



Biodiversity Policy

The Policy was last updated in September 2025

A. INTRODUCTION

Axxam Group recognises the importance of protecting biodiversity and natural resources, integrating sustainable approaches that help maintain resilient ecosystems, reduce environmental pressures while maintaining long-term ecological balance.

Guided by a commitment to global sustainability, the company supports the United Nations Sustainable Development Goals (SDGs), including SDG 12 (Responsible consumption and production), SDG 13 (Climate action), and SDG 15 (Life on land). In addition, Axxam Group's principles are aligned with the 2022 Kunming-Montreal Global Biodiversity Framework.

Axxam Group is committed to minimising its environmental impact by adopting preventive practices, pursuing continuous improvement while safeguarding resilient and healthy ecosystems.

B. PURPOSE & SCOPE OF THE POLICY

This Policy provides a framework that sets out the principles behind Axxam's commitment to operating in a nature-positive way. Protecting and supporting biodiversity is a key part of this approach, reflecting both the ways our work depends on healthy ecosystems and the potential impacts it can place on biodiversity. This Biodiversity Policy complements our broader environmental commitments by focusing specifically on how we manage biodiversity within our operations, supply chain, and engagement with stakeholders.

The Policy covers Axxam Group's direct operations across all functions and employees. Axxam also seeks to promote alignment with these principles among suppliers, partners, and other stakeholders in the value chain.

C. REFERENCES

This Policy is designed to reinforce the principles defined in our Health, Safety and Environment Policy as well as our internal Standard Operating Procedures (SOPs) and Integrated Management Systems complying with all relevant regulatory requirements.

D. DEFINITIONS

Biodiversity sensitive areas: Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas ('KBAs'), as well as other protected areas.

Key Biodiversity Areas (KBAs): KBAs are sites contributing significantly to the global persistence of biodiversity.

Natura 2000: Natura 2000 is a network of protected areas covering Europe's most valuable and threatened species and habitats.

UNESCO World Heritage: A UNESCO World Heritage Site is a cultural or natural property recognized under the 1972 World Heritage Convention as having outstanding universal value to humanity.

E. PRINCIPLES ON OPERATIONS

- Aim for the responsible use of natural resources and compliance with environmental regulations to avoid contributing to environmental degradation in the regions where we operate.
- Review potential interactions with ecosystems on a periodic basis including both dependencies and possible impacts, where relevant. These assessments can inform project planning, facility upgrades, and other key business decisions to help reduce risks.
- Consider the ecological value of areas when planning or expanding operations, with the aim to avoid significant activities in or near biodiversity-sensitive areas (e.g. KBA, Natura 2000 areas, UNESCO World Heritage sites).
- Seek to embed biodiversity and nature considerations into strategic planning, decision-making, and long-term risk assessments.
- Work towards responsible water management, maintaining procedures that support compliance with discharge requirements and help limit potential impacts on surrounding environments.

F. PRINCIPLES ON ENGAGEMENT AND TRANSPARENCY

- Promote biodiversity awareness and engagement among employees, suppliers, business partners, and other stakeholders, encouraging knowledge-sharing and best practice.
- Communicate regularly on biodiversity-related actions and progress, sharing updates on initiatives undertaken at Axxam's sites.

G. GOVERNANCE & ACCOUNTABILITY

- **Oversight and approval:** Board of Directors
- **Monitoring and review:** ESG Committee and Head of HSE
- **Implementation and adherence of the policy:** Site managers and all employees

H. REVIEW PROCESS

Axxam will periodically review its processes and practices to track progress. Updates to the Policy may be introduced in response to regulatory changes, industry best practices or feedback from stakeholders. The Policy has been approved by the Board of Directors, and any substantive revisions will require their approval prior to adoption.