# TOMRA

# ENVIRONMENTAL POLICY

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# PURPOSE

# SCOPE

This policy provides guiding environmental principles for all TOMRA Group companies to preserve and protect the environment. Aligned with TOMRA's mission to lead the resource revolution and our core values of innovation, passion, and responsibility, this policy shall be embedded and reflected in local routines, procedures, policies, and strategies throughout the company. TOMRA commits to respecting the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct[1].

The TOMRA Group Environmental Policy applies to all TOMRA controlled companies[2] and employees. TOMRA also encourages suppliers and business partners to follow similar principles in their own operations.

# GENERAL OBJECTIVES

1     Commitment to environmental risk-based due diligence.

2     Maintain relevant contingency plans.

3     Promote awareness and training of employees.

4     Contribute to environmentally responsible public policy.

5     Climate change mitigation and adaptation.

6     Reduce our GHG emissions and energy usage.

7     Minimize pollution and waste from own operations.

8     Protect biodiversity, nature and water resources.

9     Optimize resource use.

10     Transparent reporting to relevant stakeholders.

# DESCRIPTION

## RISK-BASED DUE DILIGENCE

TOMRA commits to performing regular risk-based environmental due-diligence in accordance with OECD Guidelines. We achieve this by:

- Identifying and assessing adverse environmental impacts associated with our operation and products.
- Establishing and implementing measurable objectives, targets and strategies for addressing adverse environmental impacts.
- Regularly reviewing the effectiveness and relevance of strategies and monitoring progress towards environmental objectives and targets.
- Providing relevant stakeholders with adequate information about environmental impacts.
- Providing remediation as necessary to address adverse environmental impacts we have caused or contributed to and using leverage to influence our suppliers and business partners to remediate their adverse environmental impacts.

## CONTINGENCY PLANS

TOMRA commits to maintaining relevant contingency plans. We achieve this by:

- Where relevant implementing and maintain contingency plans for preventing, mitigating and controlling serious environmental and health damage from operations, including accidents and emergencies, and mechanisms for immediate reporting to relevant authorities.

## AWARENESS AND TRAINING OF EMPLOYEES

TOMRA commits to raise awareness and provide training for employees on environmental issues. We achieve this by:

- Providing adequate education and training of employees on environmental matters covered by this policy.
- Providing regularly updated information about our environmental risks, impacts, and materiality assessment, including support and capacity-building on environmental management to employees and suppliers particularly small and medium-sized businesses, where appropriate and feasible.

## PUBLIC POLICY

TOMRA commits to constructively contribute to the development of environmentally responsible and economically efficient public policy. We achieve this by:

- Engaging with a broad range of stakeholders, including policy-makers, industry groups, local communities, and Non-Governmental Organizations (NGOs) to develop and implement effective environmental regulations.
- Working with partnerships or initiatives that will enhance environmental awareness and protection.
- Sharing our practical experience and expertise on solutions that exist today to reduce waste, increase recycling, and promote circular practices.
- Ensuring that all our public policy engagements are conducted ethically and transparently, adhering to the highest standards of integrity and accountability.

## CLIMATE CHANGE MITIGATION AND ADAPTATION

TOMRA commits to reducing greenhouse gas (GHG) emissions – ensuring corporate efforts in line with what is needed to limit global warming to 1.5°C. We achieve this by:

- Collecting and reporting on GHG emissions across scopes 1, 2, and 3 in accordance with the Greenhouse Gas Protocol[3].
- Decarbonizing our value chain in line with TOMRAs science-based climate targets, validated by the Science Based Target initiative[4].
- Develop and regularly review a climate change mitigation roadmap and Net Zero transition plan that is embedded in and aligned with our overall business strategy and planning.
- Maintaining and update climate risk assessments.
- Implementing actions to reduce vulnerability to current or expected climate change impacts.

## ENERGY USAGE

TOMRA commits to reducing our energy consumption in both manufacturing and office facilities, and to source more electricity from renewable sources. We achieve this by:

- Upgrading equipment for energy efficiency.
- Optimizing energy use in processes.
- Implementing energy management systems.
- Working towards our goal of sourcing 100% electricity from renewable sources.

## POLLUTION PREVENTION

TOMRA commits to limiting pollution and safe handling, storage, and disposal of chemicals. We achieve this by:

- Monitoring and reducing pollution of air, water, and soil.
- Complying with existing environmental regulations such as the RoHS Directive[5], REACH Regulation[6].
- Meet the 'Do No Significant Harm criteria'[7] for pollution prevention and control according to the EU Taxonomy regulation and its Delegated Acts (minimization of pollution), including:

  - Limit pollution through reducing emissions of pollutants, microplastics generated and managing waste effectively.
  - Use Best Available Techniques (BAT) to prevent and control pollution – which means that we use the most effective and advanced methods that are technically feasible and economically viable.

