Construction Waste Management Policy

Reference	**MREIT/ CWMP-V1 /2025**
Approving Authority	ESG Committee of K Raheja Corp Investment Managers Private Limited (Formerly known as K Raheja Corp Investment Managers LLP) (“Manager”) as the manager of Mindspace Business Parks REIT (“Mindspace REIT” or “REIT”)
Effective Date	This policy on Construction Waste Management shall come into effect on the date it was adopted by the ESG Committee at their Meeting held on March 28, 2025.

Revision History		
Version	**Date**	**Change Type**
V1	March 28, 2025	Approved

PURPOSE

Established to provide structured and sustainable approach to handling, reducing, reusing, and disposing of construction waste. This policy aims to minimize environmental impact, ensure compliance with regulatory requirements, promote resource efficiency

APPLICABILITY

This Construction Waste Management Policy applies to all construction, renovation and demolition activities under the purview of the Manager, Mindspace REIT. It is applicable to all employees, workers, contractors, and tenants involved in these activities, ensuring compliance with waste management practices, regulatory requirements, and sustainability commitments

POLICY AND OBJECTIVES:

Mindspace REIT is committed to managing waste responsibly, ensuring compliance with legal requirements, and preventing pollution. Our approach aligns with UN Sustainable Development Goal 12: Responsible Consumption and Production to promote sustainability and reduce environmental impact.

We adhere to all regulations for hazardous waste, solid waste, biomedical waste, and e-waste, emphasizing waste minimization, resource conservation, and responsible disposal through a structured waste management hierarchy. Additionally, we are committed to the proper management of Construction & Demolition (C&D) waste, ensuring compliance with all relevant laws and preventing illegal or indiscriminate disposal. All C&D waste must be segregated, collected, stored, transported, and disposed of in accordance with Construction & Demolition Waste Management Rules, 2016, and other applicable regulations. Waste must be directed to authorized recycling facilities or designated landfills to promote sustainable waste management

Construction & Demolition (C&D) Waste Management

- **Waste Identification, Segregation & Reduction**
  C&D waste is categorized into concrete, wood, metal, plastic, bricks, hazardous, and recyclable materials. Excavated soil is managed separately and not classified as waste. To minimize waste generation, source reduction strategies are implemented. Efficient segregation ensures that at least 75% of materials, such as concrete, metal, wood, and plastic, are properly sorted for reuse or recycling.
- **Storage, Handling & Safety**
  A designated storage area with separate and proper bins for steel scrap (usable and scrap separately), other metals (separate for each metal), plastic, wood (usable and scrap separately), hazardous waste, etc., must be created, with special provisions for hazardous waste bins to prevent contamination of soil and underground water. Identifying the storage area and installing the bins must be included in the scope of work of the contractor and must be regularly inspected and audited to ensure adherence to policies. The compliance of the Waste Management Policy and training on safe handling practices to ensure compliance with safety standards is part of the duties of the Safety Officer.
- **Reuse & Recycling Strategies**
  On-site reuse of materials such as bricks, blocks steel, aluminum, paint, concrete, and wood is prioritized to reduce reliance on virgin resources. Collaborations with recycling facilities process steel scrap, plastic, and gypsum waste, incorporating recovered materials into new projects.
- **Transportation & Disposal Compliance**
  Authorized transporters handle waste disposal in accordance with CPCB (Central Pollution Control Board) and SPCB (State Pollution Control Board) regulations. Hazardous waste is directed to approved treatment facilities, with proper documentation maintained for regulatory compliance.
- **Monitoring, Reporting & Legal Compliance**
  Regular waste audits are conducted to monitor waste generation, disposal, and recycling. Identified waste materials, including concrete (produced and purchased), blocks, steel, aluminum, paint, and special chemicals such as waterproofing (WP) chemicals, are subject to auditing. Records are maintained for waste materials delivered to the site, reused, and scrapped to ensure accountability and resource optimization. Additionally, Compliance with the C&D Waste Management Rules, 2016, issued by the CPCB under the Ministry of Environment, Forest & Climate Change (MoEF&CC), is ensured.
- **Training & Awareness Programs**
  Comprehensive training programs educate workers on waste segregation, safe handling, disposal procedures, and legal requirements. Workshops, demonstrations, and certification courses enhance awareness and improve waste management efficiency.
- **Collaboration with Recycling Facilities**
  Strategic partnerships with C&D waste recycling plants facilitate the processing of metals, plastics, and gypsum, reinforcing sustainable waste management practices.
- **Regulatory Framework: CPCB C&D Waste Management Rules, 2016**
  These rules apply to waste generated from construction, renovation, repair, and demolition activities, covering builders, developers, contractors, local authorities, and waste processing units.
- **Contractor Scope of Work**
  Create a designated storage area with separate bins for steel scrap (usable and scrap), metals, plastic, wood (usable and scrap), and hazardous waste, with provisions to prevent soil and water contamination. The contractor's scope of work includes identifying storage areas and providing bins. Regular inspections and audits will ensure adherence to policies. The Safety Officer is responsible for ensuring compliance with the Waste Management Policy and safety standards, including training on safe handling practices.

