

Sustainability Policy Statement SES

Towards Tomorrow Together

We believe that everyone has a stake in positively impacting climate change, at every level, and must collaborate to have an influential impact. This Sustainability Policy Statement shares more information about Worthington -Enterprises 'European-based operations' included within the Sustainable Energy Solutions business segment ("we", "our" or "Worthington Enterprises Sustainable Energy Solutions EU)" practices and policies that support sustainable outcomes.

Our sustainability goal is to balance people, planet, & prosperity to meet the needs of today without compromising tomorrow.

In furtherance of this goal, we are committed to transparency and accuracy concerning the principles set out in this Sustainability Policy Statement.

For Products and Services originating outside the European Union and supplied to Worthington Enterprises Sustainable Energy Solutions EU, we shall use commercially reasonable efforts to duly and timely report the necessary information set out in applicable European Union legislation (e.g. Carbon Border Tax Adjustment Mechanism Directive, Corporate Due Diligence Directive).

We are also committed to disclose publicly:

- our progress towards the Near term and Net 0 targets, as per the Science Based Target initiative Net 0 standard: and
- our sustainable development impact, targets, engagement plans and progress.

We intend to implement continuous improvement measures for our sustainability efforts, including relevant targets, implementation plans, incident registries, with correlated corrective action, and a system for internal / external audits.

We will endeavour to engage all employees to support and comply with this Sustainability Policy Statement and our Code of Conduct, and we are rolling out these principles to our suppliers. In the event of any deviations from the terms of this Sustainability Policy Statement or our Code of Conduct, we will take the corrective actions, that we deem appropriate, in a timely manner and implement relevant procedures in the event of persistent deviation.

Environment

Environmental protection is essential at Worthington Enterprises Sustainable Energy Solutions EU. We strive to fully comply with all applicable laws, regulations, and standards regarding the protection of the environment in the jurisdictions in which we operate. We are committed to operating in a way that minimizes the impact on natural resources and protects the environment, including in the following ways:

- **Climate targets:** We have adopted science-based targets and committed to reduce Greenhouse Gas emissions to:
 - a. near term with 42% emissions reduction on scope 1+2 and 25 % on scope 3, by 2030;
 - b. net 0 emissions by 2050 which equals to 90 % Greenhouse Gas emissions abatement for all scopes; and
 - c. annually disclose progress on targets.
- **Climate Change risks:** We will evaluate periodically, mitigate, and report on Worthington Enterprises Sustainable Energy Solutions EU climate change transitional and physical risks.
- **Environmental impact:** We evaluate and seek to minimize, or eradicate environmental impacts of our operations and value stream.
- **Resource conservation and circular economy:** We will strive for innovation in our products and/or services, operations, and value stream to increase resource efficiency including raw materials, water, energy (etc...), minimize waste, explore the use of alternate materials, and work to establish an adapted circular economy.
- **Renewable energy:** We commit to increase the usage of renewable energy, our own energy production, and innovate to reduce our energy consumption.
- **Residual Waste:** We will work to drastically reduce waste by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials. Control, handling, storage, transport, treatment, and disposal of any residual waste will be carried out in accordance with applicable regulations and in an environmentally responsible manner.
- **Packaging and plastic:** We commit- to innovate to reduce packaging. We will also strive to reduce plastic usage to our minimum by using bio plastics or alternative recyclable material where we deem appropriate.
- **Biodiversity preservation, deforestation and animal welfare** are essential components of environmental protection. We will endeavour to:

