

Members:

Chief of Processing;

Chief of Production;

Chief of Marketing;

Chief of Finance;

Company Secretary;

Regional Managers cum Plant In Charge

Senior Quality Control Officer – Member Secretary

## a) Management review inputs

The MRC input shall include performance and improvement opportunities related to the following:

- a) the status of actions from previous management reviews;
- b) changes in external and internal issues that are relevant to the IMS;
- c) changes in needs and expectations of interested parties, including compliance obligations;
- d) changes in Organization's significant environmental aspects;
- e) changes in risks and opportunities
- f) information on the performance and effectiveness of the IMS with respect to objectives and targets, including trends in:
  - 1) customer satisfaction and feedback from relevant interested parties;
  - 2) the extent to which Quality, Environmental and Anti-bribery objectives have been met;
  - 3) process performance and conformity of products and services;
  - 4) nonconformities and corrective actions;
  - 5) monitoring and measurement results;
  - 6) fulfilment of Organization's compliance obligations including evaluation of compliance to Legal and other requirements to which the organization subscribes, related to IMS;
  - 7) audit results;
  - 8) reports of bribery and related investigation
  - 9) nature and extent of the bribery risk faced by the organization
  - 10) the performance of external providers;
  - 11) adequacy to manage the bribery risk faced by the organization and effectiveness of ABMS
  - 12) outcome of the assessment reported by Anti-bribery compliance function
- g) the adequacy of resources;
- h) the effectiveness of actions taken to address risks and opportunities;
- i) relevant communications from interested parties (external, internal), including complaints;
- j) opportunities for continual improvement with recommendations.

## b) Management review outputs

The decisions taken on review by MRC of the IMS and the actions to be taken thereof are the outputs (Minutes) and essentially reflect:

- a) conclusions on the continuing suitability, adequacy and effectiveness of the IMS;



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- b) decisions related to opportunities for continual improvement;
- c) decisions related to any need for changes to the IMS;
- d) resource needs.
- e) actions, if any, when Quality, Environmental and Anti-bribery Objectives have not been achieved;
- f) opportunities to improve integration of the IMS with business processes, if needed; and
- g) any implications for the strategic direction of the organization

The report of management review is prepared and submitted to MD for approval. Follow up actions are initiated after approval by the MD. The approved Minutes are maintained as documented information.

### **9.3.2 Governing Body Review (CI 9.3.2 of ISO 37001: 2016)**

No separate Governing body exists. Necessary action as required for ABMS taken by the Managing Director duly consulted with Board of Directors based on the review made as depicted in CI 9.3 above.

### **9.4 Review by Anti-bribery Compliance Function (CI 9.4 of ISO 37001: 2016)**

Managing Director has formed the Anti-bribery Compliance Team (ABCT) and Anti-bribery compliance function is reviewed during Management review meeting which is held once in six months. Anti-bribery compliance function of the organization assess

- a) adequacy to manage the bribery risk faced by the organization
- b) effective implementation of ABMS

Outcome of the assessment including the results of investigation is reported to Top management. This assessment precedes by the review taken by the Top Management





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## Section 10: Improvement

**10.1** The Organization makes efforts for enhancement of customer satisfaction, bettering environmental and ABMS performances by improving its activities, processes, products and associated services and also taking into consideration the outcomes of its monitoring and measurement activities, internal audits and management reviews.

### 10.2 Nonconformity and corrective action

(CI 10.2 of ISO 9001:2015, ISO 14001:2015 and CI 10.1 of ISO 37001: 2016)

- i) On detection of nonconformity in the Organization's product and/or delivery of services, Environmental and Anti-bribery performances, determination of its cause, analysis and steps for correction and corrective action appropriate to the effects and magnitude of the problems and commensurate with the identified risks and contingency will be planned and undertaken.
- ii) While evaluating the nonconformity, action for its elimination will be planned to prevent its recurrence or occurrence elsewhere in the organization. The evaluation will also address to find out whether similar nonconformities exist elsewhere in the Organization or have potential for occurrence. The relevant issue will be included in the risk – opportunity analysis, Aspect Impact analysis and Bribery risk analysis matrix.
- iii) A review of corrective action will be done to assess whether it has been effective.
- iv) A complaint will also be dealt with in the same manner as nonconformity. An acknowledgment will be sent to the complainant. The complaint will be investigated and analyzed, then followed up with correction and corrective action. The complainant will be kept informed about the findings and action taken thereof.
- v) Controls will be introduced or strengthened in case of nonconformities related to environment and ABMS.
- vi) In case of nonconformity occurs related to environment or anti-bribery the corrective action will be appropriate to the effects and impact on environment and anti-bribery and address suitable mitigation.
- vii) If required, the risk and opportunity determined at planning stage, relevant to the nonconformity, will be updated.
- viii) If necessary, changes in the relevant management system will be made.
- ix) Documented information containing details of actions taken will be available.

