

LOCAL POLLUTION PREVENTION POLICY

1. GENERAL PROVISIONS	1
2. BASIC PRINCIPLES AND COMMITMENTS	1
3. POTENTIAL SOURCES OF POLLUTION	2
4. POLICY IMPLEMENTATION, MONITORING AND CONTROL	2
5. FINAL PROVISIONS.....	3
Annex 1: List of Potential Emergency Situations and Response Actions at Plasta AB	4

1. GENERAL PROVISIONS

- 1.1. Accidents and local pollution is the result of events that may occur during regular business activity or as a consequence of an emergency (for example, occur following the rupture of a pipe, a fire or an accident). Environmental damages include potentially serious risk to water related to underground sources or groundwater and land where there may be a risk to human health, moreover they could result in serious risks for protected species and their habitats.
- 1.2. Plasta AB (the **Company**) is one of the largest European polyethylene recyclers, producers, and suppliers of sustainable plastic products. Aiming to minimize worldwide plastic waste and ensure circularity, we are using waste plastics as a raw material to produce new products for everyday use, such as garbage bags and other PE film products.
- 1.3. Plasta AB management, is conscious that certain processes during production may cause environmental damage if not correctly managed and controlled, and that businesses that cause environmental damage are responsible for the full consequences, approves the Local Pollution Prevention Policy (the **Policy**).
- 1.4. The aim of the Policy is to set out the principles and commitments of the Company's operations to prevent accidents and ensure minimal environmental impact.
- 1.5. The Policy is based on the PLASTA Group Environmental Policy, ISO 14001 standard, the Pollution Permit issued by the Environmental Protection Agency, other national, European Union and international legislation regulating Environmental protection.

2. BASIC PRINCIPLES AND COMMITMENTS

- 2.1. Plasta AB aims to organise its business activities in such a way as to minimise negative environmental impacts:
 - 2.1.1. to comply with all applicable national environmental legal requirements;
 - 2.1.2. to improve waste sorting solutions;
 - 2.1.3. to maintain production equipment and minimise leakage of liquids and other substances from equipment;
 - 2.1.4. to collect, contain any accidental leaks and/or discharges;

- 2.1.5. provide timely and transparent information on the environmental impact of the Company's activities;
- 2.1.6. periodically analyse, assess and control the environmental impact of operational processes, and document the processes;
- 2.1.7. insure business.

3. POTENTIAL SOURCES OF POLLUTION

Plasta AB operates in accordance with a Pollution Permit, which sets out environmental requirements and standards for emissions and generation of pollution:

- 3.1. **Waste.** All waste generated by the Company's operations that is not suitable for further use is delivered for disposal to registered waste managers with whom the Company has signed contracts. The generation, storage and removal of waste is controlled in accordance with the terms of the Pollution Permit.
- 3.2. **Emissions from stationary sources of air pollution.** Emissions from stationary sources of ambient air pollution shall be controlled in accordance with the conditions of the Pollution Permit and the environmental monitoring programme. Laboratory measurements are carried out by accredited laboratories.
- 3.3. **Industrial and domestic wastewater.** The monitoring of industrial and domestic wastewater discharged to the wastewater network of Vilniaus vandenys UAB and the pollutants discharged with the wastewater shall be carried out in accordance with the conditions of the Pollution Permit and the environmental monitoring programme. The analyses are carried out by accredited laboratories and the laboratory of Vilniaus vandenys UAB. Industrial wastewater is cleaned in the Company's own wastewater purification plants.
- 3.4. **Surface wastewater.** Surface wastewater collected from the territory of the Company's plant, after cleaning in its own (local) purification plants, is used in the Company's operations for washing raw materials and, after re-cleaning in local purification plants, is discharged to the wastewater disposal system of Vilniaus vandenys UAB, together with industrial and domestic wastewater.
- 3.5. **Odours.** A total of 86 active air pollution sources are registered at the Company, some of which emit odorous pollutant compounds into the ambient air. Odour concentration is tested periodically by odour dispersion assessment studies.

