

Waste Management Policy

Table of Contents

1. Purpose	3
2. Scope.....	3
3. Definitions.....	3
4. Policy Commitments	3
5. Roles and Responsibilities.....	4
6. Communication and Training of the Policy	5
7. Monitoring and Review.....	5
8. Grievance Mechanism	5
9. Related Policies	5

Version Number	Reviewed by	Approved Date	Approved By
1.0	Business Heads	17 th May 2025	Board of Directors

1. Purpose

UFlex Limited (hereinafter referred to as “UFlex” or “the Company”) is committed to responsible waste management across its global operations, ensuring compliance with environmental regulations and promoting sustainability. This policy establishes guidelines for waste reduction, segregation, recycling, and disposal to minimize environmental impact while supporting circular economy principles and aligning with international best practices such as the Basel Convention, ISO 14001 (Environmental Management Systems), and Extended Producer Responsibility (EPR) frameworks.

2. Scope

The policy applies to UFlex Limited and its 100% subsidiaries and covers all offices, warehouses, distribution chains, and manufacturing facilities of UFlex across its operational regions. It covers all categories of waste generated, including solid, hazardous, and non-hazardous waste, throughout operational processes.

3. Definitions

‘Waste’ refers to any material that is discarded, intended to be discarded, or required to be disposed of following operational activities.

‘Hazardous Waste’, as defined by the Basel Convention, refers to substances that exhibit toxic, corrosive, flammable, reactive, or infectious characteristics, posing a risk to human health and the environment. It includes substances such as heavy metals, solvents, medical waste, and certain industrial byproducts.

‘Non-hazardous Waste’ refers to waste that poses no risk to human health and the environment.

‘Circular Economy’, as per the European union, is a model of production and consumption, which involves sharing, leasing, reusing, repairing, refurbishing, and recycling existing materials and products as long as possible. In this way, the life cycle of products is extended.

‘Extended Producer Responsibility (EPR)’ is defined by the Organisation for Economic Co-operation and Development (OECD), as a policy approach that makes producers responsible for their products along the entire lifecycle, including at the post-consumer stage.

4. Policy Commitments

UFlex aims to integrate waste management practices that align with international best practices and local regulations in its operations and promotes the principles of circularity aiding in achieving India’s commitment towards United Nation’s Sustainable Development Goals (UN SDGs). The Company is committed to:

- Complying with all applicable laws, regulations, and international standards related to waste management, including but not limited to:
 - The Solid Waste Management Rules, 2016 (India)
 - The Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 (India)

- Extended Producer Responsibility (EPR) under the Plastic Waste Management Rules, 2016 (India)
 - The EU Waste Framework Directive 2008/98/EC (Europe – Poland & Hungary)
 - General Law for the Prevention and Comprehensive Management of Waste (Mexico)
-
- Following waste management hierarchy – Eliminate, Reduce, Reuse and Recycle
 - Minimising waste generation at the source by optimizing production processes and material efficiency.
 - Implementing effective waste segregation systems to facilitate recycling and safe disposal.
 - Promoting the use of recycled and recyclable materials in packaging solutions.
 - Collaborating with businesses, industries, and communities to develop and implement waste reduction initiatives, including product stewardship programs.
 - Promoting awareness and education for the Company's employees as well as the public regarding waste management practices.
 - Establishing efficient waste segregation systems, including separate collection of recyclables, organic waste, and hazardous materials.
 - Providing adequate waste collection services, ensuring regular and reliable collection schedules and appropriate containers for different waste streams.
 - Collaborating with local authorities and waste management companies to optimize waste collection routes and minimize fuel consumption.
 - Developing specialized programs for the collection, treatment, and disposal of hazardous waste, electronic waste, plastic waste, batteries, chemicals, and bio-medical waste.
 - Prioritizing waste treatment methods that promote resource recovery, composting, recycling, reuse to divert our waste from landfill.
 - Implementing a robust monitoring and evaluation system to track progress, measure key performance indicators, and identify areas for improvement.
 - Regularly reporting on waste management activities, recycling rates, and progress towards waste reduction targets to stakeholders.
 - Continuously reviewing and updating the policy based on emerging best practices, technological advancements, and changing waste management needs

5. Roles and Responsibilities

The responsibility for implementing this policy lies with various stakeholders within UFlex:

- **Senior Management:** Responsible for providing strategic direction and ensures alignment with corporate sustainability goals.
- **Facility Managers:** Responsible for overseeing waste management programs at respective sites and ensuring regulatory compliance with national and international laws.
- **Employees:** Responsible for adhering to waste segregation and disposal guidelines while actively participating in waste reduction initiatives.
- **Supply Chain Partners:** Responsible for aligning with UFlex's waste management practices and collaborating on sustainability objectives, ensuring compliance with regional regulations.

6. Communication and Training of the Policy

UFlex will communicate this policy across all business units and ensure its accessibility to employees and stakeholders. Training sessions will be conducted to enhance awareness of waste management practices, regulatory requirements, and best practices for waste reduction and recycling. External stakeholders, including suppliers and partners, will be encouraged to align with these principles through engagement programs.

7. Monitoring and Review

UFlex will regularly monitor the effectiveness of waste management initiatives through data collection, waste audits, and performance tracking against key metrics. Compliance with national and international waste management standards, such as ISO 14001 and EPR reporting requirements, will be reviewed periodically to incorporate emerging best practices, regulatory updates, and business needs.

8. Grievance Mechanism

UFlex provides a grievance mechanism for employees and stakeholders to report concerns related to waste management practices. Concerns can be reported to the respective Facility Manager(s) at the operational site through designated internal reporting channels, such as email or written complaints. All grievances will be documented, reviewed, and addressed in a timely manner following established grievance procedures and in compliance with applicable regulatory frameworks. The Company is committed to ensuring transparency, accountability, and continuous improvement in its waste management practices through an effective resolution process.

9. Related Policies

This policy should be read alongside the following policies of UFlex:

- Environment, Health, and Safety (EHS) Policy
- Environmental Management System Policy
- Environment Social and Governance (ESG) Policy
- Product Stewardship Policy
- Supplier Code of Conduct