

Waste Policy

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Introduction

Due to the nature of activities undertaken by Firstsource Solutions Ltd (FSL), there is limited amount of waste streams that are produced from FSL sites. The waste streams range from general wastes and recyclable materials, through to some special and hazardous wastes. The Company has a duty to ensure that all of these wastes are disposed of responsibly, using approved, registered waste contractors.

This policy sets down the framework for all waste management carried out by FSL. Detailed, up-to-date information on the correct disposal routes for all waste is contained within our environmental policies and procedures and the individual waste management plans that are prepared for all projects. The company makes a conscious effort to align its waste management strategy with SDG 12 (responsible consumption and production), UNGC principles 7, 8 and 9 and the related data management & reporting mechanism with GRI 306 framework.

Policy Statement

The Company will adopt the principles of the 'best practicable environmental option' in the delivery of its waste management services. The Company will apply a 'hierarchical approach' towards managing waste that includes 5R - Refuse, Reduce, Reuse, Repurpose and Recycle waste products in preference to the disposal of waste to landfill. The goal is for Firstsource to be a zero waste to landfill organisation.

There is a legal requirement for all who produce, keep or dispose of waste of any type to comply with the various regulations and the Duty of Care under each geographies' Environmental Protection legislation. The Company recognises the importance of meeting these legal requirements and to manage its waste responsibly by refusing from suppliers, reduce the volume of waste sent to landfill and maximise reuse, repurpose and recycling wherever possible.

The Company requires all staff and supply chain partners to comply with this Policy and any other Environmental requirements to ensure compliance with all waste legislation. In accordance with the Policy Statement FSL will fulfil the following Policy Objectives.

Policy Objectives

The objectives of this policy are:

- To ensure that waste management is performed in accordance with all waste legislative requirements, including the duty of care, and to plan for future legislative changes and to mitigate their effects.
- To minimise waste generation at source and facilitate repair, reuse and recycling over the disposal of wastes, where it is cost effective.
- To provide clearly defined roles and responsibilities to identify and co-ordinate each activity within the waste management chain.
- To promote environmental awareness in order to increase and encourage waste minimisation, reuse and recycling.

- To secure where possible revenue for recyclable material to reinvest into the expansion of recycling opportunities available to the Company.
- To ensure the safe handling and storage of wastes at all office locations and construction sites.
- To provide appropriate training for staff, supply chain partners and clients on waste management issues.
- To promote industry waste management best practice.
- To appoint competent person(s) to provide waste management advice.

Application

This policy applies to all activities undertaken by (or on behalf of) FSL including its staff, supply chain partners and clients.

Organisation and Management

The responsibilities and organisational arrangements for this Waste Management Policy lie with a variety of personnel within the Company.

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:

- Ensure the Company has a comprehensive, up to date Waste Management policy and Environmental policy that meets statutory obligations.
- Ensure that the policies contain a demonstration of the CAOs personal commitment by the inclusion of a signed and dated Policy Statement.
- Review the Policies to ensure that they remain comprehensive, relevant and up to date.
- Assign duties to key personnel to apply the Policies throughout the Company.
- Support the other teams in formulating waste management plans / SoPs and related decision making, stemming out of the policy
- Coordination with the ESG / Risk management committees as and when needed.

Head of Facilities

Each geographic location in which FSL operates has a Head of Facilities and they are accountable to the CAO the implementation of this Policy in their respective functions. In particular, this will require them to:

- Demonstrate their implementation of the requirements of this policy through SoPs, role allocations and performance measurement metrics.
- Ensure that the personnel under their control are competent and provided with adequate support, supervision, information, instruction and training to execute their work without risk to the environment and abiding by the contents of waste management plans specific to the projects that they work on.
- Ensure the implementation of the Company's environmental management system and waste management policy contained within this document.
- Ensure that applicable local norms on waste management are being adhered with

Landlords

At some FSL sites the landlord is responsible for the collection, removal and disposal of waste generated within an FSL site. Whilst we cannot control the actions of the landlord we can influence them. This influence is to be aimed at ensuring zero waste is sent to landfill sites.

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 new 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:

- Be familiar with and demonstrate their commitment to this Policy and promote continuous waste management performance.
- Where appropriate instigate a formal hazard identification and risk assessment for the activities under their control.
- Ensure that where required a project waste management plan is published, maintained and complied with for their Project and distributed to all relevant parties.
- Assign specific waste management duties to members of their site management team and subcontractors.
- Ensure that no toxic, noxious or offensive substance is discharged into the atmosphere, waterways or land.

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 care and attention of the environment.
- Co-operate in fulfilling the company's pursuit of continuous environmental and waste management improvement.
- Be familiar with and implement this policy.
- Conform to the requirements of the project environmental and waste management plan, where applicable.

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. Clinical Waste

Any waste which consists wholly or partly of:

- 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 - The EPA 1990 (amended 1995) UK;
- India - The Environmental Protection Act 1986,
- Philippines -The Ecological Solid Waste Management Act No. 9003 of 2000.
- US – The overarching legislation sits within The Resource Conservation and Recovery Act (RCRA)
- Environment & Climate Change Laws and Regulations Mexico 2023

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.

Waste is further defined into four categories: Household, commercial, industrial and clinical waste. The Site produce waste in all four categories. There are some waste which are exempted as they have their own separate legislation e.g. radioactive wastes.

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.