

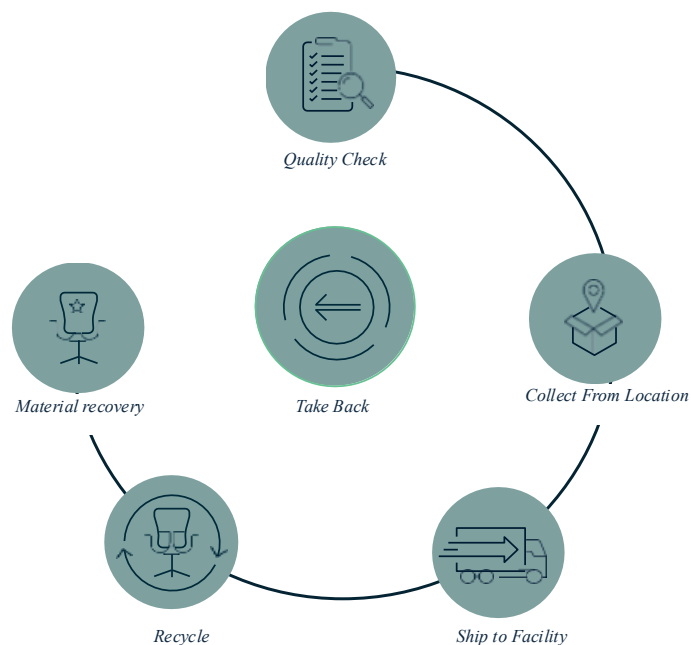


"Royal Return"

TAKE BACK PROGRAM

Operating Manual & Procedure Guide

End-of-Life Product Stewardship for ROYAL SAFE Company^{KB}



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1. Introduction and Purpose

Royal Safe Company (KB), trading under the brands ROYAL SAFE, is committed to responsible product stewardship throughout the full lifecycle of its furniture. The environmental impact of a chair or table does not end when it is delivered; at the end of its useful life it becomes a waste stream of steel, plastics, foam, fabric and wood that, if unmanaged, ends up in landfill.

The Take Back Program gives customers a practical, documented route to return Royal Safe products that have reached the end of their useful life, so that they can be dismantled and recycled through certified recycling partners rather than being sent to landfill. The program is focused on recycling only. Refurbishment and repair can take place at any point during a product's service life through the company's after-sales service, whereas recycling is the end-of-life option; recycling is therefore the sole route covered by this manual. Refurbishment, component reuse and energy recovery are not part of this program.

This manual converts the company's Take Back Program commitment into a working procedure. Its purpose is to:

- define who is responsible for each stage of the program;
- set out the eligibility criteria and commercial basis for a take back;
- describe step by step how a take back request is received, assessed, collected, processed and closed;
- establish how returned products and materials are routed (recycling through certified partners; authorised disposal of non-recyclable residue only);
- specify the records, forms and performance indicators used to demonstrate that the program is operating; and
- provide objective evidence of conformance with BIFMA e3-2024 clauses 6.3.1 and 6.3.2.

2. Scope

2.1 Products covered

The program applies to furniture manufactured and supplied by Royal Safe Company under the ROYAL SAFE brand, including seating (office, task and institutional chairs) and tables, supplied to institutional and commercial customers in India.

2.2 Activities covered

All activities from customer awareness and request intake through to assessment, collection, transport, dismantling and segregation, recycling through certified partners, and final closure with the customer, including the records generated at each stage.

2.3 Exclusions

- Products not manufactured or supplied by Royal Safe Company, unless specifically agreed in writing by management.
- Products contaminated with hazardous, biological or chemical substances that cannot be safely handled by Royal Safe personnel or its partners.
- Routine warranty repairs, service calls, and refurbishment or repair of products during their service life, which are handled under the company's after-sales process and are not part of this end-of-life program.

3. Policy Commitment

Royal Safe Company's Top Management commits to the following principles, which govern every take back carried out under this manual:

Commitment	What it means in practice
Extended Producer Responsibility	Royal Safe accepts responsibility for its products beyond the point of sale and offers practical, accessible end-of-life options to all customers.
Waste Diversion from Landfill	Furniture reaching end of life is actively diverted away from landfill and incineration through material recycling by certified recycling partners.
Customer Support & Transparency	Information about end-of-life options is made freely available through the website, sales collateral, product documentation and customer support channels. No customer should be without guidance on how to responsibly manage Royal Safe furniture at the end of its useful life.
Supply Chain Collaboration	Royal Safe works with certified recycling partners so that segregated materials are recycled responsibly and in accordance with applicable Indian environmental regulations.

