Chromewell Engineering Private Limited

Waste Management & Circular Economy Policy

POLICY NO: CW-ENV-007 | VERSION: 4.0

ISSUE DATE: JAN 2026 | NEXT REVIEW: JAN 2027 | SUPERSEDES: V3.0 (JUNE 2025)

882/1, Pune Nagar Road, Sanaswadi, Taluka Shirur, 412208 Pune, Maharashtra, India.

Table of contents

Table of contents 2
1. Document Information: 2
2. Purpose 2
3. Scope 3
4. Key Objectives and Targets 3
5. Governance and Allocation of Responsibilities 4
6. Policy Commitments 5
6.1 Waste Hierarchy 5
6.2 Waste Segregation and Labelling 5
6.3 Hazardous Waste Compliance 5
6.4 Metal Scrap and Material Recovery 6
6.5 Circular Economy Initiatives 6
7. KPI Monitoring and Reporting 6
8. Policy Review Mechanism 6
9. Compliance, Non-Conformance and Disciplinary Action 7
10. Related Documents and References 7
11. Formal Approval and Sign-Off 7

1. Document Information:

Document Details		Governance
Policy Owner: EHS Executive	**Scope:** All waste streams generated by Chromewell Engineering's manufacturing operations including hazardous waste, non-hazardous industrial waste, metallic scrap, packaging, e-waste, and wastewater sludge. Applies to all sites.	**Reviewed & Approved By:** CEO & CFO
Secondary Owner: Compliance Executive	**Applies To:** All operations generating waste: stamping (metal swarf, lubricants), welding (grinding dust, spatter), surface treatment (sludge, spent plating solutions), and general operations.	**Review Cycle:** Annual – Once a year

2. Purpose

Chromewell Engineering Pvt Ltd.'s manufacturing operations generate a variety of waste streams. Metal scrap from stamping, swarf from machining, sludge from surface treatment, spent oils and lubricants, and packaging waste are among the most significant. Some of these - electroplating sludge, and contaminated soils - are classified as hazardous waste under Indian law and require specialised management.

This policy establishes Chromewell's commitment to reducing waste generation, maximising material recovery, and reuse, managing hazardous waste responsibly, and progressing toward circular economy principles. Automotive

manufacturing is resource-intensive; reducing waste directly reduces material and disposal costs while improving environmental performance.

This policy is aligned with:

- GRI 306: Waste (2020) - GRI 306-1 through 306-5
- CSRD ESRS E5 - Resource Use and Circular Economy
- ISO 14001:2015 - Environmental Management Systems (waste management aspects)
- Indian Hazardous Wastes (Management, Handling and Transboundary Movement) Rules 2016
- Indian Solid Waste Management Rules 2016
- Indian E-Waste (Management) Rules 2022
- Maharashtra Pollution Control Board - hazardous waste storage and disposal authorisation requirements

3. Scope

This policy covers all waste streams from Chromewell Engineering's operations:

- Hazardous waste: electroplating sludge, contaminated soils and lubricants, solvent wastes, ETP sludge, and contaminated packaging
- Non-hazardous industrial waste: metal scrap (steel, copper rods), plastic scrap, used PPE, and general industrial waste
- Packaging waste: cardboard, wood pallets, plastic wrapping, and metal strapping
- Electronic waste: end-of-life computers, instruments, and electrical equipment
- Wastewater treatment sludge: from ETP processes

4. Key Objectives and Targets

Chromewell Engineering defines overarching environmental objectives at the management system level. Detailed objectives and targets for each sustainability issue are set in the respective sub-policy.

Waste Management Issue	Key Objectives	Target
Waste Reduction at Source	Apply the waste hierarchy - reduce, reuse, recycle, recover, dispose - in strict priority order. Prevent waste generation in the first place through process optimisation, material efficiency, and circular design principles.	Waste intensity: 15% reduction by 2028 vs 2025 baseline (kg waste per tonne of output) Waste reduction initiatives: minimum 2 identified and implemented annually
Metal Scrap Recovery	Maximise recovery and resale of all metallic scrap - steel offcuts, - as secondary raw material, eliminating metal scrap from landfill entirely.	Metal scrap sent to landfill: zero by 2026 Metal scrap sold to registered secondary material processors: 100% Material efficiency rate (% of raw material converted to product): tracked and improved annually

