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APPROVED

by the Chairman of the Management Board
of JSC “Navoiyazot”
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POLICY ON ENVIRONMENTAL PROTECTION

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Terms and definitions

EHS - Environmental, Health, and Safety

IFRS - International Financial Reporting Standards

KPI - Key Performance Indicators

EIS - Environmental Impact Statement (final stage of the EIA procedure)

LoRU - Law of the Republic of Uzbekistan

Incident - Failure or damage of technical equipment, deviation from regulatory requirements that creates or could create a risk of an accident

BAT - Best Available Techniques

Waste Management - Activities related to generation, collection, storage, transportation, processing, disposal, and sale of waste

ESIA - Environmental and Social Impact Assessment

Environmental Protection and Rational Use of Natural Resources (EPRUNR) - Activities aimed at conserving the environment and rationally using natural resources

Occupational Safety, Health, and Environmental Protection (OSHEP) - Ensuring workplace safety, health, and environmental protection

GHG - Greenhouse Gases

MPL - Maximum Permissible Emission

WMP - Waste Generation and Placement Standards

MPC - Maximum Permissible Discharge

Draft EIA Statement - Draft Environmental Impact Statement

Cabinet of Ministers Resolution - Legislative acts issued by the Cabinet of Ministers

EMP / EEMP - Environmental Management Plan

Waste Management Plan (WMP) - Plan for managing waste streams

SanPiN / SanPiN RU - Sanitary Rules and Norms of the Republic of Uzbekistan

ESMS - Environmental and Social Management System

Waste Utilization - Recovery of valuable components from waste or use as secondary raw materials, fuel, fertilizers, etc.

Waste Storage - Keeping waste in specially equipped storage facilities until recovery for disposal,

processing, or utilization

Emergency Situation - Situation caused by an accident, disaster, natural hazard, or other event resulting in casualties, damage, or disruption of normal life activities

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1. Introduction

1.1. Policy objective

JSC Navoiyazot (hereinafter referred to as the Company) recognizes the importance of a responsible approach to nature conservation and considers environmental protection to be one of its priority tasks and a prerequisite for the long-term development of the enterprise. The purpose of the environmental policy is to reduce and prevent negative impacts on the environment caused by production activities and product deliveries, as well as to ensure the rational use of natural resources and increase the environmental responsibility of employees and partners.

The company complies with national legislation, internationally recognized principles, voluntary standards and internal corporate documents governing environmental protection issues.

Priorities

JSC Navoiyazot sets key priorities in the field of environmental impact management, ensuring the reduction of environmental risks and the rational use of resources.

The main focus is on the following areas:

- Reducing emissions and preventing pollution. Measures are being implemented to improve the efficiency of treatment plants, modernize equipment and reduce specific indicators of emissions into the atmosphere and discharges of pollutants into wastewater.
- Improving energy efficiency. Energy-saving technologies and automated energy consumption control are being introduced.
- Waste management. Waste is managed in accordance with the hierarchy (prevention, minimization, reuse/recycling/recovery, disposal/removal as a last resort), ensuring proper collection, storage, transportation and disposal, as well as regular review of the Plan and record keeping in the Inventory Sheet.
- Introduction of innovations and best available technologies. When designing and modernizing facilities, solutions that ensure minimum emissions and energy consumption are considered.
- Rational use of water resources. Pollution prevention and minimization of water withdrawal are ensured through closed and recirculating cycles, treatment of all wastewater, and compliance with discharge and reuse standards.
- Development of a culture of environmental responsibility. Management ensures that staff are involved in achieving environmental goals and encourages suggestions for improving environmental performance.

These priorities are enshrined in the Company's internal plans and programs and are regularly reviewed to ensure compliance with current legislation, international standards and sustainable development goals.

1.2. Scope

The policy applies to all divisions and employees of JSC Navoiyazot, as well as to contractors and service providers. It covers production processes, storage and transportation of materials, emissions and wastewater management, waste management, rational use of natural resources, biodiversity and land resources. The policy is mandatory for the design of new facilities, modernisation and investment projects.

