

STANDARD OPERATING PROCEDURE (SOP)

LOCAL SOP TITLE	Waste Management Plan (WMP)		
LOCAL SOP NO.	EO-GEN-008C	NO. OF REVISION	3
DEPARTMENT	Sustainability	EFFECTIVE DATE	1 November, 2025
FOR	CROSSROADS Maldives	APPLICABLE TO	All Business Units
SUPERSEDE SOP #	EO-GEN-008B	RELATED DOCUMENTS	N/A

RECORD OF REVISIONS

REV NO.	REV DATE	BRIEF DETAILS	ENTERED BY
01	16-Nov-2023	Crossroads Branding: - Replaced: Cover page footer as per brand standard - Replaced: Crossroads logo with tagline	Executive Office
02	16-Nov-2023	Replaced: Signatory of the policy	Executive Office
03	01-Nov-2024	Replaced: Designated person-in-charge to contact	Executive Office
04	01-Nov-2024	Replaced: Signatory of the policy	Executive Office
05	01-Nov-2025	Replaced: Designated person-in-charge to contact	Executive Office
06	01-Nov-2025	Replaced: Signatory of the policy	Executive Office

1. Introduction

This document intends to provide each property operating under the CROSSROADS Maldives with guiding principles on the organisational and legal requirements for managing waste generated on-site. It is the sole responsibility of the property management to adapt the WMP to local conditions where necessary and comply with the requirements.

The most appropriate procedures for handling and storing waste will vary, depending on factors such as the nature of the waste and the disposal method. However, keeping in mind the cost involved with any waste handling option, it is economically advantageous to, first and foremost, limit the amount of material that becomes waste. Procedures for handling the generated waste can then be further divided into four phases: collection, processing, storage and disposal.

This plan fulfils local government requirements and endeavours to create best-in-class practices that are followed by all our properties.

1.1. Purpose and Objectives

The main purpose of the WMP is to help property managers and supervisors:

- prevent or minimise adverse environmental effects from property operations and activities,
- promote and maintain a high level of safety for guests and team members throughout the property,
- provide team members training about the property's waste management and reduction objectives,
- promote separation of wastes at source to maximise reuse/recycling opportunities,
- prevent on-island littering and beach pollution by promoting the use of segregated bins for all team members and guests,
- provide appropriate waste handling equipment and protective clothing to ensure all waste handling, storage and disposal methods pose minimal health and safety risks and comply with government regulations,
- undertake an annual review to ensure the Waste Management Plan keeps pace with national advances in waste recycling opportunities and disposal technology,
- identify waste reduction strategies and opportunities, quantify and improve understanding of the property's waste streams,

The WMP also provides a monitoring and reporting framework enabling timely feedback of pertinent information to property management, including the preparation of an Annual Monitoring Report (AMR) on environmental and social performance.

1.2. Scope and Structure

The WMP covers property operations and activities that have the potential to negatively impact the local environment, cause health and safety issues to guests or team members, and societal impact on inhabitants of nearby local islands. The management, monitoring and reporting tasks in the waste management plan have been identified from:

- Regulation on the Protection and Conservation of the Environment in the Tourism Industry
- National Solid Waste Management Policy for the Maldives
- Draft Solid Waste Management regulatory framework
- Recent review of the waste management practice at the operational property by the EPA through the Consultancy Project on Planning and the Improved Management of Waste from Tourist Property
- ISO-14001 Environmental Management System guidelines

1.3. Administration and Implementation

The WMP will be adapted and implemented by the property management. The management must identify a key person on each property who would fine-tune and coordinate the daily operations of the property's waste management process.

The administrative structure specifies the individuals whose duties will include active participation in the waste management processes of the property, comprising training, monitoring, consultation, reporting, review and/or decision-making. It must summarise the key management and supervisory personnel who will be most closely associated with the day-to-day procedures of the WMP.

1.4. Reporting and Review

The General Manager and Assistant sustainability manager shall be responsible for ensuring that the Annual Monitoring Report is completed.