### 10.3 Continual improvement

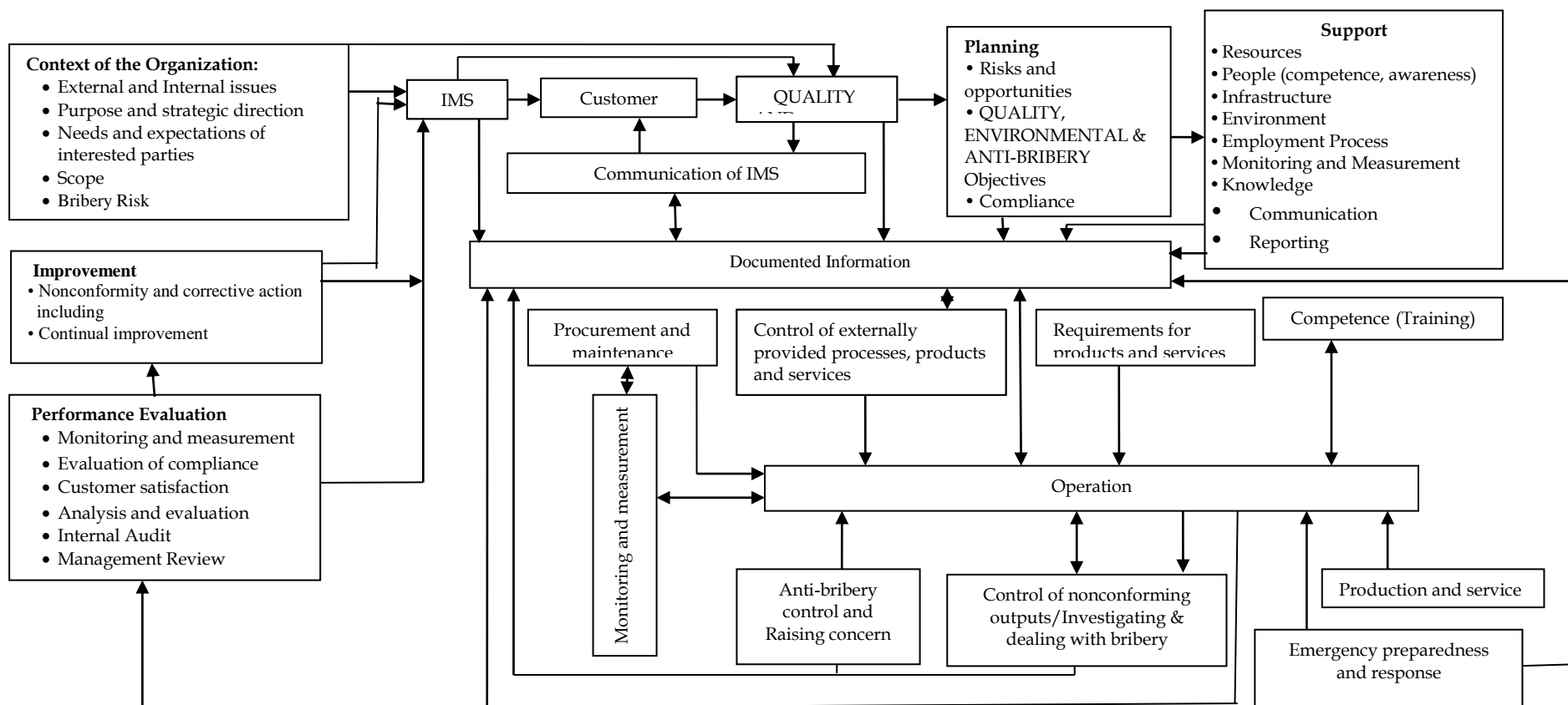
(CI 10.3 of ISO 9001:2015, ISO 14001:2015 and CI 10.2 of ISO 37001: 2016))

The organization will consider results of analysis and evaluation, outputs of management review to determine the areas, needs and opportunities for continually improving IMS. The organization will continually improve effectiveness of IMS through the use of Quality, Environmental and Anti-bribery Policy, Objectives, results of internal audits, analysis of data.