The policy is implemented through the Environmental Management System (EMS) and integrated into the Company's overall management system. Compliance with the policy is ensured through monitoring, resource conservation and waste management plans, as well as through staff training and regular internal audits.

The environmental policy is subject to review and updating as necessary, but at least once every three years. The Company publicly reports on the results of its environmental performance and confirms its commitment to the principle of continuous improvement. The management of JSC Navoiyazot is personally responsible for the implementation and updating of this Policy.

1.3. Applicable Documents and Regulations

The activities of JSC Navoiyazot in the field of environmental protection are regulated by national legislation, international standards, agreements and internal corporate documents. The company ensures compliance with all applicable environmental responsibility standards and principles at all stages of its production activities.

The key national legislative acts are:

- Law of the Republic of Uzbekistan ‘On Nature Protection’ (1992);
- Law of the Republic of Uzbekistan ‘On Environmental Expertise, Environmental Impact Assessment and Strategic Environmental Assessment’ No. ZRU-1036 of 24 February 2025;
- Law of the Republic of Uzbekistan ‘On Environmental Control’ No. ZRU-363 of 27 December 2013;
- Law of the Republic of Uzbekistan ‘On Waste’ No. ZRU 362-II dated 5 April 2002;
- Law of the Republic of Uzbekistan ‘On Industrial Safety of Hazardous Production Facilities’ (2006);
- Law of the Republic of Uzbekistan ‘On Protection of the Population and Territories from Emergencies’ (1999, as amended);
- Law of the Republic of Uzbekistan ‘On the limitation of greenhouse gas emissions’ No. ZRU-1022 (2025);
- Law of the Republic of Uzbekistan ‘On the protection of atmospheric air’ ZRU No. 353-I dated 27.12.1996;
- Sanitary Norms and Rules of the Republic of Uzbekistan (SanPiN);

- Resolutions of the Cabinet of Ministers of the Republic of Uzbekistan No. 737 dated 9 September 2019 and No. 82 dated 25 February 2013.
- Law ‘On Protected Natural Areas’ No. 710-II
- Land Code of the Republic of Uzbekistan (in relation to water protection zones)
- State programmes in the field of energy conservation
- Requirements of national procedures for EIA, PZVOS and ZEP (state environmental regulation procedures)
- Law ‘On the Protection and Use of Flora’
- Law ‘On the Protection and Use of Fauna’

International standards and agreements:

- ISO 14001 (environmental management system);
- ISO 50001 (energy management)
- IFC Performance Standards;
- World Bank EHS Guidelines;
- Basel Convention;
- Rio Declaration on Environment and Development (1995);
- UN Global Compact Principles;
- International Union for Conservation of Nature (IUCN) Guidelines;
- Paris Climate Agreement.

Internal corporate documents:

- Instruction LLC SiRIPR-OZ-01 ‘On the use and disposal of mercury-containing lamps in the workshops of the enterprise’;
- Instruction OOO SiRIPR-OZ-02 ‘On the procedure for temporary accumulation, storage, accounting and disposal of production and consumption waste’.
- Draft environmental compliance documents of JSC "Navoiyazot": Maximum Permissible Emissions (MPE) for air emissions, Maximum Permissible Waste Disposal (MPWD) for waste management, and Maximum Permissible Discharges (MPD) for wastewater.

1.4. Commitments under this Policy

We are committed to ensuring compliance with national and international legislation, agreements and standards. Under this Policy, we implement systematic measures to reduce and minimise environmental impacts. We continuously work to improve resource and energy efficiency, introduce energy-saving technologies and prevent waste generation.

We minimise the use of hazardous and toxic substances, implement safer materials and technologies, and ensure preparedness to prevent and eliminate the consequences of accidents and emergencies. Training and professional development of personnel on environmental protection, as well as

encouraging rationalisation initiatives and innovations aimed at improving environmental performance, are important elements of our approach.

Air Quality

We comply with established maximum permissible emission standards and strive to reduce the carbon intensity of our operations, supporting Uzbekistan's national goals to reduce greenhouse gas emissions. We introduce energy-efficient technologies and develop low-carbon solutions.

