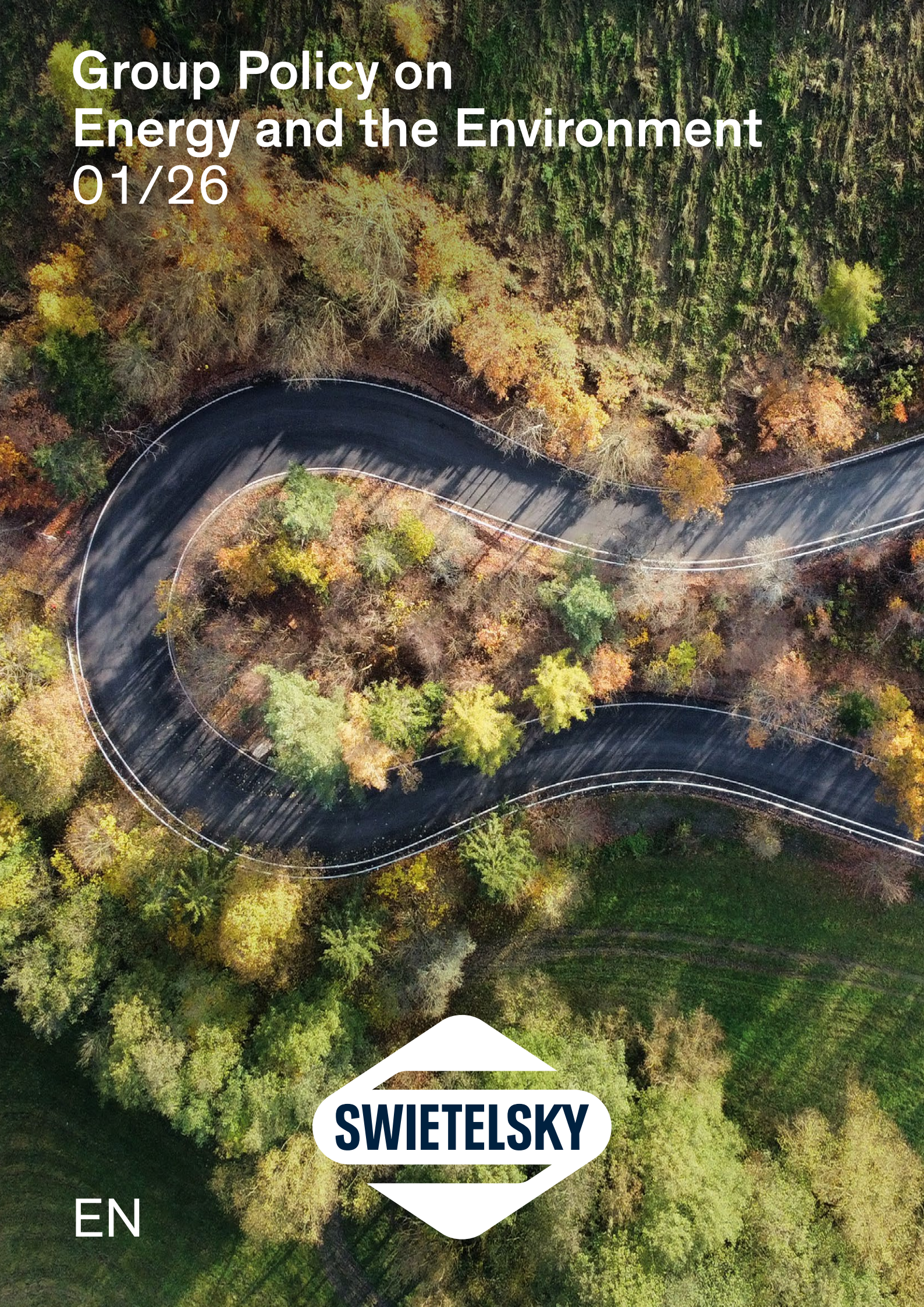


Group Policy on Energy and the Environment

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SWIETELSKY

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Note:

In the event of doubt regarding translated documents, the German version approved via the workflow shall always prevail.

