

# **HFCL Limited**

## **Product Stewardship Policy**

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## Product Stewardship Policy

At HFCL Limited, Product Stewardship is a core component of our commitment to sustainable and ethical business practices. This policy outlines our commitment to minimizing the health, safety, environmental, and social impacts of our products across their entire life cycle.

Our responsibility on materials innovation, product design, sourcing, manufacturing, distribution, and performance during a product's use, disposal and recycling is to pursue the right balance between economic prosperity, environmental protection, public health and social needs.

### 1.0 Objective, Scope and Applicability

The policy applies to HFCL and subsidiaries and covers optical fiber and fiber optic cables; telecom/networking/IoT equipment and firmware/software; accessories and packaging; turnkey network design, rollout, installation, O&M.

### 2.0 Definitions

- **“Company”, “we”, “our”, or “HFCL”** refers to HFCL Limited.
- **“Policy”** refers to this Product Stewardship Policy of HFCL.
- **Occupational Health and Safety (OHS)** refers to the policies, procedures, and practices implemented to ensure the physical, mental, and social well-being of individuals in the workplace by preventing work-related injuries, illnesses, and hazards.
- The UNFCCC defines **“Emissions”**, as the release of greenhouse gases and/or their precursors into the atmosphere over a specified area and period of time.
- **Zero Tolerance (ZETO)** refers to HFCL's safety principle that aims to eliminate unsafe working conditions and behaviors across its operations, aiming for zero workplace incidents and fostering a culture of safety and accountability.

### 3.0 Policy Commitments

With the purpose of making a substantial contribution to a safer, cleaner, and more sustainable environment for people and the planet, HFCL is committed to:

- **Assessment of Environmental and Social Impacts:** We systematically evaluate potential health, safety, environmental, and social risks at every stage of product development. We proactively implement preventive and corrective actions to mitigate adverse impacts on employees, environment and end-users, while ensuring compliance with applicable standards and regulations.
- **Innovation in Products and Processes:** We invest in research and development to deliver innovative, efficient, and safer products. Our focus includes:
  - Reducing environmental footprint through lower water consumption, waste generation, and emissions.
  - Increasing renewable energy usage across organisation.
  - Enhancing product performance while minimizing lifecycle impacts.

- **We foster a culture of safety, responsibility, and continuous learning by:**
  - providing regular training, development opportunities, and open communication;
  - ensuring a safe and healthy workplace aligned with our “zero harm” and “zero accident” objectives; and
  - encouraging employee engagement in sustainability and responsible growth initiatives.
- **Compliance with Best Practices and Regulatory Standards:** HFCL operates in strict adherence to internationally recognized standards for **labour, health, safety, and environmental management**, as along with all applicable **laws and regulations**. We treat compliance not as a minimum requirement, but as a foundation for exceeding **legal expectations** through best-in-class practices that promote responsible growth and long-term sustainability. Our commitment includes compliance with:
  - E- Waste (Management) Rules, 2022 and amendments;
  - Plastic Waste Management Rules, 2016, 2022 and amendments;
  - Battery Waste Management Rules, 2022, and amendments;
  - Hazardous and other Wastes (Management & Transboundary Movement) Rules, 2016 and amendments
  - DoT/TEC (MTCTE), BIS, WPC;
  - Substance restrictions like RoHS/REACH and global safety marks (CE/UKCA/UL/ETL/EMC).
- **Stakeholder Engagement and Collaboration:** We maintain transparent, fair, and continuous dialogue with all stakeholders—including customers, suppliers, communities, and regulators—to:
  - Build long-term, trust-based relationships.
  - Share responsibility in reducing the health, safety, environmental, and social impacts of our products.
  - Collaborate on sustainable solutions and innovations that benefit all parties.
- **Supplier Engagement and Responsibility:** We actively engage with suppliers to ensure they understand and meet HFCL's requirements for environmental and safety quality, as well as responsible labor, health, and environmental practices across their operations and supply chains.
- **Customer and End-User Support:** We support customers and end users by providing information on product safety and environmental impact, promoting responsible use and disposal, and facilitating recycling and reusing wherever possible to minimize environmental footprint.
- **Collaboration with Institutions:** We collaborate with governmental, non-governmental, sectoral, and academic bodies to shape global policies and promote local initiatives that prioritize quality, safety, occupational health, and environmental protection.
- **Transparency and Reporting:** We are committed to open and transparent communication with stakeholders, disclosing product and lifecycle information, and reporting progress toward our stewardship goals to ensure accountability and continuous improvement

## 4.0 Communication of the Policy

HFCL ensures that this Product Stewardship Policy is effectively communicated and accessible to all relevant stakeholders. The Policy is published on the Company's website and intranet and is included in onboarding materials for new employees. Regular training sessions and awareness programmes are conducted to reinforce understanding of the policy, responsibilities, procedures, and reporting mechanisms. The Company also engages with contractors, vendors, and other business partners to communicate and promote alignment with HFCL's standards across the value chain.

HFCL provides its stakeholders with multiple channels including telephone, email, fax, and courier to report any situation, including anonymously, that may breach this policy or pose a risk related to Product Stewardship. This multi-channel approach ensures accessibility, confidentiality, and prompt action.

## 5.0 Related Policies

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

S. No.	Policy
1	Environmental Management Policy
2	Water Stewardship Policy
3	Waste Management Policy
4	Climate Change and Net Zero Policy
5	Conflict Free Sourcing Policy
6	Sustainable Procurement Policy
7	Occupational Health and Safety (OHS) Policy