

## ENVIRONMENT POLICY

(Applicable to all locations: Vatva GIDC – Ahmedabad & Sayakha – Gujarat)

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**Approved by:** Managing Director

### Preamble

Crystal Quinone Pvt. Ltd. (CQPL) is a manufacturer of fine chemicals, specialty intermediates, dye intermediates and CDMO products operating at two sites in Gujarat, India — **Vatva GIDC, Ahmedabad** and **Sayakha**. In pursuing excellence, growth and long-term value for customers and society, CQPL recognizes that responsible environmental stewardship is a core business obligation. This Environment Policy integrates CQPL's commitments on energy, greenhouse gases, water, air quality, materials, chemicals and waste, product sustainability, customer health and safety, and applicable legal compliance into a single, unified framework.

"CQPL is a signatory of the United Nations Global Compact (UNGC) and is committed to upholding and advancing the Ten Principles of the UNGC on human rights, labour standards, environmental responsibility and anti-corruption in all its operations and business relationships."

This policy applies to all operations, employees, contractors and activities at both CQPL locations and is communicated to all relevant internal and external stakeholders.

### 1. Energy Consumption and Greenhouse Gases

CQPL recognizes that energy use and associated greenhouse gas (GHG) emissions are material environmental risks in chemical manufacturing. CQPL is committed to:

- Complying with all applicable legal requirements, regulations and other obligations related to energy use, consumption, efficiency and GHG reporting.
- Continually improving energy performance across all processes, utilities and buildings at both sites through monitoring, target-setting and regular review.
- Following a scientific approach to energy management and ensuring availability of information, technology and resources to achieve energy objectives and targets.

- Supporting the procurement of energy-efficient equipment, products and services, and incorporating energy performance considerations into the design of new or modified processes.
- Maintaining an annual site-level GHG inventory in line with ISO 14064-1 and the GHG Protocol, covering Scope 1 (direct), Scope 2 (electricity) and relevant Scope 3 (value chain) emissions.
- Setting and tracking GHG reduction targets, including transitioning to renewable energy sources (e.g. rooftop solar PV) to reduce Scope 2 emissions.
- Calculating and disclosing Product Carbon Footprints (PCFs) for key products in line with ISO 14067 and the TFS PCF Guideline, to support customers' Scope 3 accounting.
- Promoting awareness and shared responsibility among all employees and interested parties for energy and climate performance improvement.

## **2. Water**

CQPL is committed to responsible water use and the protection of water quality at both sites.

CQPL is committed to:

- Reducing total water consumption per unit of production through efficient process design, operational discipline and use of resource-efficient equipment and technology.
- Conducting regular awareness programmes for employees on water conservation and responsible water use in process and utility operations.
- Reusing process water wherever technically and operationally feasible, including recovery and recirculation in cooling, washing and reaction steps.
- Treating all process effluents through on-site Effluent Treatment Plants (ETPs) before discharge to CETP or approved disposal routes, ensuring compliance with applicable GPCB/CPCB effluent standards.
- Implementing measurement systems to monitor water consumption and effluent quality parameters, and using data to drive continuous improvement.
- Preventing contamination of groundwater and surface water through proper containment, spill prevention and secondary containment measures.
- Complying with all applicable water withdrawal, discharge and pollution prevention regulations at both Vatva GIDC and Sayakha sites.

## **3. Air Pollution**

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CQPL acknowledges that chemical manufacturing operations may generate air emissions and odours that can affect local air quality and communities. CQPL is committed to:

- Complying with all applicable statutory standards and consent conditions for air emissions (including particulate matter, VOCs, acid gases, odour and stack emissions) at both sites, as prescribed by GPCB/CPCB.
- Installing and maintaining appropriate air pollution control equipment (scrubbers, condensers, carbon adsorbers, bag filters) on all significant emission sources, and ensuring their continued effective operation.
- Monitoring stack and fugitive emissions at the frequency required by regulatory authorities and internal procedures, and maintaining records of all monitoring results.
- Minimizing the use of ozone-depleting substances (ODS) and phasing out HFCs/HCFs in refrigeration and air-conditioning systems in line with Indian regulatory timelines.
- Implementing solvent management and recovery systems to reduce VOC emissions and improve raw material efficiency.
- Investigating and promptly addressing any community complaints related to odour or dust from site operations.

