

ATLAS International Transport & General Contracting L.L.C – S.P.C.

Corporate Sustainability Policy *Marine & Offshore Construction Division*

Document Reference: AITGC-ENV-POL-001 | Revision 1.0 | Effective: January 2026
Reviewed Annually | Approved by: CEO



1. Purpose & Scope

Atlas International Transport & General Contracting L.L.C – S.P.C. ("the Company") is committed to responsible marine and offshore construction that preserves the health of ocean ecosystems, minimises environmental impact, and promotes long-term sustainability for coastal communities, marine life, and future generations.

This policy applies to:

- All Company employees, contractors, and subcontractors
- All marine construction projects — harbours, jetties, offshore platforms, subsea pipelines, breakwaters, and dredging operations
- All vessels, equipment, and shore-based facilities operated under the Company name
- Supply chain partners and vendors engaged on Company projects

2. Sustainability Commitment

Atlas International Transport & General Contracting L.L.C – S.P.C. is dedicated to integrating environmental stewardship into every stage of project planning, execution, and decommissioning. We recognise that our operations take place in some of the world's most sensitive ecosystems — oceans, coastlines, and tidal zones — and we accept the responsibility this entails.

Our sustainability commitment rests on five pillars:

PILLAR 1 — Marine Ecosystem Protection

- Conduct baseline ecological surveys before every project commences
- Protect coral reefs, seagrass beds, mangroves, and other critical habitats
- Implement exclusion zones around protected marine areas and endangered species habitats
- Restore or compensate for any unavoidable habitat disturbance through verified offset programmes
- Monitor water quality, turbidity, and noise levels throughout construction phases

PILLAR 2 — Climate Action & Carbon Reduction

- Reduce Scope 1 and 2 greenhouse gas emissions by 40% by 2030 (baseline year: 2022)
- Transition fleet vessels to low-sulphur fuel and hybrid propulsion systems
- Achieve net-zero carbon operations across all divisions by 2045
- Incorporate climate resilience assessments into all long-term infrastructure designs
- Source renewable electricity for all shore-based operations by 2027

PILLAR 3 — Waste, Pollution & Spill Prevention

- Implement zero-discharge policies for all offshore vessels and platforms
- Maintain oil spill response plans and conduct quarterly spill drills
- Recycle or repurpose at least 80% of construction waste by weight
- Eliminate single-use plastics from all project sites and vessels by 2026
- Dispose of dredged material only at approved designated disposal sites

PILLAR 4 — Sustainable Materials & Procurement

- Prefer materials with certified low environmental impact (e.g., recycled steel, FSC timber)
- Evaluate all major suppliers on environmental and social performance criteria
- Reduce aggregate and sand extraction from sensitive seabed areas
- Extend asset lifecycles through planned maintenance and refurbishment programmes
- Incorporate circular economy principles into project design from the outset

PILLAR 5 — Community & Social Responsibility

- Engage coastal communities and indigenous stakeholders before and during all projects
- Support local employment and skills training in port and coastal areas
- Contribute to marine conservation initiatives and reef restoration projects
- Publish transparent annual sustainability reports accessible to the public
- Uphold the rights and livelihoods of fishing communities near project areas

3. Environmental Management System

The Company maintains an Environmental Management System (EMS) certified to ISO 14001:2015. The EMS framework governs all environmental planning, monitoring, incident response, and continuous improvement activities.

3.1 Planning

- Prepare an Environmental Impact Assessment (EIA) for all projects with significant marine scope
- Develop a Project-Specific Environmental Management Plan (EMP) for every contract
- Identify and register all applicable environmental laws, regulations, and permit conditions

3.2 Implementation

- Assign a qualified Environmental Manager to each project team
- Deliver mandatory environmental induction training to all site personnel
- Install sediment curtains, silt barriers, and containment booms where required
- Monitor and record key environmental parameters at agreed frequencies

3.3 Review & Improvement

- Conduct internal EMS audits at least twice per year
- Submit to third-party surveillance audits annually
- Review and update the EMS following any environmental incident or regulatory change

