

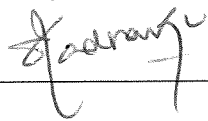



PRAYAAN CAPITAL

E-WASTE MANAGEMENT POLICY

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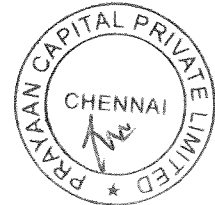
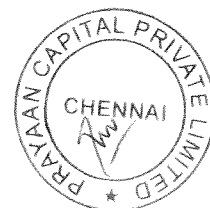
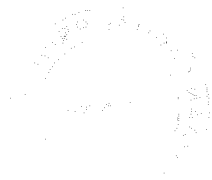


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Preamble

This E-Waste Management Policy (the “**Policy**”) is formulated by Prayaan Capital Private Limited (the “**Company**”) for ensuring the compliance of E-Waste (Management) Rules, 2022 (“**Rules**”) framed under the Environment (Protection) Act, 1986 (29 of 1986) and other applicable laws governing the e-waste management by corporate entities in India.

The objective of this Policy is to provide a detailed, framework for the life-cycle management of electrical and electronic equipment within the organization. The Policy articulates the standards, procedures, roles and responsibilities, record-keeping obligations, compliance mechanisms, and enforcement measures that are to be observed by all Personnel and Third-Party Service Providers in connection with the procurement, use, maintenance, transfer, refurbishment, recycling and final disposal of Electronic Equipment (*defined below*), with the objective of ensuring environmental protection, statutory compliance, secure handling of information, and transparency in operations.

1. Definitions

For the purposes of this Policy, the following expressions will have the meanings respectively ascribed to them below, except where the context otherwise requires:

- 1.1 “**Authorized Recycler**” means an entity holding a valid registration, authorisation or licence from the Central Pollution Control Board or the relevant State Pollution Control Board (or its successor authority) under applicable law, which is empowered to carry out collection, transportation, dismantling, recycling and disposal of E-Waste in accordance with the E-Waste (Management) Rules, 2022 and related statutory instruments.
- 1.2 “**Certificate of Data Destruction**” means documentary evidence, issued by the person or entity performing secure data sanitisation or destruction, which specifies the method used, the identity of the device(s) destroyed or sanitised, date of destruction, and signature of an authorised representative of the entity that performed the operation.
- 1.3 “**Collection Centre**” means a facility, either established by the Company, for temporary aggregation and segregation of E-Waste pending transfer to an Authorized Recycler for processing.
- 1.4 “**Data Erasure**” means the irreversible removal of data from electronic storage media by methods that render the data non-recoverable by ordinarily available forensic means and which conform to internationally accepted standards of the IT Department of the Company.
- 1.5 “**E-Waste**” means waste electrical and electronic equipment, including all components, sub-assemblies, consumables and spares forming part of the equipment at the time of discarding, as defined in the E-Waste (Management) Rules, 2022.
- 1.6 “**Electronic Equipment Register**” means the master ledger, in electronic form, maintained by the IT Department, recording the full life-cycle particulars of each Electronic Equipment.

- 1.7 **“Electronic Equipment”** means all electrical and electronic equipment owned, leased, hired, provided or otherwise under the control of the Company, including but not limited to computers, servers, monitors, laptops, storage devices, mobile phones, printers, scanners, network equipment, batteries, power supplies, peripherals, and accessories.
- 1.8 **“Personnel”** means employees, officers, consultants, contractors, interns and other persons acting for or on behalf of the Company.
- 1.9 **“Refurbishment”** means the process of restoring, repairing or upgrading Electronic Equipment to a state where it can be safely and securely reused within the Company.
- 1.10 **“Third-Party Service Provider”** means any external party engaged by the Company to provide services that involve handling, repairing, maintaining, transporting or disposing of Electronic Equipment.

2. General Policy Statement

- 2.1 The IT Department of the Company will ensure that E-Waste arising from its operations is managed in a manner that: (a) protects human health and the environment; (b) preserves information security and confidentiality; (c) complies with the E-Waste (Management) Rules, 2022 and all other applicable statutes, regulations and guidelines; and (d) promotes circular economy principles by prioritising reduction, reuse, refurbishment and recycling over disposal.
- 2.2 None of the employee or the department of the Company will, under any circumstances, permit or authorise the informal, unregulated or unsafe disposal of E-Waste, including but not limited to open burning, burial in non-sanctioned landfills, abandonment, or transfer of E-Waste to non-authorized entities.

3. Applicability and Scope

- 3.1 This Policy is binding on all Personnel and applies to all Company premises, branches and any location where Company’s Electronic Equipment is used, stored or maintained within the territory of India.
- 3.2 The Policy also applies to Third-Party Service Providers engaged for procurement, repair, maintenance, transportation, storage, refurbishment, resale, donation or disposal of Electronic Equipment and IT Department of the Company will ensure that such Third-Party Service Providers contractually undertake to comply with this Policy in favour of the Company.

