



Waste Management Policy

Classification	EXTERNAL		
Document Type	Policy		
Policy Reference Number	BW-GRP-ENV-004		
Area of Applicability	Barloworld Group		
Policy Owner	Head: Group Sustainability		
Policy Owner Contact Information	Sustainability@barloworld.com		
Version	1.3		
Date Approved	17 May 2023		
Approved by	Social, Ethics and Transformation Committee		
Policy Sponsor	Group Executive: Risk, Ethics and Governance		
Effective Date	25 September 2012		
Next Review Date	May 2025		
Documentation Status	<input type="checkbox"/> Working draft	<input type="checkbox"/> Consultation Release	<input checked="" type="checkbox"/> Final version

Approval And Ownership

Owner	Date
Head: Group Sustainability	17 May 2023

Approved By	Date
Social, Ethics and Transformation Committee	17 May 2023

Revision History

Version	Revision Date	Description	Next review Date
V1.0	25 September 2012	Policy was originally published in May 2012 and was approved by the Barloworld Group Risk and Sustainability Committee	
V1.1	14 May 2019	Last review and approval date by the Group Risk and Sustainability Committee	May 2021
V1.2	19 May 2021	Last review and approval by the Group Social, Ethics and Transformation Committee	May 2023
V1.3	17 May 2023	Last review and approval by the Group Social, Ethics and Transformation Committee	May 2025

Contents

Approval And Ownership..... 2

Revision History 2

Definitions and Abbreviations 4

1 Preamble and Policy Summary..... 4

2 Purpose and Objective 5

3 Scope..... 5

4 Roles and Responsibilities 5

5 Regulatory Background 6

6 Policy Statement..... 6

 6.1. Commitment.....6

 6.2. Guiding Principles7

7 Communication 8

8 Related Policies and Other Documents 8

9 Raising Concerns and Seeking Guidance 8

10 Breach of Policy..... 9

11 Deviations from Policy 9

Definitions and Abbreviations

Table 1: Definitions

Terminology	Description
Barloworld, the Company, or the Group	<p>Barloworld means Barloworld Limited and its subsidiaries, divisions, and business units in all countries in which it does business, or any individual subsidiary in its own capacity.</p> <p>It does not include joint ventures, other than those where Barloworld exercises management control, nor does it include investments where Barloworld owns less than 50%.</p>

1 Preamble and Policy Summary

Barloworld is an industrial processing, distribution and services company with two primary areas of focus: Industrial Equipment & Services and Consumer Industries (food and ingredient solutions).

Our provision of Industrial Equipment and related services, offers earthmoving equipment, industrial services, and power systems, which enable the operation and maintenance of a large array of mining, construction, and power solutions for our customers, with whom we have built enduring relationships based on mutual trust. Through our Consumer Industries business, Ingrain, we provide large enterprises with the ingredients essential to the manufacturing of a range of products including food and beverages, paper, pharmaceuticals, building materials and adhesives, amongst others.

One of Barloworld's core competencies is its ability to leverage systems and best practices across its chosen business segments. As an organisation we are committed to sustainable development, which remains a corporate priority.

Responsible waste management is a material element of Barloworld reducing its environmental impact and central to its strategic ambitions, sustainable value creation approach and making a world of difference to its stakeholders.

As a responsible corporate citizen Barloworld:

- a) Appreciates the importance of responsible waste management, recycling, reuse, recovery, extended lifecycle (rebuild and remanufacture), and responsible waste disposal.
- b) Recognises irresponsible waste management practices are a threat to the environment as well as the health and safety of its employees, biodiversity, the communities it serves and operates in, and poses a serious threat to the ecology.
- c) Encourages all its stakeholders to consider positive steps they may take with regards to responsible and sustainable waste management.

- d) Participates in its value-chain to promote responsible waste management and appropriate responses.
- e) Invests in recycling, remanufacture, and rebuild facilities that support internal waste management imperatives and broaden customer offerings.
- f) Commits to handling waste, including hazardous waste, according to applicable local regulatory requirements and international standards.
- g) Recognises that sustainable waste management practices provide opportunities for cost savings and support Shared Value creation
- h) Has clear accountability for waste stewardship with the group's Board and Executive, as a part of good corporate governance
- i) Incorporates waste management and related considerations in its strategic framework, which is underpinned by sustainable development.

2 Purpose and Objective

As part of its business model, Barloworld strives to minimise the negative impacts of its operations on the environment and biodiversity. Waste management considerations form an integral part of daily business activities, including risk management, strategic planning, capital and operational expenditure, investments and operating procedures.

The objective of this policy is to drive responsible waste stewardship within the Barloworld operating context and to outline the minimum expectations across Barloworld to minimise waste while enhancing responsible waste management and waste disposal practices within its direct operations.

3 Scope

The policy applies to all Barloworld employees, across all its operations and territories.

4 Roles and Responsibilities

Divisional CEOs and Board of Directors in each division are the environmental champions and are responsible and accountable for waste management practices.

Divisional Executive management have the responsibility to ensure compliance with this policy and at their discretion to define the processes, procedures and other mechanisms by which the policy is implemented.

Implemented processes ensure that the Barloworld Group Chief Executive Officer and Board of Directors are fully informed about pertinent environmental issues, including waste management.

5 Regulatory Background

Across the various jurisdictions where Barloworld operates, waste management regulations are in place that serve to govern and regulate activities related to waste including management, handling and disposal.

At a minimum, we expect all Barloworld operations to comply with their relevant local legislative framework and regulations, including those related to waste.

Examples within the South African jurisdiction include, National Environmental Management Act (NEMA), supported specifically by the Waste Act.