This commitment is endorsed by Top Management and reviewed annually as part of the management review.

4. Terms and Definitions

Term	Definition
Take Back	The return of used Royal Safe products from a customer to Royal Safe (or its authorised partner) for end-of-life management.
Extended Producer Responsibility (EPR)	The principle that a producer remains responsible for its products through to the end of their life, including collection and recycling.
Assessment & Quality Check	Inspection of returned products to identify the product, record its condition and decide the appropriate disposition.
End of Life	The point at which a product is retired by the customer and is no longer to be used. Refurbishment or repair during the service life is outside this program.
Recycling	Reprocessing of segregated materials (steel, aluminium, plastics, wood, packaging) by a certified recycling partner into raw material for new products.
Dismantling & Segregation	Dismantling of a returned product and segregation of its parts by material type so that each stream can be sent to a certified recycling partner.
Landfill Diversion Rate	Weight of returned material recycled, divided by total weight of material taken back, expressed as a percentage.
Certified Recycling Partner	An external recycler or waste handler holding valid registrations / authorisations required for the material it handles and approved under Section 9.
Disposition	The final route assigned to returned material: recycling through a certified partner or, for non-recyclable residue only, authorised disposal.

5. Roles and Responsibilities

Role	Responsibilities
Top Management	Approves this manual and the program budget; endorses the policy commitment; chairs the annual review; approves exceptions (e.g. quantities below the minimum).
Take Back Program Coordinator (Sustainability / EHS)	Owns this manual; maintains the Take Back Register; coordinates each take back end to end; approves recycling partners; compiles KPIs; issues the closure certificate to the customer.
Sales & Customer Service	Informs customers about the program at quotation and delivery; includes take back terms in contracts where requested; receives and logs take back requests; acts as the customer's single point of contact.
Dispatch & Logistics	Plans collection, arranges vehicles, prepares the Collection & Handover Note, and ensures safe loading and transport.
Production Workshop / Stores	Receives returned products; performs assessment and quality check; dismantles and segregates materials by type; weighs and records outgoing material; hands material over to certified recycling partners.
Certified Recycling Partner	Receives segregated material; processes it responsibly and legally; provides weight slips and recycling / receipt certificates.
Customer	Submits the request with accurate product details; makes products accessible for assessment and collection; confirms handover.

6. Program Eligibility and Commercial Terms

6.1 Minimum quantity

A minimum of 30 chairs (or an equivalent volume of Royal Safe furniture) is required per take back, in order to optimise the logistics costs and emissions involved in collection. Requests below this quantity may be consolidated with other collections in the same area or considered case by case with Top Management approval.

6.2 Timeframe

The target timeframe from receipt of a complete request to closure is approximately three (3) weeks, subject to quantity, location and partner availability.

Program at a glance	Value	Remarks
Minimum quantity	30 chairs	Or equivalent volume; exceptions by management approval
Target turnaround	~3 weeks	From complete request to closure certificate
End-of-life route	Recycling only	Via certified partners; disposal of non-recyclable residue only
Customer receives	Closure certificate	Including quantities and recycling summary

7. Take Back Procedure

The take back process follows five core stages — Quality Check, Collect from Location, Ship to Facility, Dismantle & Segregate, and Recycle through Certified Partners — supported by request intake at the start and formal closure at the end. The flow is summarised below and each step is detailed in Sections 7.1 to 7.8.

Step	Activity	Responsible
1	Customer awareness	Sales & Customer Service
2	Request intake	Sales & Customer Service
3	Assessment & quality check	Coordinator / Workshop
4	Collection from location	Dispatch & Logistics
5	Ship to facility	Dispatch & Logistics
6	Receipt & segregation	Workshop / Stores
7	Recycle via certified partner	Workshop / Recycling Partner
8	Closure & reporting	Coordinator

7.1 Customer Awareness

Responsible: Sales & Customer Service

Customers must know the program exists and how to use it before they need it.