GOVERNANCE AND STRUCTURE:

The ISO 14001-2015 standards provide a framework for improving environmental performance, ensuring regulatory compliance, and promoting sustainability. The key governance principles of ISO 14000 EMS include:

1. **Environmental Policy & Leadership** – Define an Environmental Policy aligned with business goals, ensure legal compliance, and maintain transparency.
2. **Risk-Based Thinking & Compliance** – Identify environmental risks, comply with regulations, and implement pollution prevention strategies.
3. **Operational Control & Sustainability** – Manage product lifecycles, enhance resource efficiency, and ensure emergency preparedness.
4. **Continual Improvement & Performance Evaluation** – Set performance indicators, conduct audits, and engage stakeholders through transparent reporting.

Construction Waste Management Responsibility Matrix	**Level 1**	**Level 2**	**Level 3**
Identification of storage area and making bins	Contractor	KRC EHS	Project Head
Identification of waste	Contractor staff	KRC EHS	Project Head
Segregation of waste	Contractor staff	KRC Engineering	KRC EHS
Planning/ strategy for reuse and recycle	Contractor staff	Project Head	KRC Management
Actual reuse	Contractor staff	KRC EHS	Project Head
Disposal	Contractor staff	KRC EHS	Project Head/ HO
Monitoring and managing waste management activity	Contractor staff	Project Head	Head office
Reconciliation: Calculating Material purchased/delivered, reused and waste generated	Contractor	KRC EHS, KRC Engineering and Project Head	Head office
Audit	EHS Head	ESG Head / City Head	Engineering Director
Tie up with MPCB approved agency for recycling purpose (hazardous waste)	KRC EHS Staff	Project Head	Head Office

The Construction Waste Management Responsibility Matrix is structured into three levels, each with distinct roles and responsibilities to ensure effective waste management, compliance, and continuous improvement. To ensure transparency and accountability, a structured reporting and escalation mechanism is established:

- **Level 1 – Execution and Implementation:**
    - Responsible for on-ground execution of waste management activities.
    - Includes contractor staff directly handling storage area & installing bins, waste identification, segregation, reuse and recycling, disposal of construction waste, inspections and monitoring
    - Includes KRC ESH head and EHS staff ensuring waste management audits and regulatory tie-ups with local/state recycling authorities
    - Systematically tracking and verifying the flow of construction materials from procurement to final utilization or disposal
    - Ensures waste is managed as per site requirements and regulatory guidelines.
    - Reports waste management activities to Level 2.
- **Level 2 – Monitoring and Compliance Oversight:**
    - Includes key personnel such as KRC EHS, KRC Engineering, Project Heads, EHS Head and City Head.
    - Monitors and inspect waste management practices, ensuring segregation as per waste classification, planning/strategy for reuse and recycle, and safe disposal.
    - Validate audit reports and take corrective actions where necessary
    - Monitor and support hazardous waste disposal compliance
    - Ensures compliance with internal policies and external regulatory requirements.
    - Reports findings, challenges, and any non-compliance issues to Level 3.
- **Level 3 – Strategic Oversight and Policy Compliance:**
    - Includes Project Heads, KRC EHS, KRC Management, Engineering Director and Head Office representatives.
    - Responsible for policy-making, strategic oversight, and ensuring full compliance with regulations across projects
    - Oversees compliance with the Construction Waste Management Policy and sustainability commitments.
    - Reviews reports from Level 2 and takes corrective action when required.
    - Implements strategic decisions for continuous improvement in waste management.