# BIHAR RAJYA BEEJ NIGAM LIMITED

## Annexure I Interaction among processes







## BIHAR RAJYA BEEJ NIGAM LIMITED

### Annexure II Workflow Chart of Bihar Rajya Beej Nigam Limited

#### Production

1. Selection of seed grower farmers
2. Sensitize them about the seed production process.
3. Provide training to them on seed production process (mostly onsite)
4. Provide them the Breeder seed (BS) and Foundation seed (FS) for production of Foundation seed (FS) & Certified seed (CS)
5. Facilitate farmers for registration with the seed certification agency of the state.
6. Monitoring of registered seed grower field by inspector of seed certification agency as well as by BRBN authorized official at different crop growth stage for production of quality seed.
7. Farmers advised to maintain the proper isolation distance, remove off-type plants, and do roguing (removal of diseased or insect-pest infested plant)
8. Harvesting done at Physiological maturity stage with proper care to avoid admixture.
9. Harvested crop threshed with ultimate care to avoid admixture.
10. BRBN field officer would collect three sample from farmers threshed seed and send one sample to state seed testing laboratory to quality and germination test.
11. After getting the laboratory test report and based on the result of the report quality control office advised the concerned official for collection or procurement of seed from farmers
12. Procurement of seed would be done on the laid down guideline by the department and store the seed in our godam located in that geography.
13. After final procurement, procured seed sent to processing plant for processing of seed.



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### Processing



1. Before start of processing work proper repairing and maintenance work complete well before the time to avoid breakdown during processing
2. Processing plant receiving the procured seed from all the procurement center and stored in the godam variety wise and lot wise and take proper care of seed to avoid insect infestation and rotting of seed in the godam.
3. Processing plant start processing of seed by removing undersize seed, inert material, and dust present in the seed.
4. At the time of processing of seed certification agency inspector remain present at the processing plant and observe the processing activity and collect sample from the processed seed and send the sample to their laboratory for quality and germination test.
5. Seed certification agency issue label & tag for only those sample of seed that passed the test result.
6. Processing plant start filling seed in the bag of different weight size as per the requirement of the marketing department with seed treatment chemical (Thiram), labelling & tagging the seed bag.
7. Processing plant also makes entry of all information of seed (start from the seed grower farmer to quality test report) in QR code and paste the QR on tag.
8. Final Processed and passed seed sent to different sale center as per the allocation made by the marketing division.



