



SC TOTAL BUSINESS LAND SRL
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POLICY ON ENVIRONMENTAL PROTECTION, SAFETY, AND SOCIAL RESPONSIBILITY

1. INTRODUCTION

1.1 The Partners and Administrator of TBL¹ (“Company” or “TBL”) have decided that TBL must formalize its policy on environmental protection, safety, and social responsibility (“Policy”).

2. POLICY OBJECTIVE

2.1 The objective of this Policy is to define how TBL, along with its administrators, officers, employees, consultants, and contractors, will conduct its business in a safe and environmentally responsible manner, adhering to the highest standards of corporate social responsibility.

3. POLICY APPLICATION

3.1 This Policy applies to all administrators, officers, employees, consultants, and contractors of TBL.

4. POLICY COMMUNICATION

4.1 To ensure that all administrators, officers, and employees of TBL, along with consultants and contractors providing essential services to TBL, are aware of its content, a copy of the Policy will be provided upon engagement and annually thereafter, or they will be notified that this Policy is available for consultation on the TBL website. Each of these individuals shall:

- (i) agree to comply with this Policy upon receiving the provisions or notification;
- (ii) be informed when significant changes to the Policy are made; and
- (iii) where applicable, be trained on the importance of the Policy.

5. COMPLIANCE

5.1 All administrators, officers, employees, consultants, and contractors (including their subcontractors), while performing duties for TBL, must comply with the laws, rules, and regulations applicable in the locations where TBL conducts business, particularly those related to environmental protection and safety. In cases of uncertainty or ambiguity, competent legal advice must be sought.

¹ The present Code applies to the companies within the TBL Group (Total Business Land SRL and Total Business Land Project), as well as to its subsidiaries, branches, or workplaces in Romania and abroad.



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5.2 All administrators, officers, and employees of TBL, along with all consultants and contractors selected by the Partners and/or Administrator of TBL or their delegates, shall provide an annual certification of compliance with this Policy upon the company's request and in a format acceptable to TBL.

6. VISION FOR SUSTAINABLE DEVELOPMENT

6.1 TBL aims to achieve sustainable development by:

- Implementing the Company's vision of a culture of safety, environmental protection, and social responsibility within our organization and those of our consultants and contractors;
- Efficiently managing the Company's activities to minimize environmental impact;
- Supporting local employment and entrepreneurship; and
- Promoting infrastructure development, health, education, training, and cultural activities in collaboration with the community.

6.2 In conducting its business, TBL will strive to contribute to healthier, safer, and more prosperous communities in the areas where it operates.

7. SUSTAINABLE DEVELOPMENT POLICY

7.1 TBL is committed to promoting responsible activities and sustainable development in the communities where it operates.

7.2 The Company endeavors to meet or exceed industry best practices in compliance with Romanian and European Union legislation and international standards across all aspects of its activities—social, environmental, and economic.

7.3 Every effort will be made to ensure that this Policy is implemented and adopted by all TBL administrators, officers, and employees, along with TBL consultants and contractors providing essential services.

7.4 To this end, TBL commits to:

- (a) Ensuring transparency, honesty, accountability, integrity, and legality in all aspects of corporate governance and interactions with stakeholders, including governments, communities, employees, consultants, service providers, and shareholders;
- (b) Respecting and, where applicable, adopting global best practice recommendations on social responsibility, including assuming responsibility for the impact of Company activities on society and the environment and for responsible and ethical behavior;



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- (c) Respecting human rights, culture, customs, and values of the host community;
- (d) Identifying, assessing, managing, and mitigating risks to the host community and the environment;
- (e) Continuously striving to improve the Company's environmental performance beyond legal requirements;
- (f) Implementing an environmental and social management system to integrate environmental and social criteria into planning, processes, and operational decisions;
- (g) Conducting comprehensive monitoring and audits to ensure compliance with relevant laws, recommendations, and standards and to prepare periodic reports;
- (h) Promoting and implementing efficient resource use and applying waste minimization, reuse, and recycling measures;
- (i) Prioritizing employment opportunities for the local workforce by offering professional training and skills development programs aligned with Company needs;
- (j) Supporting the development of local small and medium-sized enterprises (SMEs) to supply goods and services for the Company's projects;
- (k) Allocating the necessary financial resources to fulfill all Company commitments; and
- (l) Proactively engaging with local authorities and the host community in important events.

8. ENVIRONMENTAL POLICY

8.1 TBL acknowledges that the long-term sustainability of its activities depends on proper environmental management.

8.2 The Company:

- (a) Will integrate environmental considerations into all aspects of TBL's operations;
- (b) Will establish and maintain a management system capable of identifying, monitoring, controlling, and improving TBL's environmental performance;
- (c) Will conduct periodic independent assessments of its environmental performance against the Company's goals and objectives;
- (d) Will comply with all applicable laws and regulations in Romania and the European Union, as well as any other obligations undertaken by the Company;
- (e) Will strive to apply best practices in all TBL activities;



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- (f) Will ensure the availability of sufficient financial resources, or access to them, to fulfill all of TBL's environmental obligations and commitments;
- (g) Will ensure that all administrators, officers, and employees, along with consultants and contractors providing essential services, understand the Company's policy and fulfill their environmental responsibilities;
- (h) Will implement an effective and transparent communication strategy to encourage dialogue and engagement with stakeholders regarding TBL's environmental activities; and
- (i) Will collaborate with local, national, and international institutions and organizations to determine environmental protection measures.

9. HEALTH AND SAFETY POLICY

9.1 TBL is committed to providing and maintaining a safe and healthy work environment, where all administrators, officers, employees, consultants, and contractors must act responsibly and safely.

9.2 TBL is committed to maintaining high health and safety standards by implementing all relevant policies, procedures, standards, and continuous improvements in management systems, setting targets, and monitoring performance.

9.3 The Company's philosophy is that all accidents and injuries can be prevented. To ensure an accident-free culture, TBL will:

- (a) Identify and manage key health and safety risks and set realistic annual objectives and targets;
- (b) Comply with all applicable laws and regulations and strive to meet best health and safety practices in accordance with international standards;
- (c) Integrate health and safety management strategies into its key business processes and planning;
- (d) Provide employees with the necessary training and resources to minimize risks in their activities;
- (e) Require contractors (and their subcontractors) to provide employees and service providers with the necessary training and resources to minimize activity-related risks;
- (f) Encourage and support employees and contractors in promoting initiatives for continuous risk reduction in health and safety;
- (g) Provide resources for appropriate emergency response, drills, and associated training;
- (h) Ensure that work permit/access systems are carefully and correctly used by all employees and contractors;



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- (i) Ensure that all new employees, contractors, subcontractors, and visitors are properly informed about the Company's health and safety policies, procedures, and requirements before entering Company sites;
- (j) Maintain high levels of workplace hygiene;
- (k) Communicate and enforce the Company's health and safety standards with all contractors; and
- (l) Review and audit its health and safety systems and performance.

10. ALCOHOL AND DRUG POLICY

10.1 TBL is responsible for ensuring a safe workplace and work systems for all individuals on its sites. Employees, contractors, and visitors must perform their tasks in a manner that ensures their own safety and complies with Company policies and procedures.

10.2 An individual's "work capability" (CDL) may be compromised due to:

- Alcohol consumption; and/or
- Drug use (prescription/over-the-counter medication or illegal substances).

10.3 Alcohol and drug tests will be conducted by trained and competent TBL employees or external service providers as needed.

Initial Approval Date: December 17, 2024

Last Review and Approval: December 17, 2024

Approved by: TBL Partners and Administrator