- a. protect natural ecosystems and stop the conversion, deforestation, and forest degradation.
 - b. consider and respect animal welfare.
- **Chemical and Hazardous Materials:** We commit to identify chemicals and other materials posing a hazard and manage their safe handling, movement, storage, recycling or reuse and disposal.
 - **Wastewater and Solid Waste:** We monitor and control wastewater and solid waste generated at our facilities and treat them as required prior to discharge or disposal.
 - **Air Emissions:** We commit to monitor and control air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations and treat them as required prior to discharge or disposal.
 - **Soil and water contamination:** We are committed to avoiding contamination of the soil and water in our operations by safe and responsible handling and will require that logistic and freight providers we appoint to comply with the relevant environmental regulation.
 - **Noise and light pollution:** We will use commercially reasonable efforts to ensure that our operations do not create noise levels in excess of what is permitted by applicable law and minimize it for the wellbeing of our neighbourhood and nature. Likewise, we commit to use commercially reasonable efforts to reduce upward lighting generating light pollution, energy consumption and nuisance to neighbourhood and nature, and limit lighting to appropriate area.
 - **Business travel:** We commit to reduce emissions connected to business travel by limiting intensive travel mode and select primarily, whenever reasonably possible, railway and public transportation modes.

Social

We strive to fully comply with all applicable laws and regulations governing labour, health, and safety at work, including in the following ways:

- **Occupational Health and Safety:** We use a health and safety management system to implement proactive measures that supports accident prevention and minimizes health risk exposure. All employees, visitors' sub-contractors must fully comply with and respect our site rules related to Occupational Health and Safety.
- **Minimum Work Age:** We do- not tolerate any form of child labour within our organization, and do not knowingly purchase materials or services from companies using underage labour.

- **Forced Labour:** We do- not tolerate any form of forced, involuntary or slave labour within their organization, and do not knowingly purchase materials or services from companies using forced, involuntary, or slave labour.
- **Discrimination:** We promote- equal opportunities and fair and respectful treatment of all employees in recruitment and employment practices. There shall be no tolerance of harassment, mental or physical coercion, verbal abuse of employees, threats of violence, discrimination based on an employee's characteristics, age, disability, ethnicity, family status, gender, gender expression, gender identity, genetic information, national origin, physical characteristics, political affiliation, pregnancy, religion, social origin, sexual orientation, union membership or any other unlawful criterion under applicable law.
- **Modern slavery:** We do- not tolerate and/or participate directly or indirectly in any sort of modern slavery (i.e., human trafficking, sex trafficking, bonded, indentured, or involuntary prison labour, withholding personal property, passports, wages, training certificates).
- **Human Rights:** We actively contribute to respect human rights and dignity.
- **Employments contracts, training, instructions:** We endeavour to ensure that employment contracts, training and instructions are provided to employees in a language they understand.
- **Employees' legal status:** We secure that their employees are legally authorized to work and possess a valid work permit, visa and any necessary legally required documents.
- **Working environment:** We secure safe and hygienic working conditions, clean and adequate working facilities, aiming for well-being at work.
- **Students and interns' employments:** We secure appropriate measures required for young workers, students, or interns, particularly with regard to the nature of the work, duration of the work, remuneration and the maintenance of necessary records must be implemented.
- **Remuneration and Working Time:** We comply with applicable wage and working time laws and regulations.
- **Freedom of Association/ Collective Bargaining:** We recognize and respect, as far as legally permitted Employees' rights to free association and collective bargaining. We respect employees exercising their right to free association and collective bargaining.
- **Local communities:** We interact responsibly with local communities and to actively engage in dialogue, economic and social development and partnerships with our neighbourhood.
- **Indigenous People:** We will endeavour to act and comply with the "UN Declaration on the Rights of Indigenous Peoples"
- **Harassment, Harsh or Inhumane Treatment:** We create-and maintain- an environment that treats all employees with dignity and respect and shall not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse.