Water Management

We ensure the responsible and efficient use of water resources and prevent their pollution by implementing closed-loop water systems and achieving zero industrial wastewater discharge. All wastewater is treated in accordance with internal regulations.

Waste Management

Our waste management practices follow the established hierarchy: prevention, minimisation, reuse and recycling. We maintain full records of waste and regularly update waste management plans in line with evolving requirements.

Land Use

We are committed to the responsible use of land resources, preventing soil degradation and contamination, and ensuring compliance with the restrictions set for water protection zones.

Hazardous Materials

Hazardous materials management is based on the principles of life-cycle safety and precaution, minimising risks to people and the environment.

This Policy reflects our commitment to high environmental standards and sustainable development, which form an integral part of our corporate culture and long-term strategy.

2. Management principles

2.1. General principles

JSC Navoiyazot adheres to the principles of responsible and transparent operations, based on compliance with national legislation and international standards. We apply the precautionary principle and a risk-based approach to planning and operations, ensuring the responsible and efficient use of natural resources, preventing pollution, and reducing waste generation. Our work is guided by the principles of energy efficiency, innovative development and continuous improvement of environmental performance.

Key Policy Principles

- Compliance with all mandatory and voluntary environmental protection requirements.
- Implementation and continual development of an Environmental Management System (EMS) in accordance with ISO 14001, based on the principle of continuous improvement.
- Application of BAT to reduce emissions, discharges and waste generation.
- Responsible and efficient use of energy, water and raw materials, and enhancement of resource and energy efficiency.
- Prevention and mitigation of environmental risks, and timely response to accidents and emergencies.
- Integration of climate- and environment-related factors into corporate governance, strategic planning and risk management processes.
- Fostering a culture where every employee understands the environmental risks associated with their activities and takes personal responsibility for complying with established requirements.

We adhere to the principle of continuous improvement in all aspects of environmental management, safety and responsible resource use. Our activities are based on a systematic approach that includes planning, implementation, performance review and corrective action. Documented records are maintained, and regular checks and management reviews are conducted to confirm compliance with internal plans and standards. When non-conformities are identified, root causes are promptly analyzed and procedures updated to improve effectiveness. Particular attention is paid to engaging employees in identifying and implementing opportunities to enhance the environmental performance and sustainability of our operations.

2.2. Monitoring system

We have implemented an Environmental Management System in accordance with the international ISO 14001 standard. The ISO 14001 standard provides a systematic framework for managing the company's environmental impacts, ensuring the responsible and efficient use of natural resources and

reducing waste generation. It supports pollution reduction, prevents negative environmental impacts, and requires continuous improvement of environmental performance and overall corporate sustainability.

To achieve our environmental objectives, we carry out two types of environmental monitoring:

- Basic monitoring focuses on key parameters including air quality, noise levels, and the condition of surface and groundwater.
- Compliance monitoring involves inspections and audits to verify that all production processes meet management requirements, ensuring adherence to environmental regulations and standards.

The organisational structure of JSC Navoiyazot is critical for the effective operation of these processes, supporting the Company's mission to protect the environment and use natural resources responsibly. We have established procedures for environmental communication and reporting, with department heads regularly reporting on the achievement of key performance indicators (KPIs).

The current management system includes regular performance reviews. The effectiveness of the EMS is validated through external audits and data verification by independent organisations and financial institutions.

Audit objectives:

- Confirm compliance with environmental requirements and obligations under the EIA;
- Analyse implementation of recommendations from previous audits;
- Identify areas for improvement and corrective actions.

Representatives of international organisations and financial institutions may conduct annual on-site inspections to assess compliance with environmental protection measures as part of their financing obligations.

Atmospheric air monitoring is a key area of ongoing control. JSC Navoiyazot conducts comprehensive monitoring under the Environmental Monitoring and Management Plan, including both baseline and compliance measurements within the enterprise and at the boundaries of the sanitary protection zone. We monitor all major pollutants, including nitrogen oxides (NO₂, NO), sulphur dioxide (SO₂), ammonia (NH₃), carbon monoxide (CO), particulate matter (PM₁₀), and other substances listed in the plant's Maximum Permissible Emissions (MPE) project. Monitoring is performed at least monthly, with concurrent measurement of meteorological parameters such as temperature, wind speed and direction, and precipitation.

