

HFCL Limited

Waste Management Policy

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1.0	Mr. Neeraj Ahuja, Vice President – Operations	1 April, 2025	Mr. Harshwardhan Pagay, President

1. Objective

At HFCL, we are committed to ensuring that we will follow the best waste segregation, management, and disposal processes. This Waste Management Policy lays out the commitments we have in place to reduce our environmental impact, conserve resources, and contribute building a sustainable organization. HFCL aims to expand its **'Zero Waste to Landfill'** commitment to all its operating locations.

This Policy is supplemented by our Operational Control Procedure for Waste Management, which provides details on waste management processes, internal responsibilities and maintenance of records.

2. Scope and Applicability

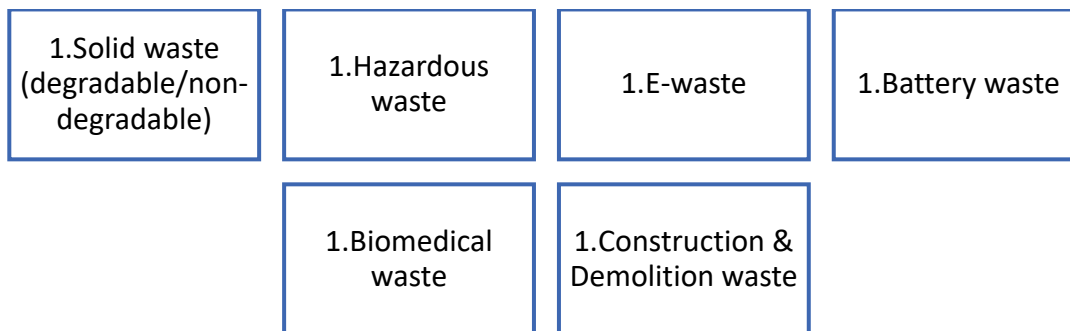
This Policy is applicable across HFCL's operations and along its value chain. The commitments of this Policy extend to the teams responsible for handling or disposing waste, including employees, contract workers, third-party vendors, service providers and senior leadership across our locations.

3. Definitions

- **"Company"** or **"HFCL"** or **"we"** or **"our"** refers to HFCL Limited.
- **"Policy"** refers to the Waste Management Policy.
- **"Waste Management"** refers to the comprehensive process of handling waste from generation to disposal.

4. Types of Waste

The various types of waste at HFCL are categorized into the following streams:



Further waste categories within these types have been defined in the Operational Control Procedure for Waste Management.

5. Policy Commitments

HFCL's commitment to reducing the negative impact on the environment applies across all business operations, including sourcing, manufacturing, and business development activities. Our aim is to reduce our waste footprint and replace input materials with less hazardous, renewable, and non-toxic alternatives. As a part of this Policy, we have laid out several commitments to be adopted at an organizational level:

- We are committed to ensuring absolute compliance with applicable laws, regulations and international standards on waste management and disposal. We partner with CPCB (Central Pollution Control Board) or SPCB (State Pollution Control Board) authorized vendors to dispose of waste generated.
- We aim to minimize waste at source and ensure that we follow segregation practices at all our locations. HFCL will also collaborate with vendors for recycling and repurposing of waste generated, as applicable.
- We aim to collaborate with suppliers who prioritize adequate waste management techniques and are committed to reducing their environmental footprint.
- We provide appropriate training to all personnel designated with handling and disposing of hazardous waste generated from our operations. Adequate personal protective equipment (PPE) will be provided to these individuals as well. All hazardous waste is collected, transported, and disposed of by CPCB or SPCB authorized vendors.
- We aim to implement a robust monitoring and evaluation mechanism to measure progress towards waste reduction and identify clear areas of improvement.
- We are committed to the integration of principles of circular economy in our operations.
 - Eliminate waste and pollution
 - Circulating products and materials at their highest value
 - Regenerating nature

6. Roles and Responsibilities for Implementation

The roles and responsibilities for implementing this policy lie with multiple teams including Production, Safety, IT Department, Engineering, and Housekeeping. Each team is responsible for a different type of waste, further bifurcated by:

- Exact requirement or target of waste handling
- Frequency of monitoring
- Method of monitoring and measuring
- Method of recording results

7. Monitoring and Review

Monitoring and measuring parameters are detailed in our Operational Control Procedure for Waste Management, which includes visual inspections, register entry, obtaining manifests, checking of authorization documents and various training and capacity building records. Responsibility for these activities spans multiple departments including Production, Safety, IT, Engineering, and Housekeeping, with certain monitoring tasks requiring engagement from all staff roles..

8. Communication of the Policy

This Waste Management Policy is made available to all our stakeholders on our website. Regular training and awareness programs are held for all employees covering disposal and segregation techniques.

9. Related Policies

This Policy should be read alongside the following policies of HFCL:

S. No.	Related Policy
1.	Operational Control Procedure for Waste Management
2.	Environmental Management Policy
3.	Water Management Policy