No harsh or inhumane treatment coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

Governance

We are committed to high ethical standards and sound corporate governance practices, including in the following ways:

- **Compliance:** We are committed to comply with all applicable international, national and local laws and regulations, contractual agreements and internationally recognized standards.
- **Prohibition of Bribery:** We do- not tolerate corruption or bribery in the course of our business and strive to ensure compliance with all anti-corruption laws, including but not limited to the Foreign Corrupt Practices Act.
- **Antitrust/ Unrestricted Competition:** We are committed to conduct business in a fair manner and comply with all applicable antitrust laws and regulations.
- **Money laundering:** We do- not tolerate or legitimise involvement in money laundering or hidden illegal funds.
- **Preventing Conflicts of Interest:** We do not make business decisions that create situations that are a conflict of interest. Any factors that might influence decision due to private, business or other conflicts of interest must be prevented.
- **Trade compliance:** We commit to comply with applicable export control and customs regulations and provide accurate information to customs and other authorities.
- **Accounts, records, accounting principles:** We shall ensure appropriate, accurate, transparent, and complete financial accounts and records in all respects.
- **Data protection, Confidentiality, and Intellectual Property:** We keep all employees' and business partners' business and financial data, intellectual property, personal data and technical information confidential using appropriate safeguards. The processing and storage of personal data must comply with the guidelines of the EU Data Protection Regulation (EU GDPR). We shall not use third parties' name and/or information, logos, products and/or images in publications, media or advertising without the third party's prior written consent.
- **Cyber security:** We are committed to the protection of our systems (hardware and/or software) with relevant policies.
- **Emergency, risks and training:** We commit- to:
 - a. evaluate environmental, health and safety risks at our premises;
 - b. implement relevant safety and emergency plans; and
 - c. inform, train, protect employees, contractors and when applicable neighbourhood communities.

- **Business contingency plan:** We maintain a business contingency planning that includes strategies and plans to recover from disasters that may disrupt the operations, including industrial, chemical, biological, natural hazards.
- **Supply-chain:** We are committed to ensure that Suppliers comply with the principle of Worthington Enterprises'- Code of Conduct in their organization and operations, and, we strive for responsible and sustainable procurement that considers environmental, social and governance aspects and seeks to ensure that the principles contained in the Supplier Code of Conduct are adhered to further up the stream. We may verify suppliers' and suppliers' upstream compliance with the Supplier Code of Conduct through surveys, audits and may engage third parties to do so. Suppliers and suppliers' upstream shall support and provide any necessary accurate and relevant evidence and documentation. In the event of any deviations from the terms of the Supplier Code of Conduct, suppliers are expected to take necessary corrective actions in a timely manner.

If we determine- that any supplier has violated the Supplier Code of Conduct, we may, at our discretion, terminate the business relationship and/or require the supplier to implement corrective actions.

Should we recognize persistent deviation from this Supplier Code of Conduct, we may seek to suspend or terminate our engagement with the relevant supplier.

- **Counterfeiting:** We intend-that our suppliers / subcontractors at all tiers will only supply products and/or build-in components that are currently in production and have been purchased from the original manufacturers, their authorized distributors, or suppliers who obtain such products and/or components exclusively from the original manufacturers of the products and/or components or their authorized distributors. We, where reasonable and practical, inspect-, test- and validate- authenticity of the products and/or components.
- **Conflict minerals:** We request- that our upstream suppliers comply with applicable material restriction and the required declaration. We provide related upstream transparency, information and certificates upon request, if available.
- **Supplier diversity and inclusion:** We commit to Supplier selection under consideration of diversity and warrant mixing, whenever possible, various supplier geography, size, structure, minority ownership.
- **Anti-plagiarism:** We intend- that documentation, publication is solely written by or on our behalf do not infringe copyrights. In the event any work, picture, map, material, or quotations from other sources are used, we commit- to secure authorization for publication and reference the source nominatively and appropriately whether it is published or unpublished.
- **Communication:** We commit that our sustainability communication does not contain false information and is factually based.



Ethics line

The Worthington Enterprises Ethics Line is open to internal / external stakeholders and can be used by anyone involved in the Worthington Enterprises Sustainable Energy Solution value stream. The Worthington Enterprises Ethics Line and website are operated by an independent third party, are available in local languages and are anonymous. To report either on-line or by phone, please check the following link, **worthington.ethicspoint.com**.