



**TROJAN**  
CONSTRUCTION GROUP

# **ENVIRONMENTAL POLICY**

## Environmental Policy

### Introduction

The Environmental Policy (the Policy) outlines guidelines of Trojan Construction Group – Sole Proprietorship LLC (TCG) and its subsidiaries (henceforth referred to as the Group) on responsible practices pertaining to its material environmental factors.

### Scope

This Policy applies to TCG, and its subsidiaries that do not have existing related policies suitable to their operations. The Policy applies to all areas of the Group's business operations, covering all directors, executives, and employees working for or on behalf of the Group. It also extends to outsourced employees or seconded employees working exclusively for or on behalf of the Group. The Group encourages external parties (vendors/suppliers, contractors, service providers etc.) working with the Group to adopt similar policies in line with the Group's Supplier Code of Conduct and applicable local environmental regulations.

### Policy Statement

The Group considers the environmental impact of its operations on the planet. The Group fosters sustainable environment practices and manages its environmental risks and opportunities to mitigate the impact it has on the environment. The Group believes that embedding environmental sustainability can generate cost savings, provide a competitive advantage, and create long-term sustainable value for shareholders.

The Group supports applicable national and global initiatives to protect the environment, such as nationally determined contribution (NDC) of the host countries of its operations and the United Nations Sustainable Development Goals (SDGs). Specifically, the Group is a proponent of initiatives of the country of its incorporation, such as the UAE's Net-Zero by 2050 Strategic Initiative, the UAE's 'We the UAE 2031' vision, and the Abu Dhabi Economic Vision 2030.

### *Climate Change and Greenhouse Gas (GHG) Emissions*

The Group undertakes to reduce GHG emissions from its operations and supply chain as it transitions to Net-Zero. The Group will review and broaden its GHG inventory in accordance with the Greenhouse Gas Protocol Standard, covering Scope 1, 2 and 3 emissions in its GHG related activities which covers external parties, by 2024. Accordingly, the Group will have established its baseline emissions and thereafter seek to define its Net-Zero plan. The Group will use a digital climate management platform to account for, monitor, and manage its GHG emissions. The Group aims to encourage its external parties to measure and disclose their GHG emissions in accordance with the Greenhouse Gas Protocol Standard. The Group aims to implement an environmental management system that includes emergency preparedness measures aligned with the International Organization for Standardization (ISO) 14001:2015 standards at operations where necessary while ensuring ongoing compliance to said standards at subsidiaries that already have certified environmental management systems.

#### *Resource Management and Conservation*

The Group undertakes to use natural resources and energy efficiently in its operations, in alignment with the standards set out in ISO 50001:2019. This includes increasing the share of renewable energy in its energy mix, and reducing water use by conducting water audits and assessments, and working with its facility management service providers in implementing water-saving technologies. The Group aims to adopt innovative practices in all its activities pertaining to natural resource and energy utilization. The Group strives to implement energy efficiency and renewable energy transition targets, and timelines to achieve said targets as it undertakes to define its Net-Zero plan. Additionally, the Group seeks to define water consumption baselines, reduction targets, and timelines to achieve said targets, in line with the principles and best practices of ISO 50001.

#### *Biodiversity Protection and Conservation*

The Group undertakes protecting and promoting biodiversity within its operations by considering the risks and impacts of its operations on ecosystems and concerned species at the locations of its operations, in accordance with applicable environmental laws and regulations. The Group aims to encourage its external parties to adopt similar policies while working with the Group.

#### *Opportunities in Clean Technologies*

The Group continuously explores and leverages opportunities to incorporate clean technologies and sustainable practices within the scope of its operations and in collaboration with relevant stakeholders. Recognizing the pressing need for water conservation, the Group is proactive in pursuing opportunities in sustainable water management which includes implementing on-site wastewater treatment solutions. Furthermore, the Group is committed to integrating green building practices in areas within its operational control, such as offices and warehouses. For instance, adopting energy-efficient measures like LED lighting helps enhance the sustainability of our infrastructure. Our overarching goal is to integrate these sustainable values into our operations, ensuring the responsible management of resources and the reduction of environmental impact, in alignment with the aspirations of our stakeholders.

#### *Pollution Prevention and Waste Management*

The Group undertakes responsible waste management practices to prevent pollution, and limit and reduce waste generated from its construction activities. The Group disposes of waste, including solid waste and wastewater, responsibly and in accordance with applicable laws and regulations. The Group promotes efforts to shift towards a circular economy model of reduce, reuse, and recycle where practicable.

#### *Minimizing Noise and Vibration*

The Group aims to minimize noise, vibration, and other nuisances through integrated planning of construction activities implementation, to decrease adverse impacts to local communities and society.

#### *Conservation of Protected Areas*

The Group protects archaeological sites and monuments of cultural heritage at locations of its operations in accordance with local laws and regulations.

### **Stakeholder Engagement**

The Group fosters close relationships with key stakeholders so that there is a clear understanding of their environmental concerns. Through stakeholder engagement, the Group identifies environmental factors that are important to stakeholders and integrates these considerations into this Policy.

### **Training and Awareness**

The Group is committed to continuously investing in the training and development of its employees on matters pertaining to responsible environmental practices. The Group aims to regularly instil awareness and promote a clear understanding of the principles outlined in this Policy, empowering individuals to uphold these standards and mitigate risks effectively.

### **Compliance**

The Group ensures regular monitoring of its activities for compliance with applicable laws and regulations in the jurisdictions where it operates. The Group undertakes internal audits environmental practices annually, reporting the outcomes to relevant stakeholders and seeking external audits to align its commitments with industry standards.

### **Roles and Responsibilities**

The Chief Executive Officer (CEO) is responsible for setting the Policy (including any revisions thereof) and monitoring its compliance. The Chief Operating Officer (COO) and / or General Managers of subsidiaries are responsible for the implementation of this Policy and continuous improvement within their operational areas. All individuals working for or on behalf of the Group are responsible for upholding principles set forth in this Policy.

### **Reporting and Transparency**

The Group discloses its environmental initiatives, issues, and performance to its stakeholders as and when required, including undertaking to communicate its progress on the United Nations Global Compact (UNGC) principles annually where relevant to environmental practices.

### **Policy Review**

The Group believes in continually improving its performance from all the activities it undertakes or services it provides. The Group will review this Policy if and as required, and revise this to ensure it remains up-to-date and aligned with the company's Mission, Vision, core values, laws and regulations of the host countries of its operations, and with global best practices. The Group shall make available on the appropriate channels any changes to this Policy, and every version will have an updated effective date. Stakeholders are advised to refer to the Group's official channels for the most recent Policy.

This Policy was last reviewed in September 2023.