- Introduce the program at quotation stage and offer to include take back terms in the purchase agreement.
- Supply the one-page Take Back Program customer notice with every delivery.
- Keep program information current on the company website and in sales brochures.

7.2 Request Intake

Responsible: Sales & Customer Service

Capture every request completely so it can be assessed without repeated follow-up.

- Receive the request by e-mail, phone or website and complete the Take Back Request Form (Annex A) with the customer.
- Record product type, model, quantity, approximate age, invoice reference (if available), site address and contact person.
- Request photographs of a representative sample of the products.
- Assign a unique Take Back Reference No. (format TB-YYYY-NNN) and enter it in the Take Back Register.
- Acknowledge the request to the customer within 2 working days, quoting the reference number.

7.3 Assessment & Quality Check

Responsible: Take Back Program Coordinator with Production Workshop

Confirm that the products have reached end of life and can be accepted for recycling, and estimate the material streams involved.

- Review the request form and photographs; where needed, arrange a site visit.
- Confirm the products are of Royal Safe and identify models.
- Record each product lot on the Assessment & QC Checklist, noting quantity, estimated weight and main material streams (metal, plastic, wood, foam / fabric).

- Confirm acceptance, proposed collection date and any commercial terms to the customer in writing.

7.4 Collection from Location

Responsible: Dispatch & Logistics

Collect products safely and with a clear record of what was handed over.

- Agree the collection date, time window, site access and loading point with the customer.
- Allocate a suitable vehicle and trained handling staff with appropriate PPE.
- Count and verify products against the accepted request; record any differences.

7.5 Ship to Facility

Responsible: Dispatch & Logistics

Move collected products to the Royal Safe plant at Sonipat or to an approved local partner, whichever minimises transport distance and handling.

- Load products securely to prevent injury, loss of parts and loss of material in transit.
- Carry the required transport documents (delivery challan / e-way bill as applicable).
- Where products are shipped directly to a local partner, notify the Coordinator and obtain the partner's receipt.

7.6 Receipt and Segregation

Responsible: Production Workshop / Stores

Confirm what has arrived and prepare products for their disposition route.

- Receive products in the designated take back area, kept separate from new stock.
- Reconcile quantities with the Collection & Handover Note.
- Dismantle all products and segregate components by material type (see Section 8).
- Weigh each segregated material stream and record the weights against the Take Back Reference No.

7.7 Recycling through Certified Partners

Responsible: Production Workshop / Certified Recycling Partner

Return end-of-life materials to the production cycle as recycled raw material.

- Dispatch segregated materials to approved recycling partners only; obtain a weighment slip and receipt / recycling certificate for every consignment.
- Send residual non-recyclable waste only to an authorised waste handler, never to open dumping or burning.

7.8 Closure and Reporting

Responsible: Take Back Program Coordinator

Close the loop with the customer and capture the data needed for KPIs.

- Compile quantities received and recycled, and total weight diverted from landfill.
- Update the Take Back Register with dates, weights and disposition, and file all supporting records.

8. End-of-Life Disposition and Recycling Routes

8.1 Disposition hierarchy

All returned products are dismantled and their materials sent for recycling through certified recycling partners. Refurbishment, component reuse and energy recovery are not part of this program. Disposal is used only for residual fractions that cannot be recycled, and the reason is recorded on the Assessment & QC Checklist.

Priority	Route	Description
1	Material Recycling	Product dismantled and materials sent to certified recyclers.
2	Disposal (last resort)	Residual waste sent to an authorised facility only. No open burning or dumping.

8.2 Recycling routes by material stream

Typical material streams arising from Royal Safe seating and tables, and their intended recycling routes, are listed below.

Material stream	Typical components	Recycling route
Steel / metal	Frames, legs, mechanisms, fasteners	Metal scrap recycler
Aluminium	Chair bases, arm components (where used)	Non-ferrous metal recycler
Plastics	Shells, arms, castors, back covers, bases	Registered plastic recycler; segregate by polymer where marked
Wood / plywood / board	Table tops, panels	Wood / board recycler
Foam and fabric / mesh	Seat and back upholstery	Foam / textile recycler; non-recyclable residue to authorised waste handler
Corrugated packaging	Cartons used for re-dispatch	Paper recycler

9. Recycling Partner Management

9.1 Selection criteria

Before any material is sent to a partner, the Coordinator verifies and records that the partner:

- holds valid registrations / authorisations required for the material handled (e.g. consent or authorisation from the State Pollution Control Board, and registration with CPCB where applicable for plastics);
- is a registered business (GST registration) with a verifiable address;
- has the capacity to handle the expected volumes;

- provides weighment slips and receipt / recycling certificates for every consignment; and
- does not landfill, openly dump or burn materials received under this program.