Dust and gas capture systems are tested, and sample analyses are conducted by JSC Navoiyazot's sanitary laboratory and specialised contractors. To ensure timely and reliable data, an Automated Continuous Monitoring System (ACMS/CEMS) is being implemented at key facilities, equipped with gas analysers for HCl, Cl₂, NO₂, SO₂, and NH₃. We are also preparing to implement procedures for

accounting and monitoring greenhouse gas emissions in accordance with the legally required monitoring, reporting and verification system.

Water resource monitoring, also included in the Plan, involves baseline and compliance monitoring. Baseline monitoring is performed by internal staff to assess the quality of groundwater, soil water, and wastewater, with sampling and lab analyses conducted by the sanitary laboratory together with the environmental engineer. Compliance monitoring verifies adherence to operational and treatment facility requirements, including daily inspections, quarterly reviews, and internal audits.

Special consideration is given to the management of Class I–V hazardous waste. All waste is identified, documented, and processed according to established procedures, with separate collection and labelling to minimise environmental risks.

To ensure a high level of control and monitoring on site, we are implementing a system that includes regular measurements, audits and checks. Responsible persons on site, such as workshop managers and occupational safety engineers, carry out daily inspections and record the results in logs. Quarterly inspections are carried out by specialists from the environmental, occupational health and safety department, and internal audits are conducted at least once every six months.

External checks by state supervisory authorities are also part of the control system, providing an additional layer of verification and validation to maintain high standards of environmental safety and regulatory compliance.

In summary, JSC Navoiyazot's environmental performance monitoring and control system is designed to ensure transparency, data reliability, and continuous improvement, forming a key component of our sustainable development strategy.

2.3. Reporting and KPIs

JSC Navoiyazot maintains a transparent and effective reporting system based on instrumental measurements and production control data. We adhere to the principles of openness and accountability, enabling us to respond promptly to environmental challenges and achieve our objectives.

As part of our reporting system, we carry out:

- State environmental reporting on actual emissions, prepared periodically in accordance with legal requirements.
- Internal reports prepared by the Head of the Environmental, Occupational Health, and Safety Department on a quarterly and annual basis, including analysis of deviations from established standards.
- We determine key performance indicators (KPIs) that cover compliance with standards for various environmental aspects: maximum permissible emissions (MPE) and pollution levels (MPL), the efficiency of treatment facilities and dust and gas capture installations, the

dynamics of waste generation and processing volumes, the frequency of environmental non-compliance and exceedances, compliance with water use requirements, and the share of investments in environmental protection technologies.

Starting in 2025, we are preparing to implement procedures for monitoring, reporting, and verifying greenhouse gas (GHG) emissions in accordance with the Law of the Republic of Uzbekistan “On the Limitation of Greenhouse Gas Emissions.” Annual GHG emissions reporting will be subject to mandatory government verification beginning in 2027. We also conduct regular internal and external audits in accordance with ISO 14001 and use benchmarking results to enhance environmental performance.

In the area of water resources, we systematically record water withdrawal and discharge volumes, along with the results of analyses and reports on wastewater quality, in accordance with established technical conditions and Maximum Permissible Discharges (MPDs). Key performance indicators (KPIs) in this area include the share of reused water in total water consumption, the number of non-conformities identified during inspections and audits, compliance with effluent quality standards for sewer discharge, and reductions in total water consumption.

In waste management, we maintain a reporting system based on monitoring and control data. Internal reporting includes regular inspections, documentation of violations and environmental incidents, while external reporting encompasses government waste statistics and collaboration with regulatory authorities in incident investigations.

Hazardous materials management is a key focus, with JSC Navoiyazot responsible for implementing management plans and procedures in line with national and international requirements. Operations are controlled through monitoring and regular inspections, with adequate resources provided to ensure effective hazardous material management.

