

# WASTE AND CIRCULARITY POLICY



## 1. Purpose

Packages Group is committed to responsible waste management to minimize environmental impact, enhance resource efficiency, and ensure full compliance with applicable legal and regulatory frameworks. This policy establishes our approach to waste reduction, recycling, and responsible disposal across all our operations.

## 2. Scope

This policy applies to all entities within Packages Group, including PCL, BSP, TPFL, DIC, OmyaPack, PLL, SPL, and HPL. It covers all waste types generated through manufacturing, office operations, and supply chain activities.

## 3. Policy Commitments

### 3.1 Waste Reduction & Prevention

- Implement waste minimization strategies in production and administrative processes.
- Optimize raw material usage and encourage sustainable sourcing.
- Promote awareness and training on waste reduction among employees and stakeholders.
- Integrate waste minimization targets into annual operational planning and review cycles.

### 3.2 Circular Economy & Recycling

- Maximize waste reuse and recycling opportunities within operations.
- Collaborate with suppliers and partners to create circular economy solutions.
- Reduce single-use plastics and promote sustainable packaging alternatives.
- Promote the design and use of recyclable, compostable, or reusable packaging solutions.

### 3.3 Hazardous & Non-Hazardous Waste Management

- Ensure proper segregation, handling, storage, and disposal of hazardous and non-hazardous waste in compliance with regulatory requirements.
- Develop and maintain robust waste tracking and documentation systems to ensure transparency, traceability, and regulatory compliance.
- Partner with authorized waste disposal vendors to ensure responsible treatment of waste.

### 3.4 End-of-Life Waste Management

- Develop strategies for responsible disposal and repurposing of products at the end of their lifecycle.
- Encourage product take-back programs and extended producer responsibility initiatives.
- Promote innovation in product design to enhance recyclability and reduce waste generation.
- Explore product redesign to minimize material complexity and enhance recyclability.

### 3.5 Compliance & Continuous Improvement

- Adhere to all local and international waste management regulations.
- Conduct periodic waste audits and impact assessments to monitor progress.
- Set and review waste reduction targets as part of the Group's sustainability strategy.
- Waste-related KPIs will be integrated into the Group's broader ESG performance framework.

## 4. Roles & Responsibilities

- Business Units & Operations Teams: Implement waste management practices and ensure compliance.
- Sustainability Team: Develop and monitor waste management initiatives and performance; provide technical guidance, coordinate cross-functional initiatives, and engage with external stakeholders where necessary.
- Employees: Actively participate in waste reduction practices and support the implementation of site-level initiatives.

## 5. Monitoring & Reporting

Packages Group will track key waste indicators, including waste generation, diversion rates, and disposal methods. Findings will be reported in the Group's sustainability disclosures.

Waste performance data will be used to evaluate goal achievement, identify areas for improvement, and inform public disclosures.

## 6. Associated Documents & Records

To ensure effective implementation and compliance, the following documents and records should be maintained:

- Standard Operating Procedures (SOPs):
  - SOP for Waste Segregation
  - SOP for Hazardous Waste Handling & Disposal
  - SOP for Waste Reduction & Recycling Practices
  - SOP for End-of-Life Product Management
- Waste Tracking & Reporting Records:
  - Waste Generation Logs (by type and quantity)
  - Waste Disposal Records (vendor details, disposal method, compliance reports)
  - Recycling and Reuse Reports
  - Waste Reduction Performance Metrics
- Compliance & Audit Documents:
  - Legal and Regulatory Compliance Reports
  - Environmental Impact Assessments related to waste
  - Internal Waste Management Audits
  - External Compliance Audit Reports
- Contracts & Agreements:
  - Agreements with Waste Disposal Vendors
  - Recycling and Circular Economy Partner Agreements
  - Extended Producer Responsibility (EPR) Commitments
- Training & Awareness Records:
  - Employee Training Attendance Sheets
  - Awareness Program Materials
  - Records of Waste Management Workshops and Campaigns

## 7. Review & Updates

This policy will be reviewed periodically to incorporate advancements in waste management practices and align with evolving sustainability goals.

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