Waste Management Guidelines

Document objective

The purpose of these guidelines is to set the foundations to avoid, minimize or mitigate possible impact on the environment, by establishing Gurit commitments towards the management of waste within its operation. The Waste Management guidelines are a complement to Gurit's Environmental policy and the Group's Sustainability Policy. These guidelines are also a part of Gurit's commitments as supporter of United Nations Global Compact and its Environmental principles.

This Waste Management guidelines apply to all companies that are part of Gurit Group.

Related documents: publicly available on www.gurit.com/sustainability

- Gurit Code of Conduct
- Gurit Sustainability Policy
- Gurit Environmental Policy
- Gurit Water Management Guidelines
- Hazardous chemicals policy

Document index

1 – Introduction and Scope

Gurit produces waste that may vary by location including hazardous chemical, electronic, inert, and recyclable waste. Gurit is deeply aware of the various adverse environmental impacts of inconsiderate waste disposal and management. Appropriate management of waste is required to ensure effective consideration and protection is given to the environment and resource use.

The Waste Management Guidelines aim to ensure sustainable waste management in accordance with legislative requirements and best practices at site and international level. These guidelines aim to encourage effective waste management including effective handling, managing and disposal of waste and above all, minimise waste generation at source as far as possible. The use of reusable, recyclable, and other environmentally friendly options is essential at all levels.

Gurit implements the international treaties and conventions including the regulations outlined in the Basel Convention, the Stockholm Convention, and the Minamata Convention, at site level for Hazardous Waste Management (HWM) to improve environmental management, clarify organizational responsibilities and strengthen management related to HWM.

These guidelines are in alignment with:
-the EU Circular Economy Action Plan, encompassing more than 200 measures to reduce waste and keep materials in circulation and
- the UN Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal.
- Supporting ISO standards include 14001 environmental management and 45001 Occupational Health and Safety management.

These guidelines are in support of GRI 306: Waste 2000 reporting the type of waste, such as hazardous waste or non-hazardous waste:
Disclosure 306-3 Waste generated;
Disclosure 306-4 Waste diverted from disposal;
Disclosure 306-5 Waste directed to disposal

These guidelines are applicable to all areas of the organization and should be considered from a circular lifecycle approach, coordinated with stakeholders from Procurement, Operations, Information Technology, Environmental Management, and Facilities Management.
Where required sites should; invest in environmental resources for waste management requirements, monitor and audit external waste disposal contractors and maintain knowledge of local legislative changes.

Within scope is all waste generated and handled at all Gurit Group sites. This may be **Hazardous Waste**, (e.g. produced from manufacturing and non-manufacturing operations including production, maintenance, laboratories, and offices) or **non-hazardous waste** (e.g. materials including electronic, glass, wood, metal, paper, food, textiles or kitchen waste). All waste must be either recycled or disposed of in an environmentally responsible method as detailed in these guidelines.

2 – Guidelines

(a) Waste Minimisation

Waste Minimisation: Waste should be minimized by following the hierarchy of waste.

i. **Prevention** is a conscious approach of acquiring and using materials judiciously. Discouraging excessive orders and procurement aligned with utilization period and expiry dates whilst managing hazardous material inventory with optimized procurement practices. Where feasible remove hazardous waste creation from processes.
ii. **Reuse** promotes safe pathways in support of the circular economy through elimination of waste, recirculation of products and regenerative natural systems.
iii. **Recycling** allows for environmentally responsible reclamation and processing of waste, either in alignment with original or for co-processing purposes. All recycling should be in a manner which ensures the protection of human health and the environment.
iv. **Recovery** processes such as energy from waste ensures that the embodied energy used to manufacture the material is recovered back into the system. Although undesirable, recovery may be the only viable alternative to disposal.
v. **Disposal** is the least desirable process and may involve landfill, incineration, or other non-recovery disposal methods.