- contains the results of all monitoring activities listed in the waste management plan;
- is prepared and drafted in a timely fashion and submitted to the relevant authorities.

The Waste Management Coordinator and other department managers shall assist the Assistant sustainability manager in preparing and drafting the Annual Monitoring Report.

During the above reporting and review activities, all WMP objectives and procedures shall be reviewed, and if necessary, modified, to continually improve property environmental management practices.

Regular review of WMP objectives, performance and results also enables timely alterations whenever circumstances change and opportunities arise, such as the availability of a new recycling option or an improved technology for waste reduction. Recommendations for altering the WMP shall be reviewed and agreed upon before such changes are implemented via the production of a new Edition of the Waste Management Plan.

1.5. Relevant Regulations and Obligations

- Environmental Protection and Preservation Act 1993. Law No. 4/93
- Maldives Tourism Act 1999. Law No. 2/99
- Regulation on the Protection and Conservation of the Environment in the Tourism Industry EIA Regulations 1997
- Ministry of Tourism – Circular 88-ES/CIR/2021/101 – 1st Amendment to the “Preservation and Protection of Environment in the Maldives Tourism Industry
- Ministry of Tourism – Circular 88-ES/CIR/2019/22 – Transfer and Disposal of Waste

1.6. Aims

The CROSSROADS Maldives is committed to ensuring that all activities and services which are performed by its management and team members shall be planned, managed and conducted with due awareness, sensitivity and consideration given to the need to:

- achieve the ecologically sustainable development and operation of the property;
- minimise, and where necessary rectify or mitigate, any adverse impacts on the natural environment and its resources;
- promote equitable and sustainable use and enjoyment of the natural environment for present and future generations;
- ensure the health and safety of all team members and guests;
- ensure that all operations and developments comply with or exceed all relevant environmental regulations and government policies of the Maldives.

1.7. Waste Minimisation Strategy

To achieve cost-effective and environmentally sound results, many waste management planners use a combination of complementary techniques to manage garbage, such as:

- reduction at source
- reuse or recycling
- processing in the property (treatment)
- discharge to a reception facility for recycling

Processing, by definition, falls under the heading of physical treatment by using physical techniques to change the composition and character of the waste. It is possible to distinguish between thermal and mechanical treatment. Every recycling process represents a conversion of the material. So, the process of recycling is also a process of the production of new materials. It describes the process of producing secondary raw materials and compares a series of activities that involve collecting, sorting, processing or converting used materials into useful goods. The goal of every recycling process is to use or reuse materials from garbage in order to minimise the amount of waste. Of significance in this recycling process is that the waste processing starts with the separation.

Our properties are encouraged to identify and incorporate strategies that are feasible given local logistics, keeping in mind local regulations and commercial sensibilities.

