LANDBELL GROUP ENVIRONMENTAL POLICY

Version: 1.0 [June 2024]   Disclosure: Public

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1. BACKGROUND ESRS 2 MDR-P

Landbell Group is an international supplier of environmental and chemical compliance services and consulting solutions. Through our services, we help businesses globally with their compliance obligation. This policy extends our environmental efforts beyond our environmental services to identify and appropriately address the environmental impacts linked to our business operations and our value chain.

Our materiality assessment identified 3 key environmental topics relevant to our business operations and value chain: a) Climate Action, b) Waste and Pollution, and c) Circular Economy. This policy describes our approach to managing environmental impacts under each topic including identification of key issues, specific goals and targets, implementation measures, and tracking and reporting progress.
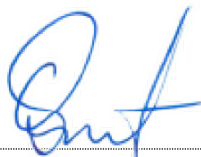
This policy applies to all entities of Landbell Group and our activities globally. Affiliates in which we have minority shareholding or control are not obliged – but are encouraged – to implement this policy voluntarily.

This policy is guided by our Corporate Sustainability Strategy and accompanied by other policies and guidelines on related topics. All relevant policies and strategies are referenced and underlined in green.

Furthermore, it is aligned with the European Sustainability Reporting Standards (ESRS). All relevant ESRS principles are referenced and marked with: ESRS Code

The policy is developed under the Sustainability Office based on a materiality assessment involving internal and external stakeholders. It is reviewed and approved by the Global Leadership Team in consultation with management teams and is endorsed by the Executive Board.

The executive board of Landbell Group formally committed to this policy. Read and endorsed on 5th June 2024 by:

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Jan Patrick Schulz, CEO

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Uwe Echteler, COO DACH

This policy is made publicly available via our corporate website landbell-group.com. In addition, it is communicated to relevant external stakeholders through respective channels and to all employees via our intranet and other internal channels.

The policy is subject to regular review and updates to reflect our progress as well as to accommodate any regulatory and strategic priorities. Further information is available via the Sustainability Office at sustainability@landbellgroup.com.

2. CLIMATE ACTION ESRS E1-2

We started taking inventory of the direct and indirect greenhouse gas (GHG) emissions across our entities in 2022. We introduced a data management system and started taking inventory of Scope 1 and Scope 2 emissions and are planning to expand this system to document Scope 3 emissions. Our primary analysis shows that for Landbell Group companies, our climate impacts are linked to the following key emissions categories and sources:
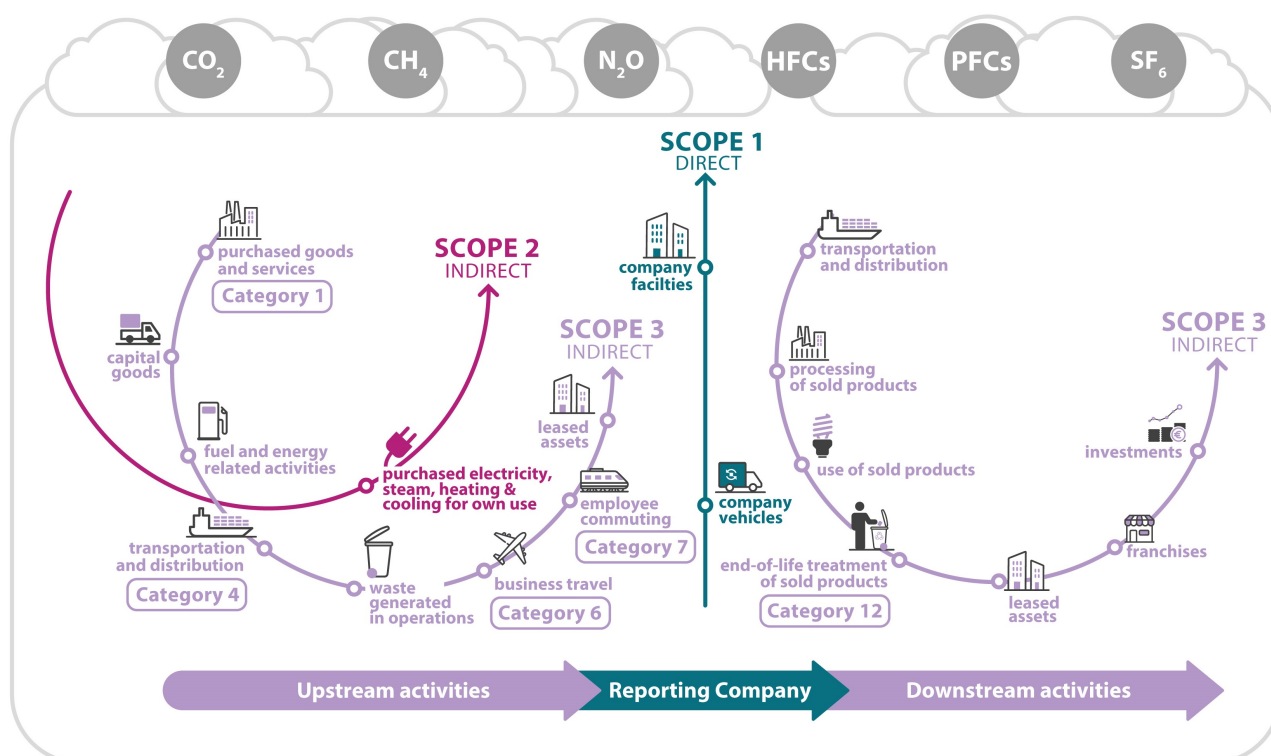
Scope 1:
- Fuels used by the fleet of vehicles owned or controlled by our entities