4. Electronic Equipment Register and Inventory Management

- 4.1 **Maintenance of Electronic Equipment Register.** The IT Department of the Company will establish and maintain the Electronic Equipment Register which will record, for each item of Electronic Equipment, at minimum: unique asset identifier; make, model and serial number; date of procurement; supplier details; warranty

information; assigned user and location; configuration and installed storage capacity; maintenance and repair history; date and reason for decommissioning; proposed disposal route; and final disposal particulars including weight and identity of Authorized Recycler. The IT Department will update the Electronic Equipment Register contemporaneously upon any transfer, assignment, repair, refurbishment or disposal.

- 4.2 **Tagging and Labelling.** All newly procured Electronic Equipment will be physically tagged with a unique asset identifier and the tag shall be reflected in the Electronic Equipment Register prior to deployment of such Electronic Equipment by the Procurement Department. The Procurement Department will provide documentary proof of tagging of the Electronic Equipment to the IT Department.
- 4.3 **Periodic Reconciliation and Audit.** The IT Department will conduct a full reconciliation of the Electronic Equipment Register with physical inventory at least once every twelve months and without delay upon any change in location of material volume or on instruction from the Compliance Officer of the Company. The IT Department will be responsible for investigated the discrepancies and the records of such discrepancies will be maintained by the IT Department.
5. **Lifecycle Management, Refurbishment and Reuse**
- 5.1 **Technical Assessment Prior to Disposal.** Prior to being declared E-Waste, every piece of Electronic Equipment identified as obsolete, end-of-life or damaged will be subjected to a technical assessment by the IT Department to evaluate whether refurbishment, repair, component recovery, or redeployment is practicable and cost-effective.
- 5.2 **Priority for Reuse and Refurbishment.** Where refurbishment or reuse is feasible and does not compromise operational security or safety, the IT Department will cause such equipment to be refurbished in accordance with best practices for refurbishment procedures and will certify the equipment for redeployment only after validation testing and security checks have been completed.
- 5.3 **Records of Refurbishment.** The IT Department will maintain a written record for each refurbished unit, specifying the nature of the refurbishment, parts replaced, functional test results, the personnel who performed the work, and the identity of the redeployed user.
- 5.4 **Donation or Sale.** Where the Company or the IT Department elects to donate or sell refurbished Electronic Equipment outside the organisation, such action will be permitted only after all data sanitisation obligations (see Clause 6) have been performed and evidenced, the recipient has signed an undertaking accepting responsibility for lawful disposal at the end of its useful life. The value of such Electronic Equipment and the transaction has been approved in writing by the [Head of IT Department].

6. Data Security, Sanitisation and Destruction

- 6.1 **Mandatory Data Sanitisation.** No Electronic Equipment containing storage media can be transferred externally, donated, sold or recycled unless it has first undergone

Data Erasure and certified in writing by the IT Department or by an Authorized Recycler authorised to perform such sanitisation.

- 6.2 **Standards and Methods.** Data Erasure will be performed in accordance with standard operating procedures followed by the IT Department and, where physical destruction is used, it will be by means that render the medium irrecoverable, such as shredding, degaussing, pulverising or incineration performed by an Authorized Recycler in accordance with law.
- 6.3 **Certificates of Data Destruction.** The IT Department will retain the Certificate of Data Destruction for each Electronic Equipment as a permanent record and will include the Certificate reference in the Electronic Equipment Register entry for the device. The certificate will be retained for a minimum period of five (5) years or such longer period as required under law or by the Company's record retention policy.
- 6.4 **Incident Reporting.** Any incident, suspected breach, or unauthorised access to data during the course of disposal, transport or recycling must be reported immediately to the Compliance Officer and the IT Department, who will cause an investigation to be initiated and remedial action to be taken, and will, where necessary, notify affected parties and regulatory authorities in accordance with applicable data protection laws.

7. Storage, Segregation and Transportation Pending Disposal

- 7.1 **Interim Storage Conditions.** E-Waste awaiting transfer to an Authorized Recycler will be stored only at designated Collection Centres or secure storage areas approved by the Administration Department in consultation with the IT Department and must be physically segregated from active Electronic Equipment, labelled clearly, and protected against weather, fire, theft and unauthorised access.
- 7.2 **Inventory and Weighing.** Prior to each handover to an Authorized Recycler, the Administration Department, together with a representative of the IT Department, will prepare a transfer manifest specifying item descriptions, serial numbers, quantity, gross and net weights and the condition of the material; such manifest will be signed by the authorised signatory of the Company and by the receiving authorised representative of the Authorized Recycler and a copy will be retained by both parties.
- 7.3 **Transportation.** Transportation of E-Waste will be undertaken only by carriers authorised to transport hazardous waste where applicable, in vehicles that prevent leakage and loss, and in compliance with the provisions of applicable transport regulations; the Administration Department will ensure that contracts with carriers include indemnities against environmental damage and data breach.

8. Engagement and Due Diligence of Authorized Recyclers and Third-Party Service Providers

- 8.1 **Due Diligence Prior to Engagement.** The Procurement Department, working with the Compliance teams, will carry out due diligence on potential Authorized Recyclers and other Third-Party Service Providers, which due diligence will include verification of registration and authorisation, review of environmental compliances and previous

performance records, inspection of facilities where practicable, and review of insurance and indemnity cover.

