Steel Strips Wheels Limited

HAZARDOUS WASTE MANAGEMENT POLICY

Document Number: SSWL/ ESG/HW/ 01

Classification: Internal

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Approved By	Dy. Managing Director

Revision History

Revision	Requested By	Revision Date	Sections modified/ Summary of Changes	Approved By

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1. Purpose

Steel Strips Wheels Limited (SSWL), is committed to preventing pollution, protecting human health, and ensuring environmentally sound management of hazardous and other wastes arising from our operations. This Hazardous Waste Management Policy ("Policy") establishes mandatory minimum requirements for identification, segregation, safe storage, handling, transportation, recycling/recovery/co-processing, and final disposal of hazardous and other wastes.

This Policy serves as a compliance and control document and supports EcoVadis evidence requirements under the Environment theme (waste management, pollution prevention and environmental compliance), with relevant linkages to Sustainable Procurement (vendor due diligence) and Occupational Health and Safety. It is aligned with the 2045 Agenda and the Sustainable Development Mission, Vision, and Goals.

2. Scope and Applicability

This policy applies to all SSWL Group locations-manufacturing units, warehouse, utility areas, laboratories, maintenance areas and project sites; all routine and non-routine activities (including shutdowns, overhauls and spill clean-up) including all SSWL Group employees, contract workers, contractors, vendors, and other authorized users connecting to SSWL's network.

HO: S.C.O 49-53 Sector 26, Madhya Marg, Chandigarh -160019, India.

Plant: Village Somalheri/Lehli, Ambala-Chandigarh Road, P.O. Dappar, SAS Nagar, Punjab-140506

Plant: Village Muria, P.O.- Kolabirathana No.-150 Distt. Seraikela, Jharkhand - 833220

Plant: Plot No. 77,78,136B & 394, Village- Martoli, Taluka – Jotana, Mehsana, Gujarat, India-3844330

Plant: Plot No. 733, 734, 735, 747 Jojobera, Chhota Govindpur, East Singhbhum, Jharkand – 831 015

Plant: A-10, Oragadam Sipcot Industrial Growth Centre, Mattur PO, Vallam Village, Oragadam, Sriperumbudur , Taluk, Kanchipuram, Tamil Nadu – 602105

This Policy covers both on-site management and off-site movement of hazardous waste to authorized recyclers, co-processors and/or common hazardous waste treatment, storage and disposal facilities (CHWTSDFs).

Note: This policy replaces SSWL/ESG /01 v1 revision 00.

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3. Definitions

For the purpose of this Policy:

- Hazardous and Other Wastes: Wastes regulated under applicable hazardous waste rules and schedules, including wastes with toxic, flammable, corrosive, reactive or environmentally harmful characteristics and other regulated wastes.
- Occupier: The entity generating hazardous waste and responsible for compliance under applicable law.
- Authorized Vendor: Transporter, recycler, co-processor or CHWTSDF holding valid authorization/consent for handling specified wastes.
- Manifest (Form 10): Prescribed movement document used to ensure traceability of hazardous waste transport from sender to receiver.

4. Commitments/ Statement

SSWL Group adheres to the following principles and objectives:

- Full legal compliance with all applicable hazardous waste rules, permits/ authorizations and statutory reporting obligations in every operation and foster best-in-class waste management processes in the industry
- Pollution prevention by eliminating spills/leaks, preventing soil/groundwater contamination and minimizing occupational exposure.
- Waste minimization through source reduction, segregation, classification, process optimization, substitution of hazardous chemicals where feasible, improved material efficiency and maximize the diversion ration.
- Full traceability of hazardous waste movement using manifests, registers and authorized vendor documentation.
- Conduct training and create waste management awareness amongst suppliers, employees, business partners, and communities.
- Continuous improvement and ensuring that the hazardous & non-hazardous waste management policy is communicated & well adhered by all the employees, vendors, suppliers, and local community.
- Drive & promote leadership, personal commitments & accountability from all employees and contractors involved in waste management.
- Responsible off-site management by engaging only authorized and competent vendors and verifying final treatment/disposal/recovery.

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- Transparent documentation for audits, customer requirements and sustainability assessments (including EcoVadis).
- Waste management is an integral component and is regarded as a key focus area of the company.
- Encourage & influence vendors & business partners including the supply chain to adopt waste management stewardship practices, set waste management targets and report on their best practices.