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### Marketing

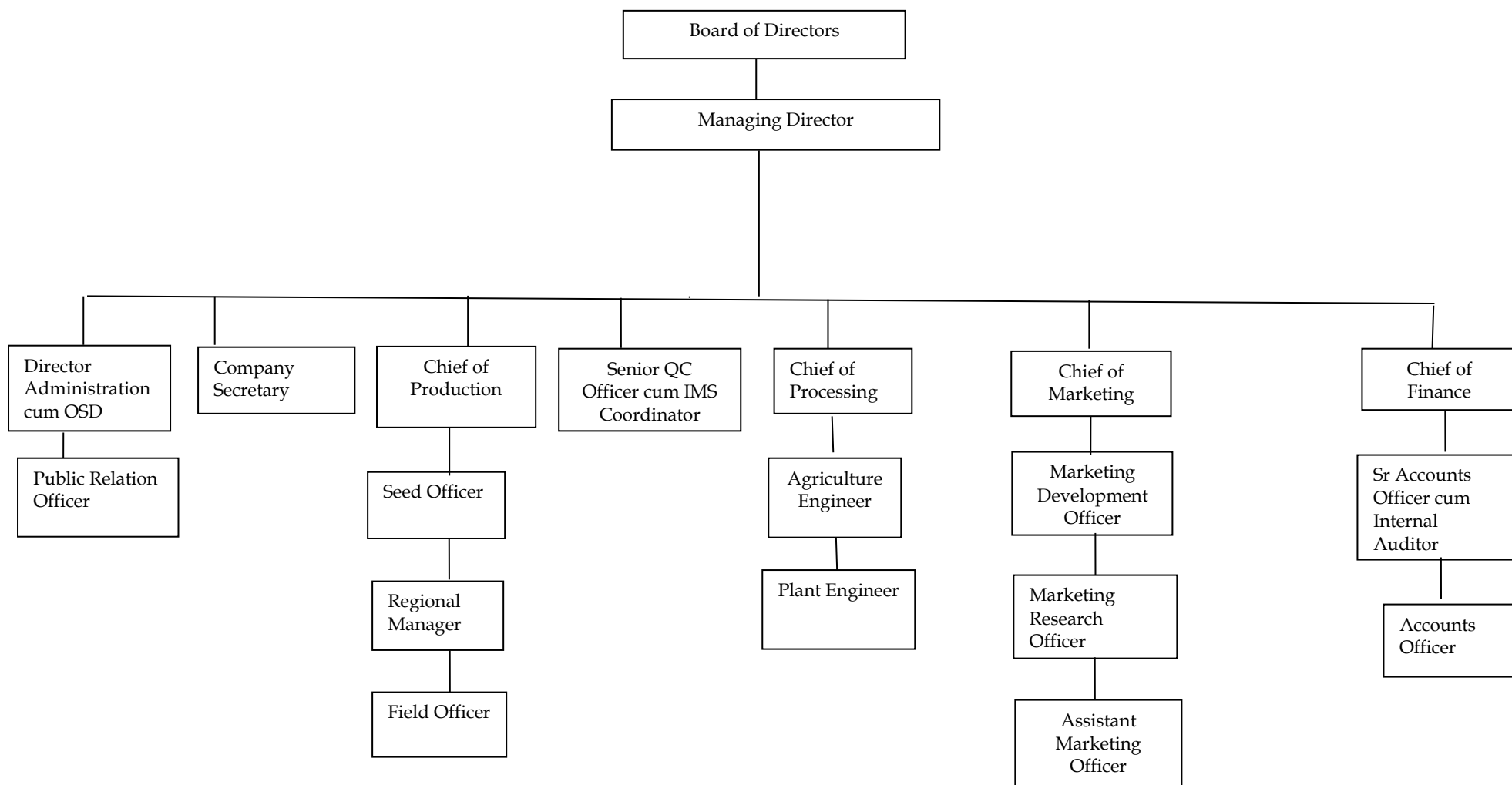


1. Marketing department announce for the application of seed online through print media well before the start of the season under different government scheme. In application there is provision for getting seed at home or collect the seed from the designated sale point.
2. Marketing department finalize the cost of seed on which the seed would be sold to the farmers.
3. Based on the application received at different level of authority, District Agriculture Officer collate the seed requirement data of the district.
4. Marketing department collect the data of seed requirement from each district under different government scheme, Collate the data to know the state seed requirement under different scheme.
5. District Agriculture Officer allocate the seed to dealer and distributor of the district for seed distribution to the farmers.
6. Marketing department after getting the seed allocation from district send the seed to respective dealer or distributor.
7. Seed distribution would be done at designated sale point or doing delivery of seed to farmer home (home delivery scheme).
8. Marketing department through IVRS system know the seed placed to the farmers or not.
9. Marketing department also collect the feedback of seed from farmers through dealer and distributor channel.
10. There is provision of complaint redressal system for all the parties.
11. Entire marketing department work is online.



# BIHAR RAJYA BEEJ NIGAM LIMITED

## Annexure II ORGANIZATION CHART





# BIHAR RAJYA BEEJ NIGAM LIMITED

## Annexure- III

### **Responsibility and Authority**

The broad responsibilities of the key personnel in the Mill with regards to integrated management systems (IMS) are given below. These responsibilities shall be read with the responsibilities entrusted by the Organization's top management as depicted in Job description Manual. The personnel have been given authority commensurate with the responsibility.

#### **Managing Director**

- Overall In-charge of the organization
- Define organization structure and assign roles and responsibilities of all employees in the organization
- Implementation of IMS
- Establish IMS policy of the organization
- Establish objective and target of the organization
- Ensure the provision of resources necessary for implementation of IMS
- Promoting an Anti-bribery culture within the organization
- Constitute Anti-bribery compliance Team (ABCT)
- Encouraging the use of reporting procedures for suspected and actual bribery.
- Ensuring that no personnel will suffer retaliation, discrimination or disciplinary action for whistle blowing
- Meeting with Board of Directors
- Coordinates with all sections of the organization and liaison with State and Central Government and other stakeholders of the organization
- Compliance of all Statutory/Legal/Applicable requirements

#### **Director Administration**

- Supervise and coordinate the cross functional activities within the organization implementing IMS;
- Ensure that IMS Policy of the Mill is communicated to all levels of employees and stakeholders;
- Ensure to achieve the IMS Objectives utilizing optimum resources
- Arrange to evaluate competence of each level of employee having significant effect on product quality, service delivery, environmental impacts and Anti-bribery issues;
- Ensuring that integrity of the ABMS is maintained during all changes.



