



Policy

CLN-POL-0000037 Global Environmental Policy

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AM



Signer Name: Andreea Moldovanu
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Reviewer	Title:	Signature:	Date:
Sam Herbert	Chief Operating Officer	DocuSigned by: <i>Sam Herbert</i> Signer Name: Sam Herbert Signing Reason: I approve this document Signing Time: 20-Jan-2023 12:09 PM GMT 46B025E6AF8449188B4F9D5ADAF86CD	20-Jan-2023 12:09 PM GMT

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Najma Ali	Responsible Person and Quality Manager	DocuSigned by: <i>Najma Ali</i> Signer Name: Najma Ali Signing Reason: I approve this document Signing Time: 20-Jan-2023 4:55 PM GMT 1901AB6C30DE4D2893D107ADF86BB79D	20-Jan-2023 4:55 PM GMT

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1. Executive Summary

As a global company we wish to present a clear guideline as to our opinion on environmental behaviour.

We recognise our responsibility to protect the environment and to act in an environmentally responsible manner. We commit to use our resources in a way that will protect and improve the environment, now and in the future.

It is our policy and commitment to ensure that we do business according to the highest ethical standards and that our practices comply with all applicable laws in any country we operate in through directly related companies or third parties.

This Policy was established referring to the laws, regulations, and other policy mechanisms concerning environmental issues and sustainability. These issues include energy and emissions, air and water pollution, biodiversity, waste management, the protection of natural resources, wildlife, and endangered species; and the environmental impacts from use of our products.

2. Purpose

The Policy sets out specific environmental commitments and expectations across a range of issues.

3. Scope

This policy applies to Clinigen Limited, its subsidiaries and affiliates (“Clinigen”).

Clinigen establishes a business relationship with suppliers, clients, partners, (sub) contractors, consultants, and other service providers (hereinafter “Business Partners”) who should comply with this Environmental Policy. Clinigen and its Business Partners will not, directly, or indirectly, deliberately harm the environment, but seek methods and ways to preserve it.

This Policy should be considered as complementary to local environmental policies in place. All the subsidiaries, affiliates and our Business Partners should seek to comply with this Policy and local policy in place. In case of absence of such policy, this Policy will be applicable.

4. Our Commitments

We are dedicated to continually improving our operations and this includes looking for good environmental solutions that ultimately protect the environment and seek to minimise our impact.

To reduce our environmental impact, Clinigen shall:

Energy Consumption and Greenhouse Gases (GHG)

- Improve our energy efficiency, reducing energy consumption and where possible commit to the use of renewable energy sources.
- Capture, report and disclose on our GHG emissions at least annually.
- Set targets to increase the use of renewable energy.
- Commit to developing and setting emissions reduction target in line with the Science Based Target Initiative (“SBTi”) criteria by 2025.

Air Pollution

- Reduce and mitigate the impacts resulting from hazardous and non-hazardous air emissions other than GHGs (e.g., SO_x, NO_x, VOC, PM, dust) and other emissions polluting the environment such as odour, noise, and light.
- Take action to reduce pollution caused due to road congestion and traffic resulting from the company's operations.

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Water

- Be a sustainable water consumer through strong stewardship.
- Periodically assess water-related risks covering our direct and indirect operations using the World Resources Institute (WRI) Aqueduct Tool.
- Establish water management programmes at Clinigen locations in respect to the risk assessments.

Biodiversity

- Conduct periodic biodiversity risk assessments to understand the risks and opportunities associated with our direct and indirect operations.
- Where possible, take action to reduce the impact our operations have in biodiversity-sensitive areas.

Materials, Chemicals and Waste

- Consistently evaluate the reduction, reuse, and recycling of materials across our business wherever possible; ensuring that our waste is managed in a safe and responsible manner and waste going to landfill is kept to a minimum.
- Set targets to reduce waste to landfill.

Environmental Impacts from use of Products

- Commit to protecting the environment and preventing pollution through continuous improvement of our processes, products, and services, ultimately reducing our environmental impact from the use of our products and services (where feasible).
- Increase the proportion of recycled and responsibly sourced materials as part of fostering a culture of circularity.

Environmental Risk, Compliance and Control

- Fully comply, as a minimum, with all relevant environmental legislation.
- Assess the risks of our business activities upon the environment and ensure that, wherever possible, any environmental impact is eliminated or, at least, reduced.
- Develop, where appropriate, environmental management systems at Clinigen sites to help us identify our environmental aspects and to establish localised environmental goals and targets which will drive improvement in our environmental performance.

