

Waste Management Policy

Version 1.2

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Revision History

Version No.	Release Date	Function	Reviewed by	Approved by	Description of Change
1.1	15/11/2023	FLM	FLM Leads	FLM Head	Document Release
1.2	31/05/2024	FLM	FLM Leads	FLM Head	Policy template standardization

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1. Introduction

BIRLASOFT Ltd. (Here after referred to as BIRLASOFT) is a Technology service provider organization in software engineering and services. Being an IT industry, the activities carried out by the organization have limited environmental footprint. However, BIRLASOFT is committed to protect the environment and commitment to manage its waste efficiently and effectively in a responsible and sustainable manner by minimizing impact on the environment, society, and community.

This policy sets down the framework for all the waste management commitments, initiatives, and activities carried out by Birlasoft. A detailed information on the procedures along with waste management plans for all categories of waste generated in our operations is contained within this policy.

2. Purpose

Due to the diverse nature of activities undertaken by Birlasoft, variety of wastes are generated and collected, ranging from municipal wastes and bio-degradable/ recyclable/ reusable materials to non-biodegradable waste to hazardous wastes. The Company acknowledges its duty to ensure that all these generated wastes are disposed of responsibly, through smart and efficient waste management practices, in accordance with national and regulatory norms.

Birlasoft is dedicated towards enabling a circular economy through the 3R's principles of 'reduce, reuse, recycle'. Birlasoft recognizes the strategic importance of waste management and is committed to investing in technologies that encourage reusability/ recyclability and promote waste minimization. The goal is to ensure zero waste to landfill, and we pursue this goal by focusing on minimizing waste to landfill and finally leading to 'Zero waste to landfill.'

3. Scope

This policy applies to all the facilities and locations owned by Birlasoft and all our stakeholders associated with our business verticals. All associates and departments of the company and its related business stakeholders shall understand, implement, and promote this policy in their own capacity.

The Facilities & Administration (FLM) team, asset, and inventory teams of Birlasoft along with all its associates and any third parties acting on behalf of Birlasoft, including suppliers, partners, contractors, vendors, and affiliates are responsible for supporting and complying with this policy. The FLM team teams shall be accountable for communicating the progress of the implementation of this policy with the Pollution Control Board along with associates, customers, suppliers, and partners of Birlasoft.

4. Policy Statement

Birlasoft's waste management practices are centered around reduction in generation, segregation at source, and reuse and recycle wherever possible. In line with the principles of a circular economy, we try to leverage the waste we generate by reusing it in different processes. Birlasoft complies with the regulations set by pollution control board and maintains a system of waste segregation, storage, reuse, recycle and disposal.

5. Policy Objectives

The objectives of this policy are to:

- ✓ Ensure waste management in accordance with all applicable legislative and regulatory requirements, plan for future legislative/ regulatory changes and develop action plan to mitigate their negative effects, if any in future.
- ✓ Provide clearly defined guidelines and SOPs for identifying and coordinating initiatives and activities to implement the waste management process across all locations.
- ✓ Undertake environmental awareness to increase awareness and encourage waste management, minimization, reuse, and recycling initiatives across sites and amongst business partners.
- ✓ Ensure safe handling and storage of waste of various types at all facilities and locations owned by Birlasoft.
- ✓ Promote best practices and holistic approach on waste management practices across all locations in a comprehensive manner.
- ✓ Ensure that hazardous waste, including used batteries and e-waste sent to recyclers authorized by the State/Central Pollution Control Boards at the respective locations.

6. Principles of Circular Economy

At Birlasoft, we employ the principles of circular economy through waste reduction hierarchy: recover, reduce, reuse, and recycle.

- ✓ Optimum utilization and Reducing usage of natural resources and materials,
- ✓ Recovering resources as much as possible,
- ✓ Reusing waste wherever practicable,
- ✓ Recycling materials whenever possible.

Birlasoft manages these wastes in accordance with all current applicable procedures including government regulations/ legislatures.

7. Action Plan

At Birlasoft we segregate the waste at the point of generation in different groups such as Bio-degradable, Non-Biodegradable, Recyclable and Hazardous wastes. This activity consists of the separation or sorting of wastes into recyclables and non-recyclables and storing them in separate containers/ locations to facilities recycling and disposal.

Hazardous Waste:

At Birlasoft, hazardous waste is sent to vendors authorized by the Central/State Pollution Control Boards (PCBs). The FLM team shall be aware of the hazardous waste management rules and responsible for safe handling of hazardous waste generated in the facility. They shall ensure that the hazardous waste is identified, monitor the collection / segregation, labelling the waste properly, facilitate the infrastructure required, ensure that it is stored in the designated place and safe disposal of hazardous waste.

They are also responsible for conducting the periodic training of the staff handling the waste and ensure that proper records of the identified waste are maintained. Then, the inventory team is responsible for approaching the PCB authorized vendors to initiate collection and disposal of waste.

Disposal of Waste Electrical and Electronic Equipment (WEEE) and batteries:

Waste such as e-waste, battery waste etc., a safe and environmentally sound recycle / disposal method is adopted. The disposal of Used Batteries and handling of e-waste is done by the FLM of Birlasoft. The asset teams are responsible for identifying and sharing the list of EOL (End of Life) equipment with the FLM team.

After identification of e-waste (defunct computers, monitors, servers, laptops, and electrical items) by the asset team, it is stored in a demarcated place as per the guidelines of the E-waste (Management and Handling) Rules, 2022. After the documentation and approval process from Finance and FLM team is over, the waste is handed over to the vendor authorized by the Central/State Pollution Control Boards.

Non-Hazardous Waste: At Birlasoft, we are reusing/ recycling the non-hazardous waste in an environmentally sustainable manner.

Office waste and mixed dry garbage waste (including plastic) is segregated, and dry garbage waste is stored in a scrapyard to be sent to scrap vendors or to municipal dump-yard for disposal.

Paper and cardboard waste is sent to authorized recyclers for recycling purposes. Food and garden waste is composted through Organic Waste Composter (OWC).

Role and Responsibility:

At each owned facility, the location lead of FLM shall:

- Ensure the placement of waste collection bins in the cafeteria/ pantry and facility premises.
- Facilitate the infrastructure required for storage of non-hazardous waste.
- Monitor the segregation/ collection of waste.
- Recycling of wet / organic waste through vermicomposting plants and OWC
- Disposal of dry waste (paper / cardboards) to authorized recyclers and other dry waste to municipal handlers.
- Conduct periodic meeting / training of the Housekeeping, Garden and Cafeteria staff.

8. Responsibilities

The overall responsibility is vested with Birlasoft management. However, the responsibility of implementation of this policy is of FLM team in-coordination with the asset management team.

The responsibilities include:

- Strategizing, reviewing, and implementing the waste management activities
- Getting finance and special economic zone (SEZ) approvals for waste disposal
- Engage with external vendors approved by Pollution Control Board (PCB) for transportation, handling, and recycling of hazardous/non-hazardous waste.

9. Communication and Training of the Policy

We communicate our Waste Management Policy internally and externally to ensure that all stakeholders, including employees, extended workforce, suppliers, vendors, and customers, are aware of our commitment to waste management and initiatives around waste management.

10. Compliance Standards

This Policy is in accordance with ISO 14001:2015 and ISO 45001:2018 standards.

11. Related Policies

- ESG Policy
- EOHS Policy

12. Review

Birlasoft commits to support and implement this waste management policy. This policy shall be reviewed at least once a year or as and when there are any changes.