



JAMNA AUTO INDUSTRIES LIMITED

WASTE MANAGEMENT POLICY

1. Objective

Jamna Auto Industries Limited (“JAI” or “the Company”) is committed to conducting its operations in an environmentally responsible and sustainable manner. The wastes like plastic waste, e-waste, battery waste, bio-medical waste and other hazardous wastes pose significant risks to the environment and human health. Proper and responsible management of these waste streams is therefore essential for environmental protection and safeguarding human health.

This Policy establishes a comprehensive framework for the safe handling, storage, transportation, reuse, recycling, treatment, and disposal of all waste streams, while emphasizing waste reduction at source, minimizing reliance on landfills and ensuring protection of the environment and human health in compliance with applicable environmental, health and safety laws.

2. Scope

This Policy applies across all plants, offices, warehouses, occupational health centres, and establishments of the Company and its subsidiaries where waste is generated.

3. Regulatory Compliance

This Policy complies with and shall be implemented in accordance with:

- a) Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016
- b) Plastic Waste Management Rules, 2016
- c) E-Waste (Management) Rules, 2022
- d) Battery Waste Management Rules, 2022
- e) Bio-Medical Waste Management Rules, 2016
- f) Environment (Protection) Act, 1986
- g) Central and State Pollution Control Boards directives and guidelines issued from time to time.

4. Waste Identification

- a) All newly generated waste shall be assessed for its nature and characteristics.
- b) A comprehensive inventory of all types of waste generated within the plants shall be maintained and periodically updated. Each waste type will be assessed for its reusability, recyclability and disposal method.
- c) Each waste shall be identified at point of generation according to defined waste categories. Waste shall be segregated in color-coded and labelled bins or containers to ensure proper handling.
- d) Segregated waste will be stored in designated storage areas. Waste will be re-used within the process or other suitable areas or re-cycled through internal methods or authorized external vendors to the extent feasible and permissible or disposed safely and in compliance with applicable laws.

5. Waste Minimization:

Streamline manufacturing processes to eliminate inefficiencies, and reduce material waste. Process optimisation, lean manufacturing practices and material substitution shall be encouraged. Prioritize the use of recyclable and biodegradable materials in production and packaging to minimize environmental impact.

6. Reuse & Recycling:

- a) Encourage reuse of packaging, office materials, production residues, and surplus items, subject to quality checks.
- b) Implement waste segregation practices and collaborate with authorized vendors to ensure proper recycling of materials.
- c) Extend equipment/product lifecycle through refurbishment, reconfiguration, and harvesting of reusable parts where safe and compliant.
- d) Vendors and suppliers shall be engaged to promote circular economy practices.

7. Waste Management (Storage, Safety & Controls):

(a) Storage

- Flammable, ignitable, reactive and non-compatible wastes should be stored separately;
- Storage area may consist of different sheds for storing different kinds of wastes;
- Storage sheds shall be provided with suitable openings;
- Loading and unloading of wastes in storage sheds should only be done under the supervision of the trained and experienced staff;
- Floor of storage area shall be structurally sound depending on the characteristics of waste stored in order to prevent spills, leaks etc. to the soil and ground water.
- Storage shed/area shall be marked 'DANGER' in bold letters;

(b) Storage of drums/containers

- Those drums or container shall be used which are non-reactive with the hazardous wastes proposed to be stored therein;
- The stacking of drums in the storage area should be restricted to three or four high on pallets (wooden frames) or metal platform. Necessary precautionary measures should be taken so as to avoid stack collapse;
- No drums should be opened in the storage sheds for sampling etc. and such activity should be done in designated places outside the storage areas;
- Drums should be labelled properly indicating mainly type, quantity, characteristics, source and date of storing etc.

(c) Spillage/ Leakage Control Measures

- Storage areas should be inspected regularly for detecting any signs of leaks or deterioration if any;
- Leaking or deteriorated drums or containers should be replaced with sound drum or container;

- In case of spills or leaks dry adsorbents/cotton should be used for cleaning instead of water;
- Proper slope with collection pits be provided in the storage area so as to collect the spills/leakages;
- Storage areas should be provided with adequate number of spill kits with compatible sorbent material in adequate quantity

(d) Fire Protection

- Fire detection and alarm system should be provided for waste storage area;
- The storage area/ storage yards should be covered by hydrant network system of the unit;
- Storage area should be provided with adequate type and number of fire extinguishers as per nature of waste stored;
- All electrical apparatus and equipment should be periodically inspected particularly for loose contacts, short circuit, and proper insulation.

(e) House Keeping

- Smoking should be prohibited in and around the storage shed/area;
- Good housekeeping needs to be maintained around the storage shed/ area;
- Signboards showing precautionary measures to be taken, in case of normal and emergency situations should be displayed at appropriate locations;
- Only persons authorized should have access to the waste storage shed/ area;
- Mock drill for onsite emergency should be conducted periodically.
- Open burning, dumping, or unauthorized disposal of waste is prohibited.

8. Hazardous Waste

- Hazardous waste shall be segregated at the source to avoid contamination with non-hazardous waste.
- A Safety Data Sheet (SDS/MSDS) shall be maintained for each hazardous substance used or produced.
- Hazardous waste shall not be stored in excess of 90 days.
- All records related to generation, storage, transportation, and disposal of hazardous waste shall be maintained.
- Hazardous waste shall be handled and disposed in accordance with Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

9. E-Waste Management

- Electrical and electronic waste shall be stored in isolated areas once non-functional or non-repairable.
- E-waste shall be handed over only to authorized recyclers or collection agencies.
- Electrical and electronic waste shall be handled and disposed in accordance with E-Waste (Management) Rules, 2022

10. Battery Waste Management

- Battery waste shall be handled in accordance with the Battery Waste Management Rules, 2022.
- Used, damaged, or expired batteries shall be segregated at source.
- Different battery chemistries shall be segregated wherever feasible.

- Batteries shall be stored protected from heat and damage.
- Disposal of used, damaged or expired batteries shall be done in an environment friendly manner by giving it to an entity engaged in collection or refurbishment or recycling;

11. Plastic Waste Management

- Plastic waste shall be handled and disposed in accordance with the Plastic Waste Management Rules, 2016.
- Plastic waste shall be segregated into recyclable and non-recyclable categories.
- Single-use plastics shall be avoided wherever feasible.
- Plastic waste shall be disposed of through authorized recyclers or municipal systems.
- Extended Producer Responsibility (EPR) obligations shall be complied with.

12. Bio-Medical Waste Management

- Bio-medical waste shall be segregated at source as per colour coding (Yellow, Red, White, Blue) and collected in non-chlorinated, labelled containers.
- Storage of Bio-medical waste shall not exceed 48 hours.
- Segregated Bio-medical waste shall be handed over to authorized common bio-medical waste treatment facility for treatment, processing and final disposal only.
- PPE shall be used and spills or needle-stick injuries reported immediately.

13. Training

Employees involved in waste handling shall be trained in:

- Safe handling practices
- Use of PPE
- Emergency response procedures

14. Governance & Review

- a) The ESG Committee shall administer and review this Policy quarterly.
- b) In the event of any inconsistency between this Policy and regulatory framework or in case of regulatory changes, the applicable statutory provisions shall prevail.