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E-WASTE MANAGEMENT POLICY

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BACKGROUND

This policy provides an overview on collection and disposal of the waste electrical and electronic products and their parts within the purview of conducting business as per the e-waste Management Rules 2016. It is expected that the e-waste management policy shall provide a frame work that allows move towards its goal of environmental sustenance by strictly operating within the framework of guidelines emanating out of e-waste Management Rules 2016.

SCOPE AND PURPOSE

This policy applies to HEG Limited and the stakeholders associated therewith. It shall come into force from the date of its approval & circulation thereof. The company recognizes the importance of Electrical and Electronic equipments play in its business activities of providing cooling services solutions and of marketing high end industrial electronics products. The company has total commitment to the environment and sustainability with regards to the disposal of unwanted and/or end of life products or its parts.

OBJECTIVE

With pervasive use of electrical and electronic equipments in our daily operations, disposal of electrical and electronic equipments/items is increasingly posing a threat to our environment comprising health aspects. Thus, there is a need to handle such disposals, referred to as “E-Waste”, in a responsible manner in line with emerging best practices and standards. The life-cycle of all E-waste equipments/items spanning from acquisition to disposal shall be managed in a manner which conforms to environmental norms as notified in the E-Waste (management) Rule 2016 & its amendments.

DEFINITIONS

- **E-waste:** E-waste means waste of electrical and electronic equipment whole or in parts or in rejects from their manufacturing and repair processes, which are intended to be discarded.
- **E-waste rules applicability:** E-waste Management rules 2016 is applicable to the state of India.
- **Schedule-I items:**
 - IT & IT items-
 - Mainframes, Minicomputers, Personal Computers, Laptops, Notebooks, Notepads, Printers including Cartridges, Computers, Laptops, Notebooks, Notepads, Printers Copiers, E-typewriters, User terminals and Systems, Facsimile, Fax, Telex, Telephones, Cordless, Cellular, Answering systems.
 - Consumer Electrical and Electronics-
 - All TV, Refrigerators, washing machines, Air conditioners excluding central Air – Conditioning plants.



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- **Bulk Consumer:** Bulk users of electrical and electronic Equipment are among others private companies registered under Factories Act 1948 and Companies Act, 1956.
- **Collection center means:** A center established individually or jointly or a registered society or a company or an association, to collect e-Waste.
- **Consumer means:** Any person using electrical or electronic equipment excluding bulk consumers.
- **Electrical or Electronic equipment means:** Equipment which is dependent on electrical current or electro-magnetic fields to be fully functional.
- **Extended Producer Responsibility (EPR):** Extended Producer Responsibility (EPR) means responsibility of any producer of electrical and electronic equipment of their products beyond manufacturing until environmentally sound management of their end-of-life products.
- **Historical e-waste:** Waste generated from electrical and electronic equipment as specified in Schedule I, which was available on the date when these rules came in force.
- **Producer means:** Any person who irrespective of selling technique used;
 - Manufactures and sells EE (Electrical & Electronic) equipment under his own brand or and sells assembled EE equipment of other manufacturers.
 - Offers to sell imported electrical and electronic equipment.

E-WASTE POLICY PRINCIPLES

Electronics & Electrical products and their parts shall be deemed to have reached their end of life and can be discarded by the owner (consumer) or the Service in charge for a region or a Factory Manager of a factory or the Administration Manager responsible for establishments. An item of equipment once permanently discarded by the user or the authorities mentioned above shall be deemed as e-waste, regardless whether it is operational or non-operational.

Four key principles regarding the disposal of e-Waste:

- Protection of the Environment
- Social responsibility
- Disposal
- Data Protection

Protection of the Environment:

- Functional Computers should be upgraded or re-deployed to specific users wherever possible.
- According to the Central Pollution Control Board's guidelines sold or/and donated equipment must be properly disposed off through the authorized service provider engaged for the purpose of collection, segregation, transportation, dismantling, recycling and disposal of e-waste.



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- In the Factories, Office buildings, Service centers and Warehouses, these materials may only be identified and stored in designated areas. The mixing of such materials with general scrap or on-site household wastes is not permitted.

Social Responsibility

The company shall make all reasonable efforts to track the products sold or donated by it till their final destination. Products sold to consumers shall be insisted upon to record the objective usage of product and guaranteeing the end-of-life disposal procedures—disposal through the company appointed authorized Service provider.

Disposal

The company has entered into an arrangement with an authorized service provider for management of the entire process of disposal of Electronic and Electrical wastes right from Collection to disposal at Approved facilities of the service provider. The collection centers of the service provider have a pan India presence.

Data Protection

It will be the responsibility of the company to protect all information in embedded, encrypted, stored or written form available in/on the storage devices and no pilferage, sharing, decoding, copying shall be allowed in whatsoever form till the point of erosion and complete sanitization of the data in a scientific and internationally acceptable manner.

CHANGES TO PROCUREMENT POLICIES

- In an attempt to address sustainability issues during the procurement of products/equipment's/parts of EE equipment additional criteria as stipulated by the requirements or any other criteria modified by law shall be added to the supplier requirements in how they address the environmental requirements in relation to:
 - Toxics reduction
 - Design for End of life
 - Material Selection
 - Life cycle extension
 - Energy Conservation.
- The company may insert conditions to include:



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- Labeling of the equipment/parts for recycling.
- Energy consumption during in service life time.
- Usable life expected out of a product.
- Take back of products for recycling or disposal.

PRODUCT TAKE BACK PROGRAM UNDER EPR

An aggressive product takes back program applicable to all consumers is designed by Marketing to ensure spreading awareness amongst consumers on the benefits of environment friendly disposal of end-of-life products. The scheme shall be extended to similar like products of other brands also to ensure maximum number of such products are disposed of in an environment friendly manner.

The policy will be applicable w.e.f. policy date, and it will supersede existing policy, if any.