5. Legal Compliance and Reporting

SSWL shall maintain a documented EHS legal register and comply with all site-specific consent and authorization conditions. At a minimum, each site shall:

- Maintain valid hazardous waste authorizations/consents and comply with all conditions therein.
- Follow the prescribed manifest procedure for every off-site movement of hazardous waste (Form 10 or any applicable regulatory system).
- Maintain required records for generation, storage, dispatch, receipt and disposal/recycling certificates.
- File statutory returns and reports to the relevant State Pollution Control Board/Pollution Control Committee as applicable.
- Prohibit illegal import/export of hazardous waste and follow legal approvals and procedures if transboundary movement is ever applicable.

6. Governance and Responsibilities

6.1 Top Management

- Provide oversight & resources, approve this Policy & review performance through periodic management reviews. Ensures waste management is performed as the objectives of our Sustainability Policy.
- Commitment towards water positive in operations where it is environmentally, economically, socially, and technologically feasible.
- Commits to create value for our employees, shareholders, and local communities by operating safely while contributing to the well-being of our employees, their families, and the communities in which we operate.

6.2 Head – EHS/ Department Head (Policy Owner)

- Maintain procedures, legal compliance system, training and emergency preparedness.
- Ensure monitoring, internal audits, corrective actions and continual improvement.
- Conduct and report risk assessments frequently to understand the impact of waste management on the business under different scenarios.

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6.3 Plant Heads / Department Heads

- Ensure segregation at source, safe storage discipline, housekeeping and compliance in their areas.
- Carrying out a periodic & systematic monitoring of waste generation.
- Ensure contractors follow site rules and PPE requirements.
- Ensure waste storage facilities are engineered and maintained to good National & International standards.

6.4 Procurement and Supply Chain

- Engage only authorized vendors and validate authorizations before onboarding and periodically thereafter.
- Include EHS clauses in agreements/contracts (legal compliance, audit rights, documentation integrity, incident reporting, and restrictions on unauthorized subcontracting).

6.5 Contractors, Transporters and Waste Vendors

All contractors, transporters and waste vendors working for SSWL must follow this Policy, comply with applicable laws, maintain valid permits, deploy trained manpower, use appropriate PPE, and provide complete and accurate documentation.

6.6 Internal Audit / Risk

Periodically verify control effectiveness, documentation integrity and closure of corrective actions.

7. Operational Controls (Mandatory Requirements)

7.1 Identification, Characterization and Inventory

- Each site shall maintain a hazardous waste inventory/register identifying waste streams, sources, category, expected quantities, storage location and approved disposal route.
- Waste categorization shall be supported by SDS/MSDS, test reports (where required) and regulatory schedules.

7.2 Waste Minimization and Substitution

SSWL shall implement and document waste prevention and minimization measures, including:

- Process optimization to reduce generation and contamination.
- Preventive maintenance to reduce leaks and spills (e.g., oils and chemicals).
- Substitution of hazardous chemicals with safer alternatives where feasible.
- Segregation to prevent hazardous contamination of recyclable/non-hazardous waste.

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7.3 Segregation and Labelling

- Hazardous waste shall be segregated at source and shall not be mixed with general waste, wastewater or incompatible hazardous wastes.
- Containers shall be compatible, in sound condition, sealed and labeled with waste name, hazard symbols, generating area, accumulation start date, responsible person and emergency contact.
- Dedicated containers/drums shall be used for different waste types as per site procedure.

7.4 Storage Area Requirements (Hazardous Waste Storage Yard)

All hazardous waste storage areas must:

- Have impervious flooring and secondary containment/bunding where required.
- Prevent rainwater ingress and avoid mixing with storm water.
- Have restricted access, signage, adequate lighting and ventilation.
- Maintain spill kits and firefighting equipment and display emergency response instructions.
- Maintain housekeeping, clear aisle space and FIFO movement, and comply with statutory storage limits and authorization conditions.

7.5 Handling and Internal Movement

- Only trained personnel shall handle hazardous waste using appropriate PPE and safe handling tools (drum lifter, pallet trolley, and forklift).
- Manual handling risks shall be minimized; incompatible wastes shall be handled separately.
- Spill response materials shall be available at generation and storage points.

7.6 Transportation and Manifest Control (Traceability)

- Off-site transport shall be carried out only through authorized transporters using appropriate vehicles and safe loading controls.
- Each shipment shall be accompanied by the prescribed manifest (Form 10) and supporting documents; SSWL shall track closure until receipt is confirmed.
- Any rejection, delay or incident during transit shall be reported to SSWL immediately and investigated.

