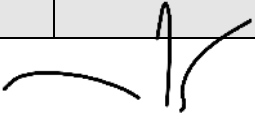




# Sustainability Policy

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<b>WIRBELN</b>	<b>Sustainability Policy</b>	
	<b>Doc. No. WEP-GL-WEP-EHS-POL-0001-00</b>	<b>Revision: 01</b>

## Change Log

REV	SECTION	CHANGE DESCRIPTION
a	All	None
00	All	Issue for use
01	All	Update

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**DEFINITIONS**

<b>Abbreviation</b>	<b>Meaning</b>
<b>Wirbeln</b>	The legal entity issuing this Document
<b>Wirbeln Personnel</b>	Directors, officers, employees, consultants, and workers acting on behalf of Wirbeln
<b>Wirbeln Business Partners</b>	Intermediaries, agents, contractors, suppliers, JV partners, and other third parties
<b>Policy</b>	Wirbeln Sustainability Policy
<b>FEL</b>	Front End Loading
<b>GHG</b>	Greenhouse Gas
<b>CO<sub>2</sub>e</b>	Carbon Dioxide Equivalent
<b>Scope 1</b>	Direct emissions from owned or controlled sources
<b>Scope 2</b>	Indirect emissions from purchased electricity, heat, or steam
<b>Scope 3</b>	Other indirect value-chain emissions
<b>Net Zero</b>	Balance of residual emissions with removals
<b>KPI</b>	Key Performance Indicator
<b>EPC / EPCM</b>	Engineering Procurement and Construction / Management

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# 1. Introduction

Reducing our carbon footprint is central to our sustainability goals and long-term growth. This policy explains our commitments, targets, and the actions we will take to minimize environmental impacts across our website, operations, products, and supply chain. It is intended for customers, partners, suppliers, and employees and it is published on our website to ensure transparency and accountability.

# 2. Purpose and Scope

This policy applies to all company operations, including our website, offices, engineering and facilities design, fabrication, manufacture, construction, field services, procurement, logistics, and third-party suppliers. It covers greenhouse gas emissions (Scope 1, 2 and material Scope 3 categories), energy use, waste and circularity, water use, and biodiversity impacts. Our multidisciplinary engineering and project execution capabilities inform how we apply sustainability across the full project life cycle— from early opportunity identification through FEL deliverables, engineering, construction, commissioning, and startup.

# 3. Net Zero Ambition

We have set a plan to support reaching Net Zero emissions by maximizing energy production with less power requirements so that operations translate into fewer emissions. We pledge to achieve **Net Zero greenhouse gas emissions by 2035 or sooner**, aligned with the goals of the Paris Agreement. We will prioritize reducing emissions at source by maximizing energy efficiency and shifting to low- and zero-carbon energy systems, and only use high-quality, transparent offsets for any residual emissions that cannot be eliminated. This ambition guides our investment, product design, manufacture, and supplier engagement decisions.

**Key commitments**

- **Target:** Net Zero by **2035** across our operations and prioritized supply-chain emissions.
- **Design principle:** Create equipment and digital services that operate with **minimum or no reliance on traditional carbon-intensive power**.
- **Innovation:** Invest in next-generation energy production and low-power technologies to reduce operational energy demand.
- **Supplier engagement:** Embed sustainability criteria into procurement and require emissions data and decarbonization plans from strategic suppliers.

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- **Residual emissions:** Use high quality, transparent offsets only for emissions that cannot be eliminated.

## 4. Energy, Emissions and Operations

### Why this matters

Electricity generation is a major source of greenhouse gas emissions in the United States; decarbonizing power and improving energy efficiency are essential to rapid emissions reductions.

