

Waste Policy

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Introduction

Firstsource Solutions Ltd (FSL) generates a limited range of waste streams due to the nature of its activities. These include wet waste, biomedical waste, electronic waste (E-waste), dry waste, sanitary waste, construction waste & radioactive waste.

The company is committed to responsible waste disposal, ensuring that all waste is managed through approved, and registered waste contractors.

This policy establishes the framework for FSL's waste management approach. Detailed information on correct disposal routes is outlined in the company's environmental policies, procedures, and individual waste management plans. FSL aligns its waste management strategy with SDG 11 12 & 13 UNGC Principles 7, 8, and 9, and follows the GRI 306 framework for data management and reporting.

Policy Statement

FSL is committed to adopting the principles of the Best Practicable Environmental Option (BPEO) in waste management. A hierarchical 5R approach (Refuse, Reduce, Reuse, Repurpose, and Recycle) is followed to minimize waste sent to landfills. The goal is to achieve zero waste to landfill.

All waste producers, handlers, and disposers must comply with local Environmental Protection legislation. FSL ensures compliance by minimizing waste, maximizing reuse, recycling, and refusing excessive packaging from suppliers.

All employees, supply chain partners, and contractors are required to adhere to this policy and related environmental requirements to maintain legal compliance.

Policy Objectives

- Ensure compliance with all relevant waste legislation and plan for future regulatory changes.
- Minimize waste generation at the source and prioritize reuse and recycling over landfill disposal.
- Define clear roles and responsibilities across the waste management chain.
- Strive towards zero waste to landfill for all waste streams.
- Where feasible, generate revenue from recyclable materials to reinvest in sustainability initiatives.
- Ensure the safe handling and storage of waste at office locations and project sites.
- Provide waste management training for employees, supply chain partners, and clients.
- Promote best practices in waste management.
- Appoint competent personnel to oversee waste management processes.
- Fulfill statutory and voluntary reporting obligations, including GRI reporting and alignment with UN Sustainable Development Goals.

Application

This policy applies to all activities undertaken by or on behalf of FSL, including employees, supply chain partners, and clients. FSL encourages suppliers and business partners to align with the company's sustainability objectives. The policy applies to all activities undertaken by (or on behalf of) FSL, including its staff, supply chain partners and clients. Encourage those suppliers and business partners whose goals and performance most closely matches our own aims and aspirations.

Organization and Management

Chief Admin Officer (CAO)

The CAO is accountable to the Board for the Waste Management and Environmental performance of the Company. In particular this will require him to:

- Maintaining and updating waste and environmental policies in compliance with regulations.
- Demonstrating personal commitment through a signed and dated policy statement.
- Assigning waste management responsibilities to key personnel.
- Coordinating with ESG and Risk Management Committees as needed.

Head of Facilities

The Head of Facilities is responsible for policy implementation in their respective locations.

Responsibilities include:

- Implementing the waste management policy through Standard Operating Procedures (SOPs) and performance metrics.
- Ensuring personnel are trained and competent in waste management practices.
- Complying with local waste management regulations and striving for zero waste to landfill.

Landlords

In locations where landlords manage waste collection and disposal, FSL will engage them to promote zero landfill waste disposal.

Third Party Facilities Manager

At many sites globally, FSL have outsourced their Facilities operation to a third party who are responsible for the removal of and disposal of waste from FSL sites. The Third Party Facilities Manager is accountable to the Head of Facilities for implementing the relevant requirements of this Policy.

In particular, this will require him to:

- Liaise with onsite Facilities Team, in monitoring the training needs of these employees.
- Maintain records of employee environmental and health & safety training,
- Provide all employees with a copy of this Policy

On-site Facilities Team

On-site Facilities Team are accountable through the recognised chain of line management for implementing this Policy. In particular, On-site Facilities Team managers are required to:

- Ensuring site-specific waste management plans are implemented and followed.
- Assigning waste management duties to site teams and subcontractors.
- Preventing the discharge of toxic or hazardous substances into the environment .

Employees

All employees are accountable through the management structure for conforming to the requirements of this policy and of statutory requirements.

In particular, every employee is required to:

- Take responsibility for environmental care.
- Follow FSL's waste management policy and site-specific plans.
- Engage in continuous environmental and waste management improvement.

Glossary of Terms

1. Best Practicable Environmental Option (BPEO)

The Best Practicable Environmental Option refers to the analysis of different methods of waste disposal. The preferred option is the one which minimises harm to the environment as a whole, taking into account what is affordable and practicable.

