

eurotorg

**Eurotorg LLC
Waste Management Policy**



General Provisions and Scope of Application

The Policy of Eurotorg LLC in the field of waste management defines the strategic approaches to managing waste generated at all stages of the operational activities of trade and logistics facilities (hereinafter referred to as "Company facilities") of Eurotorg LLC (hereinafter referred to as "Eurotorg" or the "Company"), including interaction with stakeholders: suppliers, customers, government bodies, and other partners.

Eurotorg recognizes the priority of preventing and reducing waste generation, increasing the share of recycling and reuse of waste, as well as involving all stakeholders in the implementation of sustainable development goals, and strives to minimize its negative impact through the introduction of advanced modern technical methods in waste management.

This Policy establishes the Company's goals and obligations regarding waste management, which are to be implemented in all operational processes falling under the scope of this Policy.

Structural subdivisions and facilities of the Company covered by this Policy must: carry out constant monitoring of risks and opportunities associated with this Policy; ensure compliance with regulatory requirements; establish measurable goals within the framework of this Policy; develop action plans to manage the impact of their activities on the environmental component; and ensure the continuous improvement of employee competence in the field of waste management.



Glossary

Temporary storage of waste is the keeping of waste at a temporary waste storage site prior to its procurement, sorting, utilization, neutralization, disposal, and (or) long-term storage.

Secondary material resources are waste for which there is a possibility of utilization within the territory of the Republic of Belarus.

Waste recovery is the acceptance of waste, on a reimbursable or gratuitous basis, formed after goods and packaging have lost their consumer properties, for the purpose of their accumulation and subsequent transfer for utilization and (or) neutralization.

Waste disposal (landfilling) is the isolation of waste at waste disposal facilities in order to prevent the harmful impact of waste, products of its interaction and (or) decomposition on the environment, human health, and property, not providing for the possibility of its further utilization or neutralization.

Waste utilization (use of waste) (hereinafter referred to as waste utilization) is the application of waste for the production of products (waste recycling), the production (generation) of electrical and (or) thermal energy (hereinafter referred to as energy), or the performance of work (provision of services).

Waste neutralization is the destruction of waste (including waste incineration not associated with its utilization) and (or) actions performed with waste that lead to the reduction or elimination of its hazardous properties.



Waste management is activities related to waste generation, collection, separation by waste type (including separation of waste by waste type by the waste producer during collection and waste sorting), disposal, transportation, preparation, use, disposal, burial, and / or storage.

Waste is substances or objects generated in the process of carrying out economic activity or human life activity that do not have a specific purpose at the place of their generation or have lost their consumer properties.

Production waste is waste generated in the process of legal entities and individual entrepreneurs carrying out economic activity (production of products, production (generation) of energy, performance of work (provision of services)).

Waste removal is the temporary storage of waste and its transfer for procurement, sorting, utilization, neutralization, disposal, and (or) long-term storage.

Circular economy is an economy characterized by a restorative and closed-loop nature, aimed at reducing the consumption of all types of raw material and fuel-energy resources and maximizing the utilization of waste.



Objectives

Minimization of waste generation and priority of waste utilization over neutralization or disposal.

The Company strives to reduce the volume of waste generation by transitioning to rational management models at all stages of operational activity: from the procurement of goods and logistics operations to the daily work of facilities and offices.

The priority is the prevention of waste generation, maximum sorting, and transfer of waste for utilization / neutralization to third-party organizations, as well as the minimization of disposal at waste disposal facilities.

Responsible procurement management.

The Company evaluates the life cycle of products, including packaging and raw materials, from the perspective of environmental impact and encourages suppliers to use secondary and eco-friendly materials, as well as to reject materials containing pollutants or materials that have a negative impact on the environment, the utilization or neutralization of which is impossible.