#### **4. Materials, Chemicals and Waste**

CQPL is committed to the responsible sourcing, storage, handling and disposal of all materials, chemicals and wastes. CQPL is committed to:

- **Reducing waste at source:** optimising process yields, reaction selectivity and raw material use to minimize generation of process wastes, spent solvents, spent acids and other by-products.
- **Reusing and recycling:** maximising recovery and internal reuse of solvents, by-products (e.g. HCl, spent sulphuric acid, sodium bisulphite) and other materials before external disposal; and segregating wastes at source to enable higher-value recycling or co-processing.
- **Safe storage and handling:** ensuring chemicals are stored and handled in accordance with applicable regulations, Safety Data Sheets (SDS/MSDS), CPCB/GPCB rules for hazardous chemicals storage, and the Manufacture, Storage and Import of Hazardous Chemical Rules.
- **Hazardous waste management:** disposing of all hazardous wastes (including TSDF-routed wastes, spent catalysts and contaminated packaging) through authorised,

licensed Treatment, Storage and Disposal Facilities (TSDFs), maintaining proper manifests and records in compliance with Hazardous and Other Wastes (Management and Transboundary Movement) Rules.

- **Sustainable procurement:** evaluating and, where practicable, preferring suppliers and raw materials with lower environmental impact, higher recyclability or improved resource efficiency.
- Engaging employees, suppliers and contractors in responsible materials and waste management practices.
- Developing and maintaining environmental management frameworks and reporting that promote data integrity, transparent communication and continuous improvement.

## 5. Product Use

CQPL recognizes that its specialty chemicals and intermediates are used in downstream manufacturing processes, and that responsible product stewardship extends beyond the factory gate. CQPL is committed to:

- Providing accurate, up-to-date Safety Data Sheets (SDS/MSDS) for all products, in line with GHS/UN classification requirements and Indian chemicals regulations, enabling customers to use products safely and in compliance with applicable laws.
- Communicating relevant environmental, safety and handling information (including storage conditions, incompatibilities, spill response and disposal guidance) clearly on product labels, technical data sheets and packaging.
- Continuously reviewing and improving product formulations and process chemistries to reduce the use of hazardous substances (SVHC, CMR materials, persistent chemicals) and to identify safer alternatives wherever technically feasible.
- Providing Product Carbon Footprint (PCF) data for key products, enabling customers to make informed decisions on product selection and to reduce their own Scope 3 emissions.
- Maintaining compliance with applicable product-related regulations, including REACH (for export to EU customers), BIS standards and any customer-specific chemical restrictions lists (e.g. RSL/MRSL).

## 6. Product End-of-Life

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CQPL acknowledges its responsibility for the life-cycle impacts of the products and packaging it sells. CQPL is committed to:

- Designing products and packaging that facilitate safe disposal, recycling or recovery at end of life, in line with applicable extended producer responsibility (EPR) principles and regulations.
- Providing customers and downstream users with clear guidance on the safe disposal, neutralization or treatment of product residues, spent containers and packaging waste, in line with applicable regulations.
- Reducing packaging material intensity per unit of product through lightweighting, recycled-content use and elimination of unnecessary secondary packaging.
- Engaging with customers and industry bodies to improve end-of-life outcomes for chemical intermediates, by-products and packaging, and to support circular economy principles in the specialty chemicals sector.
- Tracking applicable regulatory developments on packaging EPR, single-use plastics and product take-back obligations, and incorporating compliance into product and packaging design decisions.

## **7. Customer Health and Safety**

CQPL is committed to ensuring that its products do not pose unacceptable risks to the health and safety of customers, downstream users or end consumers. CQPL is committed to:

- Ensuring all products are manufactured, quality-checked and dispatched in full conformance with agreed customer specifications, quality standards (ISO 9001, BRC/FAMI-QS where applicable) and applicable regulatory requirements.
- Providing comprehensive, accurate and current Safety Data Sheets (SDS/MSDS) and technical documentation with every product, in the language and format required by customers and applicable law.
- Promptly notifying customers of any changes in product composition, impurity profile, specification or process that may affect product safety, regulatory status or downstream use.
- Maintaining a structured product complaint and incident management system, with timely investigation and corrective action for any reported customer health and safety concern.

- Classifying all products in accordance with GHS/UN criteria and labelling them accordingly, ensuring that hazard information is clearly communicated at the point of supply.
- Engaging with customers on product stewardship topics, including safe handling, storage, transport and emergency response, and supporting customers' own health and safety obligations.

### **General Commitments**

In support of all seven areas above, CQPL is committed to:

- Complying with all applicable environmental, chemical safety and product-related legislation and regulations in India and in the countries where our products are sold.
- Establishing, monitoring and periodically reviewing environmental objectives, targets and KPIs at both Vatva and Sayakha sites.
- Conducting periodic internal audits and management reviews of environmental performance, and using findings to drive continuous improvement.
- Communicating this policy to all employees (including temporary and contract workers), suppliers and other interested parties, and making it available publicly on request.
- Integrating environmental considerations into business planning, capital investment decisions and new-product development.

### **Approved by: Aniket Shah**

Managing Director

Crystal Quinone Pvt. Ltd.

Date: 14 / 01 / 2026

This single policy now replaces and supersedes the three separate policies previously submitted (Energy Policy, Water Management Process and Waste Policy). It is aligned with Environment sustainability risk themes and is applicable to all CQPL locations