9.2 Ongoing monitoring

- Copies of partner authorisations are kept on file and their expiry dates tracked.
- Partners are re-evaluated at least annually and whenever a non-conformance is identified.
- Where a partner fails to meet the criteria, material is not sent to that partner until corrective action is verified.

10. Records and Documentation

The following records are maintained by the Co-ordinator for a minimum of three (3) years and made available for internal review and certification audits.

Record	Owner
Take Back Request Form	Sales & Customer Service
Assessment & QC Checklist	Coordinator / Workshop
Collection & Handover Note	Dispatch & Logistics
Take Back Register	Coordinator
Material weighment records	Workshop / Stores
Recycler weighment slips & certificates	Coordinator
Take Back Closure Certificate	Coordinator
Approved Partner List & authorisations	Coordinator
Annual program review minutes	Top Management

13. Performance Monitoring and KPIs

Indicator	Calculation	Frequency
Take back requests received	Count of requests logged	Quarterly
Units taken back	Count of products received	Quarterly
Weight of material recycled (kg)	Sum of recycler weighment slips	Quarterly
Landfill diversion rate (%)	$\text{kg recycled} \div \text{total kg taken back} \times 100$	Annually
Consignments with recycling certificate (%)	$\text{Consignments with certificate} \div \text{total consignments} \times 100$	Annually
Average turnaround (days)	Closure date – request date, averaged	Annually
Customer notices supplied	$\text{Deliveries with notice} \div \text{total deliveries} \times 100$	Annually

14. Review and Continual Improvement

- The program is reviewed at least annually by Top Management, covering KPI results, customer feedback, partner performance, incidents and any changes in regulation.

- Non-conformances (e.g. missing records, material sent to an unapproved partner) are recorded and addressed through the company's corrective action procedure.
- Opportunities to improve design for disassembly, component standardisation and recyclability identified during take backs are fed back to product design.
- This manual is revised whenever the review identifies a need, and in any case every three years.

15. Regulatory and Standard References

- ANSI/BIFMA e3-2024 Furniture Sustainability Standard — Clauses 6.3.1 and 6.3.2.
- Environment (Protection) Act, 1986 and rules made thereunder.
- Solid Waste Management Rules, 2016.
- Plastic Waste Management Rules, 2016 (as amended).
- Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 — where applicable.
- ISO 14001:2015 Environmental Management System (Royal Safe Company is ISO 9001 and ISO 14001 certified).

Annexures

Annex A — Take Back Request Form

Take Back Ref. No.	TB- ____ - ____	Date of Request	
Customer / Organisation		Contact Person	
Phone		E-mail	
Site Address		City / PIN	
Original Invoice No.		Contract Take Back Clause	Yes / No
Photos Received	Yes / No	Preferred Collection Date	

S.No	Product / Model	Qty	Approx. Age (yrs)	Condition / Remarks
1				
2				
3				
4				
5				

Customer declaration: The products listed are free from hazardous or biological contamination and will be made accessible for collection.

_____ Customer Signature & Date	_____ Received by (Royal Safe) & Date
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Annex B — Assessment & Quality Check Checklist

Take Back Ref. No.		Assessment Date	
Assessed by		Method	Site visit / Photos

Check	Yes	No	Remarks
Products confirmed as ROYAL SAFE			
Quantity meets minimum (30 chairs or equivalent)			
Free of hazardous / biological contamination			
Site access and loading point suitable			
Products can be dismantled safely			
Gas lifts identified for safe handling			
Material types identifiable (metal / plastic / wood / foam-fabric)			
Approved recycler available for all material streams			

Product / Model	Quantity	Est. Weight (kg)	Main Material Streams	Remarks

All accepted products are dismantled and recycled through certified recycling partners. Refurbishment and component reuse are not part of this program.

Decision: ☐ Accepted ☐ Accepted with conditions ☐ Not accepted — Reason: _____

_____ Assessed by	_____ Approved by (Coordinator)
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