4. POLICY IMPLEMENTATION, MONITORING AND CONTROL

- 4.1. A periodic review of the implementation of the Policy shall be carried out once a year. The Policy may be amended by revising or updating individual provisions or by approving a new version of the Policy. Amendments to the Policy shall be made as and when necessary, whatever the review cycle of the Policy.
- 4.2. The heads of each of each department of the Company shall be responsible for introducing their subordinate staff with principles of this Policy.
- 4.3. In order to ensure the implementation of the provisions of the Policy and to comply with the requirements of ISO 14001, Plasta AB has approved a list of Potential Emergency Situations and Response Actions (Annex 1), which is periodically updated to identify potential emergency situations in case of changes in the business circumstances, needs and requirements of stakeholders.
- 4.4. The Company identifies and documents the actions to be taken in the event of an emergency, and periodically conducts and schedules practical and theoretical training on how to deal with an emergency situation.
- 4.5. Practical training includes the implementation of response actions according to the type of accident and assessment of emergency/incident response preparedness.

- 4.6. **Environmental Protection Specialist** reviews and updates the list of potential accidents, prepares emergency action plans, informs staff, initiates trainings, evaluates the effectiveness of the trainings, completes the trainings report, and provides information to the management.
- 4.7. **HR Project Manager** must include emergency drills in the general training plans when planning competency development for personnel.
- 4.8. **Employees** are responsible for ensuring that the Emergency Action Plans are properly implemented.
- 4.9. The Company shall make it possible to report breaches of the Policy and to obtain the necessary information related to its fulfilment in accordance with the Whistleblowing Procedures.
- 4.10. All reports of potential violations must be properly investigated in line with the Group Whistleblowing Procedures. Disciplinary action shall be taken immediately if any non-compliance with the provisions of the Policy is detected, including temporary suspension from ongoing duties or termination of employment or termination of contract with a third party.

5. FINAL PROVISIONS

- 5.1. The Policy shall be approved and amended by the CEO of Plasta AB.
- 5.2. All current and newly employed staff of the Company are required to familiarize themselves with the Policy and comply with its requirements.
- 5.3. The Policy shall apply to the extent that it does not conflict with the laws of the Republic of Lithuania and/or other applicable legal acts.

Annex 1: List of Potential Emergency Situations and Response Actions at Plasta AB

In case of an accident, please inform: the Environmental Protection Dovilė Žilionė +370 699 45401 and Head of Occupational Safety and Health Voitechas Salnikas +370 613 78607					
Item No.	Emergency situation	Preventive measures	Response actions	Responsible person	Location
1	Fire	Periodic maintenance of electrical wiring and fire extinguishers. Clean working area. No smoking outside special smoking areas Initial and periodic instruction of employees Marking of escape routes, exits (evacuation plan)	Activation of fire alarms. 112 – call the fire department. Notification to responsible persons. Other actions in accordance with the fire instruction	Head of Occupational Safety and Health, Management Representative for Environmental Protection	Administration, Production
2	Vehicle or machinery fire	Periodic technical inspection of vehicles and machinery. Extinguisher maintenance. Initial and periodic instruction of employees	Activation of fire alarms. 112 – call the fire department. Notification of responsible persons. Other actions in accordance with the fire instruction	Head of Occupational Safety and Health, Management Representative for Environmental Protection	Vehicle, parking lot, during journey
3	Water supply accident	Archiving of construction documentation. Periodic maintenance of infrastructure; Initiate infrastructure repairs/renovation when needed.	Switching off the electricity 8 800 10880 Vilnius emergency t. Notification to the responsible person Closing the water tap valve	Head of Occupational Safety and Health, Management Representative for Environmental Protection	Administration, Production

In case of an accident, please inform: **the Environmental Protection Dovilė Žilionė +370 699 45401 and**

