

ENVIRONMENTAL PROTECTION POLICY

Environmental Protection Department

2024

Objectives

- Preventing and minimising negative environmental impacts
- Effective managing of environmental risks/aspects
- Ensuring a unified approach to operating the environmental management system and its continuous improvement in accordance with the best international practices and requirements of the international standard ISO 14001

Tasks

- To analyse, improve and increase efficiency in the field of environmental protection
- To create an environmental impact monitoring system
- To ensure openness and transparency of communication on environmental issues
- To provide the Company's employees with the necessary resources and knowledge to perform their duties effectively
- To train and develop personnel in the field of environmental protection

Principles

- Compliance with international and Ukrainian environmental legislation
- Rational use of natural resources
- Energy efficiency
- Prevention and control of environmental pollution risks
- Responsibility towards the population in the regions of presence/activities related to environmental protection
- Openness and transparency

Areas of work

Planning/investment activities

- Consideration of environmental processes in strategic, investment and operational decision-making
- Assessment of the environmental impact of planned activities and, if necessary, taking measures to minimise the negative impact
- Implementation, maintenance and improvement of the environmental management system in accordance with ISO 14001

Organisation of activities

- Implementation of best practices in the field of resource conservation and minimisation of environmental impact in day-to-day activities, use of resource-efficient technologies
- Compliance with the requirements of Ukrainian legislation and international standards in the field of environmental protection
- Preparedness for emergencies that may affect the environment, response and elimination of possible environmental impacts

Areas of work

Building a high and sustainable culture of environmental protection for personnel

- Developing environmental awareness among employees
- Supporting social/educational projects in the field of environmental protection

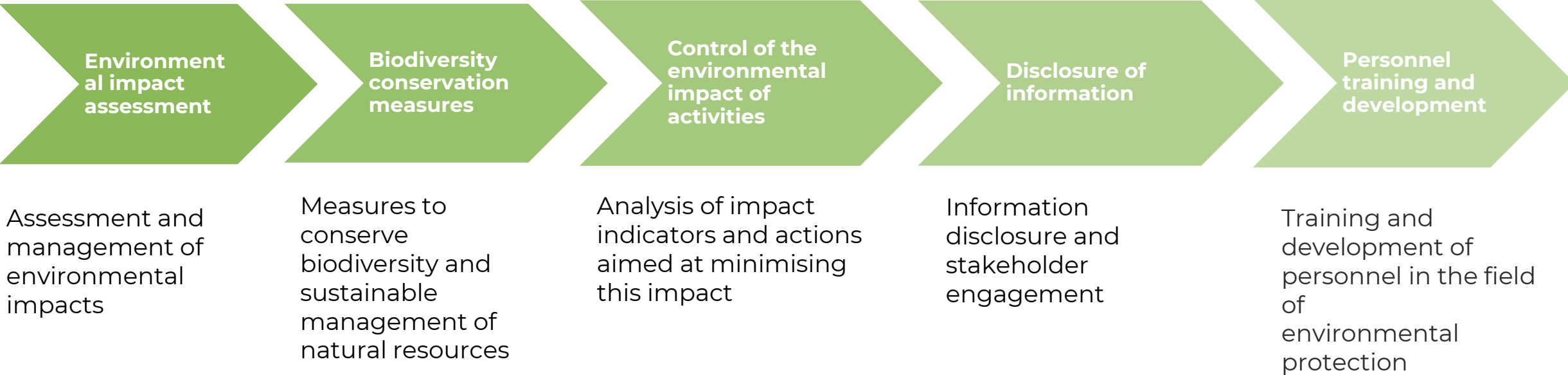
Monitoring and control of activities

- Monitoring and analysis of indicators: air pollutant emissions, water consumption, wastewater discharge, energy consumption, generation, waste management, etc.
- Monitoring of the rational use of natural resources. The results of environmental monitoring serve as a basis for decision-making and setting environmental goals and measures
- ☒ Taking measures to prevent possible emergencies (regular technical inspection of equipment)

Response in case of technogenic and natural emergencies

- Immediate start of elimination of the accident that caused environmental pollution and its consequences (stopping the production process that has a significant impact on the environment)
- Measures to minimise the environmental impact (prompt elimination of the accident consequences)

Stages of the process



Controls

- Annual monitoring of the environmental impact of its operations
- Analysis of environmental impact indicators and actions aimed at minimising this impact
- Disclosure of information on sustainable development and corporate social responsibility in the annual report in accordance with the requirements of the current legislation, international standards, principles of the Global Reporting Initiative (GRI), the European Sustainability Reporting Standard (ESRS)
- Publication of information on the principles and results of activities in the field of sustainable development for the marketing year on the Company's corporate website annually in June-July

Process participants and roles

Directors of the line of business

- Responsibility for the implementation of the Policy

Directors of enterprises

- Responsibility for the implementation of the Policy at the enterprise
- Control of prevention of violation of the Policy in the process of implementing the requirements of the Policy
- Identification of external and/or internal risks that may potentially affect the implementation of the Policy
- Ensuring response to all identified risks and implementation of appropriate control actions

Head of Sustainable Development

- Collecting information on sustainable development and corporate social responsibility
- Publication of information on the principles and results of activities in the field of sustainable development for the marketing year

Head of Environmental Protection Department

- Implementation of policy requirements at the corporate level
- Coordination of work on the implementation of the requirements of this Policy
- Periodic assessment of the overall level of environmental protection
- Coordination of certification activities in the implementation of the environmental management system
- Initiating and coordinating investigations of cases/situations of violation of the Policy

Environmental protection engineers

- Implementation of policy requirements at the assets of the business lines' enterprises
- Identification, analysis, control and management of environmental aspects of the company's activities
- Investigating and analysing situations related to deviations from regulatory requirements
- Monitoring the level of awareness of the Policy principles among new employees

Unacceptable actions

1. Violating the requirements and principles of this Policy
2. Concealing information about cases of violation of the requirements and principles of the Policy
3. Violating the requirements of international and Ukrainian legislation in the field of environmental protection

Other provisions

Approval and revision of the Policy

Shall be approved by the Director General and shall come into effect from the date of its approval

Shall be reviewed once every three years to assess its relevance and effectiveness. The policy shall correspond to the company's business needs and the dynamic nature of the business environment

Amendments and additions may be initiated by the Head of Environmental Protection, Head of Sustainable Development

The Policy shall apply to all employees of the Company

Each Employee of the Company, including temporary ones, shall be personally liable to the management and owners of the Company in case of violation of the requirements of this Policy and actions that will lead to reputational risks for the Company.

Each employee of the Company shall report violations through the Hotline 0 800 501 483 or by e-mail hotline@kernel.lu.

Process owner: Director General of the Company

Process expert (process manager): Head of Environmental Protection Department

Related documents:

- Strategy
- Corporate Code
- Policy of Sustainable Development and Corporate Social Responsibility
- Conflict of Interest Management and Anti-Fraud and Anti-Corruption Policy
- Procedure for Receiving and Reviewing Information Received via the Hotline Channels

Regulations of Ukraine

1. Water Code
2. Subsoil Code
3. Law of Ukraine “On Environmental Protection”
4. Law of Ukraine “Air Protection”
5. Law of Ukraine “On Waste Management”
6. Law of Ukraine “On Environmental Impact Assessment”