

# Waste Management Policy

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## Contents

1.	INTRODUCTION .....	3
2.	PURPOSE.....	3
3.	SCOPE.....	3
4.	POLICY STATEMENT .....	3
5.	LEGISLATIVE COMPLIANCE.....	4
6.	POLICY OBJECTIVES .....	4
7.	ACTION PLAN.....	5
8.	COMMITMENT & REVIEW .....	6

## Introduction

Firstsource Solutions Ltd (FSL) is committed to responsible waste management as part of its broader environmental sustainability strategy. Recognizing our responsibility to minimize environmental impact, we aim to implement sustainable waste management practices, grow responsibly, and inspire others to take action.

This policy establishes a structured framework for managing waste at FSL facilities, ensuring compliance with national and regional regulations. It outlines best practices for waste reduction, segregation, recycling, and responsible disposal while promoting circular economy principles. Detailed procedures, waste management plans, and compliance requirements are included in the company's environmental policies and operational guidelines.

## Purpose

Due to the nature of FSL's operations, the company generates a limited range of waste, including:

- **Wet waste** - Food waste from canteens, Garden debris (leaves, small branches).
- **Biomedical waste** - Tissues contaminated with bodily fluids.
- **Electronic waste (E-waste)** - ink toner cartridges, batteries, and obsolete electronic equipment.
- **Dry waste** - Paper, Cardboard, Plastic bottles, wrappers, Packaging materials.
- **Sanitary waste** - Sanitary napkins, tissues
- **Construction waste** - Debris from facility repairs or refurbishment, broken tiles, cement dust etc.
- **Radioactive waste**- *Not applicable to FSL's operations. The company does not generate, store, or manage radioactive materials.*

FSL is responsible for ensuring the safe and compliant disposal of all waste through authorized waste contractors. This policy serves as a guiding document for all waste management activities, aligning with **UN Sustainable Development Goal 11,12,13 along with UNGC Principles 7, 8, and 9, and GRI 306 reporting frameworks.**

## Scope

This policy applies to all FSL-owned or leased facilities, internal stakeholders (employees workers), and external stakeholders (suppliers, contractors, and third-party vendors) involved in waste management. All subsidiaries and business units & functional teams must adhere to the principles outlined in this policy to ensure responsible waste handling and disposal.

This policy governs the management of the following categories of waste:

- **Non-hazardous waste** – Includes general office waste such as paper, cardboard, packaging materials, and food waste generated from canteens and breakrooms.
- **Hazardous waste** – Includes materials such as used oils, batteries, and electronic waste (e-waste) that require specialized handling and disposal methods in accordance with applicable environmental regulations.

The Global Facilities Team, in collaboration with employees, suppliers and authorized third parties acting on behalf of FSL, is responsible for overseeing the implementation of this policy and ensuring compliance across all operations.

## Policy Statement

Firstsource Solutions Ltd (FSL) is committed to responsible waste management through waste reduction, source segregation, and maximizing reuse and recycling. Our approach aligns with the principles of a **circular economy**, aiming to minimize waste, reduce pollution, and lower carbon emissions while improving resource efficiency and business sustainability.

We adopt a **5R waste management hierarchy—Recover, Reduce, Reuse, Repurpose, and Recycle**—to drive waste reduction at every stage of our operations:

- **Reducing** the consumption of natural resources and materials.
- **Recovering** resources wherever possible to minimize environmental impact.
- **Reusing** materials to extend their lifecycle.
- **Repurposing** waste to create new uses for discarded materials.
- **Recycling** materials to support a closed-loop system and divert waste from landfills.

FSL ensures strict adherence to **government regulations and industry best practices** in managing these waste streams, collaborating with authorized vendors and recyclers to facilitate safe and compliant waste disposal.

## Legislative Compliance

FSL's waste management strategy complies with national and regional regulations in all our operating regions:

- United Kingdom: Compliance with the Environmental Protection Act 1990, Waste Regulations 2011, and WEEE Directive 2012.

