

SCOPE:

This policy applies to our operations within Midas Safety and extends to our supply chain. We expect all our employees, and suppliers, to comply with this policy.

PRINCIPLES:

Our environmental policy is based on the following principles:

- **Respect for human rights:** We respect the principles of the Universal Declaration of Human Rights as well as ILO conventions and believe in fulfilling all the human rights of our stakeholders, including our employees, customers, suppliers, and the communities in which we operate.
- **Sustainability:** Our goal is to conduct business in a way that is sustainable and continually improves sustainability and reduces the impact of our operations on the environment and society.
- **Ethics:** We conduct our business in an ethical manner and avoid corruption, bribery, anti-competitive behavior, anti-trust, and other unethical practices.
- **Biodiversity Stewardship:** We recognize the importance of biodiversity in maintaining ecological balance and commit to minimizing adverse impacts on ecosystems, species, and natural habitats in our operations and supply chain.

COMMITMENTS:

1. General

- Ensure compliance with all relevant laws, national and international standards, and all other requirements for sustainable environmental and social management.
- Establish, maintain, and implement risk identification and mitigation mechanisms, and find opportunities for improvement through risk mitigation, avoidance, and substitution.
- Educate our employees on the importance of responsible consumption.
- Integrate reduce, reuse, and recycle concepts throughout our processes.
- Assess the negative environmental aspects of our operations in terms of emissions, water, waste, energy, and material use and determine ways to reduce impacts.
- Integrate biodiversity considerations into all aspects of our operations and planning processes, recognizing the importance of preserving ecosystems and natural habitats as part of overall environmental stewardship.
- Engage with stakeholders to address environmental concerns and improve sustainability practices.

2. Energy & Emissions

- Reduce Scope -1, 2, and 3 emissions in our operations and in our supply chains.

- Ensure efficient use of energy through conservation, technology enhancement, and process improvement.
- Reduce energy consumption outside the organization in upstream and downstream operations.
- Promote renewable energy options.
- Eliminate ozone depleting substances from all our refrigeration and air conditioning equipment.
- Work on reducing air emissions, including SO_x, NO_x, and Particulate Matter.
- Conduct regular energy audits and implement energy-saving initiatives with measurable outcomes.
- Integrate climate-related risks and opportunities into business planning and decision-making.

3. Water & Effluents

- Evaluate water usage patterns, improve efficiency in water use, and acquire the latest technologies for water saving.
- Encourage the reuse of water and install systems for recycling at the factory.
- Ensure treating the water before discharge, keeping the parameters within legal allowable limits. Establish monitoring systems for water discharge parameters.

4. Waste

- Ensure proper waste segregation so that each type of waste is treated separately and to minimize hazardous waste by substitution, adapting proper handling procedures.
- Ensure to find vendors and ways to reuse, reclaim, and recycle waste so that waste going to landfills is avoided to the maximum and is used in some useful application.
- Ensure that the waste is safely disposed of through audits and contractual obligations created with vendors.
- Review waste generation and assess the need to increase investments in waste management techniques.

5. Material Management

- Enhance the use of renewable, recycled, biobased, and reclaimed materials. Reduce the use of non-renewable materials by replacing them with eco-friendly options.
- Enhance the use of recycled paper and plastic instead of virgin materials for packaging. Reduce the packaging material's weight and eliminate the use of plastic in packaging materials to curtail negative environmental impacts.
- Avoid procurement from restricted regions due to bonded labor, especially conflict minerals.

6. Chemical Management

- Maintain an up-to-date and accurate inventory of all relevant chemicals.
- Ensure proper chemical labelling in line with an internationally accepted standard.
- Adequate spill control mechanisms and safety precautions for any emergencies.
- Provide training and awareness to ensure safe and environmentally sustainable chemical management.

7. Product Stewardship

- Ensure that our products are free from harmful ingredients and restricted substances.
- Ensure that all products go through a comprehensive product launch procedure and are reviewed for all aspects of safety, marketing and labelling claims, and end-of-use disposal.
- At the time of development of new products, ensure, where possible, minimum use of resources, energy-efficient processes, recycled, renewable, and eco-friendly materials, less GHG emissions in manufacturing, and less waste at the end of use.

8. Biodiversity

- Identify and assess the potential impact of our operations and supply chain activities on local biodiversity and ecosystems, especially in areas of high conservation value (e.g., protected areas, Key Biodiversity Areas, and High Conservation Value areas).
- Avoid activities that lead to habitat destruction, ecosystem fragmentation, or deforestation. Prioritize project development in locations that pose minimal risk to biodiversity.
- Implement biodiversity conservation measures such as habitat restoration, or reforestation where avoidance is not feasible.
- Monitor and minimize the impact of land use, resource extraction, and material sourcing on native flora and fauna.
- Prohibit sourcing from suppliers that contribute to illegal deforestation, wildlife trafficking, or damage to ecologically sensitive areas.
- Promote sustainable sourcing practices using certifications that protect biodiversity and to reduce deforestation and ecosystem harm.
- Ensure that our operations and products do not involve materials that threaten endangered species and prevent the introduction of invasive species through operational or supply chain activities.

IMPLEMENTATION

This policy will be implemented through several mechanisms, including:

- Training for all employees on our policy and the principles of responsible business conduct.
- Monitoring and auditing of our operations and suppliers to ensure compliance with the policy and identify areas for improvement.
- Grievance mechanisms for stakeholders to report concerns about our compliance with the policy.

REVIEW

This policy will be reviewed periodically and communicated to relevant and interested parties, facilitating collaboration, and raising awareness about sustainable practices. Aligned with the latest GRI Standards; any updates to these standards will prompt a policy review. Progress toward environmental goals and legal compliance will be monitored through regular assessment of KPIs tied to each responsible individual, ensuring accountability and effective oversight. Corrective and preventive actions will be implemented based on audits,

stakeholder feedback, and performance reviews. Management is committed to the continual improvement of the health, safety, and wellbeing of employees and the communities in which we operate.

RESPONSIBILITY

Country heads and General Managers shall be responsible for communication, and implementation, and enforcement of this policy. This policy will be reviewed periodically to ensure its continued relevance, effectiveness, and alignment with updated standards and business objectives.

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