

ENVIRONMENTAL POLICY

Version 7 of 08 March 2023

1. Objectives

The fundamental objectives of the environmental policy include:

- a. Ensuring that the environmental impact of the Atlas Group is fully controlled and continuously improved, taking into account economic efficiency.
- b. Ensuring that environmental protection issues are taken into account at every stage of the product life cycle, in accordance with the specific nature of the Atlas Group (activities, products, services) and its context.
- c. Ensuring compliance with the legal requirements of the relevant national legislation and with other requirements to which individual companies of the Atlas Group have committed themselves and which relate to environmental aspects of their activities.
- d. Ensuring rational management of raw materials and energy.
- e. Preventing pollution and continuously improving the environmental management system.
- f. Achieving synergy in business activities.
- g. Commitment to environmental protection, including pollution prevention.

All employees of the ATLAS Group declare their commitment to having a positive impact on the natural environment.

The specific objectives set for the environmental policy for a given calendar year are published once a year on the IBM Connections portal.

2. Organisation and responsibility

- a. The Member of the Management Board of Atlas Sp. z o. o. is responsible for the implementation of the Environmental Policy in the Atlas Group.
- b. The Member of the Management Board of Atlas Sp. z o.o. makes the Quality and Environment Director of Dolina Nidy Sp. z o.o. responsible for coordinating activities related to the proper implementation of the Environmental Policy at the Atlas Group.
- c. Other companies of the Atlas Group appoint persons to cooperate with the Quality and Environment Director of Dolina Nidy Sp. z o.o. These persons are responsible for coordinating matters related to the implementation of the Environmental Policy in a given company. These persons shall retain their current organisational subordination.
- d. All employees of the companies are responsible for implementing environmental protection requirements and optimising processes in this area within the scope of their competences and duties.

3. Methods of implementation

In order to implement the Environmental Policy, the following actions are taken and responsibilities are assigned:

- a. The day-to-day coordination of activities related to the implementation of the Environmental Policy in the Atlas Group on behalf of the Member of the Management Board of Atlas Sp. z o.o. is handled by the Quality and Environment Director of Dolina Nidy Sp. z o.o. The tasks of the Quality and Environment Director of Dolina Nidy Sp. z o.o. in this regard include:
- monitoring selected environmental indicators at specified intervals and requesting the implementation of appropriate corrective and improvement measures,
 - coordinating activities related to the implementation of best practices in environmental management within the Atlas Group,
 - coordinating activities related to internal audit programmes and the development of auditors' competences,
 - coordinating the supervision of documentation related to the implementation of this Policy,
 - coordinating internal and external communication regarding the Environmental Management System,
 - organising regular meetings of persons responsible for coordinating activities related to the implementation of the Environmental Policy in individual companies, with the aim of exchanging information on an ongoing basis and developing common goals and directions for improvement,
 - preparing input data for the review of the Integrated Management System.
- b. The Quality and Environment Director at Dolina Nidy Sp. z o.o. is responsible for preparing periodic reports on the implementation of the Environmental Policy in the Atlas Group for the Management Board of Atlas Sp. z o.o.

4. Verification and evaluation of activities

Verification and evaluation of activities will be carried out on the basis of:

- a. a set of indicators (KPIs) set out in Appendix 1 to this Policy,
- b. legal compliance monitoring and assessment,
- c. the results of internal audits,
- d. the results of inspections carried out by state administration bodies and the results of third-party audits (certification audits and audits commissioned by business partners).