Monitoring, Reporting and Disclosures

- Define and monitor our key environmental performance indicators.
- Report and action any environmental issues to our stakeholders including EMT and the Board of Directors; ensuring our environmental impact is kept to a minimum.
- Systematically measure and monitor our environmental performance, reporting results to the Board of Directors (at least twice per annum).

5. Responsibility of Clinigen, its Employees and Management

Clinigen shall ensure that its practices comply with all applicable environmental legislation in its countries of operation, Clinigen's ESG Strategy, and other requirements relating to its significant environmental aspects and impacts.

All Clinigen directors and employees worldwide must read and understand this policy thoroughly and comply with it at all times. Any questions or doubts should be forwarded to esg@clinigengroup.com.

It is the responsibility of Management to communicate this Policy and ensure that all employees and external parties working on behalf of Clinigen within their area of responsibility, understand and comply with this Policy. It is the responsibility of Management to provide relevant training to employees with the aim of helping them understand and deal with dilemmas regarding the environment.

Clinigen has the responsibility to look after the natural environment both for the current and future generations. Clinigen takes a systematic and continuous improvement-driven approach to managing environmental impacts within our own operations as well as in the wider supply chain.

Specifically, we aim to:

- expand and improve our environmental management system globally, and clarify authority and responsibilities within Clinigen Limited;
- Stimulate our directors and employees to address environmental responsibilities within the framework of daily operating procedures and act to preserve the environment on a global scale;
- Continuously reduce the environmental footprint of its business operations, including saving resources, saving energy, reducing wastes, promotion of green procurement, and preventing environmental contamination considering business priorities and operations;
- Reduce the environmental impact of our products and services by taking life cycle analysis and product managements into our processes, and encouraging and stimulating the development and diffusion of environmentally friendly technologies, practices, and operations;
- Continuously work to ensure the safety of our products and services, and environmental improvements by increasing the transparency of our supply chain, and in doing so, fulfilling our social responsibility;
- Promote improved awareness of environmental issues and implementation of best practices to Clinigen's directors, employees, and Business Partners; and
- Ensure effective communication and engagement with customers, clients, suppliers, and other stakeholders through disclosure of information regarding our environmental activities and performance.

6. Business Partners

It is vitally important that Business Partners do not engage in damaging the environments or providing bad labor environment in order to obtain business with Clinigen or to obtain services on behalf of Clinigen.

Clinigen may be held responsible for the conduct of our Business Partners. It is therefore important that we know our Business Partners and make sure that they do not violate environmental laws (allegedly) or this policy on Clinigen's behalf.

Clinigen will conduct ESG/sustainability screening on Business Partners as part of the vendor risk assessment and in-take process.

7. Risks

Violations may trigger sanctions against Clinigen which include, but are not limited to, the following:

- Authorities may impose substantial fines on Clinigen;
- Criminal sanctions may lead to fines for individuals; and,
- Allegations of harming the environment and bad labor conditions may lead to substantial reputational damage and may impact our business and value.

8. Consequences Of Violations

The consequences for violating this policy will depend upon the facts of each situation but may lead to disciplinary action which may include termination of employment.

9. Record-Keeping And Reporting

All accurate records shall be kept regarding environmental matters in accordance with the related internal policies. All these records shall be clear and transparent.

All directors, employees and Business Partners are expected to report any violation of this Policy and other related requirements they become aware of. If you become aware of any actual or suspected breach, you must raise your concerns as soon as possible. This can be done by contacting the ESG team via esg@clinigengroup.com. Reporters can remain anonymous if they wish. How to report a concern anonymously is set out in the Global Freedom to Speak Up Policy.

It is the policy of Clinigen to report illegal acts to the appropriate authorities and to fully cooperate in any subsequent investigation.

10. Communication And Training

Communication and training are being implemented so that this policy is fully understood.


11. Monitoring And Review

The effectiveness of the implementation of this policy will be monitored and reviewed regularly considering its suitability, adequacy, and effectiveness.

12. References

- [Clinigen ESG Strategy and Action Plan](#)
- Science Based Target Initiative: <https://sciencebasedtargets.org>
- WRI Aqueduct Tool: <https://www.wri.org/aqueduct>

13. Document History

Change No.	Change Description (include previous policy reference if available)	Effective Date
01	New Global Policy	03-Feb-2023 DocuSigned by: <i>AM</i>  Signer Name: Andreea Moldovanu Signing Reason: I approve this document Signing Time: 20-Jan-2023 4:57 PM GMT E66126E6CAAB47169CFDFE780424B1C1

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Head of Risk, Assurance & ESG

Clinigen

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Mark Ashton-Blanksby

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