	“MOLDCELL” S.A.	Code:
	ENVIRONMENT POLICY	Revision No:2
		Date: 15.05.2024
Prepared by: Ecaterina Galer	Controlled by:	Approved by CEO: Carolina Bugaian

## I. PURPOSE AND SCOPE

This Policy is related to environmental responsibility and defines how Moldcell works to pro-actively manage its environmental impacts. The purpose is to ensure that Moldcell manages its negative and positive environmental impacts throughout the value chain and the life cycle of delivering its products and services, to meet its long-term environmental ambitions and goals.

As part of the ICT industry, Moldcell contributes to a more sustainable society by providing services that enable customers to minimize their negative environmental footprint, improve their operational efficiency and reduce cost. We create value for our customers and for society through development and continuous improvement of our environmental impacts in a conscious, resource efficient and cost efficient manner.

## II. PRINCIPLES

Moldcell is focusing on the following key environmental aspects:

- sustainable energy use (energy efficiency) combined with the transition to renewable energy sources,
- climate change mitigation and adaptation, taking into account both physical and transition risks and opportunities, and
- hazardous and non-hazardous waste reduction, with emphasis on electronic waste (e-waste) but also including other material waste streams.

Other environmental aspects on which Moldcell does not have a material impact, such as water and biodiversity, are nevertheless continuously evaluated where relevant.


Moldcell has adopted the following principles:

- To follow all applicable domestic and relevant international laws, regulations and frameworks.
- To apply a consistent and structured management approach based on continuous improvement, meaning target setting, monitoring, measuring, and evaluating impacts and risks, to minimize its negative environmental impacts.
- To promote circularity by applying the principle of Reduce, Reuse, Recycle in own operations and in customer offerings.
- To engage in research, knowledge sharing and public policy development with relevant stakeholders on topics that promote environmental responsibility.
- To support a precautionary approach in its operations and throughout its value chain.
- To develop, use and promote environmentally friendly technology, products and services in its operations and throughout its value chain, and prioritizes suppliers and partners with similar objectives.
- To communicate and report its most material environmental performance in a transparent, reliable and timely manner.

## III. REQUIREMENTS


To implement these principles, Moldcell will submit the following instructions:

- Each relevant level unit shall ensure that it has up to date information on applicable laws, regulations and frameworks, and knowledge about how they apply to their areas of work.

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Also shall, on a regular basis, carry out legal reviews within their area of work and secure legal compliance. Legal Department are to support with legal interpretation and legal advice.

2. Moldcell sustainability targets are included in the company’s strategy and business objectives. Moldcell applies a structured management approach to minimize risks and capture opportunities, based on continuous improvement.
3. Moldcell shall ensure that products, equipment, services etc. do not contain banned and restricted substances.
4. At Moldcell, we recognize the importance of environmental responsibility and are committed to operating in a sustainable manner. While we currently do not utilize renewable energy sources to power our operations, we are actively working towards a greener future. The primary focus is on reducing our overall energy consumption. We have set ambitious targets to achieve a 5-10% annual reduction in energy use across all Moldcell Group entities. This reduction will be achieved through various initiatives, such as optimizing equipment usage, implementing energy-efficient technologies, and raising employee awareness. Moldcell shall aim to install renewable energy generation capacity (solar, wind) where feasible. We aim to source 20-30% of our total electricity from renewable sources within the next 3-5 years.
5. Moldcell promotes circularity to achieve its zero waste goals by 2035. To meet this goal the principle of Prevent, Reduce, Reuse, Recycle (with implementation in that same order) is applied in own operations, during construction and maintenance of networks and when shaping customer offerings.
6. Moldcell shall limit the use of natural resources and prevent waste from being generated in the first place, based on action plans and annual reports on waste streams and progress against the goals.
7. When products, services and equipment are developed, sourced and maintained, Moldcell shall promote and apply principles of durability and repairability to prolong the lifetime of the same. (Note: Recycled materials should be considered.)
8. Moldcell shall meet the producer responsibility legislation regarding collection and recycling of electronics, batteries and packaging material within the scope of our operation. (Note: Producer responsibility legislation requirements cover all relevant sales channels (online and shops), both for B2C and B2B).
9. Moldcell shall have a system in place for buy-back program and end of life treatment of customer and employee devices as well as other relevant equipment.
10. Moldcell shall prioritize the re-use of network equipment: internal re-use of network equipment should be the first choice, re-use by other parties second and recycling the last option.
11. The company shall prefer contract ISO 14001 or equivalent certified suppliers for buy-back, re-use and recycling.
12. Moldcell develops, uses and promotes technology, products and services that are low carbon, circular and energy efficient, both in its operations and throughout its value chain. So, Moldcell shall develop products and services by taking into account life cycle impacts and circular principles (prevent, reduce, reuse and recycle). This includes integrating environmental impact aspects in product development as well as product life cycle

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management and sourcing of relevant product/service categories. This means proactively identifying and acting on opportunities to both reduce the negative environmental footprint and enable our customers to reduce their environmental impact.

