

Towards Zero Waste to Landfill Policy

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Version Control

Version No.	Change description	Effective from
1.0	Baseline Policy	September 2024
2.0	Major policy update to align with geo wise regulations	July 2025

Contents

Towards zero waste to landfill Policy.....	1
Policy Statement	3
Current practice	3
Legislative Compliance	3
Future practice	4
Action Plan:	4
Supply Chain & Preferred Suppliers-.....	4
Non-Hazardous Waste Management-	4
Hazardous Waste Management-	4
Demolition & Construction Waste-.....	5
Bio medical Waste Management.....	5
Roles and Responsibilities	5
Commitment & Review	7

Policy Statement

Firstsource Solutions Ltd (FSL) is committed to achieving Zero Waste to Landfill (ZWL) by reducing, reusing, repurposing, and recycling waste across all operations. This approach aligns with circular economy principles, of going Net Zero by 2050 by minimizing environmental impact while improving resource efficiency and sustainability.

Zero waste for FSL means that nothing is placed in landfill that doesn't need to be and all assets are recycled or recovered.

The key guiding principal is our 5R waste management hierarchy—Recover, Reduce, Reuse, Repurpose, and Recycle—to ensure maximum waste diversion.

Current practice

Sustainable supply chain policy: [Sustainable-Supply-Chain-Policy_V1.0-19th-March.pdf](#)

Supplier code of conduct: [Supplier-Code-of-Conduct_V1.0-19th-March.pdf](#)

ZWL policy applies to all waste types, including:

1. General office waste (paper, cardboard, plastics).
2. Organic waste (food scraps, garden debris).
3. Hazardous waste (oils, filters, batteries, e-waste).

FSL ensures compliance with global waste regulations and partners with authorized waste contractors and suppliers to responsibly manage waste streams.

Legislative Compliance

FSL adheres to waste management regulations across operational locations:

UK: Environmental Protection Act 1990, WEEE Regulations 2013.

US: Resource Conservation and Recovery Act (RCRA), EPA guidelines.

India: Solid Waste Management Rules 2016, E-Waste Management Rules.

Australia: National Waste Policy Action Plan, state-level EPA laws.

Mexico: General Law for the Prevention and Integral Management of Waste (LGPGIR)

South Africa: National Environmental Management: Waste Act (NEM:WA)

Trinidad & Tobago: Waste Management Rules (2014) & Environmental Management Act

Romania: Waste Law No. 211/2011

Philippines: Ecological Solid Waste Management Act (RA 9003)

Future practice

- Achieve 100% Zero Waste to Landfill by 2030 across all sites.
- Minimize waste generation through sustainable sourcing and process optimization.
- Engage suppliers and partners to improve waste reduction in the supply chain.
- Promote waste awareness among employees and stakeholders.
- Enhance tracking and reporting to measure waste diversion progress.

Action Plan:

Supply Chain & Preferred Suppliers-

Collaborate with suppliers to reduce packaging waste and promote eco-friendly materials.

Implement take-back programs for IT equipment, batteries, and recyclable office materials.

Conduct compliance assessments and apply sustainability standards when selecting and approving waste vendors.

Non-Hazardous Waste Management-

Segregate paper, plastic, and cardboard for recycling through authorized vendors.

The practice of composting food and garden waste using Organic Waste Converters (OWCs) is implemented at select sites where it is feasible and operationally supported.

Ensure responsible municipal waste disposal per local regulations.

Hazardous Waste Management-

Used oil generated from diesel generators at Firstsource facilities is securely stored in designated containers and only disposed of through authorized, government-approved waste handlers. This ensures compliance with local and national environmental laws pertaining to hazardous waste.

At UK and EU sites, Firstsource manages E-waste and battery waste collection and disposal as per the WEEE Directive, adhering to requirements for safe handling, storage, and authorized recycling.

In the US, E-waste and battery handling is aligned with EPA guidelines.

In Indian operations, Firstsource strictly follows the E-Waste Management Rules for collection, storage, and disposal, engaging licensed recyclers and maintaining traceability.