Head of Occupational Safety and Health Voitechas Salnikas +370 613 78607

Item No.	Emergency situation	Preventive measures	Response actions	Responsible person	Location
4	Leakage of hydraulic fluids and lubricants from machinery or vehicles	<p>Use only suitable and adapted chemical containers. Maintain the technical condition of the equipment daily. The use of machinery that is not in proper technical condition on the premises is prohibited. Employees using chemicals must be instructed in safety data sheets.</p> <p>Introductory and periodic training in handling chemicals</p>	<p>112 – call the fire department. Notification to the person responsible. Cover the spill with disposal materials (sorbent, sawdust, sand, etc.), refer to the safety data sheets.</p>	<p>Head of Occupational Safety and Health, Management Representative for Environmental Protection</p>	<p>Vehicle, parking lot, during journey</p>
5	Pavement contamination petroleum products	<p>Use only suitable and adapted chemical containers. Maintain the technical condition of the equipment daily. The use of machinery that is not in proper technical condition on the premises is prohibited. Employees using chemicals must be instructed in safety data sheets.</p> <p>Introductory and periodic training in handling chemicals</p>	<p>112 – call the fire department. Notification to the person responsible. Cover the spill with disposal materials (sorbent, sawdust, sand, etc.), refer to the safety data sheets.</p>	<p>Head of Occupational Safety and Health, Management Representative for Environmental Protection</p>	<p>Vehicle, parking lot, during journey</p>
7	Contamination of soil and/or water with petroleum products	<p>Use only suitable and adapted chemical containers. Maintain the technical condition of the equipment daily. The use of machinery that is not in proper technical condition on the premises is prohibited.</p>	<p>112 – call the fire department. Notification to the person responsible. Cover the spill with disposal materials (sorbent, sawdust, sand, etc.), refer to the safety data sheets.</p>	<p>Head of Occupational Safety and Health, Management Representative for Environmental Protection</p>	<p>Vehicle, parking lot, during journey</p>

In case of an accident, please inform: **the Environmental Protection Dovilė Žilionė +370 699 45401 and
Head of Occupational Safety and Health Voitechas Salnikas +370 613 78607**

Item No.	Emergency situation	Preventive measures	Response actions	Responsible person	Location
		<p>Employees using chemicals must be instructed in safety data sheets.</p> <p>Introductory and periodic training in handling chemicals</p>			
9	Sewage accident	<p>Archiving of construction documentation.</p> <p>Periodic maintenance of infrastructure;</p> <p>Initiate infrastructure repairs/renovation when needed.</p>	<p>8 800 10880 Vilnius emergency t.</p> <p>Notification to the responsible person</p>	<p>Head of Occupational Safety and Health, Management Representative for Environmental Protection</p>	<p>Administration, Production</p>
11	Power failure in electricity networks	<p>Archiving of construction documentation.</p> <p>Periodic maintenance of infrastructure;</p> <p>Initiate infrastructure repairs/renovation when needed.</p>	<p>1852 - Electricity grid emergency service.</p> <p>Notification to the responsible person</p>	<p>Head of Occupational Safety and Health, Management Representative for Environmental Protection</p>	<p>Administration, Production</p>
12	Stormwater accident	<p>Archiving of construction documentation.</p> <p>Periodic maintenance of infrastructure;</p> <p>Initiate infrastructure repairs/renovation when needed.</p>	<p>8 800 10880 Vilnius emergency t.</p> <p>Notification to the responsible person</p>	<p>Head of Occupational Safety and Health, Management Representative for Environmental Protection</p>	<p>Administration, Production</p>
13.	Gas explosion	<p>Documentation analysis.</p> <p>Compliance with health and safety instructions</p> <p>Employee training</p>	<p>1804 - Gas emergency service</p> <p>Notification to the responsible person</p>	<p>Head of Occupational Safety and Health, Management Representative for Environmental Protection</p>	<p>Administration, Production</p>

In case of an accident, please inform: **the Environmental Protection Dovilė Žilionė +370 699 45401 and
Head of Occupational Safety and Health Voitechas Salnikas +370 613 78607**

Item No.	Emergency situation	Preventive measures	Response actions	Responsible person	Location
14	Work related injures for variuos reasons	Compliance with health and safety instructions First aid training First aid kit	112 Ambulance in case of injury (depending on condition), Providing first aid	Head of Occupational Safety and Health, Management Representative for Environmental Protection	Administration, Production Vehicle, parking lot, during journey
15	Electrical injuries from electrical equipment	Compliance with health and safety instructions Employee training First aid kit First aid training Regular, periodic maintenance and inspection of electrical installations Only qualified personnel should be allowed to work with power tools and electrical installations Use of PPE	112 Ambulance In case of injury (depending on condition), Switch off the power Providing first aid	Head of Occupational Safety and Health, Management Representative for Environmental Protection	Administration, Production