

# AJM GROUP

## *Report – Reducing Use of Hazardous & Toxic Materials*

### **What are Hazardous and Toxic Materials and Substances?**

Hazardous and toxic materials and substances are those that harm the environment or are dangerous to employees, vendors or customers. Toxic substances can cause adverse health effects when utilized improperly. A large number of these substances may also cause ecosystem damages, either from exposure to concentrated doses, or from long-run exposure to trace amounts that show up in the workplace.

Not all toxins are chemicals. Some, like heavy metals (mercury, cadmium, etc.), are by-products of various industrial operations, or they can be generated from a variety of activities and may take the form of liquid, sludge, gas or solid.

### **Why Minimize Toxic Waste Materials?**

The Environment Protection Act (EPA) includes regulations for use, management and disposal of toxic materials in industries and has mandated all facilities that generate waste have a waste minimization plan.

#### **EPA Definition of Waste Minimization**

According to the EPA definition, waste minimization, is any method that reduces the volume or toxicity of a waste that requires disposal. EPA regulations require that the production, use and disposal of all wastes, and particularly hazardous wastes, are kept to a minimum.



The implementation of a waste minimization program is vital to an effective hazardous waste management program, and the most efficient and cost-effective method of handling waste materials is to produce as little waste as possible. The AJM Group is committed to protecting the health and safety of all employees while also complying with applicable state and central regulations.

### **Benefits to Business**

Reducing the use of toxic chemicals can produce business benefits including lower costs for waste disposal, raw materials, worker protection insurance, increased production efficiency and reduced sick days.

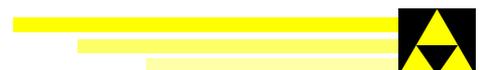
While not every reduction in toxic waste leads to direct financial savings, it can have other benefits including: competitiveness benefits, customer retention and product quality improvement and positively impact employee morale.

### **Intent**

The policy is part of our policies and reports on our impact on the environment. The main objective of this plan is to reduce or eliminate the generation of hazardous waste to the extent that is economically and technically feasible.

### **Operating Principles:**

1. Reduce environmental impact as much as feasibly possible through the proper management of hazardous substances.
2. Strive to re-use and recycle at every opportunity.
3. Strive to improve environmental sustainability by reducing carbon footprint through proper management of hazardous waste.
4. Ensure compliance to statutory requirements.
5. Encourage suppliers and contractors to adopt cleaner technologies and products with low or no impact to the environment. Suppliers for production, transportation and disposal of toxic materials will only be considered if they meet environmental and safety requirements.
6. Demonstrate leadership to the community on sustainable practices of hazardous waste management.



## Examples of Toxic Materials include:

A few examples of hazardous waste defined by the Environmental Protection Agency (EPA) are categorized as follows:

- Flammable liquids, such as non-halogenated solvents
- Corrosive liquids, such as strong acids and bases
- Solid oxidizers
- Wastes that contain heavy metals and halogenated organics
- Greases and oils
- Electrical and Electronic items
- An in-organic/organic element, which because of its toxicological, physical or chemical properties may give out harmful, acute or chronic impacts on the health of humans and the environment.

Common hazardous substances produced in many industries include ammonia, acid, bleach, chlorine, and carbon monoxide, mercury, pesticides, and cleaning wastes. These potentially hazardous materials must be handled as directed by central, state and local laws and regulations.

## Corporate Pledge

*We shall decrease our usage of toxic and hazardous materials and substances.*

## Procedures

**The AJM Group does not manufacture any products that use or release toxic substances.** At Kamivisa the product is completely natural and organic. At Samvi we use naturally occurring metals.

We have developed these procedures as a pre-emptive measure to reduce any future possible usage and develop guidelines in case any future products produce or use toxic substances. Employees handling hazardous or toxic waste materials must comply with the following procedures.



## Reduction

- Determine the hazards and potential wastes associated with a materials or process before beginning a project.
- Consider less hazardous substitutes when possible.
- Order and maintain only the minimum amount of the materials required. It may appear cost effective to order in bulk, however waste disposal costs are often more than original material cost.
- Think about disposal before buying materials as some materials may require special disposal methods that can be difficult or expensive.
- Use supplies only for their intended purpose.

## Labelling and Documentation

- Document agreements with suppliers to ensure that specified procedures are followed.
- Safely store hazardous products and containers. Containers should be sealed when not in use.
- Properly label hazardous materials to prevent unlabelled materials from being disposed. In many cases employees do not have the time to check or test what the material could be and so generate more waste by disposing unknown substances.