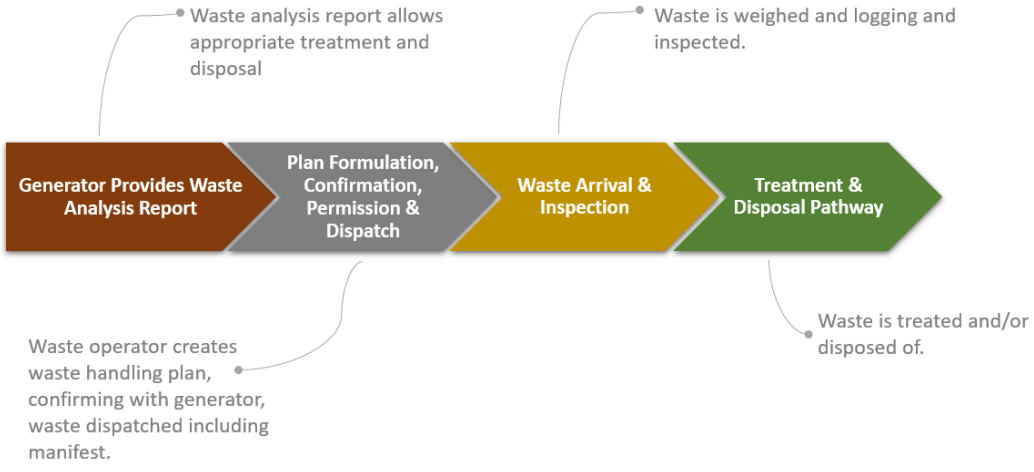
Waste minimization yields advantages for individuals, the organization, and the environment, encompassing cost reduction, mitigation of potential health risks, alleviation of potential long-term disposal liabilities, advancement of environmental ethics, and the prevention of pollution.

Practical approaches to minimize waste include:

- Ensure effective housekeeping practices within workspace including accurately labelled containers
- Maintain a current inventory of all hazardous materials employed within work areas
- Thoroughly assess all generated wastes and explore possibilities for reduction and minimization
- Whenever feasible, opt for the utilization of less harmful chemicals as substitutes
- Reach out internally and externally for opportunities to reuse any surplus products or materials
- Modify processes to generate reduced waste quantities whenever feasible
- Consider the treatment or disposal of hazardous by-products in all processes
- Integrate waste minimization considerations when designing work processes
- Promote the widespread adoption of cleaner production practices, the waste hierarchy and Environmental Management Systems as effective strategies for preventing, eliminating, and minimizing hazardous waste.
- Raise awareness and motivate stakeholders to embrace the concept of a circular economy within their production and operational processes.
- Encourage waste generators to prioritize production methods that emphasize the utilization of recovered or recycled materials. Promote energy and resource recovery at the conclusion of a product's useful life while striving to prevent additional pollution associated with waste management of end-of-life products.
- Champion the use of eco-friendly alternatives, advocate for the utilization of less harmful chemicals and promote the adoption of greener chemical options.

(b) Waste Handling and Storage

In cases where elimination or treatment is not feasible, hazardous waste must undergo treatment to reduce hazardous properties. Collaborating with licensed treatment facilities ensures environmentally sound disposal.



Suggested sequence of operations, Hazardous Material Treatment & Disposal

As a waste generator, Gurit is responsible for ensuring proper and acceptable final disposal of waste. Disposal methods outlined in Annex IV A of the UN Basel Convention, provides a list of

authorized disposal operations. Exploration of potential avenues for end of life including physio-chemical or biological treatment, incineration, or other secure and environmentally responsible methods of disposal can ensure the most effective, environmentally sound disposal method is used.

Waste must be stored in appropriate manner

- Avoid excessive build-up of waste, especially where hazardous waste may pose a risk to human health or the environment
- Ensure all waste is appropriately labelled and identifiable including personnel responsible.
- Note any stored waste that may lead to altered site emergency planning. Identify potential hazards and vulnerable areas from storage of waste where spills or accidents are likely to occur. Where potential incidents are identified, ensure mitigations are implemented including emergency equipment such as spill kits and fire-fighting equipment, Safety Datasheet and Personal Protective Equipment are available.
- Regularly review the quantity of waste on site and identify improvement actions to reduce as far as is feasible.

(c) Profiling, Characterization & Segregation

To deliver strong and collaborative enforcement of hazardous waste legislation and to ensure protection of human health and the environment, Gurit enforces a comprehensive set of measures to carefully collect and store hazardous waste at site or disposal facilities, while also prioritizing the implementation of safety protocols during the handling and transportation of the waste from its origin to the ultimate disposal site. A thorough inventory of all hazardous waste produced during the manufacturing process, encompassing materials such as resin scraps, solvents, adhesives, and various by-products should be produced, and waste categorized in accordance with local and international guidelines to determine toxicity level and subsequent appropriate procedure for safe handling and disposal.

Segregating hazardous waste from other materials removes the risk of intermixing incompatible substances and facilitates the identification of the appropriate disposal procedures. Hazardous waste storage zones serve as interim repositories for waste containers before transportation. Every hazardous waste container is segregated and prominently labeled, detailing its contents and associated hazards, in line with local legislation. Each container must be appropriately marked with the term "Hazardous Waste," the specific waste name, and the location where the material originated. An example label is given in Appendix I. Unidentifiable contents should be indicated on the label and communicated in waste handling documentation.