## WASTE MANAGEMENT

TOMRA commits to responsible handling and reducing waste across our business. We achieve this by:

- Ensuring that waste is either recycled or disposed of responsibly, following local requirements and procedures and using approved, registered waste contractors.
- Applying the following waste hierarchy in accordance with EU's Waste Framework Directive[8].
- Prevention – take measures to reduce the quantity of waste, the adverse impacts of the waste generated and the content of harmful substances in material and products.
- Preparing for reuse – Check, clean and repair products or components of products that have become waste, so that they can be reused without any further processing.

- Recycling – reprocessing of waste material into products, materials, or substances, whether for the original or other purposes.
- Recovery (e.g., energy recovery) – replacing other materials with waste.
- Disposal (e.g., landfilling, incineration).

## RESOURCE USE AND CIRCULAR ECONOMY

TOMRA is on a mission to transform how we all obtain, use and reuse the planet's resources to enable a world without waste, and we are deeply committed to contributing to responsible resource use and a circular economy. We achieve this by:

- Driving increased resource productivity in all sectors that we serve.
- Business model innovation to increase and strengthen product and material circularity across value chains in which we operate.
- Actively work to improving the circularity of own product through Sustainable Product Design strategy and targets.

## SUSTAINABLE PRODUCT DESIGN

TOMRA commits to designing and developing our products in a sustainable manner. We achieve this by:

- Following our 4 Sustainable Product Design Principles:
  - Design for Material Efficiency – Using less materials or resources to create a product or provide a service.
  - Design for Energy Efficiency – Consuming less energy to accomplish the same task, which avoids energy waste.
  - Design for Disassembly – Provide rules that guide designers in designing products that are easy to disassemble.
  - Design for Recycling – Focuses on products recyclability at End-Of-Life.
- Promoting higher levels of awareness among customers of the environmental implications of using our products, including by providing relevant and accurate information on their environmental impacts.

## PROTECTION OF WATER RESOURCES

TOMRA commits to the protection of water resources. We achieve this by:

- Do not discharge pollutants into water bodies that exceed regulatory thresholds and reduce risk for water contamination through control measures if needed.
- Encouraging conscious and resource-efficient water management throughout our operations.

## PROTECTION OF BIODIVERSITY AND ECOSYSTEMS

TOMRA commits to limiting our impact on nature and biodiversity through our operations and products and contribute to the protection of ecosystems. We achieve this by:

- Identifying and assessing our material negative impacts on biodiversity and ecosystems, including from land use and land use change.
- Taking actions to reducing our negative impacts from GHG emissions and energy usage; managing and mitigating any negative impacts resulting from TOMRA-controlled land use and land use change.
- Limiting and preferably avoiding products that contribute to deforestation.

## BUSINESS TRAVEL

TOMRA commits to reducing negative environmental impacts from business travel, including carbon emissions and air pollutions. We achieve this by:

- Reviewing and optimizing our business model through strategic changes in organizational structure and locations.
- Promoting remote work and virtual meetings.
- Implementing local travel guidelines to ensure efficient travelling practices.

## SUPPLIER ASSESSMENT AND ENGAGEMENT

TOMRA commits to assessing our suppliers on environmental performance to minimize risk of any negative environmental impacts in our supply chain, and to actively engage with our strategic suppliers to collaboratively drive more sustainable business practices in our supply chain. We achieve this by:

- Screening and evaluating all new supplier against environmental performance criteria.
- Including environmental topics as part of regular supplier engagement meetings.

## REPORTING

TOMRA commits to transparent reporting on material environmental issues to relevant stakeholders. We achieve this by:

- Reporting in compliance with the CSRD and other mandatory regulation frameworks.
- Regularly updating our webpage with relevant information.

## RESPONSIBILITY AND AVAILABILITY

- Adopted by the Executive Leadership Team January 31st, 2025.
- Last updated: January 31st, 2025.
- Accountable for implementation: Executive Leadership Team.
- Responsible for implementation: Vice President, Head of Group Sustainability.
- Review process: Annually.
- The Policy is available for stakeholders through TOMRA intranet and TOMRA.com.

[1] OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
[2] TOMRA Systems ASA and companies in which the parent company has control and are included in TOMRA Group's consolidated financial accounting.
[3] Greenhouse Gas Protocol
[4] Science Based Target initiative
[5] RoSH Directive - Restriction of Hazardous Substances in Electrical and Electronic Equipment
[6] REACH Regulation - To protect human health and the environment against the harmful effects of chemical substances.
[7] Do No Significant Harm criteria
[8] Waste Framework Directive

# ENDNOTES