APPROVED
By the Order of the CEO
of Ukrainian Energy Exchange
Limited Liability Company
No. 27-OCH dated September 23, 2026

Enters into force on October 1, 2026.

ENVIRONMENTAL POLICY
of the Ukrainian Energy Exchange
Limited Liability Company

Kyiv 2026

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1. General Provisions

1.1. The Environmental Policy of the Ukrainian Energy Exchange Limited Liability Company (hereinafter referred to as the "Policy") has been developed to ensure the effective management of potential environmental risks and environmental aspects associated with the professional activities conducted by the Ukrainian Energy Exchange Limited Liability Company (hereinafter referred to as the "Exchange") in organized commodity markets, as well as its other activities.

1.2. The purpose of this Policy is to direct the Exchange's efforts toward preventing negative environmental impacts resulting from its activities and minimizing such impacts should they occur, in accordance with the applicable legislation of Ukraine and international standards of the ISO 14000 series (Environmental Management)—specifically ISO 14001, which establishes requirements for an environmental management system.

1.3. The Policy applies to all employees of the Exchange, including those who may be engaged on an outsourcing or outstaffing basis.

1.4. The Exchange declares its commitment to ensuring everyone's constitutional right to an environment safe for life and health and to compensation for harm caused by the violation of this right.

1.5. In its operations, the Exchange adheres to environmental provisions, standards, and requirements established by the legislation of Ukraine.

1.6. The Exchange is not a payer of the environmental tax and does not hold on its balance sheet (whether through ownership, lease, or use) any facilities that have, or could have, a harmful impact on the state of the natural environment.

1.7. The Exchange declares that it is not an industrial (manufacturing) enterprise and that potential negative environmental impacts resulting from its operations are minimal or non-existent.

1.8. The environmental component of the Exchange's activities is transparent and public.

1.9. The Exchange appoints a person responsible for the implementation of this Policy.

2. Key components of environmental policy

2.1. The main components of the Exchange's environmental policy aimed at improving the ecological state of the environment are the following (but not exclusively):

- environmental awareness;
- awareness of employees in matters of ecology and environmental protection (ecological awareness);

- environmental values;
- balanced use of natural resources;
- reduction of environmental risks and a safe environment;
- complete elimination of environmental pollution associated with the Exchange’s business operations, as well as the causes thereof;
- use of office equipment, machinery, and consumables that impact or ensure environmental safety, in accordance with the best global standards;
- rational use of natural resources and reduction of waste generated during the Exchange’s business operations, as well as their timely disposal;
- cooperation with environmental stakeholders, constructive engagement with the public;
- priority of preventive actions to avoid negative environmental impact;
- strengthening the sense of environmental responsibility among Exchange employees at all levels;
- preliminary environmental impact assessment of all new Exchange activities;
- involving all Exchange employees in measures to reduce environmental risks;
- ensuring the necessary sanitary and hygienic working conditions for employees in accordance with the requirements of current legislation;
- low level of energy and resource consumption;
- use of electrical and thermal energy from alternative energy sources.

3. Strategic goals for implementing environmental policy

3.1. The strategic goals of implementing the Exchange's environmental policy are:

- environmental protection, including pollution prevention, promoting the sustainable use of resources, reducing the impact on climate change, and protecting biodiversity and ecosystems;
- development of environmentally sustainable and rational practices;
- compliance with mandatory legislative and other environmental requirements adopted by the Exchange;
- ensuring environmental safety during the Exchange's business operations;
- continuous improvement of the environmental management system to enhance the environmental performance of the Exchange’s operations.

4. Tools for implementing the strategic goals of environmental policy

4.1. In order to achieve the strategic goals of the environmental policy, the Exchange undertakes obligations:

- ensure the participation of Exchange employees in environmental seminars, training sessions, and other events aimed at fostering environmental awareness and adopting advanced environmental values and practices;
- develop and implement a comprehensive system of environmental values at the Exchange;
- analyze potential environmental risks associated with the Exchange's activities, and regularly assess, minimize, or completely avoid them;
- ensure and develop environmental cooperation with interested stakeholders;
- subject to financial feasibility – to fund environmental initiatives and projects;
- conduct a preliminary environmental impact assessment of all new types of the Exchange's activities;
- ensure the public availability of information regarding the Exchange's environmental management system and a system for informing Exchange employees about the Exchange's environmental policy;
- implement energy-saving technologies and resource-efficient practices;
- participate in external environmental protection initiatives, including the development and improvement of Ukraine's environmental legislation;
- motivate Exchange employees to improve environmental performance and competence;
- conduct regular reviews of the implementation of the environmental policy to identify ways to improve it.

5. Implemented environmental policy measures

5.1. At this stage, the Exchange has implemented the following environmental policy measures:

- use of energy-saving technologies – energy-saving light bulbs;
- switching to the use of phosphate-free detergents;
- annual participation in community and other activities related to landscaping and beautification;
- implementation of the European approach to the separate collection of non-food waste generated during business operations, for the purpose of subsequently transferring it to appropriate organizations for disposal or reuse;

- refusal by Exchange employees to use plastic tableware;
- provision of drinking water of appropriate quality to employees;
- minimization of waste generated by Exchange employees during their activities;
- provision of adequate financial and organizational-technological resources to the person responsible for implementing this policy, to enable the proper implementation thereof;
- ensuring the sanitary and hygienic working conditions for employees as prescribed by law;
- compliance with mandatory legislative and other environmental requirements adopted by the Exchange.

6. The Exchange's Environmental Aspirations

6.1. Establishment and maintenance of an effective environmental management system.

6.2. Improvement of the environmental management system through the consideration and implementation of state-of-the-art monitoring and control mechanisms and the application of best practices.

6.3. Involving Exchange employees in environmental protection activities.

6.4. Development of environmental culture among Exchange employees.

6.5. Confirmation of the environmental management system's compliance with the requirements of international standards, specifically the ISO 14001 series.

7. Final Provisions

7.1. All internal documents of the Exchange, as well as the measures and procedures employed by the Exchange to implement this Policy, are developed and executed in accordance with the legislation of Ukraine.

7.2. Amendments and additions to this Policy are approved by an order of the CEO and are effected by issuing the Policy in a new version. The adoption of a new version of this Policy terminates the validity of the previous version.

7.3. Matters not regulated by this Policy are governed by the legislation of Ukraine and the relevant internal documents of the Exchange.

7.4. In the event that any part of this Policy conflicts with the legislation of Ukraine—including due to the adoption of new regulatory legal acts—this Policy shall remain in effect only to the extent that it does not contradict the applicable legislation of Ukraine.

7.5. Compliance with and implementation of the provisions of this Policy are overseen by the Exchange Committee, the CEO, and the Exchange's management.

CEO _____ Oleksandr KOVALENKO