7.7 Treatment, Recycling, Co-processing and Disposal (Waste Hierarchy)

- SSWL will prioritize recycling/recovery/co-processing over disposal wherever legally and technically feasible.
- Hazardous waste shall be sent only to authorize recyclers/co-processors/CHWTSDFs with valid approvals for the specific waste category.

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- Final disposal/recycling certificates and weighbridge slips shall be collected and retained as evidence.

7.8 Vendor Due Diligence and Oversight

SSWL will implement a risk-based vendor control program that includes:

- Verification of authorization/consent scope, validity and capacity for the waste category.
- Assessment of vendor capability and EHS controls (and, where feasible, compliance history).
- Contractual clauses covering legal compliance, audit rights, documentation integrity, incident notification and restrictions on unauthorized subcontracting.
- Periodic performance review using KPIs (pickup timeliness, documentation accuracy, incidents, and non-compliance).

7.9 Special Waste Streams (Where Applicable)

SSWL shall maintain additional compliance controls for site-relevant waste categories such as used/spent oil, solvent waste, paint sludge, ETP/process sludge (if categorized as hazardous), contaminated absorbents/rags, chemical containers, and other regulated wastes (e.g., batteries/e-waste/plastics) where applicable.

7.10 Transboundary Movement (If Applicable)

SSWL prohibits illegal import/export of hazardous waste. If transboundary movement is ever applicable, it shall be undertaken only with prior approvals and in compliance with law.

8. Emergency Preparedness and Response

SSWL shall maintain documented emergency preparedness for hazardous waste incidents, including spill response procedures, incident reporting and escalation, periodic mock drills, and investigation and corrective actions for all spills, leaks and near misses.

9. Monitoring, Measurement and Reporting

SSWL shall track hazardous waste generation, storage, movement and final treatment/disposal, and shall maintain documentation for internal audits, regulatory inspections, customer requirements and EcoVadis submissions. Suggested indicators (site-wise) may include total hazardous waste generated, percentage recycled/recovered/co-processed, manifest closure rate, vendor compliance scores, and number and severity of incidents/spills.

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10. Training and Awareness

All relevant employees and contractors shall receive induction training on hazardous waste segregation, labeling, storage rules, emergency response and documentation requirements, with refresher training at least annually or as required by role and risk. Visual controls and signage shall be displayed at points of generation and storage areas.

11. Speak-Up, Grievance and Non-Retaliation

SSWL encourages employees, contractors and stakeholders to report concerns related to hazardous waste handling, illegal disposal, document falsification or unsafe practices through approved reporting channels. Retaliation against good-faith reporting is prohibited.

12. Non-Compliance and Disciplinary Action

Non-compliance, including illegal dumping, falsification of records, bypassing manifest procedures or unsafe handling, may result in disciplinary action for employees (as per HR policy), corrective actions and penalties for contractors, suspension/termination of vendor contracts, and escalation to authorities where required by law.

13. Review and Document Control

This Policy shall be reviewed at least once every two years or earlier in case of regulatory changes, operational changes, audit findings, incident learnings, or stakeholder/customer requirements.

Annexure A - Typical Hazardous Waste Streams

Actual site-specific lists shall be maintained in the Hazardous Waste Inventory/Register.

- Used/spent oil and oil filters; oily rags/absorbents
- Paint/solvent waste and contaminated absorbents
- ETP/process sludge (where categorized as hazardous)
- Spent chemicals and contaminated chemical containers/drums
- E-Waste, Batteries and other regulated wastes where applicable

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Annexure B - Mandatory Records (Minimum)

- Hazardous Waste Inventory/Register (generation, storage, dispatch and receipt)
- Hazardous waste authorizations/consents and conditions tracker
- Manifests (Form 10 or applicable) and supporting transport documents
- Authorized vendor permits/authorizations and validity tracker
- Weighbridge slips and recycling/co-processing/disposal certificates
- Storage area inspection checklists and corrective action closure evidence
- Incident/spill logs with root cause analysis and corrective actions
- Training attendance and competency records
- Internal audit reports and management review records

Prepared By:	Approved By:
HOD - EHS & ESG	Dy. Managing Director

STEEL STRIPS WHEELS LTD. Chandigarh

** End of Document**

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