This structured approach ensures accountability at every level, enhances compliance, and fosters a culture of responsible waste management across all construction, renovation, and operational activities.

WASTE CATEGORIZATION, SEGREGATION AND STORAGE

1. Waste Categorization

To ensure efficient waste management, all construction waste will be categorized into the following primary categories:

- Organic Waste: Vegetation, and plant material.
- Inert Waste: Non-reactive materials including concrete, bricks, tiles, and stones.
- Metal Waste: Scrap metal, including steel, copper, aluminum, and others.
- Wood Waste: Timber, plywood, pallets, and other wood products.
- Plastic Waste: Packaging materials, plastic piping, and other plastic items.
- Glass Waste: Broken or unused glass, windows, and mirrors.
- Gypsum/Plasterboard Waste: Drywall, gypsum boards, and plaster materials.
- Hazardous Waste: Paints, solvents, asbestos, chemicals, and other hazardous materials.
- Miscellaneous Waste: Electrical components, rubber, insulation, and non-recyclable waste.

Waste categorization will be conducted at the point of generation to ensure proper segregation and disposal of materials. Project managers (KRC EHS) are responsible for ensuring that workers understand these categories and segregate waste accordingly.

2. Waste Segregation

Waste segregation refers to the process of sorting materials by category at the construction site to facilitate recycling, reuse, and proper disposal. The following guidelines must be followed:

- On-Site Segregation: All construction waste must be segregated by type at the point of generation. Different type of Waste should be placed into clearly labeled, color-coded bins or containers to streamline collection and disposal.
- Wood, Metals, Plastics, and Glass: Should be stored separately in designated containers, bins or storage areas to prevent cross-contamination.
- Hazardous Materials: Must be segregated into clearly labeled, secure containers to prevent exposure and ensure safe disposal.
- Concrete, tested concrete cubs, rubbles, excavated soil and Masonry Waste should be collected separately for potential on-site reuse (e.g., road base, plum concrete, backfilling) or sent to authorized recycling plants.
- Pre-Segregation: Whenever possible, procurement teams should consider material types that are recyclable or reusable, to reduce the volume of waste generated on-site.
- Hazardous Waste Handling: Hazardous materials, including asbestos, chemicals, and paints, as per established Waste Handling and Health & Safety SOPs and guidelines and segregated into secure, weatherproof containers. Personal protective equipment (PPE) must be worn during handling.
- Training: All personnel will receive training on proper waste segregation procedures before the commencement of any construction project. This includes identification of waste categories, safe handling practices, and recycling protocols.

3. Waste Storage

Proper storage of construction waste is vital for maintaining safety, preventing contamination, and ensuring efficient waste management. The following storage practices must be adhered to:

- Designated Storage Areas: Separate storage areas must be designated for different categories of waste on-site. Waste storage areas will be clearly marked and organized to prevent cross-contamination between materials
- Hazardous Waste Storage: Hazardous materials must be stored in secure, weatherproof, and properly labeled containers. These containers will be kept separate from other types of waste to avoid accidental exposure or contamination.

- Non-Hazardous Waste Storage: Waste that does not pose a hazard (e.g., concrete, wood, metals) should be stored in clean and dry areas, where materials can be protected from the elements and preserved for recycling or disposal.
- Recycling Storage: Materials such as metals, plastics, and wood should be stored in dedicated bins or areas, free from contaminants, to maintain their recyclability.
- Monitoring and Inspections: Site supervisors (Contractor Staff) will conduct regular inspections of waste storage areas to ensure that waste is being stored in compliance with this policy. Any violations or issues will be addressed immediately to maintain safety and regulatory compliance.