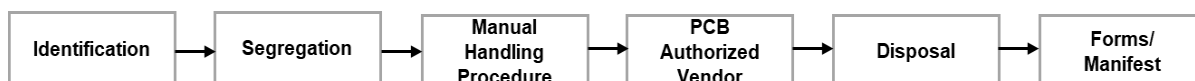
- United States: Adheres to EPA regulations, Resource Conservation and Recovery Act (RCRA), and state-specific waste disposal laws.
- Philippines: Follows Republic Act 9003 (Ecological Solid Waste Management Act) and DENR waste disposal regulations.
- India: Complies with the Solid Waste Management Rules, 2016, E-Waste Management Rules, and Hazardous Waste Management Rules.
- Mexico: Aligns with the General Law for the Prevention and Integral Management of Wastes.
- South Africa: Operates under the National Environmental Management: Waste Act, 2008.
- Australia: Adheres to the National Waste Policy Action Plan and state-level EPA regulations.
- Trinidad & Tobago: Complies with the Waste Management Rules (2018) and EMA regulations.
- Romania: Follows EU Waste Framework Directive and national waste management laws.

## Policy Objectives

- Ensure waste management in accordance with all legislative requirements and adapt to future regulatory changes.
- Minimize waste generation at source and facilitate reduction, reuse, and recycling through authorized recyclers and vendors in a cost-effective manner.
- Establish clear guidelines for waste identification, segregation, and disposal.
- Promote environmental awareness to encourage reuse and recycling initiatives.
- Ensure the safe handling and storage of various waste types across all FSL leased facilities.
- Promote best practices and a holistic approach to waste management.
- Work with suppliers and customers to explore waste reduction opportunities.
- Educate employees on the environmental impact of waste and encourage sustainable practices both at work and at home.

## Action Plan

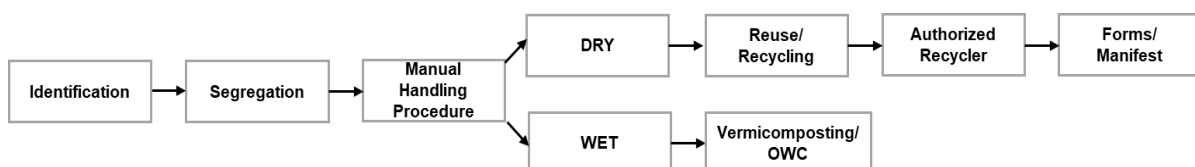
- Oil Waste: Used oil from diesel generators is stored securely and sent to Pollution Control Board-authorized vendors within 90 days.
- Waste Electrical and Electronic Equipment (WEEE) and Battery Disposal.
- Compliance with the WEEE Directive in the UK and EU, EPA e-waste regulations in the US, E-Waste Management Rules in India, and similar regulations in all operating regions.
- E-waste, including defunct computers and batteries, is identified, securely stored, and disposed of via authorized recyclers.
- Documentation such as Form II and Form VI (India) or equivalent regional compliance records is maintained for legal tracking.
- Non-Hazardous Waste Management: Paper, plastic, and cardboard waste are segregated and sent to authorized recyclers.
- Food and garden waste is composted using Organic Waste Converters (OWCs) where feasible.
- Municipal solid waste is managed in compliance with local waste collection and recycling policies.



## Facility Responsibilities

At each facility, the Location Administrator is responsible for:

- Ensuring waste collection bins are placed appropriately in cafeterias, pantries, and throughout the facility.
- Providing infrastructure for non-hazardous waste storage.
- Overseeing waste segregation and collection efforts



- Sanitary Waste: Collected in designated bins and disposed of through authorized biomedical or municipal waste handlers in accordance with local sanitary disposal norms (e.g., SWM Rules 2016 in India).
- Biomedical Waste (e.g., tissues from first-aid kits): Managed through certified disposal agencies and documented for compliance, where applicable.
- Construction & Demolition Waste: Any debris from facility maintenance or refurbishments is removed by contracted civil vendors, who are required to dispose of it in line with local construction waste rules.
- Radioactive Waste: *Not applicable* to our operations. FSL does not generate, store, or handle radioactive materials.
- Miscellaneous Waste: Any unusual or region-specific waste types (e.g., fluorescent tubes, printer ribbons) are assessed and directed to certified disposal vendors or local collection programs as per environmental guidelines.

## Commitment and Review

FSL is committed to supporting and implementing this waste management policy. We continuously review our waste streams and update disposal protocols to ensure full compliance and environmental responsibility across all locations.