

# KFIN TECHNOLOGIES LIMITED ("KFINTECH")

Document Name            **WASTE MANAGEMENT POLICY**

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## Document Revision History

Version	Date of Release / Revision	Prepared/ Revised By	Reviewed By	Approved by	Reasons for revisions
1.0	June 06, 2022	Lokesh Kumar Panwar	Sourav Mukherjee	Board of Directors	Initial version
2.0	May 27, 2026	Compliance Team	Anish Kumar	Board of Directors	<p>Policy updated to strengthen alignment with the Company's ESG framework and statutory sustainability disclosures, including the Business Responsibility and Sustainability Report (BRSR) and ESG Factbook. The revisions include introduction of:</p> <ol style="list-style-type: none"> <li>i. a structured approach to waste management,</li> <li>ii. clearer identification of waste streams,</li> <li>iii. enhanced articulation of waste management practices,</li> <li>iv. defined roles and responsibilities across governance levels, and</li> <li>v. formalisation of monitoring, disclosure and amendment mechanisms.</li> </ol>

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## 1. PURPOSE

KFin Technologies Limited including its subsidiaries, joint ventures and branches (collectively referred to as “KFintech” or “Company”) recognises its responsibility to minimise environmental impact arising from its operations and is committed to responsible waste management as part of its Environmental, Social and Governance (ESG) framework. The purpose of this Waste Management Policy (“Policy”) is to establish a systematic framework for the responsible management, handling, segregation, storage, recycling, and disposal of waste generated from the Company’s operations.

Through this policy the Company commits to:

- Comply with environmentally friendly operations as disclosed under Principle 6 (Businesses should respect and make efforts to protect and restore the environment) of the Business Responsibility and Sustainability Report (BRSR).
- Promote reuse, waste reduction, segregation, recycling, environmentally sound disposal of non-recyclable waste across offices and operational locations;
- Ensure compliance with applicable environmental laws, including those governing waste and e-waste management.
- Maintain transparency in waste-related ESG disclosures

This approach is consistent with all the disclosures made in KFintech’s BRSR and ESG Factbook, particularly under the theme of embracing circularity and minimising environmental impact.

## 2. SCOPE

This policy shall apply to all locations and offices of KFintech that fall within the Company’s established ESG reporting scope. All waste management information will be collected and reported using the same boundaries and documentation practices that KFintech already follows for its sustainability disclosures. If there are any changes to these boundaries in the future, they will be communicated in a manner consistent with the Company’s existing disclosure practices to ensure clarity and comparability over time and each employee shall be made a partner in implementing the policy.

## 3. REGULATORY & FRAMEWORK ALIGNMENT

This Policy is aligned with and guided by:

- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
- SEBI Business Responsibility & Sustainability Reporting (BRSR) Framework.
- National Guidelines on Responsible Business Conduct (NGRBC), 2019

## 4. APPROACH

KFintech is committed to managing waste in an environmentally responsible manner, with a focus on:

- Reducing waste generation at source;
- Segregation of waste streams;
- Recycling and reuse wherever feasible; and
- Safe, compliant disposal of waste, including electronic waste.

Waste management forms a part of KFintech's broader ESG governance framework, overseen by senior management and the Board, as disclosed in the BRSR governance narrative. KFintech aims to comply with the applicable regulations on waste management and follows the principles of waste segregation, reuse, recover, recycle and dispose responsibly.

## 5. IDENTIFICATION OF WASTE STREAMS

In line with the BRSR Core attribute on Embracing Circularity, KFintech identifies its waste streams based on the nature of materials generated, source of generation, and regulatory classification applicable to its operations.

KFintech operates primarily through office-based and technology-enabled service environments, the waste generated is predominantly non-industrial. Waste streams are identified through periodic review of office operations, asset usage and facilities activities, and are categorised to enable segregation, recycling, reuse and environmentally sound disposal, as applicable.