Scope 2:
- Electricity consumption in our offices and energy consumption for space heating

Scope 3:
- Non-production-related procurement (indirect procurement) of goods and services [Category 1]
- Logistics for transportation and distribution services purchased (direct procurement) [Category 4]
- Business-related transportation of employees in third-party vehicles, and hotel stays [Category 6]
- Transportation of employees between homes and worksites, and remote working [Category 7]
- Disposal and treatment of waste [Category 12]

Overview of GHG Protocol scopes with highlighted key Scope 3 emissions linked to our operations

Our corporate climate action initiatives have the following objectives:

a) **Reducing our emission footprint:** We prioritize reducing emissions in our operations and value chain based on the identified energy consumption and emissions hotspots.

b) **Contributing to removal efforts:** We plan to invest in permanent GHG removal efforts through high-quality nature-based as well as technology-based carbon capture projects.

c) **Supporting our customers in their climate action:** We support our customers in identifying and reducing emissions in our supply chain as per their climate action priorities and reporting obligations.

d) **Science-based target setting & disclosures:** We align our climate action with global standards and frameworks.

To meet these objectives, we are committing to various climate action measures:

a) Measures to reduce our direct and indirect emissions

Emission	Emission Source	Climate Action Measures
Scope 1	Company cars	• Monitor and reduce fuel consumption by company cars • Raise awareness of fuel efficiency among company car drivers • Plan and implement measures towards electric mobility
Scope 2	Electricity consumption in buildings	• Monitor and reduce electricity consumption in all locations • Raise employee awareness of energy efficiency in our facilities • Transition to more energy-efficient equipment • Transition to renewable electricity
	Heating & cooling (except electricity)	• Monitor and reduce energy consumption in all locations • Raise employee awareness of energy efficiency in our facilities • Transition to less emitting sources (subject to rental agreements)
Scope 3	Category 1: Indirect procurement	• Implement green procurement practices guided by our Sustainable Procurement Policy
	Category 4: Supplier vehicles	• Engage with suppliers to start taking inventory • Explore emission reduction possibilities as per our Sustainable Procurement Policy
	Category 6: Business-related travel	• Monitor the number of business trips and related emissions • Raise employee awareness of travel-related impacts • Prioritize train travel over flights • Prioritize electronic meetings over physical meetings
	Category 7: Employee commuting	• Incentivise public transport and bike rides • Promote alternative transport for all employees
	Category 12: Waste treatment and disposal	• Measure and document emissions from waste processing & disposal • Implement granular data collection

b) Measures to support removal efforts

We plan to invest in high-quality nature-based carbon removal projects on behalf of our customers including projects focused on reforestation and renaturing of moorlands. These measures shall handle unavoidable and residual emissions that we cannot reduce. Also, customers above a certain turnover threshold may receive Climate Tokens for each contract. We are currently in the process of developing this program.

c) Measures to support customers

Our climate actions are also in part guided by the sustainability needs of our stakeholders. Within this group, our customers have specific needs for their environmental initiatives and related reporting. We engage with them to understand their specific needs and to support them in their climate actions as described in our Engagement and Cooperation Strategy.

d) Measures to set science-based targets

We will expand our emissions inventory and data management system enabling us to match potential stakeholder demands for disclosing our climate actions following CDP and eventually to set targets following Science-based Target Initiative (SBTi) requirements.

