

ENVIRONMENTAL POLICY

1. Policy Statement

Eastern Produce Kenya Limited (EPK) recognizes its environmental obligations and endeavours to:

- i. Comply with all applicable environmental legislation, permits and regulatory requirements in the jurisdictions in which it operates, including adopting international best practices.
- ii. Integrate environmental considerations into business planning, operational decision-making and investment processes.
- iii. Identify, assess and manage material environmental risks and impacts associated with its operations.
- iv. Prevent pollution and minimise adverse environmental impacts arising from the use of natural resources, emissions, waste generation and land use.
- v. Promote sustainable development and continuous improvement in environmental performance.
- vi. Continuously monitor, measure, and improve environmental performance.
- vii. Act as a responsible neighbour and engage appropriately with local communities, government authorities, and environmental organizations with regard to safeguarding the environment.

2. Purpose

The purpose of this policy is to guide EPK in conducting its operations responsibly, minimising negative environmental impacts, conserving natural resources, protecting biodiversity, and complying with applicable environmental laws and international best practices. This policy also guides EPK on sustainable development and continuous improvement in environmental performance across all our operations.

3. Scope

This policy applies to:

- i. All employees of EPK, officers, consultants, volunteers, interns, suppliers, service providers, company agents, and contractors.
- ii. Individuals performing functions in relation to the Company.
- iii. All operational sites including estates, factories, offices, and field locations.
- iv. Third parties affected by EPK operations, including local communities, visitors, customers, suppliers and the general public.
- v. Activities across the EPK value chain, including upstream and downstream operations.

4. Definitions

- i. **Environmental Impact:** Any change to the environment resulting from EPK's activities, including resource use, emissions, and waste generation.
- ii. **Biodiversity:** The variety of flora, fauna, and ecosystems present in EPK estates and surrounding environments.
- iii. **Waste:** Any material generated by EPK's activities that is no longer required, including solid, liquid, and hazardous waste.
- iv. **Environmental Incident:** Any unplanned event that results in harm or potential harm to the environment.

5. Roles and Responsibilities

i. Operations Director:

- Ultimate responsibility for environmental management across all operations.
- Provision of adequate resources for effective environmental management.
- Reviews environmental performance and significant risks at executive level.

ii. Technical Development Manager

- Oversees implementation of environmentally responsible agricultural and forestry practices.
- Supports soil conservation, water protection, biodiversity protection and invasive species control initiatives.
- Drives operational improvements related to energy efficiency, carbon intensity reduction and resource optimisation.

iii. Compliance and Environment Manager:

- Coordinates environmental monitoring, assessments, and audits.
- Provides training and guidance to staff on environmental best practices.

- Monitors compliance with environmental legislation, permits and licence conditions.
- Investigates environmental incidents and follow up on corrective actions.
- Reports environmental performance and compliance risks to senior management.
- Engages with the supply chain and community on environmental matters.

iv. Line Managers

- Implement environmental controls and procedures within their areas of responsibility (factory, estate, field or office).
- Ensure staff compliance with environmental requirements and safe work practices.
- Monitor resource use, waste management and operational risks at site level.
- Report environmental incidents, non-compliance or emerging risks promptly.

v. All employees

- Comply with this Policy and associated procedures.
- Minimise environmental impact in the course of their work.
- Promptly report environmental risks, incidents or non-compliance.

6. Environmental Commitments

Legal and Regulatory Compliance

The Company shall maintain a register of applicable environmental legislation and seek to comply with all relevant environmental laws, permits and regulatory requirements.

Climate, Energy and Carbon

The Company shall:

- Identify and assess material environmental impacts associated with its activities.
- Improve energy efficiency in factory and field operations through optimised equipment, insulation, heat recovery and sound boiler management.
- Monitor energy consumption and consider the generation and use of renewable energy where feasible.