Eurotorg strives to create circular economy mechanisms, ensuring the reuse of products / materials through:

- consistent increase in the number of partners involved in the further utilization / neutralization of generated waste, as well as the search for new opportunities for further utilization / neutralization;
- undertaking obligations to develop and implement requirements for the environmental friendliness of packaging for private label goods, own-production products, and goods in the "ready-to-eat" segment (including the use of recyclable / biodegradable materials, reduction of packaging weight and volume, introduction of return and reuse systems for packaging).



Sustainable development of logistics.

Optimization of logistics processes, including fleet renewal and testing of eco-friendly types of trucks for product delivery and waste removal, optimization of routes, and transport loading.

Digitalization and innovation.

Implementation of new technologies and solutions based on best international practices aimed at reducing waste generation volumes through more precise planning at all stages of operational activity, implementation of electronic document management, and other digital solutions, including in terms of interaction with stakeholders.

Formation of responsible consumption.

Eurotorg strives to develop infrastructure for separate waste collection, stimulate customers and employees toward eco-friendly behavior, and popularize the purchase of eco-goods and the use of digital solutions, including within the framework of the Company's loyalty programs.

Maintenance of the reputation of a responsible Company and transparency in business processes, communication, and reporting.

The Company strives to reduce reputational risks through communication with stakeholders and the popularization of adopted eco-friendly solutions through activity in the country's information field.

Obligations in Implementing Objectives

The Company implements the objectives of this Policy by:

- acting on the principles of legality and validity, where all waste management measures comply with the requirements of national legislation, as well as internal documents aimed at implementing this Policy;
- focusing primarily on reducing waste generation volumes and only subsequently on their utilization or neutralization;
- ensuring the collection of waste and its separation by type, storage / disposal of waste in authorized places, and transfer for utilization / neutralization;
- implementing appropriate waste management systems into operational processes and continuously improving them;
- realizing its responsibility, including as a producer of private label goods, own-production products, and goods in the "ready-to-eat" segment, from production to disposal;
- carrying out waste accounting, conducting waste inventory in the manner established by the legislation of the Republic of Belarus on waste management, as well as providing statistical reporting on production waste management;





- setting measurable goals and ensuring regular monitoring and analysis of the achievement of these goals, including regarding waste generation volumes;
- preventing the harmful impact of waste, products of its interaction and (or) decomposition on the environment, human health, and property, and in the event of such impact, implementing measures to eliminate or reduce the consequences of this impact;
- maximally involving its customers, employees, and partners, creating a culture of environmental responsibility (including through the implementation of joint projects / initiatives, training on waste management, information campaigns on responsible consumption) and calling for adherence to similar standards;
- carrying out constant monitoring of risks and opportunities associated with this Policy, as well as implementing measures to prevent negative consequences. The Company appoints responsible persons at each facility for the implementation and control of compliance with this Policy;
- allocating the necessary financial, material, and human resources for the effective implementation of this Policy and the achievement of set goals, as well as investing in research and pilot projects for the introduction of innovative technologies for reduction, sorting, and utilization of waste, and in the professional development of Company employees responsible for controlling the implementation of this Policy.

Monitoring and Reporting

Control over the implementation of this Policy is carried out by the Ecology and Environmental Protection Department.

The Ecology and Environmental Protection Department is responsible for:

- regular collection of data on the generation, utilization, neutralization, and disposal of waste from all Company facilities;
- setting and monitoring the achievement of measurable goals;
- analysis of the effectiveness of implemented measures and projects;
- conducting internal audits of the waste management system.



Conclusion

Management of waste generated at all stages of the operational activity of the Company facilities is carried out in strict accordance with the legislation of the Republic of Belarus, internal requirements, and regulations of Eurotorg.

Taking into account the emergence of new risks and the impact of the implementation of this Policy on the Company's activities, as well as in accordance with the current requirements of the legislation of the Republic of Belarus and EAEU member states, this Policy will be updated to maintain its relevance and significance for the business and all stakeholders.

The Company will ensure resource support, monitoring, and implementation of initiatives to improve waste management activities while maintaining business sustainability.

