

SUSTAINABILITY POLICY

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ACRONYMS AND ABBREVIATIONS

The following acronyms and abbreviations are used throughout this document:

Abbreviation	Definition
CGQD	Corporate Governance and Quality department
CIRD	Communication and International Relations department
CMSD	Construction Material Supply department
ESG	Environment, Social, Governance
HRMAD	Human Resources Management and Administration department
LD	Legal department
MB	Management Board
PD	Procurement department
RBGP	Rail Baltica Global Project
RBR	RB Rail AS, including branches
SB	Supervisory Board
SD	Security department
SHSD	Sustainability, Health and Safety department

DEFINITIONS

The following terms are used throughout this document:

Term	Definition
ESG Environmental dimension	In terms of this policy topics related to environmental protection, including but not limited to climate change, energy efficiency, pollution, water resources, biodiversity and circular economy.
ESG Governance dimension	In terms of this policy topics related to business conduct and stakeholder relations, including but not limited to corporate governance, culture and ethics, transparency and fairness, management of relationships with stakeholders, payment practices, cybersecurity and data privacy, protection of whistle-blowers, anti-corruption and bribery.
ESG Social dimension	In terms of this policy topics related to workforce, affected communities, consumers and end users, including but not limited to working conditions and work-related rights, health and safety, non-discrimination, diversion and inclusion, access to quality information.
Sustainability matter	Opportunity, risk as well as positive and negative impact on people or environment related to ESG Environmental, Social and Governance dimensions.

1. OBJECTIVE

1.1. The objective of the policy is:

- 1.1.1. to declare the RBR's commitment to sustainability.
- 1.1.2. to establish the core principles and responsibilities that guide the implementation, maintenance, and continual management of sustainability matters across ESG dimensions.
- 1.1.3. ensure that sustainability is embedded in RBR processes and decision making through cross functional collaboration.

2. SCOPE

- 2.1. This Policy builds upon the RBGP Declaration of Sustainability Principles, which establishes a joint commitment to sustainability at the project-wide level.
- 2.2. It serves as the general framework for integrating ESG dimensions into the operations of RBR, defines the approach to managing sustainability matters within RBR, whilst respective ESG topics are governed in detail by topic-specific policies and related internal governance documents.
- 2.3. It is applicable to RBR, its branches, departments and employees, and sets expectations for contractors, suppliers, and partners engaged in the Rail Baltica project, requiring alignment with its sustainability principles and commitments.

3. POLICY STATEMENT

- 3.1. As the central coordinator of the Rail Baltica Global Project, RBR is committed to setting an example and promoting sustainability through **environmental protection, social responsibility, and sound corporate governance, including stakeholder engagement**. RBR aims to minimize its environmental footprint, safeguard the well-being and rights of workforce, uphold high quality and ethical standards, and foster transparent relationships with all stakeholders, contributing to the long-term value of Rail Baltica project.

4. PRINCIPLES

- 4.1. **Delivery of sustainable infrastructure** is guided by RBGP Declaration of sustainability principles [Reference No 1.1.] and overarching objectives of safety, resilience, innovation, cross-border cooperation, efficiency, and long-term economic and social value.
- 4.2. **Environmental protection** is guided by the principles of compliance, improvement, mindful office operations, responsible mobility, teamwork, external reach and advocacy [Reference No 1.2.].
- 4.3. **Social responsibility** is guided by the principles of safe and healthy work environment, equal treatment and opportunities for all, diversion, inclusion and harassment prevention, fostering continuous learning and development, and prioritizing employee's wellbeing [Reference No 1.3.].
- 4.4. **Sound Corporate Governance** is guided by the principles of compliance, quality, accountability, transparency, responsibility, security, risk management and stakeholder relations based on inclusiveness, transparent communication, regular dialogue, responsiveness to concerns, and long-term value creation for communities, partners, and users [Reference No 1.4., 1.5., 1.6., 1.7.].

5. COMMITMENTS

- 5.1. Sustainability commitments of the related ESG dimensions are defined and implemented through respective topic-specific policies and governance documents, detailing objectives, targets, and actions.
- 5.2. Unified commitments for sustainability are:
 - 5.2.1. To assess and manage ESG related impacts, risks, and opportunities.

- 5.2.2. To embed ESG in corporate strategy and operations, integrating ESG principles into strategic planning, decision-making, day-to-day operations and functional collaboration.
- 5.2.3. To drive continuous improvement, establishing measurable objectives and performance indicators, and monitoring progress.
- 5.2.4. To engage regularly and transparently with stakeholders, maintaining open and constructive dialogue to understand and meet their sustainability expectations.
- 5.2.5. To ensure high-quality and reliable sustainability information, adhering to the highest standards of transparency, accuracy, and timeliness in sustainability-related disclosures.
- 5.2.6. To promote accountability across the value chain, encouraging suppliers, contractors, and partners to adopt and implement ESG practices consistent with RBR commitments.

6. ROLES AND RESPONSIBILITIES

- 6.1. The SB provides strategic oversight on sustainability matters, ensuring that ESG considerations are integrated into long-term decision-making, risk management, and performance evaluation.
- 6.2. The MB holds responsibility for implementing sustainability policy, alignment of ESG-related policies, oversight of the RBR's sustainability performance providing the necessary resources and support to achieve sustainability objectives and reporting to SB.
- 6.3. Departments responsible for specific ESG topics are accountable for the implementation, management, and maintenance of their respective areas. They are expected to collaborate across functions to ensure alignment of ESG-related policies and to monitor progress toward objectives.

ESG dimension	Sustainability topic	Responsible department
Environmental dimension	Climate change adaptation and mitigation, energy consumption and efficiency, pollution, water consumption and wastewater management, direct and indirect drivers on biodiversity, resource inflows and use, outflows related to products and services, waste management	SHSD
	Fair and compliant working conditions, secure employment, adequate wages and equal pay for work of equal value, diversity, equality and inclusion, work-life balance, access to quality information, learning & development, measures against violence and harassment in the workplace, fostering value-based culture,	HRMAD
Governance dimension	Health and safety	SHSD, HRMAD
	Corporate ESG governance, culture and ethics, protection of whistle-blowers, conflict of interest, corruption and bribery prevention	CGQD, HRMAD, SD
	Stakeholder engagement and satisfaction, transparent communication and access to ESG information, structured dialogue and consultation processes, feedback mechanisms, and collaboration with communities, partners, and suppliers	CIRD
	Security and cyber security, information protection	SD
	Data privacy	LD
	Sustainable supply	PD, CMSD, LD, SHSD

Table 1. Responsible departments of ESG topics

7. CLOSING PROVISIONS

- 7.1. The policy is reviewed periodically for continued relevance and effectiveness, amended upon necessity and is made available to all interested parties.

REFERENCES

Ref:	Document Number:	Document Title:
1.1.	RBGL-RBR-STN-Z-00015	RBGP Declaration of sustainability principles
1.2.	RBGL-RBR-POL-00003	Environmental policy statement
1.3.	1.11 / 6/ 14	Human Resource Management Policy
1.4.	Decision No. 2/220/2024	RB Rail AS Company strategy 2024 – 2030
1.5.	1.11 / 2/9	Code of Ethics and Conduct
1.6.	RBGL-RBR-POL-Z-00001	Quality Policy
1.7.	RBGL-RBR-STN-Z-00001	Common Procurement Standards and Guidelines for the Rail Baltica