

Nordzucker's Energy and Environmental Policy

Preamble

Nordzucker's Environmental and Energy Policy outlines our commitments and specific actions within the areas, which were evaluated in our Double Materiality Assessment (DMA). We use materiality and environmental aspect assessments to identify risks and opportunities of our activities incorporating the relevant context of our organization and use the outcomes for improvements. Affected stakeholders have been consulted through our DMA processes and their key interests are hence indirectly included in this policy.

This policy applies to all employees of the Nordzucker Group. We expect all our business partners across the value chain to uphold the same standards we set for ourselves. We specifically require them to comply with all relevant national legislation regarding energy efficiency and environmental protection and to actively pursue higher levels of environmental protection, striving to minimize their environmental impact while increasing energy efficiency, as stipulated in our Supplier Code of Conduct.

Cross-cutting commitments

We are committed to:

- Inform, maintain and make this policy available within the organization and to interested parties
- Communicate and report on our environmental and energy performance regularly to our stakeholders and involve them to help us enhance our performance and live up to legal demands
- Identify material impacts, risks and opportunities in and beyond our own operations on a regular basis and use the outcomes for improvements (site environmental impact, energy efficiency assessments and DMA)
- Apply a value chain approach to our continuous improvement efforts by working to promote good climate, energy, and environmental performance throughout our value chain in close collaboration with selected stakeholders
- Place special emphasis on initiatives with climate, energy and environmental benefits by prioritizing our investments accordingly and by considering energy and environment in product development
- Train and inform our employees about the energy and environmental aspects of our activities to motivate them to act accordingly and to engage them in the continuous improvement of environmental and energy processes
- Apply sustainability requirements, including energy and environmental performance, to our suppliers by way of our Supplier Code of Conduct
- Involving our customers and business partners in sustainability requirements, including energy and environmental performance

Our Commitment to the Environment

We recognize our obligation to:

- Protect and preserve the natural resources we all depend on
- Collaborate closely together with our suppliers of sugar beet and cane to promote the sustainable cultivation of primary raw material for sugar production
- Source and produce our products in a climate and environmentally friendly way by committing to an efficient use of resources and waste minimization in our operations
- Minimize the climate impact of our operations and in the value chain by collaborating with our business partners
- Minimize the negative impact of pollution across our products' lifecycle, with a specific focus on substances of concern, emissions into the air, water and soil and noise pollution
- Track and measure the environmental performance related to pollution of all our sites
- Implement water consumption minimization practices within our operations and collaborate with business partners to improve water management capabilities
- Have efficient water management, water and wastewater treatment, the prevention and minimizing of water pollution, and the preservation of water quality, especially in high water-stress areas
- Reduce waste and increase the reuse and recycling of waste materials wherever possible, supported by our Sustainable Packaging Policy
- In addition to legal obligations, meet the binding commitments we have made

Our Commitment to Energy savings and efficiency

We are committed to:

- Reduce absolute scope 1 and 2 GHG emissions 50.4% by 2030 from the base year 2018 (Nordzucker Group target¹).
- Reduce absolute scope 3 GHG emissions from purchased goods and services, fuel and energy-related emissions, business travel, employee commuting, and processing of sold products and end of life treatment of sold products, 30% by 2030 from a 2018 base year (Nordzucker Group target^{2,3}).
- Phase out the combustion of coal by 2030 and fossil fuels by 2050 at the latest (Nordzucker Group target¹)
- Continuously improving our energy management and improve our energy consumption performance
- In addition to legal obligations, meet the binding commitments we have made

¹ These targets represent the cumulative ambition for the Nordzucker Group as a whole, and entities within the Nordzucker Group are not subject to these targets at an individual subsidiary level. While Nordzucker EU entities develop their Scope 1 and 2 targets via the GoGreen, entities within the Nordzucker Group outside the GoGreen scope are in the process of developing climate-related targets that reflect the specific circumstances of the individual entity. Targets set at an entity level will assist Nordzucker Group in achieving the overall targets set out in this policy.

² These targets represent the cumulative ambition for the Nordzucker Group as a whole, and entities within the Nordzucker Group are not subject to these targets at an individual subsidiary level. While Nordzucker EU entities develop their Scope 3 targets via Group functions, other entities outside EU are in the process of developing climate-related targets that reflect the specific circumstances of the individual entity. Targets set at an entity level will assist Nordzucker Group in achieving the overall targets set out in this policy.