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- Liaison with Top Management for all matters pertaining to ABMS
- Identify the training needs, organize the training activities and measure effectiveness of the courses conducted;
- Maintain records of education, experience and training of all the personnel in the organization;
- Review the requirements of the resources for effective implementation of IMS requirements in the administration department
- Review the suitability, adequacy and effectiveness of IMS;
- Ensure that corrective and preventive actions are planned, effectively implemented and maintained for continual improvement in IMS.

### **Company Secretary**

- Ensure that the requirements of IMS Policy and Objectives, and IMS are implemented
- Liaise with all Departmental Heads in respect of legal and Statutory requirements
- Ensure that statutory and regulatory and other requirements are identified communicated within the organization and complied
- Extend advice on legal matters
- Report to MD on the status of legal and statutory compliance

### **Chief of Finance**

- Ensure that the requirements of IMS Policy and Objectives, and IMS are implemented in the section under him;
- Ensure that responsibilities and authorities of the personnel in the section are communicated without ambiguity;
- Ensure that effective communication take place between the section and other functions of the Organization and Generate amongst all a sense of preventive vigilance
- Liaise with Director Administration to identify and review bribery risk and its prevention

### **Senior Quality Control Officer cum IMS Coordinator**

- Ensure that processes needed for IMS are established, implemented and maintained;
- Maintain all documents and records as per the requirements of IMS and to ensure that these are amended as per defined procedure as and when required;
- Ensure that documented information on IMS are available and document control is implemented;
- Assist Director Administration for promoting awareness of IMS Policy and Objectives throughout the organization;



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- Liaise with external parties regarding IMS requirements;
  - Plan, implement and ensure effectiveness of internal audit;
  - Plan management review of IMS and record its outcome;
  - Ensure effective review of risk – opportunity, Aspect-Impact and Anti-bribery risk analysis;
  - Ensure that the quality, environment and anti-bribery requirements of the Organization are implemented;
- 
- Ensure that effective communication take place between the sections to ensure product and process quality and Generate amongst all a sense of preventive vigilance
  - Review the requirements of the resources for effective implementation of IMS requirements in the Organization;
  - Maintain all documents and records as per the requirements of IMS and to ensure that these are amended as per defined procedure as and when required;
  - Ensure that corrective actions are planned, effectively implemented and maintained for continual improvement of IMS and
  - Report to MD on the performance of IMS and any need for improvement.

## Chief of Marketing

- Ensure that the requirements of IMS Policy and Objectives, and IMS are implemented in the section under him;
- Ensure that responsibilities and authorities of the personnel in the section are communicated without ambiguity;
- Ensure that effective communication take place between the section and other functions of the Organization and Generate amongst all a sense of preventive vigilance
- Provide input for bribery risk analysis and its review thereof
- Keep liaison with the customer and the production Department.
- Review the requirement of the orders received and maintain the related records.
- Obtain customer feed-back and analyze the same.
- Maintain all documents and records as per the requirements of IMS and to suggest amendment as and when required;
- Ensure that corrective actions are planned, effectively implemented and maintained for continual improvement of IMS in the organization.





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## Chief of Production

- Ensure that the requirements of IMS Policy and Objectives, and IMS are implemented in the section under him;
- Ensure that responsibilities and authorities of the personnel in the section are communicated without ambiguity;
- Ensure that effective communication take place between the section and other functions of the Organization;
- Maintain liaison with seed grower and provide technical support
- Review the requirements of the resources for effective implementation of IMS requirements in the section under him;
- Ensure that the Objectives and targets for the section are achieved;
- Maintain all documents and records as per the requirements of IMS and to ensure that these are amended as per defined procedure as and when required;
- Ensure that corrective and preventive actions are planned, effectively implemented and maintained for continual improvement of IMS in the section under him.