Key indicators for responsible resource use include reducing specific energy consumption, increasing the share of saved electrical and thermal energy, minimizing losses during transmission and distribution, and enhancing the recovery and reuse of heat and other resources. Reports on these indicators are prepared quarterly and annually for internal management review and for external stakeholders, in line with requirements established by environmental standards and financial institutions.

In summary, JSC Navoiyazot’s reporting system and KPIs are designed to ensure high transparency and efficiency in managing environmental aspects of our operations, supporting the achievement of sustainable development and compliance with environmental standards.

2.4. Risk Identification and Assessment

We integrate environmental and climate risk management into our corporate risk management system in accordance with the Risk Management Policy and Risk Identification and Assessment

Methodology. Environmental and climate risks are systematically identified, analysed, and assessed, considering the likelihood of occurrence, potential impact, and residual risk levels. Assessments are conducted regularly and updated in response to changes in technological processes, regulatory requirements, and monitoring and audit results.

At this stage, the corporate Risk Register is primarily based on environmental risks, including soil, air, and water pollution, impacts on biota, and radiation-related factors.

Climate risks, including transitional risks (e.g., higher electricity and gas costs, carbon payments, CBAM exposure) and physical risks (e.g., water shortages, extreme temperatures), are already being analysed within the management system. Their gradual inclusion in the Risk Register is planned as EMS approaches and procedures continue to develop.

Each environmental risk is assigned an owner, management measures, and performance evaluation criteria. Risk management follows the principles of prevention, including mandatory assessment of environmental and climate aspects during the design, modernisation, and implementation of technologies.

A production environmental control system monitors environmental risks, encompassing air, water, soil, and biological resources. Monitoring results inform adjustments to mitigation measures and updates to risk assessments. The Company has procedures in place to prepare for and respond to potential emergencies, including testing of plans and personnel training.

Clear role allocation, interdepartmental coordination, and established reporting mechanisms ensure timely decision-making and transparency in risk management processes. The system emphasizes continuous improvement and the adoption of best available technologies to minimise environmental impact and enhance the sustainability of the Company's operations.

Regular inspections enable early identification of potential pollution sources, mitigating possible impacts on the environment and personnel.

2.5. Measures for responsible resource use and energy efficiency

JSC Navoiyazot implements a series of measures designed to minimise atmospheric emissions and ensure the efficient management of natural resources. These measures align with our environmental protection plans and responsible resource use initiatives, and include:

- Equipping emission sources with dust and gas capture systems achieving at least 99.5% efficiency.
- Conducting regular preventive and major maintenance of gas cleaning equipment to sustain operational efficiency.
- Utilising process gases by redirecting them to boiler rooms for heat production rather than flaring.

- Implementing measures to enhance energy efficiency and reduce specific energy consumption in production processes, contributing to a reduction in direct (Scope 1) greenhouse gas (GHG) emissions.
- Expanding the use of electricity from renewable sources and improving production process energy efficiency, thereby reducing indirect (Scope 2) GHG emissions.
- Greening enterprise territories and establishing protective plantings along the perimeter.

Technical and organisational solutions are applied to reduce specific energy consumption and resource losses, including:

- Modernising power supply and distribution systems, including dual supply from 110/6 kV substations, use of sectionalised switchgear and transformer substations, and backup of critical loads via diesel generators to enhance reliability and prevent non-targeted losses.
- Utilizing frequency converters, phase load balancing in 0.4 kV networks, and selecting equipment and circuits designed to minimise energy losses.
- Widespread deployment of energy-efficient lighting in production and administrative facilities.
- Recovering heat from process streams, including tail gas heat, feed water heating, and harnessing mechanical energy from gases to drive the nitrous gas compressor.
- Enhancing dual pressure technology to achieve high ammonia oxidation efficiency with minimal catalyst losses, thereby reducing energy consumption.
- Providing steam for start-ups and process circuits via an energy-efficient natural gas boiler, with subsequent utilisation of steam within the facility.
- Achieving a tenfold reduction in electricity consumption compared to the decommissioned facility while maintaining comparable productivity.

These measures are implemented in the new production facility, based on issued technical specifications, design solutions, and the energy-saving programme.

