

 <i>Pellet to Pallet Solution</i>	WASTE MANAGEMENT POLICY	Doc. Ref. : KVMG/ESG/HR/48
		Rev. No. : 00
		Date : 25.08.2025

Purpose

The Company is committed to managing all waste generated from its operations in a responsible, systematic, and environmentally sustainable manner. Waste management is recognized as a critical component of environmental protection, regulatory compliance, occupational health and safety, operational efficiency, and long-term sustainability. This policy establishes the framework for minimizing waste generation, preventing environmental contamination, ensuring safe handling and disposal, and promoting resource recovery across all operational areas.

Scope

This policy applies to all manufacturing processes, maintenance activities, utilities, warehouses, laboratories, administrative functions, and site infrastructure. It covers all categories of waste generated within Company premises, including hazardous waste, non-hazardous industrial waste, recyclable materials, chemical residues, used oils, sludge, packaging waste, electronic waste, and general municipal waste. The policy applies to employees, contractors, vendors, and service providers operating within the premises.

Regulatory Compliance

The Company shall comply with all applicable waste management laws, environmental regulations, and statutory requirements. A documented legal compliance register shall be maintained and periodically reviewed to ensure all waste-related obligations are identified and fulfilled. Required authorizations for hazardous waste storage, handling, and disposal shall be obtained and maintained. Statutory reports and annual returns shall be submitted within prescribed timelines. Any deviation from compliance requirements shall be reported to management and corrective action shall be initiated without delay.

Waste Identification and Classification

All waste streams generated from Company operations shall be identified, documented, and evaluated. A Waste Inventory Register shall be maintained specifying the source of generation, type of waste, hazard classification, quantity generated, storage requirements, and approved disposal method. Waste shall be classified based on regulatory definitions and risk characteristics to ensure appropriate handling and control measures.

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Waste Minimization and Prevention

The Company shall prioritize waste prevention at source. Process optimization, improved material utilization, preventive maintenance, and operational efficiency improvements shall be implemented to reduce waste generation. Opportunities for material substitution, packaging reduction, and scrap reduction shall be evaluated periodically. Measurable waste reduction objectives shall be established and monitored to drive continuous improvement.

Waste Segregation and Control

Waste shall be segregated at the point of generation to prevent cross-contamination and facilitate recycling. Clearly identified and labeled containers shall be provided for different categories of waste. Hazardous waste containers shall clearly indicate the type of waste, hazard classification, date of generation, and responsible department. Mixing of hazardous and non-hazardous waste is strictly prohibited. Supervisory personnel shall ensure segregation practices are consistently followed.

Storage and Containment

Designated waste storage areas shall be established within the premises. Hazardous waste storage areas shall be clearly demarcated, access-controlled, and constructed with impervious flooring to prevent soil and groundwater contamination. Secondary containment systems shall be provided where required. Storage areas shall be protected from weather exposure and equipped with fire prevention measures. Periodic inspections shall be conducted and documented to verify compliance with safety and environmental standards. Storage duration shall not exceed statutory limits.

Handling and Transportation

Waste handling shall be carried out in a manner that prevents spillage, leakage, fire hazards, and environmental contamination. Personnel handling waste shall be trained and provided with appropriate personal protective equipment. Internal movement of waste shall use designated containers or transport systems to minimize risk. Hazardous waste shall be transported externally only through authorized transporters and disposed of at government-approved facilities. All transportation and disposal documentation, including manifests and disposal certificates, shall be maintained as compliance evidence.

Recycling and Resource Recovery

The Company shall actively promote reuse, recycling, and recovery of materials wherever feasible. Production scrap, packaging materials, and other recyclable

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waste shall be segregated and sent to authorized recycling agencies. Recycling performance shall be monitored through defined indicators such as recycling percentage, landfill diversion rate, and scrap reduction levels. Continuous efforts shall be made to enhance resource recovery and reduce dependency on landfill disposal.

Monitoring, Measurement, and Reporting

Waste generation data shall be recorded on a monthly basis and analyzed to identify trends and improvement opportunities. Waste intensity metrics, such as waste generated per unit of production, shall be calculated and reviewed. Any abnormal increase in waste generation shall trigger investigation and corrective action. Waste performance shall be reviewed during management review meetings to evaluate effectiveness and allocate necessary resources.

Emergency Preparedness

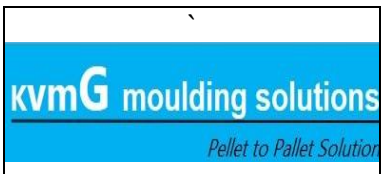
Emergency procedures shall be established to manage incidents such as hazardous waste spills, chemical leaks, or fire in waste storage areas. Spill response kits shall be available in designated locations. All incidents shall be documented, investigated, and corrective actions implemented to prevent recurrence. Emergency drills related to waste handling and spill control shall be conducted periodically.

Roles and Responsibilities

Top Management shall provide necessary resources, approve waste reduction objectives, and review performance periodically. The designated Environmental or EHS Representative shall maintain waste registers, ensure regulatory compliance, conduct inspections, and coordinate disposal activities. Department Heads shall monitor waste generation within their respective areas and ensure adherence to segregation and handling requirements. Employees and contractors shall follow established procedures and report unsafe conditions or deviations.

Training and Awareness

Periodic training programs shall be conducted to ensure employees and contractors understand waste segregation practices, hazardous waste handling procedures, emergency response protocols, and regulatory obligations. Specialized training shall be provided to personnel directly involved in hazardous waste management. Training records shall be maintained and reviewed.

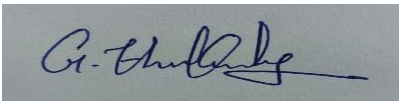
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Continuous Improvement

The Company shall establish measurable waste reduction and recycling improvement targets on an annual basis. Internal audits shall be conducted at planned intervals to verify compliance and effectiveness of waste management controls. Identified non-conformities shall be addressed through corrective and preventive actions. Continuous improvement initiatives shall focus on minimizing waste generation and improving operational efficiency.

Communication and Review

This Waste Management Policy shall be communicated to all employees and relevant stakeholders. The policy shall be reviewed periodically to ensure its continued adequacy, relevance, and effectiveness. Any revisions shall be approved by top management before implementation.

Prepared by	Approved by
	
ESG Coordinator	Director / MD