Waste Management Policy

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1. INTRODUCTION

This document sets Tech Mahindra Ltd.'s (hereafter referred to as "Tech Mahindra"/"company") commitment with regards to Waste Management. As a forerunner in sustainable IT practices, we are committed towards environmental responsibility by minimizing our impact on the environment, growing sustainably and inspiring others to act. As part of that commitment, this policy establishes some principles relating to best practices in waste management.

This policy sets down the framework for all waste management activities carried out by Tech Mahindra. 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 Tech Mahindra, a wide variety of wastes are produced and collected, ranging from general wastes and recyclable materials to hazardous wastes. The company has a duty to ensure that all this waste is disposed of responsibly, through smart and efficient waste management practices. Tech Mahindra is dedicated towards enabling a circular economy through the principles of recover, reduce, reuse, and recycle. Being an environment-friendly organization, Tech Mahindra 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 going to landfill.

3. SCOPE

This policy applies to all the facilities and locations owned by Tech Mahindra and the stakeholders associated with these verticals. All associates and departments of the company and its stakeholders shall understand, respect, implement and promote this policy. This policy pertains to all hazardous (solid - UPS batteries; liquid - compressed oil/used oil, used filters, RO plant and STP chemicals), e-waste (defunct computers, monitors, servers, laptops, and other electronic items) and non-hazardous waste (dry - scrap waste, paper and cardboard, garbage and other office waste, and plastic waste, wet food waste from canteens, other organic waste such as grass, leaves).

The Corporate Services (CS), Asset and Inventory teams of Tech Mahindra along with all its associates and any third parties acting on behalf of Tech Mahindra, including suppliers, partners, contractors, vendors, and affiliates are responsible for supporting and complying with this policy. The CS and Inventory 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 Tech Mahindra.

4. POLICY STATEMENT

Tech Mahindra'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. Tech Mahindra 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 legislative requirements, plan for future legislative changes and to mitigate their effects.
- ✓ Minimize waste generation at source and facilitate reduction, reuse and recycling of waste generated through authorized recyclers and vendors in a cost-effective manner.
- ✓ Provide clearly defined guidelines for identifying and coordinating activities within the waste management process.
- ✓ Promote environmental awareness to minimize waste generation and encourage to adopt reuse, and recycling initiatives.
- ✓ Ensure safe handling and storage of waste of various types at all facilities and locations owned by Tech Mahindra.
- ✓ Promote best practices and holistic approach on waste management.
- ✓ Ensure that hazardous waste, including used batteries and e-waste is sent to recyclers authorized by the State/Central Pollution Control Boards at the respective locations.
- ✓ Achieve the target to certify 100% of owned campuses for Zero Waste to Landfill.
- ✓ Benchmark parameters against the industry best practices to establish and continuously improve waste management systems.

6. PRINCIPLES OF CIRCULAR ECONOMY

Businesses are encouraged to utilize the concept of circularity" with the aim to eliminate waste and employ systems to continually reuse, share, repair, refurbish, remanufacture, and recycle resources in a closed-loop system. Circularity reduces costs and improves business efficiencies, along with the environmental benefits of reduced waste, pollution, and carbon emissions.

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

- ✓ **Reduc**ing usage of natural resources and materials,

- ✓ **Recover**ing resources as much as possible,

- ✓ **Reus**ing waste wherever practicable,

- ✓ **Recycl**ing materials whenever possible and moving towards a circular economy.

This is applied at every stage of our operations to minimize all types of waste, including general office waste, including paper waste and cardboards, cotton, plastic, organic waste such as grass/leaves from garden, food waste from canteen, and hazardous waste such as oils, oil filters, fuel waste from DG sets chemicals and batteries, electronic waste.

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

7. ACTION PLAN

Segregation means to separate the wastes into the groups of solid (organic, inorganic, recyclables) and hazardous wastes. Waste segregation is an activity undertaken to facilitate recycling and disposal. Basically, it 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. It is a good idea to separate the waste at its place of origin as it provides for the applicable process to be followed for further treatment of waste.

Hazardous Waste:
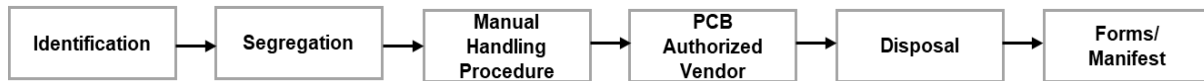
Safe disposal of hazardous waste –

Hazardous waste is the waste that has substantial or potential threats to public health or the environment. At Tech Mahindra, hazardous waste is sent to vendors authorised by the Central/State Pollution Control Boards (PCBs). At each owned facility, the location engineer (CS 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.

