



## ENVIRONMENTAL POLICY

### 1. PURPOSE

CLdN actively seeks ways to reduce its impact on the environment, whether on sea or on land, in alignment with our mission statement "to excel as an integrated provider of maritime links". This Environmental Policy demonstrates CLdN's respect of sustainability principles and complements CLdN's "Code of Conduct" and "Supplier Code of Conduct", which serve as the primary guides for ensuring accountability and ethical conduct within the organisation and its value chain respectively.

This policy may be updated periodically, considering elements such as risk assessments and/or regulatory updates.

### 2. COMMITMENT

At CLdN we recognize our opportunity to mitigate environmental impact and to contribute to the sustainable future of the maritime industry. This policy outlines our commitment to environmental stewardship across all operations, at sea or on land, in line with applicable international, regional, and national laws as well as with voluntary standards.

### 3. SCOPE

CLdN employees are expected to be aware of and act in accordance with this Environmental Policy. Temporary and self-employed workers are also expected to act in accordance with this Environmental Policy when working for CLdN.

CLdN's suppliers are expected to operate in a manner consistent with this and other policies, as further indicated in CLdN's "Supplier Code of Conduct".

The Environmental Policy is in some cases supplemented by specific company policies and procedures providing more detail. It is the responsibility of each employee to ensure they are aware of the policies and procedures that apply to their specific area of work.

### 4. CONTENT

#### 4.1 Compliance and continuous improvement

We commit to comply with all relevant environmental regulations that apply to our operations. We pursue continuous improvement in our environmental performance through defined metrics and annual reviews.

#### **4.2 Pollution prevention and reduction of emissions**

We contribute to the prevention of marine and coastal environment pollution as well as to the reduction of emissions by:

- Reducing GHG emissions through operational and technological measures, such as route optimization, the utilization of alternative propulsion methods and fuels, the application of low-friction hull coatings, the implementation of regular hull and propeller cleaning, as well as the investment in modern and efficient vessels for our fleet
- Utilizing lower-emission port equipment
- Maintaining equipment to prevent pollution (air, water and soil) from our operations, such as oil spills and contamination due to water discharges (e.g. ballast water)
- Managing waste in accordance with the waste hierarchy: prevent, reduce, reuse, recycle, dispose
- Implementing recycling initiatives across our locations

#### **4.3 Energy and resource efficiency**

We aim to optimize energy consumption and resource use by:

- Monitoring vessel energy efficiency and applying corrective action
- Utilizing lower-emission port equipment
- Implementing on-site power generation (e.g. solar panels, wind turbines) and optimized utilization of the produced electricity
- Securing electricity supply from 100% renewable sources across our locations, where feasible
- Complying with energy efficiency requirements and implementing recycling initiatives across our locations

#### **4.4 Biodiversity and marine ecosystems**

We aim to minimize negative impacts to marine ecosystems and to biodiversity by:

- Avoiding anchorage in sensitive habitats
- Preventing the spread of invasive species through effective ballast water management
- Collaborating with ports and authorities to reduce underwater noise and in-port air and noise pollution by our vessels, where feasible

#### **4.5 Transparency and monitoring**

We aim to collect and make available accurate information concerning operations as they relate to the environment. Specifically, we:

- Measure emissions data to understand our environmental impact



- Communicate transparently about our greenhouse gas emissions across our value chain

## 5. DUE DILIGENCE

The Environmental Policy is overseen by the Corporate Social Responsibility (CSR) department and the CSR steerco. All employees and suppliers in the value chain are expected to operate in a manner consistent with this policy. Regarding suppliers, this expectation is outlined in CLdN's "Supplier Code of Conduct" and affirmed through contractual requirements.

## 6. GRIEVANCE MECHANISM

CLdN provides a whistleblowing system, as detailed in CLdN's "Whistleblower Policy and Procedure". This system can be used to report issues or concerns related to environmental matters. The mechanism is available for all employees, suppliers, customers, other third parties and external stakeholders to confidentially report any serious concerns at the dedicated e-mail address [whistleblower@cldn.com](mailto:whistleblower@cldn.com).

## 7. RESPONSIBILITY FOR THE IMPLEMENTATION

The responsibility for the environmental strategy of CLdN sits with CLdN's management. However, the entire organization shares the responsibility to respect and safeguard the environment in which CLdN operates. The coordination of sustainability efforts at CLdN is entrusted to the CSR department.

## 8. COMMUNICATION

CLdN communicates this Environmental Policy to all employees. All external communications are disseminated through our website <https://www.cldn.com/>.