CATALYST
Investment Management

ENVIRONMENTAL POLICY

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May 2026

REV NO.	DATE	DESCRIPTION OF REVISION	REVISED BY	REVIEWED BY	APPROVED BY
Rev00	12/05/2026	First issue	Qusai Alabbassi	Firas Rimawi	Ennis Rimawi

Responsibility

Name	FUNCTION
Ennis Rimawi	Founder and Managing Director
Firas Rimawi	Technical Director
Qusai Alabbassi	ESG & Impact Lead

For inquiries related to document coding, please contact the code administrator, Alaa Alqaruti.

Statement of Intent

Catalyst Investment Management ("Catalyst") recognises that sound environmental management is essential to responsible investment, operational resilience, and long-term value creation. Catalyst seeks to prevent pollution, promote efficient use of resources, and protect ecosystems and communities, and will work to improve environmental performance across Catalyst operations and Catalyst-managed project companies in a manner proportionate to the nature and risks of its activities.

Policy Objectives

Catalyst's environmental objectives are to: (i) identify and manage environmental risks and impacts in a structured and proactive manner; (ii) ensure compliance with legal requirements, permits, and lender obligations; (iii) improve resource efficiency, including energy and water; (iv) prevent where possible, minimise, and control pollution to air, water, and land; (v) manage wastes and hazardous materials safely across their lifecycle; and (vi) establish performance monitoring and continual improvement practices proportionate to the level of risk.

Scope of Application

This Policy applies to:

- Catalyst employees and activities under Catalyst's direct management.
- Contractors, subcontractors, service providers, and suppliers when performing work for and/or on behalf of Catalyst and/or on Catalyst-managed sites.
- Project and portfolio companies to the extent that Catalyst manages, controls, or can influence environmental performance through governance rights, financing covenants, contractual requirements, and supervision.

All such parties are required to implement environmental management measures in line with:

1. This Policy principles.
2. Applicable national environmental legislation, laws, regulations, permits, and approvals.
3. IFC Performance Standards (PS).
4. World Bank Group (WBG) Environmental, Health, and Safety (EHS) General Guidelines.
5. Relevant sector-specific World Bank Group (WBG) EHS Guidelines, as applicable to the nature of the activity or project, including:
   - World Bank Group (WBG) EHS Guidelines for Electric Power Transmission and Distribution.
   - World Bank Group (WBG) EHS Guidelines for Wind Energy.
   - World Bank Group (WBG) EHS Guidelines for Water and Sanitation.

Where differences exist between national requirements and international good practice, all related parties will apply the more stringent requirement to the extent permitted by applicable law and contractual arrangements.

Roles and Responsibilities

Catalyst defines clear environmental responsibilities at all levels:

- Senior Management: Provide leadership, resources, and oversight to ensure effective implementation of this Policy and accountability for environmental performance.
- Managers, Leads, and Supervisors: Identify environmental aspects and risks, implement and monitor control measures, ensure compliance with permits and internal requirements, and communicate environmental expectations to workers and contractors.
- Employees: Comply with environmental requirements and instructions, use controls provided and promptly report environmental hazards, near-misses, incidents, and non-compliances.
- Contractors, Service Providers, and Suppliers: Comply with this Policy and applicable environmental requirements and site rules throughout the contracting lifecycle (Request for Proposal, Terms of Reference, Contracts, etc); implement all environmental requirements, ensure workers are adequately trained and equipped; manage wastes and hazardous materials responsibly; and promptly report incidents, spills, and unsafe or non-compliant conditions related to their activities.
- Project and Portfolio Companies: Implement site-specific environmental arrangements consistent with this Policy and applicable legal and lender requirements, maintain appropriate monitoring and records, and ensure effective oversight of contractors, service providers, and suppliers.

Principles

The following environmental principles guide the management of Catalyst's own operations and the oversight of Catalyst-managed activities and relevant projects through all phases and in consistency with IFC Performance Standard (2), where applicable. Implementation is the responsibility of the relevant parties (including contractors, operators, and portfolio companies), with Catalyst exercising oversight consistent with its role, rights, and influence.

Principle 1. Environmental Risk Management and Governance:

Apply a risk-proportionate environmental management approach across the investment lifecycle, define responsibilities and ensure competent implementation by staff and contractors, and require project companies and contractors to apply mitigation measures and maintain site-specific management plans and procedures commensurate with risk.

Principle 2. Training and Competency:

Provide environmental training appropriate to roles and risk exposure (including induction and task-specific training) and ensure workers in environmental or safety-critical roles are competent to perform their duties.

Principle 3. Legal Compliance and Permits:

Activities should be conducted in compliance with applicable environmental laws, permit conditions, approvals, and other binding requirements, with timely corrective action taken in the event of non-compliance and engagement with relevant authorities where required.

Principle 4. Resource Efficiency and Energy Conservation:

Promote efficient use of energy, water, and materials and will require risk-based management measures where consumption is material. Where relevant, project companies will establish monitoring and targets appropriate to their operations and identify feasible opportunities to reduce demand and losses, improve efficiency, and adopt good operational practices.