Monitoring and control of measures

To ensure the effectiveness of implemented measures, a monitoring and control system is in place, including:

- Regular measurement and analysis of emissions, wastewater, and waste by internal and external auditors.
- Periodic on-site inspections by workshop managers and occupational safety engineers, with results documented in logs.
- Internal audits conducted at least semi-annually by environmental and occupational safety specialists to evaluate implementation and identify deviations.
- External inspections by state supervisory authorities provide an additional layer of control and data verification.

In summary, JSC Navoiyazot's measures for responsible resource use and energy efficiency aim to achieve high environmental safety standards and promote sustainable development, forming an integral part of our corporate policy.

3. Policy implementation mechanisms

3.1. Management

As part of its environmental policy, JSC Navoiyazot has defined clear roles and responsibilities to ensure effective management of environmental risks and compliance with applicable legislation. Each official and department plays a key role in implementing the environmental policy and advancing the company's sustainable development objectives. Key roles and responsibilities include:

Supervisory Board

- Holds overall responsibility for strategic direction and adherence to the environmental policy. Approves approaches to environmental risk management in line with applicable requirements.

Management Board

- Responsible for implementing and executing the environmental policy at the company level. Reviews and approves environmental risk reports and makes decisions on corrective actions.

Department Heads

- Ensure compliance with environmental requirements within their areas of responsibility, integrate risk management measures into production processes, and achieve established environmental performance targets.

Head of the Department of Ecology, Occupational Health and Safety

- Coordinates environmental management activities, analyses production control results, and prepares information for corporate reporting on environmental risks.

Employees

- Must comply with environmental requirements, follow established procedures, and promptly report any observed violations or potential environmental risks.

Staff Training and Engagement

JSC Navoiyazot fosters a culture where every employee is aware of the environmental risks associated with their work and takes personal responsibility for compliance, promptly reporting non-conformities and incidents. We promote an atmosphere of trust and open dialogue, encouraging initiative and the reporting of potential risks as opportunities for learning and improvement. Training programmes include introductory and regular briefings on occupational health, safety, and environmental protection, delivered by qualified specialists. Core training covers environmental requirements, emergency response, and responsible resource use. Training effectiveness is evaluated through the

proportion of employees trained, results of knowledge assessments, the number of briefings conducted, and the reduction of environmental and safety violations.

3.2. Strengthening Corporate Governance through IFRS S1/S2 Principles

JSC Navoiyazot is committed to integrating sustainable development principles into its operations, including adherence to IFRS S1/S2 standards. We recognise the importance of transparency and accountability in managing environmental risks and are dedicated to the continuous improvement of our processes and practices in this area.

To support this initiative, we are actively aligning our activities with IFRS S1/S2, focusing on the following key aspects:

- **Risk Management**
We implement a systematic approach to managing risks related to climate change and sustainable development, including the identification, assessment, and monitoring of risks affecting our operations. This approach enables us to minimise negative impacts and identify opportunities for improvement.
- **Integration into the Management Matrix**
All environmental risks recorded in the JSC Navoiyazot Risk Register are integrated into our risk management matrix, ensuring a comprehensive approach to their assessment and control. The matrix is regularly reviewed and updated to reflect changes in legislation, technology, and the environmental context.
- **Responsibility for Environmental Aspects**
Our policy clearly defines roles and responsibilities across all management levels. The Supervisory Board, Management Board, department heads, and employees are accountable for adhering to environmental and climate policies and implementing risk management principles. This includes regular training and communication of best practices in environmental protection.
- **Reporting and Transparency**
We aim for openness in reporting environmental and climate performance, regularly providing information on risk management, achievements, and progress. We actively engage stakeholders—including investors, customers, and the public—to ensure a comprehensive understanding of our sustainability initiatives.
- **Continuous Improvement**
We are committed to continuous enhancement of environmental protection, including regular internal and external audits to evaluate process effectiveness and identify opportunities for improvement.

JSC Navoiyazot recognises that compliance with IFRS S1/S2 principles is not only a requirement but also an opportunity to foster a sustainable future. Integrating these principles into our operations

supports the achievement of high environmental safety standards and sustainable development, forming an integral part of our corporate culture.