Electronic Waste (e-waste), including batteries, should be managed throughout its lifecycle, encompassing its usage, internal transfers, and eventual disposal. In accordance with country-specific e-waste regulations, producers of electronic waste (e-waste) must:

- Ensure that the e-waste generated is directed to authorized collection centres, registered dismantlers, or recyclers, or returned via pick-up or take-back services as provided by the producers.
- Maintain accurate records of the e-waste generated by their operations.
- Dispose of broken or outdated electronic equipment responsibly through recycling.

Electronic devices may contain hazardous materials like heavy metals that pose risks to human health and the environment. Common components found in computers and electronic

equipment include lead, cadmium, and mercury, which are harmful substances. To prevent environmental harm, unwanted electronic devices should either be donated for reuse or properly recycled. For responsible disposal, non-donatable electronic equipment should be directed to electronics recyclers.

(d) Transportation and Record keeping

All employees in contact with or processing hazardous waste shall receive appropriate training in safe procedures including handling hazardous waste, emergency procedures and appropriate personal protective equipment (PPE).
Transportation of hazardous materials should be carried out whilst adhering to local regulations and using registered waste carriers only. Hazardous waste transportation companies must use secure and sealed containers for hazardous waste conveyance. Furthermore, all vehicles, pipelines, and equipment engaged in the transportation process must be maintained in a condition that prevents leakage of material or emission of noxious odors.

Comprehensive records documenting the entire lifecycle of hazardous waste including generation, handling, certificate of analysis, transportation, and disposal must be kept and include permits, licenses, hazardous waste shipping documents, inspection logs, training records, and regulatory agency correspondence and must be retained for at least three years.

Dangerous Goods (DG) checks are conducted on drivers, and compliance audits with waste processors and carriers are carried out to ensure proper and safe waste handling. Insurance and certificates should be freely available from the waste processor and carrier as needed. Waste carriers must ensure waste carrier licenses are maintained and should be regularly reviewed by Gurit sites.

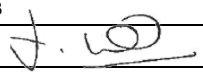
3 – Setting targets and Communication

Gurit sets targets regarding its waste and reviews them annually as part of its Sustainability strategy. Targets and progress towards these targets are reported annually in the Corporate Sustainability Report.

The latest version of these guidelines is published on Gurit's Sustainability web page at www.gurit.com/policies/

4 – Review, Stakeholder Feedback and Reporting Concerns

These guidelines will be reviewed every 24 months or as is appropriate by the Sustainability Coordination Team. Stakeholders are encouraged to share concerns, complaints, questions, or observations with the Global Sustainability Team via e-mail to: sustainability@gurit.com. Stakeholders may also use the Gurit Group's Report-a-Concern platform available online at: www.gurit.com/report-a-concern

Guidelines content owner	**Amy Moram, Chemical Regulatory Compliance Manager and Sustainable Products Lead**
Reviewer	Valerie Collaudin, Head of Sustainability
Approver	Lance Hill, Member of the Executive Committee
Date of approval	26th October 2023
Approver signature	
Date of last review	3 October 2023

5 – Appendix: Example Hazardous Waste Labelling

HAZARDOUS WASTE LABEL (Fix to Lid)	
Name:	{ FORMTEXT }
Date:	{ FORMTEXT }
Department:	{ FORMTEXT }

WASTE TYPE	Tick the Box
Dirty Solvent – mostly IRIS	{ FORMCHECKBOX }
Dirty Solvent – mostly Methylene Chloride	{ FORMCHECKBOX }
Liquid Resin	{ FORMCHECKBOX }
Solid Resin	{ FORMCHECKBOX }
Liquid Hardener	{ FORMCHECKBOX }
Solid Hardener	{ FORMCHECKBOX }
Liquid/Solid Resin with plastic bags / pots	{ FORMCHECKBOX }
Liquid/Solid Hardener with plastic bags / pots	{ FORMCHECKBOX }
Prepreg Catalyst Paste	{ FORMCHECKBOX }
Oil	{ FORMCHECKBOX }
Contaminated water	{ FORMCHECKBOX }
Spill kit contaminated with resin	{ FORMCHECKBOX }
Spill kit contaminated with hardener	{ FORMCHECKBOX }
Other waste - describe	{ FORMCHECKBOX }