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# TITAN Group Environmental Policy

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## Table of Contents

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<b>Purpose .....</b>	<b>3</b>
<b>Scope and application .....</b>	<b>3</b>
<b>Assessing environmental risks and impacts .....</b>	<b>3</b>
<b>Environmental management .....</b>	<b>4</b>
1. Air emissions.....	4
2. Noise control .....	4
3. Land stewardship and local biodiversity protection .....	4
4. Conserving and stewarding water resources.....	5
5. Soil protection .....	5
6. Circular economy practices .....	5
7. Creating an environmentally responsible culture.....	6
<b>Environmental governance and responsibilities.....</b>	<b>6</b>
<b>Stakeholder engagement and transparency .....</b>	<b>7</b>
<b>Policy administration .....</b>	<b>7</b>

## Purpose

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At **TITAN Group**, we are committed to making the world a safe, sustainable, and enjoyable place to live. We act every day with integrity, empathy, and environmental accountability to shape a brighter future for all. Our environmental policy is central to our purpose, and we prioritize minimizing any adverse impacts on the environment while engaging with our stakeholders to build long-term relationships of trust and make together a positive impact.

Addressing the requirements of global and local legislation and respective standards is fundamental to our commitments, which we augment with voluntary pledges and sectoral initiatives. TITAN Group invests in modern technologies, innovative practices, and facilities, builds on knowledge and management systems, and collaborates with key stakeholders to achieve continuous improvement.

**TITAN Group's Environmental Policy** (hereinafter referred to as the "Policy") aims to:

- Provide the due diligence framework.
- Define governance and responsibilities.
- Enhance awareness for our employees, business partners and suppliers.
- Build confidence with all stakeholders through transparency and collaborative actions.

## Scope and application

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This Policy applies to all TITAN Group employees in all operations and subsidiaries and covers any activity under our operational control. While business units within the Group may implement their individual environmental policies, adapted to local legislative requirements, these policies must adhere to the Group Policy, which should be clearly embedded in their environmental management systems.

## Assessing environmental risks and impacts

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TITAN Group is incorporating the principles of double materiality assessment, in a dynamic process which involves mapping and assessing the impact of the Group's operations on the environment and on society, as well as assessing the financial impacts of environmental risks on the Group.

To effectively identify and mitigate such exposures, the Group manages its risks in accordance with established international practices, embedding key dimensions of Enterprise Risk Management (ERM) into its processes, systems, and governance.

## Environmental management

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TITAN Group is committed to the continuous improvement of its environmental performance, backed by a due diligence management system that reviews and monitors, at top management level, the effectiveness of its programs and actions by setting corporate objectives and environmental targets, while aiming to implement best practices and investing in innovative solutions. TITAN Group complies with the GCCA Sustainability Charter, which sets rules on issues like the environment and nature, as well as on the circular economy, including co-processing.

TITAN Group has adopted comprehensive management systems in relation to:

- Monitoring, and reporting on the overall environmental impact on air, soil, water, and noise.
- Actively working on pollution and noise prevention and mitigation and optimizing the use of raw materials, energy, and water.
- Reducing, and wherever possible, minimizing waste generation by implementing circular economy.
- Rehabilitating quarries and enhancing biodiversity in areas of high biodiversity value.

### 1. Air emissions

TITAN Group has undertaken efforts to develop and implement the best available techniques aimed at effectively monitoring, controlling, and mitigating emissions necessary to achieve and sustain a strong environmental performance, complying with existing and potential new regulatory requirements as well as with our ambitious voluntary targets, positioning the Group among the top performers in its sector.

Our Group is committed to adhering to strict regulations for controlling and mitigating emissions not only from stationary but also fugitive sources through active housekeeping measures. Additionally, we conduct air emission dispersion studies to ensure the air quality of the surrounding areas.

As regards CO<sub>2</sub> emissions, TITAN Group follows a separate policy on climate change.

### 2. Noise control

TITAN Group follows a program of periodic measurements to monitor and control noise levels, aiming to minimize disturbance to neighboring communities. Furthermore, the Group has developed proper action plans that adopt the most appropriate best practices like closing openings, noise traps, and insulation.

### 3. Land stewardship and local biodiversity protection

We develop and implement rehabilitation plans at all our quarry sites, in line with best practices, meeting the needs and expectations of local stakeholders, while striving to lead by example in land stewardship.



We take the necessary measures to protect and, where possible, enhance biodiversity. We apply specific biodiversity management plans at all our quarry sites in high biodiversity value areas.

#### 4. Conserving and stewarding water resources

TITAN's commitment to conserve the quantity and sustain the quality of water resources in all its facilities and their neighboring areas aims to reduce the withdrawal and consumption of fresh water and minimize its downstream impact, through recycling and by promoting responsible and efficient practices for water usage and discharge. Our approach includes the development of technologies for water efficiency, water recycling, and wastewater treatment.