We follow 3 key principles regarding the disposal of Hazardous Waste:

- Health, Safety, and Environment (HSE): The hazardous waste which is generated is kept in designated areas in campus premises keeping in mind the environment and health and safety of the associates. It is disposed of through the authorized service provider engaged for the purpose of collection, segregation, transportation, dismantling, recycling, and disposal of hazardous waste per the guidelines of the Central/State Pollution Control Board.
- Social Responsibility: Tech Mahindra makes all reasonable efforts to track hazardous material till they reach their destination and ensure the end-of-life disposal procedures.
- Disposal: Tech Mahindra has tied up with authorized vendors approved by state/central pollution control board for the management of the entire process of disposal of electronic and electrical wastes right from collection to disposal at the facilities across India operation.

The steps involved in the Hazardous waste management include:

1. Waste identification; segregation and accumulation/storage in the identified setup/infrastructure.
2. Proper handling and labelling; thereafter, storage in designated containers/ location
3. Share the records of waste inventory with the inventory management team.
4. Inventory team shall identify and contact the PCB authorized handlers/ recyclers; generate waste disposal request; handle PCB forms (Form X), manifests/ checklists/ references.
5. Ensure disposal of waste off site through these handlers and maintain records.

Oil Waste – The used oil generated from DG set over the year is stored in a closed drum in an isolated place out of reach of the associates. The waste oil is sent to the vendor authorized by the Pollution Control Board within 90 days of generation.

**Disposal of Waste Electrical and Electronic Equipment (WEEE) and Batteries**:

For waste such as e-waste, battery waste, a safe and environmentally sound recycle/disposal method is adopted. The disposal of used batteries and handling of e-waste is done by the Inventory team of Tech Mahindra. The Asset teams are responsible for identifying and sharing the list of EOL (end of life) equipment with the Inventory team.

All products that are subject to the WEEE Directive shipped from August 13th, 2005, are compliant with the WEEE marking requirements. Such products are marked with the "crossed out wheelie bin" WEEE symbol in accordance with European Standard EN 50419.

After identification of e-waste (defunct computers, monitors, servers, laptops, and electrical items) by the asset team, it is stored in a demarcated place per the guidelines of the E-waste (Management and Handling) Rules, 2011. After the documentation and approval process from Finance and Inventory team is over, the waste is handed over to the vendor authorized by the Central/State Pollution Control Boards. Form II and Form VI is generated once it is recycled by the authorized vendor.

<u>Batteries</u> – Battery waste is stored in an open space, which is out of reach of the associates. Post documentation of records and consents from the respective teams, the used batteries are consigned to the vendors / recyclers authorized by the Central/State Pollution Control Boards. Form VIII is submitted to the State PCB by Tech Mahindra once every 6 months, i.e., by 30th June and 31st December, respectively.

<u>Non-Hazardous Waste</u>:
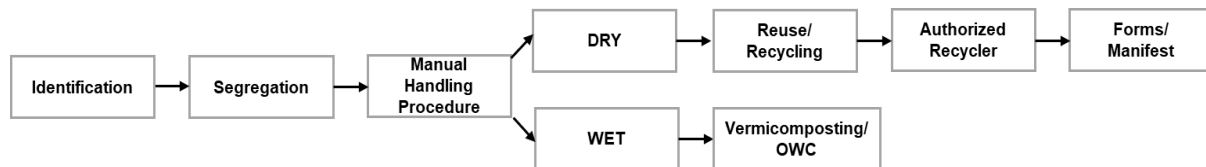
<u>Reuse, recovery and recycling of non-hazardous waste</u> –

At Tech Mahindra, we are reusing/recycling the non-hazardous waste in an environmentally sustainable manner. Paper 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 (such as NGOs) for recycling purposes. Food and garden waste is composted through OWC or sent to piggeries as feed.

At each owned facility, the location manager/service executive (CS team) 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 staff.

Food waste is segregated and stored in different bins marked as dry waste and wet waste. Then it is sent to either organic waste converter (OWC) or vermicomposting plants.

8. STRUCTURE & RESPONSIBILITIES

The overall responsibility is vested with TechM management. However, the responsibility of implementation of this policy is of Corporate Services team in-coordination with the Inventory Management team.

The responsibilities include:
- Strategizing, reviewing, and implementing 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. COMMITMENT & REVIEW

Tech Mahindra commits to supporting and implementing this waste management policy. This policy shall be reviewed at least once a year or as and when there are any changes.