3. WASTE AND POLLUTION ESRS E2-1

As a service provider of compliance solutions for Extended Producer Responsibility, we handle significant volumes of waste on behalf of our clients. Consequently, management of waste and pollution is central to our business. We strive to provide quality services on this topic to our customers while also leading with examples of managing our waste within our offices.

Waste management on customers' behalf

In 2022, we managed 1.1 million metric tonnes of waste packaging, batteries, and waste electrical and electronic equipment. Waste and pollution are therefore strongly relevant topics to our sustainability impacts. To address these topics, we focus on the following aspects:

a) **Regulatory compliance:** We require all our service providers that all waste transport and treatment on our behalf comply with all relevant local and regional regulatory requirements including export restrictions. This is ensured by our Sustainable Procurement Policy, supplementary procedure guidelines and contractual relations on waste collection and handling with our service providers.

b) **Zero pollution:** We require all our service providers that all waste streams are processed, recovered, and disposed of on our behalf with no waste leakage in the process following recognized treatment standards.

c) **Material flow transparency:** We strive to create full material flow transparency for the waste streams we manage.

Waste management at our offices

Our services are office-based with no waste resulting from manufacturing or processes. Thus, our impact here is comparably low as also our materiality assessment showed. Nevertheless, we would like to lead with example in waste and pollution management and aim to achieve the following:

a) **Best waste management practices:** We sort and dispose of our waste in our offices following the local best practices and waste management systems.

b) **Employee Awareness:** We regularly organize internal training and awareness-raising events on the topics of waste and pollution, circular economy, and sustainable production and consumption.

c) **Waste collection and clean-up efforts:** We organize waste collection events and support local communities in clean-up campaigns.

4. CIRCULAR ECONOMY ESRS E5-1

We are embracing circular economy principles and galvanizing them through innovation and partnerships. In our offices, we promote circular practices including reuse and repair of IT equipment. In our industry sector, we facilitate the transition to a more circular economy with the following objectives:

a) **Eco-design, reuse, and recyclability:** We work with our customers on the design of products and packaging for optimal end-of-life options including product reuse and efficient material recovery.

b) **Circular materials:** We work with industry partners to obtain high-quality secondary raw materials and to close the loop using circular materials in new products and packaging.

c) **Research:** We engage in research projects intending to increase the circularity of products and materials through innovative waste treatment processes and technologies.

d) **Advice:** We advise stakeholders in low- and middle-income countries globally to implement and improve waste management solutions promoting a more circular economy.

e) **Circular economy start-ups:** We support start-ups working on circular economy concepts as outlined by our Engagement and Cooperation Strategy.

5. LANDBELL GROUP'S ENVIRONMENTAL TARGETS

Climate Action

Targets	2025	2030
a) Reduction targets		
Scope 1: Transition to electric mobility for company vehicles fleet	50% (fleet)	100% (fleet)
Scope 2: Reduce electricity and energy consumption in our facilities	Set targets	Implement targets
Scope 2: Transition to renewable electricity for our facilities	50% (entities)	100% (entities)
Scope 3: Implement a data management system to document relevant emissions	Categories 1, 4, 6, 7, 12	All categories
b) Removal targets		
Direct investment in removal efforts	Establish removal programs (including Climate Token)	Implement removal programs
c) Support targets		
Document Scope 3 emissions for customers' waste transportation and processing	50% of waste volume	100%
d) Science-based emission reporting and reduction targets		
Disclosure of climate action following CDP and SBTi frameworks	Start the process	Full disclosure and validation

Waste and Pollution

Targets	2025	2030
Achieve and maintain a 100% compliance rate in our waste management operations	Zero non-compliances	Zero non-compliances
Offer full transparency of material flows in our value chain	Sampling base for all waste streams	All major suppliers covered
Increase awareness & promote best practices in waste sorting & disposal in our offices	Awareness campaign on all sites	Best practices implemented on all sites
Support waste collection and clean-up efforts in local communities	10 voluntary events	20 voluntary events

