Waste Management Policy 1st Issued: Dec 2023

INTRODUCTION

Tong Herr Resources Berhad ("THR" or "the Company"), including its subsidiaries ("the Group") acknowledges the environmental impact caused by its business operation and products or services, and strives to promote global environmental preservation and prevent pollution. The Group management and employees are aware of the global environmental protection activities, develop and maintain the environmental management system, and engage in continuous improvement activities through joints efforts.

The Group clearly identifies and complies with legal requirements such as laws/regulations and agreements to be observed, and other requirements accepted by the company. As a result of having identified the outstanding environmental issues of our company, the key priority has been given to the following activities,

- Comply with the laws, regulations and users requirements for controlling hazardous substances in products and materials.
- The schedule waste are keeps and discharge according to Environmental Act.
- Ensure all work procedures are compiled and carried out effectively during operations and maintenance to prevent environmental pollution at workplace.
- Provide information and training to employees and management in term of reporting, investigating, and corrective measure taken to prevent reoccurrence of environmental issue.

This document sets the Group commitment with regards to waste management. As part of that commitment, this policy establishes some principles relating to best practices in waste management. This policy sets down the framework for all waste management activities carried out by the Group. Detailed information on the procedures along with waste management plans for all categories of waste generated in our operations is contained within this policy.

PURPOSE

Due to the diverse nature of activities undertaken by the Group, a wide variety of wastes are produced and collected, ranging from general wastes and recyclable materials, through to special and hazardous wastes. The Group has a duty to ensure that these wastes are disposed of responsibly, using approved, registered waste contractors. This policy sets down the framework for waste management carried out by the Group.

SCOPE

The Policy applies to all operations within the direct control of the Group, and all employees of the Group shall understand, respect, implement and promote this policy. This policy pertains to hazardous waste (such as sludges) and non-hazardous waste (scrap waste, paper, cardboard, garbage). We shall work towards implementing the policy proportionately and appropriately to relevant third parties working for and/or on behalf of the Company, including consultants, suppliers, vendors, and contractors.

POLICY STATEMENT

The Group waste management practices are centered around reduction in generation, segregation at source, and apply a 'waste hierarchical approach' to reduce, reuse, recycle and recover waste products wherever possible. In line with the principles of a circular economy, we try to leverage the waste we generate by reusing it in different processes. There is a legal requirement for all who produce, keep or dispose of waste of any type to comply with the various regulations. The Group complies with the regulations set by pollution control board and maintains a system of waste segregation, storage, reuse, recycle and reduce the volume of waste sent to landfill.

POLICY OBJECTIVES

The objectives of this policy are:

- To ensure that waste management is performed in accordance with all waste legislative requirements, including the duty of care, and to mitigate their effects.
- To minimize waste generation at source and facilitate reduction, reuse and recycling of waste generated through authorized recyclers and vendors in a cost-effective manner.
- To develop and implement strategies to minimize waste generation in our manufacturing processes through the adoption of efficient production methods and sustainable material use
- To foster a culture of responsibility and environmental awareness among our employees, encouraging them to actively participate in waste reduction initiatives. To ensure the safe handling and storage of waste of various types at all office locations, facilities and locations owned by the Group.
- To secure where possible revenue for recyclable material to reinvest into the expansion of recycling opportunities available.
- To provide appropriate training for staff, supply chain partners and clients on waste management issues.

ACTION PLAN

Segregation means to separate the wastes into the groups of general wastes and recyclable materials and hazardous wastes. Waste segregation is an activity undertaken to facilitate recycling and disposal. Basically, it consists of the separation or sorting of wastes into recyclables and nonrecyclables and storing them in separate containers/ locations to facilities recycling and disposal. It is a good idea to separate the waste at its place of origin as it provides for the applicable process to be followed for further treatment of waste.

A) Hazardous Waste:

Hazardous waste is the waste that has substantial or potential threats to public health or the environment. For instant, the hazardous waste is sent to vendors authorised by the government authority. At each owned facility, the person in-charge (PIC) of waste management shall be aware of the hazardous waste management rules and responsible for safe handling of hazardous waste generated in the facility. The PIC shall ensure that the hazardous waste is identified, monitor the collection / segregation, labelling the waste properly, facilitate the infrastructure required, ensure that it is stored in the designated place and safe disposal of hazardous waste. They are also ensure that proper records of the identified waste are maintained. Relevant PIC shall ensure that all his employees involved in the identification, handling, labelling, transportation, storage and spillage or discharge response of wastes attend training programmes.

We follow 3 key principles regarding the disposal of Hazardous Waste:

- Health, Safety and Environment: The hazardous waste which is generated is kept in designated areas in factory premises keeping in mind the environment and health and safety of the associates. It is disposed of through the authorized service provider engaged for the purpose of collection, segregation, transportation, dismantling, recycling, and disposal of hazardous waste as per guidelines of the department of environment of ministry.
- Social Responsibility: The Group makes all reasonable efforts to track the hazardous material to reach till their final destination and ensure the end-of-life disposal procedures.
- Disposal: The Group has tied up with authorized vendors approved by state/central of environment control board for the management of the entire process of disposal of wastes right from collection to disposal at the facilities across operation.

B) Non-Hazardous Waste:

At Tong Heer, we are reusing/recycling the non-hazardous waste in an environmentally sustainable manner. Paper waste and mixed dry garbage waste (including plastic) is segregated, and dry garbage waste is stored in a scrapyard to be sent to scrap vendors or to municipal dump-yard for disposal. Paper and cardboard waste is sent to authorized recyclers (such as NGOs) for recycling purposes.

STRUCTURE AND RESPONSIBILITIES

The responsibilities and organisational arrangements for this Waste Management Policy lie with a waste management team.

The team responsibilities include:

- Strategizing, reviewing, and implementing the waste management activities.
- Getting local government authority's department approvals for waste disposal.
- Engage with external vendors approved by pollution control board for transportation, handling, and recycling of hazardous/non-hazardous waste.

All employees are accountable through the management structure for conforming to the requirements of this policy and of statutory requirements. In particular, every employee is required to:

- Take care and attention of the environment.
- Co-operate in fulfilling the Group's pursuit of continuous environmental and waste management improvement.
- Be familiar with and implement this policy.
- Conform to the requirements of the project environmental and waste management plan, where applicable.

COMMITMENT AND REVIEW

Tong Herr Resources Berhad ("THR" or "the Company"), including its subsidiaries ("the Group") commits to support and implement this waste management policy. This policy shall be reviewed and updated as and when necessary or there are any changes. The Policy sets out the general principles and guidance, and shall not constitute a ground for any counterparts, stakeholders, third parties etc. to claim against the Group for any liability.