



APPROVED
at AS "CleanR Grupa" Council meeting of 08 Apr 2026.
Decision No 3

at AS "CleanR Grupa" Board meeting of 07 Apr 2026.
Decision No 3

AS "CleanR Grupa"
CRISIS MANAGEMENT AND BUSINESS CONTINUITY POLICY

1. INTRODUCTION

- 1.1. The AS "CleanR Grupa" (hereinafter CleanR Grupa or the Group) subsidiary companies provide society with essential services, including waste collection and management, waste sorting and recycling, commercial cleaning, as well as urban maintenance. These services are crucial for the public health, environmental protection, quality urban environment, therefore their continuous and safe delivery is one of the Group's top priorities.
- 1.2. Given the specifics of the industry, the Group's operations are subjected to various risks: operational, technological, environmental, IT, and the like. Also, the Group's operations may be affected by external factors, for example, natural disasters, infrastructural disruptions, power outages, and other unforeseen events. To ensure a timely response to them and mitigate their impact on the service provision, the Group has laid down the basic principles and procedure for joint crises management and business continuity.

2. SCOPE

The Group's Crisis Management and Business Continuity Policy (hereinafter the Policy) applies to all the companies directly or indirectly owned by CleanR Grupa where the Group is the majority shareholder or exercises full operational control.

3. AIM

The aim of this Policy is to lay down principles, structure, and key mechanism to manage crises and ensure continuity of the Group's key processes by acting coherently in the event of an emergency, using resources effectively, as well as communicating early and clearly with all the stakeholders.

4. CRISIS EVENT AND ITS MANAGEMENT PRINCIPLES

In the Group's view, a situation which greatly impacts the Group's operations and entails a high level of uncertainty constitutes the event of a crisis by posing or potentially posing threats to the public health, the environment, or the company's financial stability, exceeding the everyday operational management and requiring an immediate and coordinated response from the management and the initiation of the business continuity plan.

If the event of a crisis, the following steps are performed immediately:

- A crisis management team is set up.
- Internal and external communication is ensured (including with clients and state / municipal institutions).
- Services are prioritized.
- Technical and human resources are reviewed to provide priority services.
- Continuous monitoring of the situation is ensured for further decision-making.

Once the crisis is resolved, it is followed by post-crisis communication, risk reassessment, and the review of risk mitigation steps.

5. RESPONSIBILITY

- 5.1. The board of each subsidiary company of the Group is responsible for the identification of the event of a crisis at their company and reporting it to the CleanR Grupa Board.
- 5.2. The CleanR Grupa's Board is responsible for setting up a crisis management team.
- 5.3. The crisis management team is responsible for a timely, coordinated and effective response to the crisis, ensuring the safety of the people, protection of the environment, continuity of critical services, and maintenance of the company's reputation and compliance.
- 5.4. The boards of the subsidiary companies of the Group are responsible for the implementation of action plans addressing the core risks of crisis events, as well as conduct risk assessment no less than once a

year or following the event of a crisis. In the event of a crisis, the board of a subsidiary company acts in a coordinated fashion with the crisis management team.

- 5.5. The CleanR Grupa Chief Process Management and Efficiency Officer is in charge of the risk management processes and informing the Group of risk assessment and reported incidents.

6. OTHER PROVISIONS

- 6.1. This Policy is binding to all the Group employees.
- 6.2. The board of each subsidiary company of the Group is responsible for the observance of the principles stipulated in this Policy.
- 6.3. The Group undertakes to continuously update its risk management, safety and business continuity systems to ensure high quality of services, employee safety, and environmental protection also in the event of a crisis.
- 6.4. The Policy is supplemented by other operating principles of the Group, which are laid down in the Group's internal policies and procedures, for example, the Group's Risk Management Policy, Code of Business Conduct, Procedure for Reducing Environmental Impact in Emergency Situations, and others.
- 6.5. The Policy is reviewed and updated upon the request of the CleanR Grupa Board when required but no less than every three years.