Circular Economy

| Targets	2025	2030
Increase resource allocation on circular initiatives (e.g., eco-design and recyclability)	2% of total FTE	5% total FTE
Support clients in implementing repair and reuse practices for the products they sell	1 Project	10 Projects (accumulated)
Implement repair and reuse practices for IT equipment in our offices	Initiate in the 3 largest entities (DE, UK, IT)	Expand to all Entities
Develop solutions for traceability and materials circularity	Develop Digital Product Passport for Batteries & Textiles	Implement Digital Product Passport for all waste streams
Engage in consulting projects promoting proper waste management and circular economy in low- and middle-income countries	Projects in 10 countries (accumulated)	Projects in 20 countries (accumulated)
Engage in research and innovation projects and practices promoting circular economy	5 projects (accumulated)	10 projects (accumulated)
Expand support for circular economy start-ups and initiatives	Attract more applications to the Green Alley Award	Establish investment fund for start-up joint ventures

6. ENVIRONMENTAL SERVICES AND ADVOCACY

Landbell Group is a provider of environmental services and is proactively involved in policy and advocacy on the topics of waste management, circular economy, and extended producer responsibility. Building on our expertise in running multi-waste and multi-country extended producer responsibility (EPR) solutions, we advocate for a ruleset globally promoting proper waste management and EPR in a level playing field stimulating investment into infrastructure and innovative technologies. This is creating an attractive market for secondary raw materials so that more material is kept in a circular economy and shall reduce pollution generated from improper waste management and the extraction of virgin raw materials.

7. GOVERNANCE   ESRS E1   ESRS G1-1

The Sustainability Office coordinates with the Global Leadership Team (GLT) and supports all Group entities to maintain and implement this policy. Department & Country Managers are accountable for the policy and implementation strategies. Sustainability PICs (appointed locally by managers) are responsible for implementing the policy locally and supporting data collection and reporting in coordination with the Sustainability Office. Periodic evaluation of progress towards environmental goals and actions will be conducted jointly by the sustainability office and the GLT.
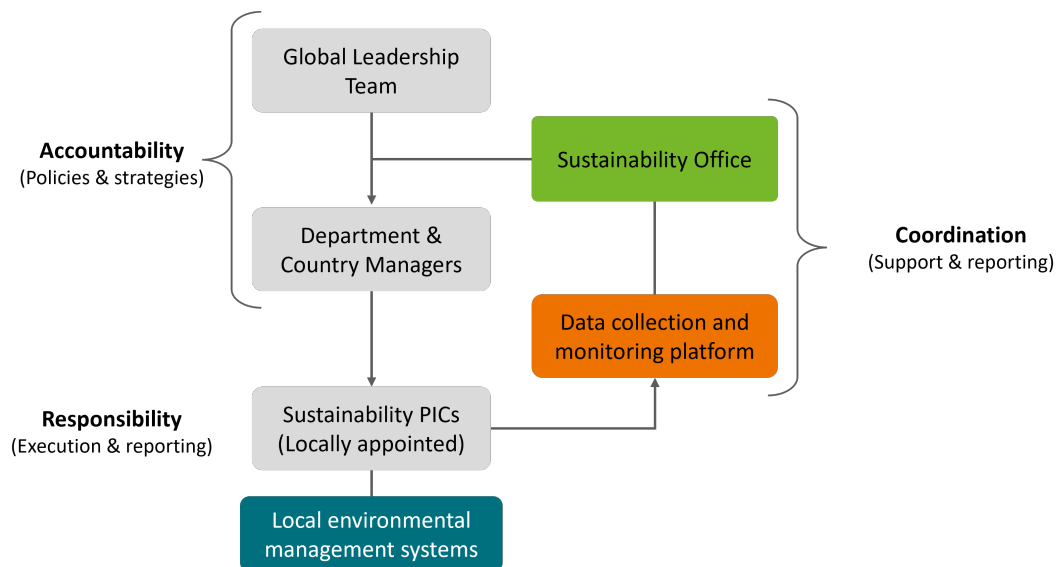
Governance structure for the implementation of this policy

Entities that maintain local energy and environmental management systems will align local efforts with this Group policy. The sustainability office will work with the operational managers on the harmonization of environmental management systems across all Group entities.

A Group-wide data collection and monitoring platform is implemented for energy and emissions data. This platform allows for taking inventories of emissions following GHG protocol. The operational managers are responsible for providing relevant information on a timely basis using the platform. The sustainability office will then analyse, consolidate, and report the climate data as part of the Group sustainability disclosures.