1.8. Storage

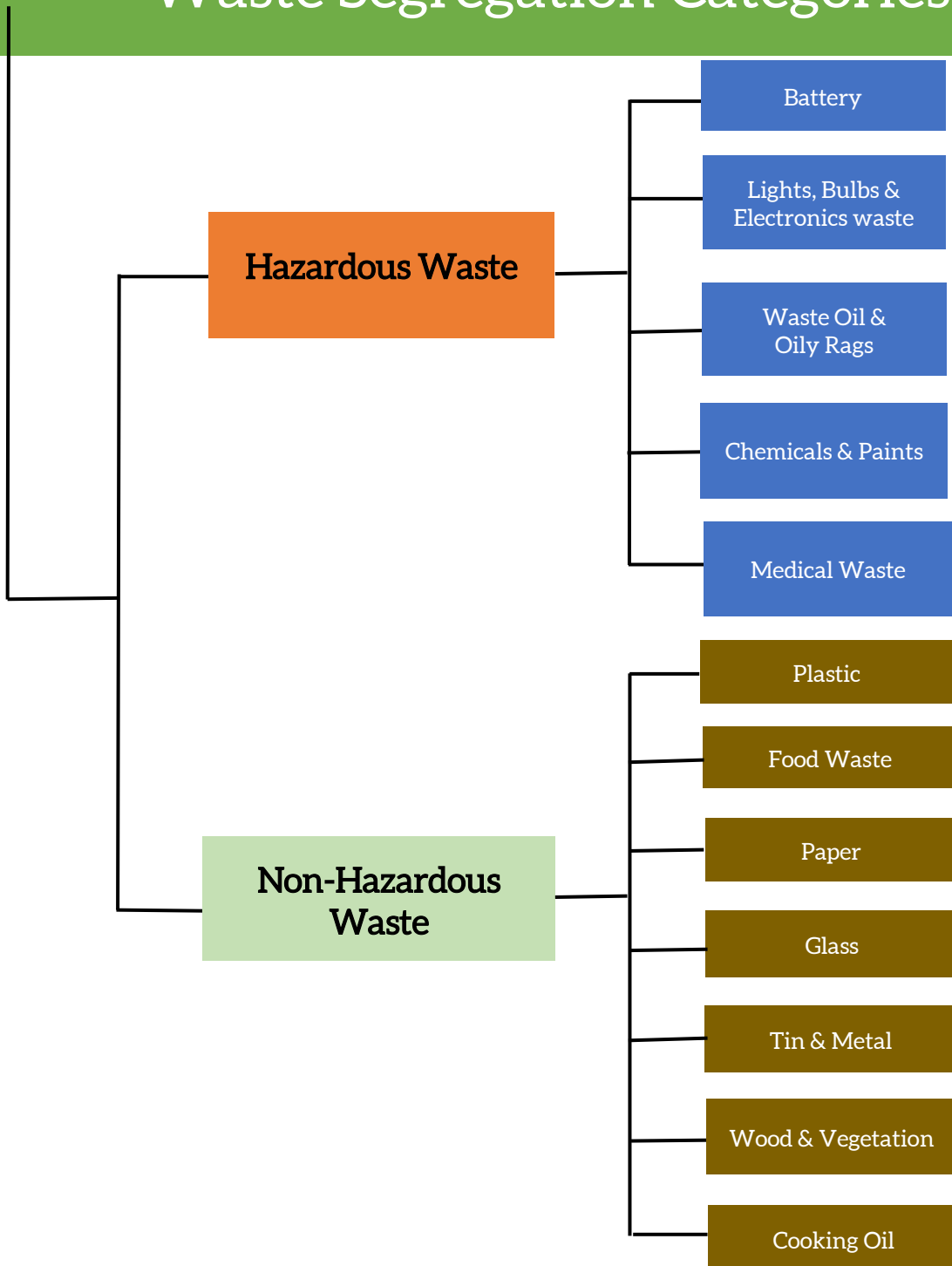
Designated processing or storage locations/containers must be identified, marked and prepared for storage of garbage collected from various areas. Waste materials must be stored in a manner which avoids health and safety hazards. All processed and unprocessed garbage stored for any length of time should be kept in adequate containers that can prevent unintentional discharge of potentially harmful material. Food wastes, medical wastes and other garbage which may carry disease or pests should be stored in tightly covered containers and kept separate from garbage which does not contain such items.

1.9. Waste Processing

The waste generated in the property is to be segregated based on its nature and subsequent processing requirements. The tourism industry is the largest generator of waste in the Maldives. The property is isolated on small islands scattered among oceanic atolls and therefore faces some unique challenges to ensure its wastes do not cause environmental degradation or health risks. Inappropriate waste disposal on small sand islands can easily cause groundwater contamination, marine pollution and wildlife damage. Poor combustion or composting methods can also generate noxious gases and smells, while inadequate handling of kitchen and sanitary wastes can pose health risks to team members and guests. In order to safeguard against these risks, the waste generated at our property has been broadly divided into Hazardous Waste and Non-Hazardous Waste, with sub-categorisations as below:

Hazardous Waste	Batteries; Lights, bulbs & electronics; Waste oil and oily rags; Chemicals & Paints; Medical Waste
Non-hazardous Waste	Plastic; Food waste; Paper; Glass; Tin & other Metals; Wood & Vegetation; Cooking Oil

Waste Segregation Categories



2. Collection & Processing of the Waste

Garbage receptacles are to be placed at identified locations, taking into consideration the type of waste being generated in that specific location.