Hazardous Waste Management	Manage all hazardous waste in full compliance with Hazardous Waste Rules 2016 - storage, labelling, manifest, and authorised disposal only through CPCB/MHPCB-registered facilities.	Zero unauthorised hazardous waste disposal Hazardous waste manifest: 100% completed for all dispatches Hazardous waste storage: within 90-day consent limit always Authorised disposal contractors: 100% MHPCB-registered and audited annually
ETP Sludge and Plating Waste	Minimise hazardous sludge generation from electroplating and surface treatment ETPs through bath management, drag-out recovery, and chemical optimisation.	ETP sludge generation: 20% reduction by 2028 vs 2025 Sludge metal content recovery: evaluated by 2026 Sludge disposed to authorised TSDF: 100%
Packaging Waste Reduction	Reduce packaging waste through supplier packaging guidelines, reusable transit packaging, and partnership with customers on returnable packaging systems.	Packaging waste recycling rate: ≥ 50% by 2027 Single-use plastic packaging: phased out for internal use by 2026
Circular Economy Materials	Progress toward circular economy by recovering and reusing materials within operations, and engaging with suppliers and customers on product return, refurbishment, and material loops.	Circular economy assessment: completed by December 2025 Internal material reuse initiatives: minimum 2 identified and piloted annually Supplier-take-back arrangements for used oils and packaging: established by 2027

5. Governance and Allocation of Responsibilities

Clear accountability is assigned at every level of Chromewell Engineering's ESG Governance Structure. The table uses a RACI framework (Accountable, Responsible, Consulted, Informed).

Role / Designation	RACI Level	Department	Key Responsibilities Under This Policy
CEO/CFO	**Accountable (A)**	Executive	Final approval. Receives annual waste performance report. Approves capital investment for waste reduction and material recovery initiatives.
EHS Executive	**Primary Owner (R)**	EHS / Operations	Manages hazardous waste compliance (Hazardous Waste Rules 2016), MHPCB authorisation, waste manifest system, authorised contractor management, ETP sludge management, and GRI 306 data.

Compliance Executive	**Secondary Owner (R)**	Compliance	Manages CSRD ESRS E5 circular economy reporting, GRI 306 sustainability report disclosures, and customer waste questionnaires.
Operations Manager	**Consulted (C)**	Operations & Production	Implements waste segregation at source across all production areas. Manages metal scrap identification and segregation. Reports waste generation data monthly by stream.
Purchase Manager	**Consulted (C)**	Procurement & Supply Chain	Manages supplier packaging guidelines and returnable packaging agreements. Engages suppliers on take-back arrangements for oils and packaging. Evaluates circular economy procurement options.
Maintenance Manager	**Consulted (C)**	Maintenance	Manages used oil collection, labelling, and handover to authorised recyclers. Ensures equipment maintenance generates minimal waste and that waste is correctly segregated.

RACI: A = Accountable (signs off, one person only) · R = Responsible (does the work) · C = Consulted (input required) · I = Informed (kept in loop).

6. Policy Commitments

6.1 Waste Hierarchy

Chromewell applies the waste hierarchy in strict priority order: (1) Reduce generation, (2) Reuse within operations, (3) Recycle through authorised processors, (4) Recover energy value, (5) Dispose responsibly. Landfill is the last resort.

6.2 Waste Segregation and Labelling

- All waste is segregated at source into clearly labelled, colour-coded bins: hazardous / non-hazardous / metal scrap / electronic waste / packaging
- Hazardous waste is stored in a designated, labelled, bunded hazardous waste storage area for a maximum of 90 days before dispatch to authorised disposal
- Waste storage areas are inspected monthly by the EHS Executive for labelling, containment, and quantity compliance

6.3 Hazardous Waste Compliance

- All hazardous waste is disposed of exclusively through MPCB-registered and authorised treatment, storage, and disposal facilities (TSDF)
- A waste manifest is completed for every hazardous waste consignment and retained for a minimum of five years
- Authorised disposal contractors are audited annually by the EHS Executive to confirm their regulatory status and environmental performance
- Hazardous waste generation, storage, and disposal is reported to MPCB annually per Hazardous Waste Rules 2016 requirements

6.4 Metal Scrap and Material Recovery

- All metal scrap - steel offcuts, copper, and brass swarf - is segregated by alloy type and sold to registered secondary material processors
- Material efficiency is tracked monthly: weight of raw material purchased vs weight of finished product output; the gap represents waste generation
- Used machining oils and lubricants are collected separately and returned to authorised oil recyclers

6.5 Circular Economy Initiatives

- Chromewell works with key customers to develop returnable packaging systems for finished parts, replacing single-use cardboard and foam
- Suppliers take-back arrangements for used oil drums and chemical containers are established with key chemical suppliers
- An annual circular economy assessment identifies at minimum two material loop or reuse opportunities within operations.