#### 5. Soil protection

TITAN has implemented measurement programs and baseline studies, in compliance with local legislation, to monitor soil quality and minimize the impact of our operations. We manage and store raw materials and fuels properly, and we divert waste from landfills within the framework of a circular economy. Additionally, we have developed appropriate emergency plans to address spillage and accidental releases by containing and avoiding soil contamination.

#### 6. Circular economy practices

TITAN Group is committed to the principles of the circular economy, starting from the development of new products, and applies advanced technical solutions to minimize, reuse, recycle or recover materials and energy, thus preserving natural resources, reducing CO<sub>2</sub> emissions and managing waste responsibly.

We attempt to reduce conventional raw materials and fossil fuel consumption, decreasing waste production from our operations, reusing our own by-products, minimizing landfilling, and managing any residual wastes, according to the waste management hierarchy. We aim to utilize by-products of other industries to increase the use of alternative raw materials in clinker, cement, and concrete production. Additionally, we design and develop new lower-carbon products to meet the current and future needs for sustainable construction.

The co-processing of waste in cement kilns as an alternative fuel is an established and highly regulated waste management option. Co-processing residues from recycling processes or non-recyclable waste in cement manufacturing provides a more sustainable solution compared to waste-to-energy, incineration, or landfilling, thanks to full energy recovery and material recycling. This approach brings multiple benefits for the business units and the local communities embracing the principles of the circular economy.



## 7. Creating an environmentally responsible culture

We are committed to the United Nations Sustainable Development Goals (SDGs) and the United Nations Global Compact's Ten Principles, recognizing the fundamental human right of our employees and local communities to a healthy environment.

TITAN Group actively fosters a culture of sustainability by promoting environmentally responsible behaviors among all employees and contractors. We work together to make a positive impact on society and local communities, focusing on long-term sustainability and embodying TITAN's values in our day-to-day operation. We provide upskilling and reskilling opportunities to all our employees, particularly in areas crucial for sustainable development. We also offer environmental-related training to the contractors, emphasizing our commitment to raising environmental awareness.

### Environmental governance and responsibilities

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**The Group Executive Committee and the Chief Sustainability and Innovation Officer** have the overall responsibility for the Policy and performance reviews, while **the Board of Directors** conducts oversight. Our performance-driven operating model includes ESG targets at the local level.

**The Group ESG Performance Department** is responsible for the oversight coordination and consolidation of the Group's sustainability actions, ensuring the delivery of the best possible results. To effectively manage sustainability actions, we have established a network consisting of ESG liaisons from every business unit to develop sustainability strategies and coordinate the implementation of sustainability commitments at regional level throughout the Group.

**All TITAN Group employees** and those of TITAN's affiliate companies should be aware of and comply with the pledges of this Policy, actively participating in their implementation and reporting any violation.

**Each TITAN employee whose position involves material decision-making** on environment-related activities, as well as planning or executing plans for managing environmental aspects, is required to:

- Be familiar with the fundamental principles of the applicable environmental laws and respective regulations in each country, state, or municipality.
- Identify environmental aspects and potential issues when they arise, as addressed in the systems for environmental management and monitoring our legal compliance.
- Be personally committed to achieving full compliance with the existing law, while aspiring and promoting the principles of TITAN's values and environmental policy.



**TITAN expects its contractors, suppliers, and business partners along the value chain** to be aware of and comply with this Policy, as well as relevant laws and standards where applicable. All suppliers must attempt to adhere to TITAN's environmental protection requirements and strive for continuous improvement in their work. Titan qualifies its suppliers appropriately, according to their performance in this area in line with TITAN's Procurement Policy.

## Stakeholder engagement and transparency

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We engage with key stakeholders in collaborative actions to build trust, improve our understanding of the impacts of our operations, address their environmental concerns, and develop applicable solutions, while sharing knowledge and best practices. Our key stakeholders include employees, local communities, business partners and suppliers, customers, NGOs, academia, and regulators.

In this direction, TITAN Group invests resources in joint global and local collaborative initiatives to scale up our sustainability efforts. TITAN contributes to the development of sector-specific guidelines, and scientific methods and standards, thus enabling a global sectoral approach to achieving environmental stewardship.

We conduct environmental impact studies when selecting greenfield sites or prior to developing major modifications on existing sites, in line with local legislative requirements, sectoral standards and best practices, taking into consideration feedback from the public consultation process.

We proactively anticipate and address our customers' needs by offering innovative, resilient, and cost-efficient materials and solutions. Our goal is to minimize the environmental footprint associated with buildings and infrastructure across the entire construction value chain. We publish third-party verified Environmental Product Declarations for our products, providing customers with the necessary information.

As a publicly listed company, TITAN Cement International complies with the strict governance and reporting obligations of the Belgian Corporate Governance Code, the Corporate Sustainability Reporting Directive (EU) and the Taxonomy Regulation (EU). The Group's ESG performance reports and statements are validated annually by independent verifiers.

## Policy administration

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The Group ESG Performance Department is responsible for the administration and periodical update of this Policy. Any revisions that are submitted by the Group ESG Performance Department require approval from the Group Executive Committee.