**We work for people.
We shape the future.
We are part of the solution.
Building ever better.**

IMPRINT

Media owner and publisher:
Swietelsky AG
Edlbacherstraße 10, A-4020 Linz
+43 732 6971-0, office@swietelsky.at
www.swietelsky.com

Commercial Register No. (FN): 83175 t
VAT No.: ATU 232 40 400
Regional Court of Linz

Graphic concept and design:
Studio5 kommunikations Design

Photographs, unless otherwise indicated:
Swietelsky AG, Linz

Produced by: X-Files Druck-, Consulting-
und Produktionsagentur GmbH

Place of production:
4040 Linz/Lichtenberg, Austria

Published:
1st edition, April 2026

I Principles and objectives

The sustainable use of natural resources is an integral part of SWIETELSKY's business operations. We are committed to continuously improving our energy and environmental performance in order to optimise the use of natural resources and energy, ensure protection of the environment by preventing pollution, and avoid or, where avoidance is not possible, minimise any other negative impacts on the environment, people, and society.

II Commitment to compliance with legal, standard-related and contractual requirements

On construction sites and in our operating and production facilities, we are committed to full compliance with all applicable national laws and regulatory requirements in the following areas:

- Construction products and chemicals
- Air pollutants, as well as air, soil, and water protection
- Waste and circular economy
- Nature conservation, deforestation, and biodiversity
- Energy use and energy efficiency
- Greenhouse gas emissions (GHG emissions)

This standard also applies to the upstream and downstream value chain, as stipulated in the Code of Conduct for Business Partners. Furthermore, our management systems in all Group countries comply with standard-related requirements, in particular ISO 14001 and ISO 50001. ISO 14001 certifications are maintained in all core markets and in additional Group countries. ISO 50001 certifications are currently in place in two of the four core markets, and certification across all core markets is being pursued. In addition, contractual requirements may be specified, provided they do not conflict with national legislation or any relevant standard requirements.

With its commitment to the Science Based Targets initiative (SBTi) made in June 2025, SWIETELSKY reaffirms the alignment of its decarbonisation strategy with the Paris climate goals.

III Energy and environmental management systems

Internal compliance with legal and any additional relevant standard requirements is procedurally anchored in an energy and environmental management system (ISO 50001 and ISO 14001). Climate-, energy- and environment-related risks and opportunities associated with business operations are identified, and appropriate measures are subsequently derived from these.

The contents of this Group Policy are further detailed in a corresponding internal Group Guideline on Energy and Environmental Management.

Action area: Energy & GHG emissions

We are reducing our Corporate Carbon Footprint (CCF) as well as selected Project Carbon Footprints (PCF). Subject to technical feasibility and economic viability, we focus on:

- Energy efficiency measures and awareness-building
- Successive replacement of fossil fuels with renewable energy sources
- Procurement of low-emission building materials
- Analysis and evaluation of our work processes with regard to energy efficiency in order to improve them
- Expansion of in-house energy supply from renewable sources
- Life cycle assessments to increase resource efficiency and reduce the overall greenhouse gas emissions of buildings

Action area: Environment

Within our own sphere of influence, we focus on:

- Proper maintenance and use of plant, construction machinery, construction equipment and the vehicle fleet
- Fundamentally economical use of water
- Project-specific measures to reduce noise and dust emissions
- Separation of construction waste by material type and material recycling in the form of secondary building materials
- Promotion of recyclable building materials and the circular economy

- Risk assessment and, where necessary, measures in the areas of deforestation and microplastics
- Efficient land use and positive biodiversity accounting in our real estate development

Management and key performance indicators

To manage the continuous improvement in environmental and energy management, we are optimising the data basis in the following areas:

- Energy and greenhouse gas accounting
- Waste and circular economy
- Water
- Land consumption and biodiversity with a focus on our real estate development

On this basis, we are further developing measurable and specific key performance indicators.

Sustainability in procurement and investments

Energy efficiency, environmental, and sustainability aspects are taken into account in procurement and investment processes. Furthermore, we strive to use the best available technology.

IV Stakeholder dialogue

Convinced that sustainable construction can only succeed with the early involvement of all relevant stakeholders, we engage in dialogue with clients, in research and development, as well as in the further development of guidelines and standards through industry associations.

V Skills development and training

We are driving forward skills development for sustainable construction and general sustainability among our employees through training courses. In addition, we train them in the area of energy efficiency as well as on the key contents of the Group Guideline on Energy and Environmental Management. The Group's energy and environmental policy is published and made available to all employees.

VI Provision of resources

The SWIETELSKY Executive Board is committed to providing the necessary financial resources and structural prerequisites, taking into account the economic framework conditions, and to promoting the continuous improvement of the energy and environmental management performance in order to ensure the achievement of statutory and Group-specific targets.

VII Whistleblowing system

To report legal and environment-related violations of any kind, a whistleblowing system is available to employees and business partners at <https://swietelsky.integrityline.com>.