7. KPI Monitoring and Reporting

The following KPIs are tracked by the ESG Working Group, reported quarterly to the ESG Steering Committee, and published annually in the Chromewell Sustainability Report

KPI / Indicator	Target	Measurement Method	Cadence	Owner
Total Waste Generated (tonnes)	Tracked; intensity reducing	Waste records by stream	Monthly	EHS Executive
Waste Intensity (kg per tonne output)	15% reduction by 2028	EMS data	Monthly	EHS Executive
Waste to Landfill (tonnes)	25% reduction by 2028	Disposal manifests	Monthly	EHS Executive
Metal Scrap to Landfill	Zero by 2026	Scrap sale records	Monthly	Operations
Hazardous Waste Manifest Compliance	100%	Manifest register	Per dispatch	EHS Executive
Hazardous Waste Storage Duration	Within 90-day limit always	MHPCB records	Monthly	EHS Executive
Authorised Contractor Audit Completion	100% annually	Audit records	Annual	EHS Executive
ETP Sludge Generation (tonnes)	20% reduction by 2028	ETP records	Monthly	EHS Executive
Packaging Waste Recycling Rate	≥ 50% by 2027	Waste contractor receipts	Annual	Compliance Executive

8. Policy Review Mechanism

Reviewed annually every April by Head of EHS with CEO approval. Interim review triggered by: MHPCB hazardous waste notice, new waste stream from process change, amendment to Hazardous Waste Rules, or CSRD ESRS E5 guidance update.

Version	Date	Author	Approved By	Summary of Changes
1.0	July 01, 2021	EHS Executive / HR HOD	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Initial issue
2.0	May 03, 2022	EHS Executive / HR HOD	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Minor edits on the Quantitative targets
3.0	June 05, 2025	EHS Executive / HR HOD	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Updated to v3.0: KPI has been revised
4.0	Jan 14,2026	EHS Executive / HR HOD	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Added related policies with clear accountability and ownership

9. Compliance, Non-Conformance, and Disciplinary Action

- Unauthorised disposal of hazardous waste - including fly-tipping or disposal to unsanctioned facilities - constitutes gross misconduct and a serious regulatory offence
- MHPCB notices are reported to the Head of Legal immediately; corrective action is implemented within the statutory timeframe
- Concerns are reported through Policy CW-ETH-004 - Whistleblower Protection & Speak-Up Policy
- “Report a concern” form available on ChromeNet as an anonymous grievance redressal mechanism and, we have a dedicated hotline number published on the website to report any concern anonymously.

10. Related Documents and References

Internal policies:

- CW-ENV-001 - Environmental Management Policy
- CW-ENV-005 - Pollution Prevention & Environmental Compliance Policy
- CW-ENV-006 - Hazardous Substances, Chemicals & REACH Compliance Policy
- CW-ENV-008 - Product End-of-Life & ELV Compliance Policy
- CW-PROC-SCM-001 - Sustainable Procurement Policy

External standards:

- GRI 306: Waste (2020) - GRI 306-1 through 306-5
- CSRD ESRS E5 - Resource Use and Circular Economy
- Indian Hazardous Wastes (Management, Handling and Transboundary Movement) Rules 2016
- Indian Solid Waste Management Rules 2016
- Indian E-Waste (Management) Rules 2022
- Maharashtra Pollution Control Board - Hazardous Waste Storage and Disposal Authorisation
- ISO 14001:2015 - Environmental Management Systems

11. Formal Approval and Sign-Off

This policy has been prepared, reviewed, and formally approved:

Prepared By	Reviewed By	Approved By
Name: Mr. Kaka Rakhapasre **Designation:** EHS Executive **Date:** Jan 2026 **Signature:**	**Name:** Mr. Sandeep Divekar **Designation:** HR HOD **Date:** Jan 2026 **Signature:**	**Name:** Ms. Risha Naik **Designation:** CFO **Date:** Jan 2026 **Signature:**

FOR FURTHER INFORMATION:

This policy is issued under the authority of the CEO & CFO of Chromewell Engineering Pvt Ltd. It supersedes v3.0 (June 2025). For further information or advice, please contact a Chromewell Finance or Compliance Officer or Chromewell's Board or Directors.