## Prevention Methods

- Avoid creating hazardous waste by preventing spills or leaks.
- Keep frequently used hazardous materials near the site to minimize spills and accidents.
- Store hazardous product and waste containers in secure areas, and inspect them frequently for leaks.
- Avoid mixing hazardous waste with non-hazardous waste as this generates even more hazardous waste.
- Be familiar with the appropriate spill clean-up procedures and use the minimum amount of clean-up materials possible.
- Keep records of when and why larger spills occurred in order to identify spill prevention opportunities and document related costs.

## Environmental Considerations

- Work with vendors to accept back excess, off-spec, or expired materials.
- Use quality suppliers that meet all environmental compliances.



- Recycle wherever possible. Recycling can save money and energy and protects the environment.

In addition, here are some specific guidelines outlined in the EPA regarding plastic waste that all employees and additional staff must be aware of:

#### **Rules of Compliance for Plastic Waste:**

- Recyclers must be registered with the State Pollution Control Board. This registration is valid for 3 years.
- Plastic bags cannot be given to any retailers free of cost.
- The rules for the segregation of virgin, renewable or compostable plastic need to be complied with at all costs.
- Non-compliance of the above rules shall lead to a penalty of ₹1,00,000 and/or imprisonment for up to 5 years.

## **Company Adherence**

In order to comply with various environmental laws, good safety practices, and avoid future liabilities, the AJM Group will follow a conservative approach while handling hazardous materials and wastes produced on site.

This document applies to all whom handle hazardous substances; electrical and electronic waste either within an organization or as a third-party supplier.

- **All employees should aim to minimize waste produced at the AJM Group.** Good housekeeping procedures generally save money and prevent accidents and waste, which is why employees are encouraged to constantly search for ideas that can be implemented to improve our waste reduction efforts.
- Waste reduction will be considered during all phases of a process including project or process design, purchasing, and use. The most effective location to minimize the amount of waste generated is at the point of waste generation.
- Employees who generate or handle hazardous waste shall be trained to minimize hazardous waste generation. Access to all such hazardous materials will be limited to trained employees only.



- Any relevant third party companies we work with must be audited for compliance with all environmental requirements.

## **Implementation, Governance and Reporting Violations**

Compliance with the Environment laws is a necessity for creating goodwill in the market as well as sustaining the environment. An internal communication regarding this policy will be made to all employees, external suppliers, stakeholders and other interested parties. It is the responsibility of the departments and employees handling such substances and products to implement such policies during the appropriate stages.

Non-compliance of these rules can lead to cancellation or suspension of authorization, imprisonment and hefty fines by the State Pollution Control Board. Such matters can damage the reputation and functioning of the AJM Group and is taken very seriously.

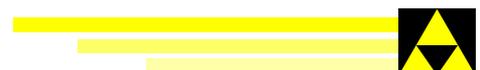
Employees are required to strictly adhere to set procedures and report any violations they witness to their direct reporting manager.

### **Legal Compliance**

Under the **Environment Protection Act, 1986** in Conjunction with The Ministry of Environment and Forests, the Central Government draws legislation with respect to the standards of air-quality, soil, the maximum permissible limits of the environmental pollutants, procedures, and prevention for the same.

Samvi is a certified Green Company by the State Pollution and Control Board and the products made by Kamivisa are completely natural and biodegradable.

**The AJM Group is ensures that all its companies are fully compliant in accordance with all regulations with regard to the environment and waste management.**



## **AJM Group Business Ethics Policy: Section Related to Hazardous and Toxic Materials**

*We strive to adopt sustainable, environmentally-conscious processes and procedures in our operations wherever possible. We aim to reduce our carbon emissions, water usage, and waste through enhancing the efficiency and performance of our equipment and processes.*

## **AJM Group Green Policy: Sections Related to Hazardous and Toxic Materials**

*We will follow all appropriate protocols when handling toxic and hazardous materials, including using personal protective equipment to minimize the risk of injury. We will follow all applicable waste disposal laws when disposing of hazardous and toxic waste. We will report any incidents involving toxic and hazardous waste to management immediately.*



## Key Takeaways

The Environment Protection Act (EPA) outlines rules for reduction of toxic and hazardous substances that all companies must be compliant with.

Employees are required to minimize the use of such substances to the best of their ability.

Departments handling toxic or hazardous materials will ensure that their teams are fully compliant and training is given where needed.

Any violations of this procedure must be reported immediately or you and the AJM Group could face serious consequences.