6 Policy Statement

6.1. Commitment

- 6.1.1. Waste management is an integral part of management in the company and is recognised as one of the corporate priorities.
- 6.1.2. In all its divisions, Barloworld will publish divisional Waste Management Policies appropriate to the business of each division, subordinate to this company policy, which will, inter alia:
 - a) Establish clear accountability for waste management performance with divisional Executives and top management, as a part of good corporate governance.
 - b) Require compliance with relevant waste management legislation, other standards and codes of practice to which the company subscribes.
 - c) Where practicable, optimise responsible waste management, prioritizing waste minimisation through source reduction and selective purchasing, recycling, recovery and reuse, extended lifecycle (rebuild and remanufacture), and responsible waste disposal.
 - d) Ensure that waste management considerations form part of the company's overall business and risk management processes.
 - e) Ensure responsible waste management considerations, are incorporated into its facilities and maintenance cycles, its strategic plans as well as expansion projects and acquisitions.
 - f) Promote waste management awareness within company operations.

- g) Require the maintenance of open dialogue with stakeholders, including customers and suppliers to promote environmental protection through responsible waste management practices.
- h) Develop contingency procedures to deal with unscheduled occurrences and community concerns.

6.1.3. Environmental Management Systems implemented in the divisions will include aspects of waste management to guide environmental responsibility and accountability at all levels of management and continual improvement of environmental performance through self-assessment and auditing.

6.1.4. Barloworld will continue to assess its physical, regulatory, reputational and financial risks associated with waste and, where practicable, adapt its operations, processes and procedures accordingly. It will also pursue relevant identified opportunities where practicable.

6.2. Guiding Principles

6.2.1. All operations shall comply with the following principles and initiatives:

- a) Measurement and reporting of material environmental indicators including waste management.
- b) Appropriate targets are set and initiatives implemented once reliable baselines have been achieved for applicable indicators.
- c) Monitoring and reporting mechanisms track progress made against set targets.
- d) Aspirational improvement targets set for responsible waste management practices.

6.2.2. Barloworld is cognisant of its responsibility for all its products and services, raw material usage and management of waste products after use. Where practicable Barloworld will make sustainable use of renewable resources and, wherever practicable, use renewable or recyclable materials. In addition, the company will promote the efficient and optimal use of finite resources, thereby conserving such resources. The company will reduce and, where practicable eliminate, waste through appropriate and sustainable waste minimisation techniques. All waste will be handled and disposed of through legally compliant, safe and responsible methods. The management of waste by disposal to landfill will be used as a last resort, where alternatives are not practicably available.

6.2.3. Waste management considerations will form part of assessments for significant new projects and of the planning phase for modifications to existing operations.

6.2.4. Barloworld will strive to minimise the environmental, health and safety risks to employees and the communities in which the company operates through safe technologies, facilities and operating procedures.

6.2.5. All operations will be prepared for emergencies. Barloworld divisions will strive to appropriately communicate with those affected by conditions caused by the company that endangers the environment, biodiversity or public health and safety.

7 Communication

This policy should be communicated to all Barloworld employees, across all its operations and regions.

8 Related Policies and Other Documents

All operations within the Barloworld Group are expected to uphold the principles contained within this policy which is to be read in conjunction with the policies as detailed below:

Document Name
Barloworld Worldwide Code of Conduct
Barloworld Climate Change
Barloworld Environmental
Barloworld Energy Efficiency Policy
Barloworld Water Use and Management Policy

9 Raising Concerns and Seeking Guidance

If any person is seeking advice on aspects within this policy, they are encouraged to contact the Head: Group Sustainability (sustainability@barloworld.com).

If any person becomes aware of a circumstance or action that violates or appears to violate this policy, they are encouraged to contact their manager, or alternatively the Barloworld Ethics Line at www.tip-offs.com.

The Barloworld Ethics Line is an independent and confidential system for reporting allegations of unethical behaviour, illegal actions, or actions that violate the Barloworld Worldwide Code of Conduct.

The Barloworld Global Whistleblowing Policy applies to the use of the Barloworld Ethics Line and it contains the contact details pertaining to each company, division, or business unit.

Barloworld is committed to ensuring that no employee suffers any occupational detriment as a result of reporting a genuine concern in good faith.

10 Breach of Policy

Barloworld has established clear reporting structures in all divisions that culminate in compliance with relevant legislation and adherence to this policy. Material waste aspects impacting the environment and/or health and safety of employees or communities are reportable to the respective divisional Executive Committee and other relevant divisional governance structure/s and thereafter to the group Executive Committee, and to the group Social, Ethics and Transformation Committee, a sub-committee to the Board of Directors.

It is the responsibility of Divisional CEO and Board of Directors in each division to comply with this policy and failure to do so by any employee could amount to disciplinary action and a material breach of the contract of employment.

11 Deviations from Policy

It is the responsibility of divisional Executive management to ensure that this policy is adopted and approved by an appropriate divisional Executive Committee.

Any deviations to this Barloworld group policy that amend the meaning or lower the minimum standard of the group policy requirements must be tabled, approved and recorded at a Divisional Executive Committee meeting, and thereafter tabled, approved and recorded at the Group Social, Ethics and Transformation Committee.

Any deviations that add more specific requirements, and therefore raise the minimum standard of this Barloworld policy, may be included at the discretion of divisional Executive management and then, tabled, approved and recorded at a Divisional Executive Committee meeting.

Language translations of Barloworld policies must be conducted or checked by a professional language translator to avoid translation errors that may change the meaning of the policy requirement.