WASTE HANDLING

Health & Safety Measures

- **PPE Requirements** – Workers must wear gloves, goggles, masks, and respirators when handling hazardous waste.
- **Training** – Safe handling, segregation, and disposal training, with specialized instruction for hazardous materials.
- **Spill Containment** – Use of spill kit, Immediate cleanup and containment to prevent environmental contamination.
- **Emergency Response** – Established procedures for hazardous waste spills, including emergency contact details.

WASTE PROCESSING, REUSE, AND RECYCLING

Effective waste management involves systematic categorization of materials to facilitate appropriate handling and processing in terms of reuse, recycling, and disposal in compliance with environmental regulations

1. Waste Categorization & Processing

- **Organic Waste (Soil, Vegetation)** – Compost, mulch, or reuse for leveling.
- **Inert Waste (Concrete, Bricks, Tiles, Stone)** – Crush for aggregate or landfill if recycling is not possible.
- **Metal Waste (Steel, Copper, Aluminum)** – Recycle at metal centers or repurpose.
- **Wood Waste (Timber, Plywood, Pallets)** – Recycle into timber products or mulch.
- **Plastic Waste (Packaging, Pipes)** – Recycle or send non-recyclables to landfill.
- **Glass Waste (Windows, Mirrors)** – Secure storage; recycle at glass facilities.
- **Gypsum/Plasterboard Waste** – Recycle into drywall or use in agriculture.
- **Hazardous Waste (Asbestos, Paints, Chemicals)** – Store securely; dispose of via certified hazardous waste services.
- **Other Waste (Rubber, Insulation, Electrical Components)** – Recycle where possible; landfill non-recyclables.
- **Bio-medical waste (used cotton, bandages, syringe etc) –** Tie up with authorized agency for disposal as per guidelines

WASTE TRANSPORTATION AND DISPOSAL

Proper waste transportation and disposal are critical components to ensure environmental protection, regulatory compliance, and sustainability. Establishing a structured approach to managing waste transporters and disposal agencies helps enhances accountability, transparency and ensures that waste is processed using appropriate and compliant methods. Following guidelines are followed:

- Maintain a comprehensive list of authorized waste transporters and disposal agencies to ensure accountability and regulatory compliance.
- Classify waste types and map them to appropriate transporters and disposal agencies, ensuring proper handling and disposal.
- Implement procedures to prevent and monitor illegal dumping of construction waste, incorporating tracking mechanisms to ensure compliance with the C&D Waste Management Rules, 2016
- KRC EHS ensures tracking and overseeing compliance against waste disposal.
- Authorized waste transporters and disposal agencies handle waste disposal in accordance with CPCB (Central Pollution Control Board) and SPCB (State Pollution Control Board) regulations and guidelines

COMPLIANCE WITH REGULATORY REQUIREMENTS

Internal Review Process for Waste Management Plans

A structured and mandatory internal review process will ensure all waste management plans are compliant, efficient, and standardized before submission to local authorities.

1. Internal Review Process

- **Mandatory Review**: Each waste management plan undergoes review by Environmental Compliance, Health & Safety, and Project Management teams to align with regulations and internal policies.
- **Checklist-Based Assessment**: A structured checklist ensures all critical elements are addressed.
- **Approval Workflow**: Plans must be approved by key stakeholders (Project Manager, Environmental Officer, Safety Officer) before regulatory submission.

2. Standardized Templates & Checklists

- **Waste Management Plan Template**: A standardized format covering waste categorization, segregation, recycling, and disposal.
- **Internal Review Checklist**: Ensures compliance with internal policies and local regulations, acting as a quality control tool.