13. Moldcell shall prioritize suppliers who can demonstrate concrete achievements in reducing their negative environmental impacts. Moreover, we shall prioritize those who promote circularity in their production and offering.
14. Each employee shall consider virtual meetings as first choice and select environmentally conscious option when necessary to travel.
15. Moldcell engages in research, knowledge sharing and public advocacy with relevant stakeholders on topics that promote environmental responsibility. In such interactions we shall also aim to increase the awareness of the positive impacts of our products and services. The company will not enter as member in organizations that advocate against a rapid transition to a low-carbon and circular economy.
16. Moldcell shall regularly report about its environmental performance to its employees, management and board, and to external stakeholders.
17. Each relevant level unit shall establish SMART (Specific, Measurable, Achievable, Relevant, Timely) targets as an integrated part of its business strategy implementation. These targets shall be based on Moldcell’s short and long-term targets.
18. Each relevant level unit shall ensure that environmental data and other information reported in Annual Report is complete, accurate, comparable, reliable and can be externally assured. It shall be provided to Sustainability Officer in a timely manner.

These principles apply to the extent that they do not place Moldcell in violation of domestic laws and regulations.

#### IV. ROLES AND RESPONSIBILITIES


This Policy applies to the Moldcell Group, encompassing:

- Moldcell SA: Operating within the electronic communications industry.
- Moldcell Technology SRL: A subsidiary of Moldcell SA, operating in the information technology industry and a resident of the Moldova IT Park since 2018.
- Moldcell Foundation: A separate non-profit, non-governmental, and apolitical organization dedicated to philanthropic and socially responsible projects in the Moldovan community.

All entities within the Moldcell Group are located in the Republic of Moldova and share the same premises at str. Belgrad 3, Chisinau city.

The CEO is responsible for ensuring that all relevant entities within Moldcell Group adopt and implement the Group Environmental Policy.

The Sustainability Officer plays a crucial role in supporting the CEO and driving the Group's sustainability agenda.

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## V. BREACHES AGAINST THE POLICY


Any Moldcell employee who suspects violations of Moldcell Company’s Code of Ethics and Conduct or this Policy must report and raise the issue primarily to their line manager, secondly to the People and Communication Director, to the Sustainability Officer, or through the reporting channel available on Moldcell Company’s internal tool [Whistleblowing \(moldcell.md\)](#) and external email [whistleblowing@moldcell.md](mailto:whistleblowing@moldcell.md).

Moldcell Company expressly forbids any form of retaliation. For specific requirements, please see our Policy on Internal Reporting and Non-Retaliation [Sustainability \(sharepoint.com\)](#)

Violation against the Policy can lead to disciplinary action, up to and including termination.

## VI. TERMS AND ABBREVIATIONS

Terms and abbreviations	Description
<b>Circularity</b>	A concept based on three principles: design out waste and pollution; keep products and materials in use; and regenerate natural systems. It entails gradually decoupling business activities from the consumption of finite resources, preventing waste and creating closed loops of materials moving towards Rethink/Reduce -Reuse – Repair – Refurbish - Recycle from the current Take – Make – Discard linear model.
<b>Continuous improvement</b>	Using environmental management system to improve company’s environmental performance consistent with the environmental policy, making progress over time.
<b>Environmentally friendly technology</b>	Technology that either: <ul style="list-style-type: none"> <li>• Is less negative compared to another technology with regard to environmental impact (for example more energy efficient), or</li> <li>• Has an overall positive environmental impact (for example tele- or videoconferencing solutions, that enable remote meetings which replace physical travel).</li> </ul>
<b>GHG</b>	Greenhouse gas emissions - Emissions that have an impact on the climate and contribute to global warming. The most common activity that produces greenhouse gas emissions is combustion of fossil fuels (coal, diesel, etc.).

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	The most common greenhouse gas emitted by human activities is carbon dioxide (CO2)
<b>Renewable energy</b>	Energy generated from non-limited power sources – e.g. solar, wind or hydro.
<b>Precautionary approach</b>	To act on limiting environmental impact, despite a lack of complete understanding of the actual and potential impacts of a certain product or service. For example, this involves not using certain chemicals whose health effects are not yet fully assessed.
<b>Structured management approach</b>	A planned, documented and process-based way of working, based on the “Plan-Do-Check-Act” approach.
<b>Zero waste</b>	Moldcell shall strive to prevent/reduce waste in our own operations, including in network construction and maintenance. All left-over materials shall be re-used, re-purposed or recycled and nothing shall by 2035 go to incineration or landfill. The same underlying principle – Prevent, Reduce, Reuse, Recycle, shall be applied in the rest of our business activities.