Garbage receptacles are to be clearly labelled and marked.

Food waste that is likely to decompose (such as meat, prawn tails, etc.) to be handled carefully.

The waste **MUST** be segregated at the source and transported to the recycling station by designated persons at frequent intervals.

Waste processing and treatment include a lot of different processes. Aside from the organisational, structural and technical measures of waste treatment, the following should also be considered:

- Biological treatment
- Recycling
- Mechanical treatment
- Chemical-physical conversion
- Incineration

Separation of waste at the beginning of the process supports the treatment of the waste and helps to raise the efficiency of the facilities which deal with the waste.

Dumping of any category of waste into the Ocean is strictly prohibited.

Waste generated at the property should be processed as follows:

Hazardous Waste

Batteries	To be handed over to a scrap dealer for recycling
Lights, Bulbs & Electronics	To be handed over to a scrap dealer for recycling
Waste oil and oily Rags	Waste oil and oily rags are to be mixed and incinerated on the property and handed over to dealer for recycling
Chemicals and Paints	To be transferred to Thilafushi
Medical Waste	To be collected separately and transferred to Thilafushi as per HPA & MOT guidelines.

Non-Hazardous Waste

Plastic	Bottles are to be handed over to Parley for the Oceans NGO and other plastic waste is to be compacted and transferred to Thilafushi.
Food Waste	To be handled in the Property (if not possible to be transferred to Thilafushi)
Paper	To be incinerated in the property or to be transferred to Thilafushi
Glass	To be crushed and recycled (if not possible to be transferred to Thilafushi)
Tin & Metal	To be transferred to Thilafushi
Wood and Vegetation	To be recycled in the property
Cooking Oil	To be handed over to a scrap dealer for recycling

Our Vision (Reduce – Reuse- Recycle)

Hazardous Waste

Battery	To be handed over to a scrap dealer for recycling
Lights, Bulbs & Electronics	To be handed over to a scrap dealer for recycling
Waste oil & oily Rags	Waste oil and oily rags are to be mixed and incinerated on the property.
Chemical and Paint	To be transferred to Thilafushi
Medical Waste	To be transferred to Thilafushi

Non-hazardous Waste

Plastic	Bottles are to be handed over to Parley for the Oceans NGO and other plastic waste is to be compacted and transferred to Thilafushi.
Food Waste	To be processed through a digester, and the effluent will be sent to the wastewater treatment system for further processing and reused.
Paper	To be pulped and recycled to produce paper for property use
Glass	To be crushed and reused in property
Tin & Metal	To be compacted and handed over to a scrap dealer for recycling
Wood and Vegetation	Composting on the property
Cooking Oil	To be mixed with oily rags and incinerated in the property

2.1. Designated Person in charge (Engineering Manager or Sustainability Development Assistant Manager)

Property management must identify the designated person or persons in charge of implementing the waste management plan.

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2.2. Health and Risk Management

