

ENVIRONMENTAL POLICY

The Environmental Policy applies to all companies belonging to Hegelmann Company's subsidiaries (according to organizational structure). It is an integral part of its business strategy with a view to reducing the environmental impact of its operations.

BY TAKING RESPONSIBILITY FOR THE ENVIRONMENTAL IMPACT OF OUR OPERATIONS, WE COMMIT TO:

1. Conduct business in compliance with all mandatory environmental legislation, integrated pollution prevention and control permits and other applicable documentary requirements.
2. Preserve natural and energy resources: reduce consumption of water, electricity and materials used in our operations; use, where possible, renewable energy sources; use chemicals responsibly.
3. Reduce the waste generated by our operations and ensure safe and responsible management and sorting, reuse and recycling.
4. Reduce our carbon footprint and reach climate neutrality by 2045. For this purpose, we measure and report greenhouse gas (GHG) emissions and implement emission-reducing measures.
5. Renew the transport fleet to cleaner vehicles using alternative fuels, thus contributing to improving air quality.
6. Develop staff competences and an environmentally responsible attitude, and encourage the staff's involvement in environmental initiatives.
7. Apply all preventive measures for emergency management.
8. Implement the environmental objectives and provide the necessary resources, thereby contributing in reducing air pollution, improving water quality, conservation of resources, and preservation of wildlife, biodiversity, land, soil and forests.
9. Communicate our environmental goals and objectives to all employees, customers, service providers, suppliers, the local community and other external stakeholders.
10. Adhere to environmental principles and continuous improvement at all levels of our business.

IMPLEMENTING AND MONITORING ENVIRONMENTAL POLICY

1. The implementation and proper enforcement of this Policy Hegelmann Companies' shall be the responsibility of the managers and environmental specialists of the companies belonging to the Company, who shall ensure timely identification of the environmental aspects with actually or potentially significant impact on the environment, setting the environmental goals, establishment of the tasks to achieve the objectives, regular monitoring the achieved results, and auditing the processes.
2. In order to ensure continuous improvement in environmental performance, the companies belonging to Hegelmann shall periodically monitor and record environmental indicators to measure the level of achievement and changes.

3. Hegelmann member companies will require similar environmental standards from all suppliers, providers and contractors in order to ensure full compliance in the service supply chain.

IMPLEMENTATION OF THE POLICY

The Company has approved this policy so that all employees comply with the principles and norms established herein. Any employee who notices violations of the policy must promptly inform their manager. The Company guarantees complete confidentiality, data protection, and protection against retaliation for whistleblowers.

FINAL PROVISIONS

1. All Company employees are familiarized with the policy, which applies to all Hegelmann Companies'.
2. The Company publicly publishes the policy on its website, making it accessible to all interested parties.
3. The Company reviews the policy every 2 years to ensure it remains relevant and appropriate.

Document Title:	Environmental Policy
Approved by:	Shareholder Anton Hegelmann
Approved on:	2025-04-15
Valid from:	2025-04-15
Reviewed on:	
Policy owner:	Head of Sustainability – Environment
Policy prepared by:	Head of Sustainability – Environment
Policy publication:	Publicly available

Anton Hegelmann

