Waste Management Policy

SKIPPER Limited

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1. Introduction

Skipper Limited, a leading manufacturer of power transmission and distribution structures, polymer products and poles recognizes the environmental impact of its industrial processes. As part of our commitment to sustainable development and environmental compliance, this Waste Management Policy outlines our approach to minimizing, handling, storing, treating, and disposing of all types of waste generated across Skipper's manufacturing units, offices, and project sites.

2. Purpose

Due to the diverse nature of activities undertaken by Skipper, a wide variety of wastes are produced and collected, ranging from general wastes and recyclable materials to hazardous wastes. The Company has a duty to ensure that all this waste is disposed of responsibly, through smart and efficient waste management practices. This policy aims to:

- Ensure legal and responsible handling of hazardous and non-hazardous waste.
- Promote resource efficiency through reduce, reuse, recovery, and recycling.
- Prevent environmental contamination from industrial waste streams like galvanizing residues, paint sludge, and plastic scrap.
- Establish clear accountability and structured systems for waste tracking, documentation, and reporting.

Skipper recognizes the strategic importance of Waste management and is committed to investing in technologies that encourage reusability/ recyclability and promote waste minimization. The goal is to ensure Zero waste to landfill, and we pursue this goal by focusing on minimizing waste going to landfill.

3. Scope

This policy extends to Skipper's operational sites and business units, including future expansions, employees involved in procurement and vendor management, suppliers, and service providers and constitutes a critical component of supplier selection, assessment, and ongoing performance management.

4. Policy Statement

Skipper shall strive to implement sustainable waste management systems based on the hierarchy of Reduce, Reuse, Recycle, and Recover. Waste shall be minimized at the source, segregated accurately, and disposed of using environmentally sound and legally compliant methods. We commit to achieving 100% compliance with all applicable national and local waste management laws by MoEF&CC, SPCB/CPCB.

5. Policy Objectives

The objectives of this Waste Management Policy are to:

a) Ensure Legal Compliance: Adhere to all applicable environmental rules and regulations such as:
   - Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016
   - Hazardous and Other Wastes (Management and Transboundary Movement) Amendment Rules, 2025
   - E-Waste Management Rules, 2022
   - Plastic Waste Management Rules, 2016 (and amendments)
   - Solid Waste Management Rules, 2016
   - Batteries Waste Management Rules, 2022
   - Biomedical Waste Management Rules, 2016 (and amendments)
   - Construction and Demolition Waste Management Rules, 2016

b) Minimize Waste at Source: Encourage design and process optimization across galvanizing, fabrication, and polymer extrusion units to reduce raw material wastage.

c) Promote 4Rs – Reduce, Reuse, Recycle and Recover: Ensure all facilities adopt circular practices by enhancing resource efficiency and material recovery.

d) Enable Safe and Sustainable Disposal: Implement systems for secure storage, labelling, and disposal of hazardous waste through authorized vendors.

e) Enhance Resource Circularity: Increase internal reuse of process scrap (e.g., steel offcuts, polymer runners) and external recycling via authorized partners.

f) Build Awareness & Accountability: Conduct training for workers, contractors, and vendors on segregation, safe handling, and documentation.

g) Data Management & Transparency: Track waste generation, disposal, and recycling metrics with regular internal reporting and external disclosures (e.g., BRSR).

h) Strive for Zero Waste to Landfill: Phase-wise certification of facilities under ZWL protocols by 2027.

6. Principles Of Circular Economy

Skipper Limited embraces circular economy principles to minimize waste, optimize resource use, and reduce environmental impact across its operations. These principles are embedded in our processes, procurement strategies, and awareness programs, enabling a shift toward a regenerative and efficient production system.

We follow four core principles:

- **Design Out Waste and Pollution:**

We aim to eliminate waste at the source by minimizing offcuts and overproduction in our fabrication and polymer lines. Preference is given to recyclable and environmentally sustainable raw materials and packaging.

- **Keep Materials in Use:**
  We ensure maximum material utility by:
  - Reusing internal steel scrap in production.
  - Utilizing recycled polymers in non-critical applications.
  - Engaging with authorized recyclers for the closed-loop recovery of plastic, metal, and packaging waste.
- **Regenerate Natural Systems:**
  Organic waste from gardens and canteens is composted wherever feasible. For non-recyclable waste fractions, we explore environmentally sound disposal methods such as co-processing and waste-to-energy solutions.
- **Apply the 4Rs – Recover, Reduce, Reuse, Recycle**

7. Key Waste Streams and Management Methods

Waste Category	Typical Sources at Skipper	Management Strategy	Applicable Regulation
Hazardous Waste	Zinc ash, flux sludge, spent acid (from galvanizing); used oil; paint sludge	Stored in labelled, secured containers; disposed via TSDF/authorized recyclers	Hazardous & Other Wastes Rules, 2016
Non-Hazardous Solid Waste	Steel scrap, rejected fabricated parts, polymer rejects, paper/carton, thermocol	Segregated, sold to authorized scrap dealers or sent for recycling	SWM Rules, 2016
Plastic Waste	Polymer plant offcuts, packaging film	Sent to CPCB-registered plastic recyclers	Plastic Waste Management Rules, 2016
E-Waste	Defunct computers, printers, electrical items	Disposed through CPCB-registered E-Waste handlers	E-Waste (Management) Rules, 2022
Used Batteries	Inverters, UPS systems	Buy-back via authorized battery dealers	Batteries Waste Management Rules, 2022
Organic Waste	Canteen leftovers, garden clippings	Composted on-site or sent to piggery/composting vendors	SWM Rules, 2016
C&D Waste	Site-level scrap, debris, concrete waste	Segregated, reused where possible, or sent to local C&D facilities	C&D Waste Rules, 2016

8. Operational Responsibilities

A. Corporate EHS Team	B. Plant Heads / Unit Managers
• Develop SOPs for waste handling and storage. • Conduct annual audits and compliance checks. • Liaise with SPCBs/CPCB for consents and returns (e.g., Form IV, Form 10).	• Ensure on-site waste segregation, storage, and disposal as per SOPs. • Maintain manifests, logbooks, and vendor receipts. • Supervise training for plant and contract staff.
C. Procurement & Inventory Team	**D. Employees & Contractors**
• Ensure vendor due diligence (only authorized recyclers). • Include take-back clauses for batteries, e-waste, and chemicals.	• Follow color-coded bin systems and labels. • Prevent unsafe disposal practices. • Report incidents, leaks, or non-compliance.

9. Waste Handling & Documentation

- **Segregation at source** is mandatory.
- **Color-coded bins** and labelling for different categories.
- **Material Safety Data Sheets (MSDS)** for hazardous chemicals must be available.
- **Storage limits** not to exceed 90 days for hazardous waste.
- **Records**: Form 3 (Hazardous waste inventory), Form 10 (E-Waste), manifest copies, disposal certificates.

10. Training & Capacity Building

- Annual training for plant teams, housekeeping, and new employees.
- Contractor onboarding includes waste handling protocols.
- Display of visual SOPs and signage in local languages.

11. Accountability & Review

Skipper commits to supporting and implementing this Waste Management Policy. This policy shall be reviewed at least once a year or as and when there are any changes.

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