2. Biomedical Waste

Includes biological waste (e.g., blood, tissue), pharmaceuticals, and contaminated medical materials that pose health risks including Human or animal tissue; Blood or other body fluids; Excretions; drugs or other pharmaceutical products other than controlled or cytotoxic drugs; Swabs or dressings; Syringes, needles or other sharp instruments; which unless rendered safe may prove hazardous to any person coming into contact with it. It also includes any other waste arising from medical, nursing, dental, veterinary, pharmaceutical or similar practice, investigation, treatment, care, teaching or research, or the collection of blood for transfusion, being waste which may cause infection to any person coming into contact with it.

Clinical waste is managed by specialist vendors, organised through FSL or Landlords to ensure the correct transportation and disposal.

Legislation

There are differing pieces of environmental legislation in the different geographies in which FSL operates. Below shows the main piece of legislation for each of these geographies:

- UK – Environmental Protection Act (EPA) 1990 (amended 1995)
- India – Environmental Protection Act 1986
- Philippines – Ecological Solid Waste Management Act No. 9003 (2000)

- US – Resource Conservation and Recovery Act (RCRA)
- Mexico – Environment & Climate Change Laws and Regulations (2023)
- Australia – National Waste Policy (2018), Environmental Protection and Biodiversity Conservation Act (1999)
- South Africa – National Environmental Management: Waste Act (2008)
- Trinidad & Tobago – Waste Management Rules (2008), Environmental Management Act (2000)
- Romania – Waste Management Law No. 211/2011

These differing pieces of legislation identify that waste leaving FSL Sites is controlled waste. This is described as the waste arising from household, commercial or industrial premises. Controlled waste includes waste from offices, food handling, shops and other domestic activities. A “Duty of Care” on producers and handlers of waste, “to take reasonable measures to prevent the unauthorised deposit, treatment or disposal of waste.” This means the following:

1. The Site must keep records of how much waste it is generating.
2. The Site must ensure that a registered carrier collects their waste.
3. The Site must ensure that all transfer notes are completed and filed detailing the type of waste for disposal. These must be kept for three years.
4. Ensure that all waste is dealt with in accordance with the “Duty of Care”. Breach of the Duty of Care is a criminal offence and can incur financial penalties or an unlimited fine if convicted on indictment.

Hazardous Waste

These are the most dangerous wastes as they can cause the greatest environmental damage or are dangerous to human health. Some common hazardous wastes are listed below:

- Acids Pesticides Fluorescent Tubes
- Alkaline Solutions Photographic Chemicals Televisions
- Batteries Waste Oils Paint
- Solvents Computer Monitors

Other hazardous wastes, such as asbestos and radioactive substances, are subject to their own specific legislation.

E-Waste

Where possible, geography dependant, our e-waste, including; monitors, laptops and mobile phones are collected for disposal and to ensure environmentally sound management of all types of Waste Electrical and Electronic Equipment.

Recycling

The diversion of waste away from landfill or incineration and the reprocessing of those wastes either into the same product or a different one. This mainly includes non-hazardous wastes such as paper, glass, and cardboard, plastic and scrap metal. Firstsource Solutions Limited segregates waste at

source by providing labelled recycling bins on site.

Responsible Person

The person who oversees the wastes to be removed from the premises at which it was produced or is being held.

Waste

Waste is defined by the UN as materials that are not prime products (that is, products produced for the market) for which the generator has no further use in terms of his/her own purposes of production, transformation or consumption, and of which he/she wants to dispose.

There are some waste which are exempted as they have their own separate legislation e.g. radioactive wastes which is not applicable to FSL's operations. The company does not generate, store, or manage radioactive materials

Waste Hierarchy

The hierarchy lists the different ways of dealing with waste in order of preference.

1. Refuse

The first element of the 5 R's hierarchy. Refuse is the most effective way to minimize waste.

2. Reduce

Also known as waste minimisation, to reduce the amount of waste materials being produced.

3. Re-use

To continually re-use an item in order to eliminate the use of resources in making new items.

4. Repurpose

Item that can't be refused, reduced, or reused, are repurposed or upcycled.

5. Recycle

The collection and reprocessing of wastes either into the same product or a different one.

Conclusion

FSL is committed to sustainable waste management through compliance, education, and continuous improvement. All stakeholders must actively participate in implementing this policy to achieve the company's environmental goals.