



APPROVED
by AS "CleanR Grupa"
Supervisory Council
Decision No. 1 (4.1.) of
16 December 2025.

APPROVED
by AS "CleanR Grupa"
Management Board
Decision No. 1 (8) of
16 December 2025.

AS "CleanR Grupa" SUSTAINABILITY POLICY

1. INTRODUCTION

- 1.1. AS "CleanR Grupa" (hereinafter CleanR Grupa or the Group) comprises Latvia's leading environmental services companies operating in the areas of waste management and recycling, premises cleaning, road and urban maintenance, as well as producer responsibility system management.
- 1.2. Care for people and the environment, as well as fair and ethical governance underpins CleanR Grupa's operations. CleanR Grupa seeks to place sustainable development at the core of its operations to promote the Group's further growth, thus not only setting an example in the industry but also, with the services it provides, making a positive impact on the business environment and society.

2. SCOPE

"AS "CleanR Grupa" Sustainability Policy" (hereinafter - Policy) applies to all companies directly or indirectly owned by AS "CleanR Grupa", in which it is a majority shareholder and maintains full operational and financial control.

3. AIM

The Policy defines a unified approach to sustainability within the Group – the Group's key principles of sustainable operation and the sustainability management system at CleanR Grupa.

4. STAKEHOLDER ENGAGEMENT

- 4.1. CleanR Grupa always seeks to find out its stakeholders' needs and opinion to ascertain the value it can bring. Therefore, the Group regularly carries out the necessary measures and activities (surveys, interviews, working groups, one-on-one meetings, etc.) to find out and monitor its stakeholders' needs.
- 4.2. The Group is aware of its impact as well as its responsibility towards its stakeholders - investors, employees, customers, policy makers and supervising authorities, suppliers, and society in general. The Group's position and role, as well as its stakeholders' opinion, serve as the basis for CleanR Grupa's sustainability approach and strategy.

5. SUSTAINABILITY FOCUS AND REPORTING

- 5.1. At least once every three years, CleanR Grupa, considering the Group's business strategy and the views of stakeholders, conducts a materiality assessment and identifies material sustainability areas.
- 5.2. Based on the results of the assessment, the Group develops and sets sustainability priorities, paying particular attention to and taking targeted measures for the responsible management of its material impacts, risks, and opportunities.
- 5.3. The Group's priorities in sustainability for 2026 -2028 are:
 - o Climate change mitigation - introducing mitigation solutions;

- Promoting Circular Economy - reducing waste and increasing resources;
- Employee safety, well-being, and growth;
- Customer satisfaction and experience improvement;
- Increasing environmental awareness in society;
- Implementation of an open and ethical corporate culture.

5.4. The Group's priority sustainability areas are integrated into the Group's business development strategy. In these sustainability areas, the Group defines targets and specific key performance indicators to be achieved.

5.5. Each year, the Group prepares a consolidated sustainability statement in accordance with European sustainability reporting standards, which is a part of the Group's consolidated annual report. The Group also publishes a separate sustainability statement. The statements are available on the CleanR Grupa's website at cleanrgrupa.lv/sustainability/.

6. SUSTAINABILITY PRINCIPLES

6.1. In its daily operations, CleanR Grupa has committed to the following sustainability principles:

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- We adhere to high legal, ethical, economic, social, and environmental standards.
 - We ensure fair competition, transparent and responsible commercial practices, and expect the same from our partners.
 - We engage in open and active dialogue with stakeholders.
 - We actively participate in the development of business and the industry, providing expert opinions and expressing our position in associations, responsible government institutions, and non-governmental working groups.
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- We invest in efficiency and modernization, infrastructure development, improving services, their availability and security.
 - We strive for the highest standards of customer service, ensuring high customer satisfaction.
 - We implement modern digital solutions that help to effectively improve remote and self-service opportunities for customers.
 - We base our communication about the Group and its services on complete, accurate, comparable and verifiable data.
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- Our utmost priority is the well-being of our employees – their health and safety.
 - We respect labour and human rights and pay fair wages.
 - We create a fair, inclusive, and growth-promoting work environment where everyone feels valued and can fully realize their potential.
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- We monitor and reduce our environmental and climate impact.
 - We ensure environmentally friendly and energy-efficient solutions in our day-to-day operations.
 - We constantly monitor our resource consumption and carbon emissions. Based on the data, we plan and implement targeted and practical measures to reduce emissions and increase energy efficiency.
 - We promote the circular economy by creating new services and ensuring circularity-promoting initiatives.
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- We continuously promote environmental awareness among our employees, customers, and society by implementing extensive environmental education activities and events on the circular economy, waste prevention, and proper waste sorting.
 - We regularly communicate the Group's achievements and ambitions in the field of sustainability through external and internal communication channels.

7. SUSTAINABILITY MANAGEMENT

7.1. The CleanR Grupa Management Board is responsible for determining priority areas (strategy) for sustainability, setting goals, and ensuring their implementation.

- 7.2. The Group's Council ensures oversight of the implementation of the sustainability strategy.
- 7.3. The Member of the CleanR Grupa Management Board responsible for corporate communications and sustainability regularly reports on sustainability issues at Management Board meetings and Group management meetings, including ensuring the necessary external communication on the Group's sustainability plans and progress in achieving its goals.
- 7.4. The Sustainability Manager is responsible for the sustainability reporting process within the Group, as well as ensuring the day-to-day management of sustainability-related topics, promoting internal communication on sustainability issues and implementing initiatives.
- 7.5. To ensure broader involvement and understanding of sustainability within the Group, including ensuring the implementation of tasks necessary for the achievement of sustainability goals, the Group has a Sustainability Working Group.
- 7.6. The Working Group consists of the representatives of the management of the Group's companies, heads of centralized functions, and specialized experts. The group is led by the Sustainability Manager. It is convened as necessary, but at least twice a year.
- 7.7. Once a year, the Sustainability Manager reports to the Group's Management Board and the Council on the status of sustainability goals, measures taken and planned, including progress in implementing the sustainability reporting practices within the Group.

8. OTHER PROVISIONS

- 8.1. The Policy is binding on all Group employees.
- 8.2. The board of each Group company is responsible for compliance with the principles set out in this Policy.
- 8.3. The Policy is supplemented by other principles of the Group's operations set out in the Group's internal policies and procedures, such as the Code of Ethics, Personnel Policy, Marketing and Communication Principles, Environmental and Energy Management Policy, and others. The Group's policy documents are available on the CleanR Group website, in the Corporate Governance section.
- 8.4. Review of the Policy is initiated and ensured by the Sustainability Manager as necessary, but at least once every three years.