Accordingly, the key waste streams identified are as follows:

- Paper waste generated from office activities;
- Electronic waste (e-waste), including IT hardware and peripherals; and
- General office waste (dry and wet waste).

## 6. WASTE MANAGEMENT PRACTICES

KFintech follows defined waste management practices to manage different categories of waste generated across its operations. The Company discloses engagement with its authorised vendors for environmentally compliant disposal, particularly for e-waste, in its sustainability disclosures. These practices are outlined below:

### **Waste Minimisation:**

KFintech encourages the digitisation of processes across its operations with the objective of reducing paper consumption and dependence on physical documentation. In addition, the Company promotes the efficient use of office resources by employees and teams to minimise waste generation arising from routine business activities.

**Waste Segregation:**

KFintech follows the practice of segregating waste at source into Biodegradable waste, recyclable waste (paper, plastic, metal, glass), non-recyclable and electronic waste categories across its offices and operational locations. To support effective segregation, the Company undertakes employee sensitisation initiatives aimed at building awareness and encouraging adherence to prescribed waste segregation practices.

**Recycling and Responsible Disposal:**

Recyclable waste generated across KFintech's operations is channelled through authorised recyclers or municipal waste management systems, as applicable. Non-recyclable waste is disposed of in accordance with applicable local regulations and municipal guidelines.

**7. E-Waste Management:**

KFintech manages electronic waste in accordance with applicable laws and regulations, including:

- Disposal of e-waste only through authorised and certified e-waste recyclers;
- Selection of vendors based on regulatory approvals and environmental compliance credentials.

**8. ROLES AND RESPONSIBILITIES****a. Employees**

Employees play a key role in supporting effective waste management at KFintech. Employees are encouraged to:

- Follow waste segregation practices prescribed at their respective office locations;
- Comply with internal guidelines and instructions relating to waste handling and disposal;
- Use office resources responsibly to minimise waste generation; and
- Participate in sensitisation or awareness initiatives related to waste management, where applicable.

**b. Senior Management**

Senior Management is responsible for overseeing the implementation of this Policy within the Company's governance framework. This includes:

- Providing guidance and direction for effective implementation of waste management practices;
- Allocation of adequate resources for waste management initiatives.
- Ensuring that waste management practices remain aligned with KFintech's sustainability and ESG disclosures, including BRSR requirements;
- Reviewing implementation status and key matters related to waste management, as appropriate; and
- Facilitating continuous improvement in waste management practices in line with regulatory or operational changes.

### **c. Board of Directors**

The Board of Directors shall have the overall responsibility for governance and oversight of this Policy to:

- Review and approve the Waste Management Policy and any subsequent amendments thereto;
- Oversee the integration of waste management within KFintech's broader ESG and sustainability governance framework; and
- Review, at an appropriate level, disclosures and matters relating to waste management as part of statutory sustainability and governance reporting.

## **9. TRAINING AND AWARENESS**

KFintech promotes awareness on sustainability and environmental responsibility through internal communication and awareness initiatives undertaken across its offices and operations. Such initiatives include periodic communication, information sharing and awareness initiatives on waste reduction, segregation, and sustainability aimed at reinforcing responsible environmental practices among employees. These efforts are aligned with the Company's sustainability approach as disclosed in its ESG Factbook and BRSR, and are intended to support employee understanding of sustainability-related matters relevant to KFintech's operations.

## **10. MONITORING, REVIEW AND DISCLOSURE**

KFintech monitors and reviews its waste management practices as a part of its broader internal governance and ESG oversight processes. The Company also ensures transparency and accountability in relation to waste management through appropriate disclosures made in accordance with applicable statutory sustainability reporting requirements.

## **11. POLICY REVIEW AND AMENDMENT**

This Policy shall be reviewed at least annually to ensure effectiveness. KFintech reserves the right to review and/or amend the terms of this Waste Management Policy from time to time.