Principle 5. Air Emissions and Ambient Air Quality:

Air emissions should be prevented where possible and otherwise minimised through feasible measures, including the management and control of dust and fugitive releases, to meet legal and permit requirements and reduce impacts on sensitive receptors. Where relevant, responsible management of refrigerants and the avoidance of uncontrolled releases should be promoted, with monitoring carried out where required by permits, lenders, or warranted by the level of risk.

Principle 6. Wastewater and Ambient Water Quality:

Seek to manage discharges and related water quality impacts in line with applicable local laws and regulations and to avoid significant adverse effects on receiving environments and human health, with monitoring and maintenance proportionate to discharge risks and regulatory requirements.

Principle 7. Waste Management:

Sound environmental is guided by the waste management hierarchy according to the local laws and regulations. Where relevant and practicable, this includes ensuring waste characterisation, segregation, safe storage, and the use of reputable/authorised waste management service providers where available, with hazardous wastes segregated and managed under additional controls to prevent releases.

Principle 8. Hazardous Materials Management:

Where hazardous materials are handled or stored, risk-based management shall include, as applicable: maintaining up-to-date inventories; ensuring safe handling and storage; providing suitable secondary containment and leak prevention; and establishing clear written procedures for transfer and use. Spill prevention and response arrangements shall be proportionate to the level of risk, integrated with emergency preparedness plans, and supported by appropriate training in hazardous materials handling and management.

Principle 9. Noise Management:

Prevent or minimise adverse noise and vibration impacts beyond local laws, regulations, and boundaries, particularly at sensitive receptors, through controls at source where feasible and operational measures such as maintenance, operational scheduling, and siting. A mechanism to receive and respond to noise-related complaints will be maintained where appropriate, and monitoring will be conducted where required by permits/lenders or warranted by risk.

Principle 10. Biodiversity and Ecosystems:

Where activities may affect sensitive habitats, protected areas, or biodiversity, appropriate measures should be applied to avoid or minimise impacts and to implement mitigation and monitoring commensurate with risk throughout the project life cycle, consistent with applicable legal requirements, permits, and recognized best practices.

Principle 11. Contaminated Land:

Land contamination should be prevented through effective controls on hazardous materials, wastes, and oils from the project planning stage, in line with applicable laws and regulations. Where contamination is suspected or identified, an approach should be adopted that considers contaminants, receptors, and exposure pathways, with immediate controls implemented where imminent hazards exist. Where warranted, investigations and risk assessments should define appropriate risk reduction measures aligned with current and foreseeable land use.

Principle 12. Emergency Preparedness and Environmental Incidents:

Maintain emergency preparedness arrangements and procedures proportionate to environmental risks, including readiness for spills and other incidents that could affect air, water, land, or communities. Environmental incidents will be reported, investigated, and addressed through corrective and preventive actions, and authorities will be notified where required.

Principle 13. Monitoring, Records, and Reporting:

Maintain monitoring and recordkeeping commensurate with risk and operational context to support compliance oversight, risk management, and continual improvement. This may include, where relevant and practicable, tracking resource use, emissions and discharges, waste generation and transfers, incidents, and complaints. Performance information will be reviewed periodically, as appropriate, to identify trends and lessons learned.

Principle 14. Construction, Demolition, and Decommissioning Controls:

For construction, refurbishment, demolition, and decommissioning activities, environmental controls should be applied to prevent or minimise potential impacts on communities and the environment in a manner proportionate to risk, including (where relevant and practicable) the management of dust, emissions, noise and vibration, erosion and sedimentation, runoff and drainage, protection of water bodies, and the prevention or limitation of spills and releases of fuels, oils, and chemicals.

Principle 15. Waste and Hazardous Materials Management during Construction and Demolition:

Construction- and demolition-related wastes and hazardous materials should be managed in line with applicable laws and regulations, including adequate sanitation and wastewater arrangements, the identification and safe management of hazardous substances encountered during demolition (e.g., asbestos and polychlorinated biphenyls), the management of any contaminated media, and the reinstatement or restoration of sites in accordance with approved plans and intended land use where applicable.

Communication and Implementation

This Policy shall be communicated to all employees and contractors at workplaces in languages understood by workers, made publicly available on Catalyst's website, implemented across Catalyst activities, and reviewed periodically and updated whenever necessary.

Catalyst maintains an external communication and grievance mechanism to enable stakeholders, including affected parties, to raise environmental concerns or complaints. All submissions are handled in a timely, transparent, and non-retaliatory manner.

Detailed requirements referenced in this Policy shall be implemented through site-specific environmental plans, procedures, and standards consistent with the IFC Performance Standards and the World Bank Group (WBG) EHS Guidelines and applicable local laws and regulations.

Compliance with this Policy is a condition of employment and contractual engagement. Failure to comply may result in corrective or disciplinary action, as appropriate.

Ennis Rimawi
Founder and Managing Director

May 12, 2026