



## SUSTAINABILITY POLICY

Version:	01	Effective date:	1 February 2022
Applicable to:	All employees	Control (C):	yes
Approved by:	Board of Directors	Date of approval:	28 January 2022



## Introduction and Purpose

Elementum Energy Group (“Elementum” or “Company”) commits to powering a transition to a carbon-free society with affordable, reliable, sustainable and modern energy and ensuring that our environmental, societal, economic and governance decisions benefit future generations.

We believe that fulfilling our commitments helps to address the global challenges and achieve the UN Sustainable Development Goals (SDGs).

Elementum embeds the SDGs in its business strategy with SDG 7 Clean Energy and SDG 13 Climate Action as our key goals.

The Policy sets out general principles to ensure that all of Elementum's corporate activities are carried out in a sustainable way, contributing to the achievement of the SDGs, and rejecting actions that contradict or hinder them.

The general principles and set forth in this Policy are further developed and specified in specific environmental, social and corporate governance policies.

## Scope

This Policy applies to all employees of Elementum, regardless of their department and the position they hold and outsourcing staff.

Where Elementum participates in existing joint ventures as a non-controlling shareholder, the other shareholder(s) shall be made specifically aware about the significance to Elementum of this policy and shall be encouraged to apply the same policy or a similar standard to the joint venture.

For contemplated new minority joint venture cooperations, Elementum shall strive to commit the other shareholder(s) to adopt the policy or a similar standard for the joint venture.

## Policy Statements

### 1. ENVIRONMENTAL SUSTAINABILITY

We founded our business on the sustainability of renewables and our dedication to the idea that clean energy will ultimately cover the energy demand of the vast majority of communities and industries around the world.

Promoting access to affordable, reliable, sustainable energy, we actively contribute to combating climate change and power the transition towards a low-emissions future.

We limit our environmental impact and minimize CO<sub>2</sub> emissions through the effective resource management, control of air emissions, wastewater discharges, and soil protection at all stages of our operations.

We adhere to the principles of minimizing waste generation, recycling and reuse.

We commit to protecting the ecosystems, avoiding, and minimising or restoring biodiversity loss.

### 2. SOCIAL SUSTAINABILITY

Elementum believes that human life has intrinsic value and states that safety, health and well-being of our employees, community members or any other people with which we interact is an inviolable principle of our company.

We state that fair wages, decent, safe, transparent and predictable working conditions, work-life balance, non-discrimination and protection from harassment and violence at work are core elements of the employment relationship.

We commit to building strong bonds with the communities where we operate, taking in consideration their viewpoints and expectations regarding significant potential issues, favouring their social and economic growth.

### 3. BUSINESS SUSTAINABILITY



Elementum works against corruption in all forms, including extortion and bribery.

Elementum selects supply partners who demonstrate a commitment to continuous improvement in resource and waste management, pollution prevention, health, safety and working conditions that meets or exceeds our requirements.

Elementum believes that the taxes we pay is our obligatory contribution to the funding of social well-being and we are committed to the application of good tax practices and ensuring compliance with all applicable tax laws and regulations.

#### 4. REPORTING

We are committed to reporting on our sustainable development policies, goals and progress, reaching for the best practices to continually improve our sustainability performance and contribute to a more sustainable future.

This Policy meets the requirements of:

- International Finance Corporation's Performance Standards (2012),
- The International Bill of Human Rights and IFC Sustainability Framework (2011),
- Environmental and Social Policy of European Bank for Reconstruction and Development (2019),
- UN Sustainable Development Goals and the requirements of national legislations.

Members of Elementum Energy Group include:

- Elementum Energy Limited;
- Subsidiaries of Elementum Energy Limited.

<b>Body/Function/Individuals</b>	<b>Roles and Responsibilities</b>
Board of Directors	Approves the policy.
Chief Operating Officer	Policy Owner: owns, endorses and ensures the implementation of the policy. Advises on policy content, and ensures relevant and correct communication of policy efforts to internal and external stakeholders.
Management, employees and contract workers of Elementum	Responsible for adhering to this policy. Comply with the letter and spirit of the policy. Engage and take responsibility for ensuring that all initiatives are developed in line with the policy.

#### Deviations

No exemptions from this policy can be granted unless there are exceptional circumstances or the policy is obviously not applicable. All requests for exemptions must be made in writing to the policy owner. The policy owner must assess and decide on each request individually. Exemptions must be duly logged and documented.

#### Policy Revision

This policy must be regularly reviewed in order to ensure its continued adequacy and relevance. It may be amended at any time with the approval of Board of Directors. In the event of any discrepancies between the English version of this policy and a translated version, the English version will prevail.

#### Associated Policies and Procedures

- Climate Change Policy;
- Human Recourses Policy;
- Involuntary Resettlement Policy;



- Anti-Corruption and Anti-Money Laundering Policy;
- Conflict of Interest Policy;
- Tax Policy;
- Occupational Health and Safety Policy;
- Environmental Policy;
- Biodiversity Conservation and Sustainable Management of Living Natural Resources Policy.

**Contact**

For more information, please contact the Chief Operating Officer.