Potential Impact	Management Objective	Monitoring Indicator
Health risks from kitchen and domestic sanitary wastes	Ensure safe solid waste handling, storage & disposal as per Tourism Regulation	Cases of illness linked to waste handling (record and investigate)
Safety risks from inappropriate handling, storage or treatment of hazardous waste	Team members handling waste streams receive adequate safety and hygiene training and use equipment and protective clothing suited to their tasks	Any injury or accident involving a hazardous waste (record and investigate)
Smoke & noxious gases from incomplete or low temp. combustion	- Maintain high-temperature incineration. - No open rubbish fires	- Keep a log of incinerator temperature and waste types in each burn cycle. - Record any incinerator servicing problem or repair delay - Record the number of smoke or fume incidents or concerns
Environmental impact from waste collected, sorted, treated and sent to Thilafushi gets disposed of on its route to the final disposal site	Tracking the waste that is sent to Thilafushi on the supply dhoni for final disposal	Log the types and quantities of waste sent on the supply dhoni and verified by the Thilafushi
Waste management and reduction efforts hindered by team members' unawareness of the property's Waste Management Plan, including re-use/recycling opportunities	All team members understand the purpose and requirements of the property's Waste Management Plan	Quantify waste types and sources by undertaking a waste survey as part of a strategy to reduce intractable wastes
Property imports excessive amounts of intractable packaging due to the unawareness of the Purchasers & Supplier	Property requests and support efforts (a) get Suppliers to reduce the amount of non-reusable packaging, and (b) to adopt a preference ordering for beverages/water in new generation biodegradable plastic	Type of waste reduction assistance achieved by purchasers and suppliers
Transportation of marine pollutants to Thilafushi	- Provide awareness training to the crew of the supply dhoni, which takes waste back to Thilafushi - Implement the waste monitoring system to ensure that the waste loaded onto the supply dhoni reaches Thilafushi	- Team members delivering waste bags to the supply dhoni for Thilafushi, to record the date, time, type of waste, size and number of bags, in a copy of the Thilafushi Waste Disposal Monitoring Sheet - Provide a summary of the waste transportation to Thilafushi operations in the Annual Monitoring Report

2.3. Waste Management Monitoring and Reporting

The quantity of the waste disposed of using various methods, as per the WMP, is to be recorded in the Waste Disposal Record Book, as per category. The waste generated is to be monitored on a monthly and annual basis.

2.4. Training

Training should be provided to property team members who are involved in operating the waste processing equipment and handling and disposing of waste as part of their operational responsibilities.

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Strategy:	Undertake training and awareness-raising programmes targeted at the property team members on the property's waste management system.
Actions:	Provide training to team members - on the property's waste management, twice a year - on the property's waste reduction objectives, twice a year - by developing a leaflet on the new waste management system on the island and placing the leaflet in the team members' rooms
Responsibility:	Training Manager & SD
Monitoring & Reporting:	The training manager is to keep a record of the number and types of training and awareness programmes undertaken, and the number of team members involved in each programme.

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Type of incident: [a 'Near-Miss' is an incident]	
Date and time of incident:	
Location of incident:	
Cause or origin of incident:	
Outcome or result of the incident: [possible outcome if near-miss]	
Response / remedial actions taken at the time of the incident:	
Follow-up actions taken or recommended:	
RECORDED BY: Position: _	Name: _ Date _ Signature
LOGGED / FILED BY: Position:	Name: _ Date _ Signature
RECORD REVIEWED BY: Position:	Name: _ Date _ Signature

Thilafushi Waste Disposal Monitoring Sheet

Details of the Dhoni, which carries waste from the Property to Thilafushi

Name of Dhoni	
Registration Number	
Captain Name	
Captain Signature	

Details of the Waste which is loaded onto the Dhoni at the Property

Number of Bags	
Number of Containers	
Category of the waste (record each category separately)	
Date the waste was loaded.	
The time the waste was loaded.	
The date that Dhoni left the property	
The time at which Dhoni left the property	

Verification that Waste Dhoni reached Thilafushi

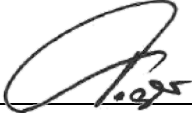
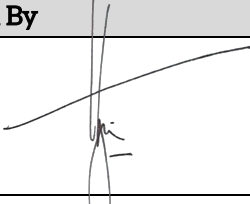
Number of Bags	
Number of Containers	
Other waste	
Date the Dhoni reached Thilafushi.	
The time at which the waste started to unload	
Time at which the waste unloading of waste finished	
Verification Signature from Thilafushi	
Title	
Date	

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Approval / Signature:

Author/Editor	Reviewed and Verified By	
		
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