## Chief of Processing

- Ensure that the requirements of IMS Policy and Objectives, and IMS are implemented in the section under him;
- Ensure that responsibilities and authorities of the personnel in the section are communicated without ambiguity;
- Ensure that effective communication take place between the section and other functions of the Organization;
- Maintain liaison with all regional managers for effective processing of seeds
- Review the requirements of the resources for effective implementation of IMS requirements in the section under him;

Ensure that the Objectives and targets for the section are achieved;

- Maintain all documents and records as per the requirements of IMS and to ensure that these are amended as per defined procedure as and when required;
- Ensure that corrective and preventive actions are planned, effectively implemented and maintained for continual improvement of IMS in the section under him.

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# BIHAR RAJYA BEEJ NIGAM LIMITED

## Regional Manager cum Plant In-charge

He is overall responsible for operational effectiveness, efficiency, implementation of policies and programmes approved by CEO and planning, implementation, maintenance and continual improvement of IMS requirements in the section under him. His responsibilities are to:

- Ensure that the requirements of Quality and Environmental Policy and Objectives, and IMS are implemented in the section under him;
- Ensure that responsibilities and authorities of the personnel in the section are communicated without ambiguity;
- Ensure that effective communication take place between the section and other functions of the Organization;
- Review the requirements of the resources for effective implementation of IMS requirements in the section under him;
- Ensure that maintenance programmes for the machinery/equipment/infrastructure in the Mill and/or utilities are planned and implemented;
- Ensure that effective repair of the machinery/equipment/infrastructure under breakdown are carried out without undue delay;
- Ensure that the measuring and monitoring devices of the processing unit are calibrated as per requirement;
- Ensure that the Objectives and targets for the processes for the section are achieved;
- Maintain all documents and records as per the requirements of IMS and to ensure that these are amended as per defined procedure as and when required;
- Ensure that corrective and preventive actions are planned, effectively implemented and maintained for continual improvement of IMS in the section under him.

## Anti-bribery Compliance Team

- Review, update, change of ABMS documents, when necessary, and arranging approval.
- Ensuring that integrity of the ABMS is maintained during all changes.
- Ensuring that the processes of ABMS are established, implemented and maintained.
- Ensuring that the ABMS conform to the requirements of ISO 37001.
- Reporting to Managing Director and all concerned the performance of ABMS and any need for its improvement.
- Assist IMS Coordinator to conduct internal audit periodically and initiate necessary Action based on the findings of Internal audit
- Liaison with Top Management for all matters pertaining to ABMS.
- Ensuring that the Management Review Meetings are conducted, documented, recorded and communicated for taking decided actions in time.
- Communicating and proving support directly to all in matters related to ABMS.



# BIHAR RAJYA BEEJ NIGAM LIMITED

## Annex IV Responsibility Matrix

Sl No.	Activity	Direct Responsibility	Supporting responsibility
1.	Authorization for implementation of IMS	Managing Director (MD)	
2.	Context of the Organization	MD	HODs, Sr QCO & Coordinator
3.	Risk - opportunity Analysis	MD	HODs, Sr QCO & Coordinator
4.	IMS Policy	MD	
5.	Bribery risk assessment	MD	Director Administration, Anti-bribery compliance Team (ABCT), Sr QCO & Coordinator
6.	Aspects-Impacts Analysis	MD	HODs, Sr QCO & Coordinator
7.	Legal & Other Requirements	Company Secretary	HODs, Regional Manager, Sr QCO & Coordinator
8.	Objectives & Targets	MD	HODs
9.	Resources	MD	HODs
10.	Competence, Training & Awareness	Director Administration	HODs
11.	Communication	MD	HODs, Sr QCO & Coordinator
12.	Documented Information (Documentation ; Control of Documents & Records)	HODs	HODs, Sr QCO & Coordinator; Supporting persons
13.	Documents of External Origin	HODs	
14.	Operational Control	HODs	Supporting persons
15.	Emergency Preparedness & response	Director Administration	HODs, Security personnel
16.	Monitoring & Measurement	Chief production, Regional Manager, QCO	
17.	Evaluation of Compliance	HODs	Sr QCO & Coordinator
18.	Nonconformity, Corrective Action	HODs	Supporting persons
19.	Complaint Handling	Chief Marketing	
20.	Internal Audit	Sr QCO & Coordinator	Director Administration & HODs
21.	Management Review	MD	Management Review Committee & ABCT