- 8.2 **Contractual Requirements.** The IT Department is required to ensure that the contracts with Authorized Recyclers and Third-Party Service Providers will obligate such parties to: (a) comply with all applicable environmental and data protection laws; (b) provide a Certificate of Data Destruction for each device sanitised or destroyed; (c) maintain records and permit audits by the Company; and (d) indemnify the Company against claims arising from improper handling, illegal disposal, data breach or contamination.
- 8.3 **Annual Review and Renewal.** The Admin team will re-assess and re-certify the eligibility and performance of each Authorized Recycler annually and will not renew contracts where material non-compliance or reputational risk is identified.

9. Roles and Responsibilities — Detailed Allocation

- 9.1 **Board and Senior Management.** The Board of Directors of the Company has adopted this Policy and senior management of the Company is responsible to ensure allocation of adequate resources, oversight of compliance, and periodic review of the Policy. The Board shall appoint a senior officer (the “**Designated Authority**”) with ultimate accountability for E-Waste governance and compliance of this Policy.
- 9.2 **Compliance Department.** The Compliance Department of the Company is responsible for interpreting the legal obligations under the **E-Waste (Management) Rules, 2022** and any other applicable laws; advise on regulatory changes; coordinate statutory reporting obligations; and oversee investigations of potential breaches.
- 9.3 **IT Department.** The IT Department of the Company is responsible for maintaining the Electronic Equipment Register; perform technical assessments, Data Erasure, certification and record-keeping; supervise refurbishment and testing; and coordinate handover to Authorized Recyclers.
- 9.4 **Procurement Department.** The Admin Department of the Company is responsible for integrating environmental criteria into purchasing specifications, including requisite return/ take-back clauses where practicable, and select suppliers on environmental and data-security grounds in addition to commercial terms.
- 9.5 **Administration Department.** The Administration Department of the Company will be responsible for managing Collection Centres and interim storage, co-ordinate logistics for movement of E-Waste, ensure physical security, and liaise with carriers and recyclers.
- 9.6 **Human Resources.** The HR Department of the Company will be responsible to include awareness of this Policy in induction programmes and disciplinary frameworks and will, in coordination with Compliance Department, ensure that breaches by Personnel are addressed in accordance with employment law and internal disciplinary policy.

- 9.7 **Finance Department.** The Finance Department is responsible for undertaking the transaction for sale or donation of the Electronic Equipment and they are required to maintain financial records of transactions involving sale, donation or disposal of Electronic Equipment.
- 9.8 **All Personnel.** All Personnel are required to comply with the Policy, promptly report obsolete or damaged equipment to the IT Department, and should not attempt to dispose of E-Waste independently.

10. Training, Awareness and Reporting

- 10.1 **Training Programmes.** The Compliance Department and HR Departments of the Company will be required to institute periodic training and awareness programmes on E-Waste obligations, data security during disposal and procedures to be followed by all the Personnel, and should maintain attendance records.
- 10.2 **Reporting Mechanism.** The IT Department is required to provide [quarterly reports] to the Compliance Officer and senior management detailing quantities of E-Waste generated, destinations, Certificates of Data Destruction obtained, and any incidents or non-conformities.

11. Audit, Inspection and Non-Compliance

- 11.1 **Audits.** The Compliance Department is required to conduct or commission periodic internal / external audits of E-Waste handling and record keeping and of the Authorized Recyclers and is responsible to report findings to senior management with recommended corrective actions and timelines for remediation.
- 11.2 **Sanctions for Non-Compliance.** Breach of this Policy by Personnel may attract disciplinary action up to and including termination of employment; breaches by Third-Party Service Providers may attract contractual penalties, termination of contract and claims for damages.

12. Continuous Improvement and Review

- 12.1 **Periodic Review.** This Policy will be reviewed at least annually by the IT Department and Administration Departments, with such recommendations for amendment as are necessary to ensure compliance with statutory requirements and best practices; material amendments will be subject to approval by the Board.
- 12.2 **Records Retention.** All documents relating to disposal, Certificates of Data Destruction, transfer manifests and audit reports shall be retained for a minimum period of [five (5) years] or longer where required by statute or Company records policy.

13. Exceptions and Emergency Measures

- 13.1 **Temporary Exceptions.** Any request for exception to a specific provision of this Policy shall be made in writing to the Compliance Officer, shall specify the precise

scope and duration of the exception sought, and shall be granted only with written approval of the Designated Authority; conditional approvals shall specify mitigating controls.

- 13.2 **Emergency Disposal.** In the event of an emergency that requires immediate disposal (for example, health and safety risk or data-breach containment), the Head of IT Department, together with the Compliance Officer, may approve expedited measures provided that a full written report is submitted to senior management within forty-eight (48) hours and that Certificates of Data Destruction and proper manifests are obtained retrospectively.

14. Effective Date and Adoption

- 14.1 This Policy is effective from the date of approval by the Board of Directors of the Company and supersedes any prior policies dealing with electronic waste. The Policy shall be published on the Company intranet and shall be accessible to all Personnel.