- iv. Monitor and evaluate its carbon footprint to support continuous improvement.
- v. Seek continuous reduction in carbon dioxide emissions per unit of tea produced through operational efficiencies and appropriate technologies.
- vi. Seek to align, where appropriate and practicable, with national decarbonisation targets.
- vii. Gather and maintain data necessary for the calculation of its carbon footprint, including electricity, petrol, diesel, firewood and fertiliser use, and progressively assess Scope 1, Scope 2 and, where practicable, Scope 3 emissions.

Water Stewardship

The Company shall:

- i. Maximise rainwater harvesting and reduce abstracted water use where practicable.
- ii. Treat factory wastewater through constructed wetlands prior to discharge.
- iii. Conduct water quality monitoring of natural water bodies to prevent contamination or nutrient leaching.
- iv. Protect riparian zones and maintain a minimum 30-metre buffer from open watercourses for certain plantation activities.
- v. Provide safe, potable water within Company housing and facilities.

Land Use, Biodiversity and Forestry

The Company shall:

- i. Retain and protect all indigenous forest areas from exploitation.
- ii. Enrich indigenous forest areas with suitable species and expand forest cover where feasible.
- iii. Protect wetlands and prohibit their drainage, sand harvesting or gravel extraction.
- iv. Control invasive species in environmentally sensitive areas.
- v. Prevent and mitigate soil erosion.
- vi. Comply with national wildlife protection laws and hunting prohibitions.
- vii. Avoid open burning except where required for controlled wildfire management.

Resource Efficiency and Waste

The Company shall:

- i. Minimise waste generation and maximise recycling where feasible.

- ii. Treat wastewater appropriately before environmental release.
- iii. Apply fertilisers and herbicides responsibly, using only approved products and trained personnel, and limiting use to the minimum necessary.

Data Collection and Monitoring

The Company shall gather, monitor and evaluate environmental performance data, including:

- i. Energy consumption
- ii. Water usage
- iii. Waste generation
- iv. Emissions and carbon footprint

This data shall be used to inform management decisions and drive continuous improvement.

Supply Chain and Logistics

The Company shall:

- i. Be aware of upstream and downstream environmental impacts.
- ii. Seek to engage with significant suppliers and customers to promote environmentally responsible practices across its supply chain by communicating environmental expectations, encouraging compliance with internationally recognised sustainability standards.
- iii. Encourage key suppliers and customers to measure and reduce their greenhouse gas emissions where practicable.
- iv. Encourage efficient transportation and logistics to minimise emission footprints.

Incident Prevention and Emergency Response

The Company shall:

- i. Seek to prevent environmental incidents.
- ii. Maintain appropriate emergency response procedures.
- iii. Investigate environmental incidents and implement corrective actions.
- iv. Maintain records of environmental incidents and mitigation measures.
- v. Escalate environmental incidents to regulatory authorities where required by law.

Community and Stakeholder Engagement

The Company shall:

- i. Act as a responsible neighbour.
- ii. Engage with local communities, government authorities, civic leaders and environmental organisations where appropriate.
- iii. Consider voluntary commitments aligned with internationally recognised environmental management standards.

7. Communication and Training

- i. The Company shall ensure that this Environmental Policy is effectively communicated and implemented across all its levels and, where appropriate, to relevant external stakeholders.
- ii. This policy shall be made available to all employees and individuals performing functions in relation to the Company. Environmental expectations shall be communicated to suppliers, contractors, service providers and other relevant business partners at the outset of the business relationship and reinforced where appropriate.
- iii. Environmental training shall form part of the induction process for relevant employees and shall be provided periodically to reinforce awareness and understanding of environmental responsibilities. Role-specific training shall be delivered where environmental risks are higher or where specialized knowledge is required.
- iv. Records of communication and training activities shall be maintained to support accountability and continuous improvement in environmental performance.

8. Monitoring, Reporting and Review

Environmental performance shall be periodically monitored and reviewed by the Environment and Compliance Team.

Records of environmental performance, assessments, and incidents shall be maintained.

This policy will be reviewed biennially by the Policy Review Committee, or sooner if required by changes in legislation or operational risk.

Approved by the Operations Director, May 2026