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E-WASTE MANAGEMENT POLICY
HEG GRAPHITE LIMITED

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 2022. 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 2022.

SCOPE AND PURPOSE

This policy applies to HEG Graphite 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 electrical and electronic equipment, including solar photo-voltaic modules or panels or cells, whole or in part discarded as waste, as well as rejects from manufacturing, refurbishment and repair processes;
- **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.

- **Bulk Consumer:** Bulk Consumer means any entity which has used at least one thousand units of electrical and electronic equipment listed in Schedule I of the E-waste(management)rules2022, at any point of time in the particular Financial Year and includes e-retailer;
- **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 and Electronic Equipment means equipment which are dependent on electric current or electro-magnetic field in order to become functional and also the equipment for the generation, transfer and measurements of the electricity.
- **Extended Producer Responsibility (EPR):** Extended Producer Responsibility means responsibility of any producer of electrical or electronic equipment as given in [Schedule-I for meeting recycling targets as per Schedule-III and Schedule-IV] of E-waste(management) rules, 2022, only through registered recyclers of e-waste to ensure environmentally sound management of such waste;
- **Historical e-waste:** Waste generated from electrical and electronic equipment as specified in Schedule I of E-Waste Management rules, 2022 which was available on the date when these rules came in force.
- **Producer means:** any person or entity who, -
  (i) manufactures and offers to sell electrical and electronic equipment and their components or consumables or parts or spares under its own brand; or
  (ii) offers to sell under its own brand, assembled electrical and electronic equipment and their components or consumables or parts or spares produced by other manufacturers or suppliers; or
  (iii) offers to sell imported electrical and electronic equipment and their components or consumables or parts or spares; or
  (iv) who imports used electrical and electronic equipment; irrespective of the selling technique used such as dealer, retailer, e-retailer, etc.;

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.

- 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:
    - 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.

Date of approval of the Board: - August 10, 2026