### Actions we will take

- **Energy efficiency:** Continuously reduce energy demand across our website and infrastructure through efficient code, optimized hosting, caching, and content delivery networks; set annual energy-use reduction targets for our digital services.
- **Clean energy procurement:** Transition to **100% carbon-free or renewable electricity** for our offices and data hosting where feasible; prioritize providers with verifiable carbon-free energy claims.
- **Low-power product design:** Require energy-efficient design criteria for hardware and software, including low-power modes, efficient power supplies, and lifecycle energy assessments.
- **Onsite and distributed generation:** Where practical, deploy or procure from next-generation clean energy systems (e.g., solar, wind, battery storage) to reduce reliance on traditional generation.

### Performance indicators

- **Annual absolute GHG emissions** (tCO<sub>2</sub>e) for Scope 1, 2 and prioritized Scope 3 categories.
- **Percentage of electricity from carbon-free sources.**
- **Energy intensity** of our website and services (kWh per 1,000 user sessions).
- **Year-on-year reduction targets** (e.g., minimum 10–20% reductions in key areas until Net Zero).

## 5. Supply Chain, Procurement and Products

### Supplier engagement

We will work with suppliers to reduce upstream emissions by:

- **Embedding sustainability criteria** into procurement decisions and contracts.

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- **Requiring emissions data** and improvement plans from strategic suppliers.
- **Prioritizing suppliers** that demonstrate credible decarbonization pathways and use low-carbon energy.

#### **Sustainable products and services**

- **Design for longevity and reparability** to reduce material and energy impacts.
- **Material selection:** Favor low-carbon, recycled, and responsibly sourced materials.
- **Circularity:** Implement take-back, refurbishment, and recycling programs where applicable.

## **6. Waste, Water and Biodiversity**

#### **Waste reduction and circular economy**

- **Minimize single-use materials** in packaging and operations.
- **Set targets** to increase recycled content and reduce landfill waste.
- **Promote digital alternatives** to paper and physical shipping where appropriate.

#### **Water stewardship**

- Monitor and reduce water use in operations and facilities; prioritize water-efficient fixtures and processes.

#### **Biodiversity and land use**

- Avoid or minimize impacts to sensitive habitats in any site development, support restoration or conservation projects where relevant.

## **7. Monitoring, Reporting and Transparency**

#### **Measurement and reporting**

- We commit to measure and report our GHG emissions annually using recognized standards and methodologies.
- We will publish a public sustainability report that includes progress against targets, methodology, and third-party assurance where feasible.

#### **Verification**

- Use recognized frameworks and third-party verification for emissions accounting and claims.

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## 8. Governance and Continuous Improvement

### Accountability

- **Senior leadership** will own the Net Zero target and integrate sustainability into business strategy.
- **A cross-functional sustainability team** will manage implementation, track KPIs, and report progress.

### Policy review

- This policy will be reviewed at least annually and updated to reflect technological advances, regulatory changes, and progress toward our targets.

## 9. Stakeholder Engagement and Support

This policy will be published on a dedicated sustainability page on our website and clear, accessible progress metrics will be provided, and a concise client-facing summary that reflects our capability to translate engineering, fabrication, manufacture, and project execution into emissions reductions.

### Employees and contractors

- Provide training and incentives to reduce energy use and support sustainable practices.

### Customers and partners

- Communicate our sustainability commitments clearly on the website and invite partners to collaborate on emissions reductions.

### Community and advocacy

- Support broader decarbonization efforts and public policies that accelerate clean energy deployment and equitable transition.

## 10. Implementation Checklist for Website Content

- **Publish this policy** on a dedicated sustainability page.
- **Display progress metrics** (annual emissions, % renewable electricity, key projects).
- **Provide downloadable summary** and contact for sustainability inquiries.
- **Link to methodology** and any third-party verification statements.

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## Closing Statement

We recognize that achieving Net Zero by 2035 is ambitious. We commit to transparent reporting, prioritizing emissions reductions at the source, and using our decades of hands-on experience in concept development, surface engineering, facilities design, and project execution to deliver practical, verifiable decarbonization across our operations and the projects we support.