Demolition & Construction Waste-

Implement waste diversion plans for demolition sites.

Prioritize reuse and recycling of construction materials.

Bio-Medical Waste Management-

Firstsource's bio-medical waste is managed by a third-party vendor responsible for handling medical services for India & PH. We do not manage any bio-medical waste in the UK, Australia, or the US.

Roles and Responsibilities

Chief Administrative Officer (CAO):

- Establish and endorse global waste management and sustainability policies aligned with corporate goals.
- Oversee geowise compliance, ensuring regional Heads of Facilities implement local regulatory and company standards.
- Drive strategic partnerships with vendors and landlords to support circular economy initiatives and resource efficiency.
- Monitor overall waste performance metrics and report progress to executive leadership.

Head of Facilities (Geography-wise):

- Implement and adapt corporate waste management policies to local regulations and operational contexts.
- Coordinate with landlords, CBRE facility management teams, and vendors to ensure consistent, compliant waste handling and disposal.
- Lead site-specific sustainability programs such as segregation protocols, composting, and E-waste take-back schemes.
- Conduct periodic audits and risk assessments to optimize waste reduction and recycling efforts.

Environment Team:

- Design, implement, and update the waste management and environmental policies in alignment with ZWL objectives and regulatory requirements.
- Ensure the organization complies with all relevant environmental laws, regulations, and standards related to waste management and sustainability.
- Lead initiatives for minimizing waste generation through process improvements, material substitution, and promoting a circular economy approach.

- Develop and deliver training programs and awareness campaigns focused on environmental stewardship and best practices for waste segregation and reduction.
- Track, analyze, and report environmental performance metrics related to waste management to senior management, highlighting progress towards ZWL goals.

Landlord:

- Provide access to adequate infrastructure for waste segregation, collection, and storage at leased premises.
- Ensure availability of authorized waste disposal services compliant with local environmental regulations.
- Collaborate with tenants and FM providers to facilitate reporting and operational support for sustainable waste management.
- Support waste audit requests and corrective actions to maintain regulatory compliance.

CBRE Facilities Management:

- Deliver day-to-day operational management of waste systems, including segregation, collection, treatment, and recycling processes.
- Leverage digital technologies (AI, IoT) to optimize waste tracking, reporting, and resource efficiency.
- Conduct regular employee training on waste procedures, safety, and sustainability best practices.
- Facilitate circular economy opportunities such as asset reuse, refurbishment, and materials exchange within the facility.
- Provide timely documentation of waste disposal and regulatory compliance to Firstsource and landlords.

Onsite Facilities Manager:

- Supervise proper waste segregation and disposal by occupants and staff following company and local guidelines.
- Coordinate waste collection schedules with CBRE and authorized vendors, ensuring secure storage of hazardous materials.
- Maintain onsite records, including waste transfer notes and manifests, for all waste categories.
- Report operational waste challenges and collaborate with stakeholders to implement improvements.
- Promote employee engagement initiatives focused on reducing waste generation and enhancing recycling rates.

Employees:

- Actively participate in segregation of waste into designated categories (e.g., paper, plastic, organic, e-waste).
- Engage meaningfully in sustainability programs promoted by the company, adhering to best disposal practices.
- Report any observed non-compliance or waste management concerns to onsite facilities managers.
- Adopt waste reduction habits such as minimizing single-use items and reusing office materials where possible.

Vendors & Partners:

- Ensure all waste collection, transport, recycling, and disposal services comply with relevant legal, environmental, and company standards.
- Maintain valid licenses and certifications for hazardous and non-hazardous waste handling.
- Provide transparent and timely documentation regarding waste streams and disposal outcomes.
- Support innovation in circular waste solutions, including take-back programs, remanufacturing, and sustainable packaging.
- Collaborate closely with CBRE and Facilities teams for scheduled audits and continuous improvement.

Commitment & Review

FSL is dedicated to continuous improvement in waste management. This policy will be reviewed annually or upon regulatory updates. Policy updates and ZWL progress will be communicated to all employees and disclosed through our annual ESG disclosures.