³ Achieving this Scope 3 target is reliant on emission reductions within Nordzucker Group's value chain and will depend on the adoption of emerging low-carbon technology. Ultimately, Nordzucker Group does not have direct influence on the decarbonisation activities in our value chain, and progress towards this target is outside our management control

- Ensure the availability of information and resources necessary to achieve energy targets
- Strive to procure energy-efficient products and services that affect our energy consumption

Our environmental and energy saving actions

Climate change

We act to continuously improve in coordination with our changing operating context and we engage with and train our employees in responsible business conduct.

To achieve our targets, we launched the project 'Go Green', which was supported by targeted investment. This project delivers individual development plans for all factories, identifies, and explores new technologies, energy efficiency, and screens for attractive renewable energy solutions.

We continuously monitor physical and transitional climate risks affecting our factories, sourcing locations, and end-user consumption patterns to be adapted to climate change.

Our 2030 greenhouse gas emission reduction targets have been validated by the Science Based Targets initiative (SBTi). We communicate our plans and achievements with external stakeholders on a regular basis. We apply sustainability requirements to business partners in our value chain.

Pollution

We act proactively to minimize the impact of pollution. Through our proactive approach we mitigate, prevent and control potential incidents, limiting their impact on people and the environment from our operations and in our value chain in collaboration with our business partners.

All Nordzucker plants are audited regularly in accordance with applicable national and international legislation and standards. This includes certification of applied environmental and energy management systems.

Some of our sites are prone to noise and smell pollution due to the manufacturing processes. Here, we engage with the community and ensure that inconveniences are addressed, e.g. by factories or through our Agricentres. This effort connects with our efforts related to SAI's Farm Sustainability Assessments.

Water and marine resources

Across our operations, water is used to wash, transport, and extract sugar from the sugar beet and sugar cane. Here, we minimize our freshwater needs through the water naturally present in the beet and cane, reusing the water several times. For beet this is done in an efficient closed loop system and we are able to cover almost the entire water need. We continue to target further reductions in freshwater usage across our production processes, for new products, and within our value chain.

For our sugar beet growers, we apply engagement through systems such as the Sustainable Agriculture Initiative (SAI) Platform's Regenerating Together framework and the SAI's Farm Sustainability Assessment to monitor our suppliers' water management.

Biodiversity and ecosystems

We have engaged to maintain high yields while reducing emissions from mineral fertilizer use.

We recognize the importance of preserving natural ecosystems as we are dependent on continued and well-functioning eco-systems to supply our primary production input, beet and sugar cane. This policy is applicable directly to our identified biodiversity risks i.e. biodiversity loss impact drivers, impacts on the state of species, and impacts on the extent and condition of ecosystems. To manage our risks and reduce the social consequences of biodiversity-related impacts, we have e.g. been a member of the Sustainable Agriculture Initiative Platform SAI since 2015 and use the SAI's Farm Sustainability Assessment (FSA) to verify farm practices in sugar beet growing, including management of soil, nutrients, crop protection and biodiversity together with our farmers.

We also work with the SAI Platform's Regenerating Together framework to introduce regenerative agriculture to our farmers' practices. Like our own impact, we continuously monitor how physical and transition risk in the biosphere influence our value chain's stability. The commitments are further supported by our No Deforestation Policy.

Resource use and circular economy

Our approach focuses on an efficient use of sugar beet and sugar cane, to minimize waste and create efficiency gains for our business while reducing our impacts.

We use beet pulp, which is the by-product of our production processes, as animal feed or for biogas production, while our farmers leave beet leaves either to decompose naturally as fertilizer in the field or as utilization for biogas energy generation.

Bagasse, the fibrous Biomass residue left from the processing of sugar cane, is used to produce our own electricity and sell surplus electricity production to the energy grid and co-located businesses on the factory sites.

Reporting a breach of the Environmental and Energy Policy

We are committed to enabling effective grievance procedures. Any breach of this Policy is also considered to be a breach of the Nordzucker's Code of Conduct and should be reported promptly. If any employee or other relevant stakeholder identifies or suspect an adverse impact on environment in the scope of Nordzucker's business activities, they are asked to report a concern or a complaint. Employees can report any violations or suspicions immediately to one of the following contact partners:

- Plant Manager or direct superior
- Members of the Compliance Organization

- Use of the anonymous whistleblower system SpeakUp (web application and telephone hotline)

Business partners and other third parties also have access to the anonymous whistleblower system SpeakUp. We treat every report confidentially and ensure that it is only accessible to the people involved in its investigation. We never retaliate against whistleblowers, and we protect those that raise issues with us.

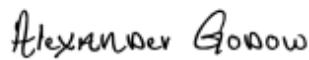
Governance

All heads of functions are responsible for ensuring adherence to these commitments and the Executive Board has overall responsibility for overseeing their implementation. The policy is publicly available on our website.

Braunschweig, September 2025



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