3. Customization for Project-Specific Needs

- **Project Size & Scope**: Scaled plans based on complexity and waste volume.
- **Waste Types**: Tailored strategies for hazardous materials or large recyclable waste.
- **Local Regulations**: Adapted to meet location-specific compliance requirements.

AWARENESS TRAINING AND CAPACITY BUILDING

The Waste Handling Training Program conducted on monthly basis aims to equip employees, contractors, and site workers with the necessary knowledge and skills to manage waste safely and efficiently

The program ensures safe and compliant waste management by covering:

- **Waste Segregation & Recycling** – Proper identification, sorting, and recycling.
- **Hazardous Material Handling** – Safe management to prevent risks.
- **Storage & Transport** – Secure containment and movement of waste.
- **Safety & Emergency Response** – Preparedness for accidents and spills.
- **Regulatory Compliance** – Legal requirements and record-keeping.

Training Frequency:

- Initial Training: Provided to all new personnel (4-6 hours).
- Refresher Training: Annually or when regulations change (2-3 hours).
- Specialized Training: For hazardous waste handlers, every 2 years (1 day).
- Project-Specific Training: Tailored for unique projects (3-4 hours).

Attendance and Assessments:

- Attendance tracked for each training session.
- Records of training will be maintained.
- KRC EHS ensures training compliance

EMERGENCY AND CONTINGENCY MEASURES

Hazardous Waste Spill & Emergency Response Protocol

1. **Spill Management**
    - **Immediate Actions**: Evacuate area, notify supervisor, contain spill, and stop the source if safe.
    - **PPE**: Use gloves, goggles, protective suits, and respirators as needed.
    - **Reporting**: Document and report to regulatory agencies per legal requirements.
2. **Emergency Response Plan**
    - **Activation**: Supervisor alerts emergency services; trained response teams manage the spill.
    - **Containment & Cleanup**: Neutralize chemicals, remove contaminated material, and decontaminate affected areas.
    - **Health & Safety**: Medical teams assess exposure; injured personnel receive treatment.

- **Post-Incident Review**: Investigate cause, assess response, and document lessons learned.

3. **Emergency Contacts**
    - **Internal**: Site supervisor, environmental officer, and health & safety officer.
    - **External**: Fire department, waste disposal contractors, regulatory agencies.
    - **Contact List**: Posted on-site and provided during training.
4. **Backup Waste Collection Plan**
    - **Storage**: Secure labeled areas for excess hazardous waste.
    - **Disposal**: Backup contractors for alternative disposal.
    - **Adjustments**: Modify segregation, storage, and containment as needed.
    - **Communication**: Notify personnel and relevant contacts of disruptions.

DOCUMENTATION AND RECORD-KEEPING

Accurate and systematic documentation is essential for ensuring compliance, accountability, and continuous improvement in waste management practices. Maintaining detailed records supports regulatory reporting, enhances operational efficiency, and provides transparency. Following practice to follow:

1. Make a reconciliation statement of all identified materials for which Waste Disposal Management policy is applicable
2. Maintain comprehensive records material purchased/delivered, soil excavated and used in refilling, record of waste generation, segregation, transportation, recycling, reuse and disposal, ensuring traceability and regulatory compliance.
3. Document all waste transporters and disposal agencies, including permits, certifications, and contracts, to verify compliance with legal and environmental requirements.

MONITORING, REPORTING & LEGAL COMPLIANCE

<Below statements are for reference. As per the suggestion from waste management team, update the below mentioned pointer as required>

- A structured waste tracking system shall be implemented at all construction sites to record weekly, and monthly waste data.
- **Responsibilities** for maintaining accurate waste logs shall be assigned to **designated personnel**
- A data validation process shall be established to ensure the accuracy and integrity of waste tracking records
- **Quarterly review meetings** with senior management shall be conducted to assess waste management performance, analyze trends, and implement necessary corrective actions to enhance efficiency and compliance
- **Annual** third-party audits shall be mandated to verify compliance with waste management policies, assess the effectiveness of waste tracking systems, and enhance transparency in operations. Audit findings shall be documented and acted upon to drive continuous improvement.