4. Key Performance Indicators

The following KPIs will be tracked, reported quarterly, and published in the Company's Annual Sustainability Report:

KPI	Target	Timeline
GHG Emissions (Scope 1 & 2)	-40% vs 2022 baseline	2030
Construction Waste Recycling Rate	≥ 80% by weight	2026
Zero Oil Spill Incidents (>1 barrel)	0 incidents per year	Ongoing
Single-Use Plastic Elimination	100% phase-out	2026
Renewable Electricity (Shore Ops)	100% renewable	2027
Ecological Survey Compliance	100% of qualifying projects	Ongoing
Supplier ESG Screening	100% of major suppliers	2025
Community Consultation Sessions	≥ 2 per project	Ongoing
Employee Sustainability Training	100% annual completion	Ongoing
Net-Zero Operations Target	Full net-zero achieved	2045

5. Roles & Responsibilities

Chief Executive Officer

- Approve and endorse this policy and its annual review
- Set sustainability targets and allocate resources accordingly
- Receive quarterly ESG performance briefings
- Champion sustainability as a core business value
- Ensure sustainability objectives are integrated into company strategy

Head of HSEQ (Health, Safety, Environment & Quality)

- Manage and continuously improve the ISO 14001 EMS
- Oversee environmental compliance across all projects and facilities
- Prepare the Annual Sustainability Report

Project Managers

- Implement project-level Environmental Management Plans
- Ensure all team members comply with this policy and site-specific controls
- Report environmental incidents within 24 hours to the HSEQ team

All Employees & Contractors

- Always follow environmental procedures
- Participate in environmental training programmes
- Report environmental concerns through the Company's Open Reporting System

6. Legal & Regulatory Compliance

The Company will comply with all applicable environmental laws, regulations, and international conventions, including but not limited to:

- MARPOL 73/78 — International Convention for the Prevention of Pollution from Ships
- London Protocol — Prevention of Marine Pollution by Dumping of Wastes
- Convention on Biological Diversity (CBD) — protection of marine biodiversity
- Local Environmental Protection Acts and Port Authority regulations
- National EIA requirements and permit conditions in all countries of operation
- ISO 14001:2015 Environmental Management System standard

Where the Company's own standards exceed legal requirements, the higher standard shall apply.

7. Training & Awareness

Environmental competence is a condition of employment and project engagement. The Company will:

- Deliver a mandatory Environmental Awareness Induction to all new hires and contractors
- Provide role-specific environmental training for vessel crews, site engineers, and project managers
- Conduct annual refresher training covering regulatory changes, incident lessons learned, and sustainability targets
- Maintain training records and competence matrices for all personnel
- Recognise and reward outstanding environmental contributions through the Company's Sustainability Awards programme

8. Reporting & Transparency

Atlas International Transport & General Contracting L.L.C – S.P.C. is committed to transparent communication of its environmental and sustainability performance. The Company will:

- Publish an Annual Sustainability Report aligned with GRI Standards and TCFD recommendations
- Report material environmental incidents to regulators within required timeframes
- Disclose Scope 1, 2, and 3 greenhouse gas emissions annually
- Engage with external sustainability rating agencies and respond to investor ESG queries
- Conduct biennial stakeholder materiality assessments to ensure reporting remains relevant

9. Policy Review & Amendment

This policy shall be reviewed annually by the Head of HSEQ and approved by the CEO. Revisions may also be triggered by:

- Significant changes in applicable legislation or international conventions
- A major environmental incident involving Company operations
- Changes to the Company's business activities, structure, or geographic scope
- Feedback from stakeholder engagement or third-party audits

The most current approved version of this policy will be published on the Company intranet and made available to all stakeholders upon request.

10. Approval & Sign-Off

Authorised By	Details
Chief Executive Officer	Name: _____
Head of HSEQ	Name: _____
Approval Date	Date: _____
Next Review Date	Date: _____
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