UNITED HERITAGE FINANCE Sp. z o.o.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

Strategic ESG Framework, Governance and Disclosure

Version 1.0 – Adopted by the Management Board on 1 December 2025

1. Corporate Identity and Statement of Commitment

The Management Board of **United Heritage Finance Sp. z o.o.**, Warsaw, Poland (hereinafter "UHF", "the Company", "we" or "our"), formally adopts this **Environmental, Social, and Governance Policy ("ESG Policy")**.

UHF operates as an **international advisory and capital facilitation platform**, providing, among others:

- Strategic advisory and M&A services,
- Transaction structuring and due diligence,
- Capital sourcing and partnership facilitation,
- Cross-border advisory focusing on Ukraine, Poland, EU, USA, and friendly jurisdictions.

UHF considers **ESG principles as core to its corporate governance, advisory operations, and strategic development**, including investment facilitation and partner engagement.

2. Strategic Mission and Geopolitical Responsibility

2.1 Mission

UHF's mission is to **strengthen economic resilience, cross-border investment, and corporate development**, focusing on:

- Reconstruction and modernization of Ukraine,
- Integration of Ukrainian companies into global markets,
- Facilitating international investments into Ukraine and the region,
- Strengthening the Polish-Ukrainian economic corridor and EU integration,
- Supporting development in **Construction & Development, Logistics, Defense & Dual-Use, Agriculture, Energy, and Technology sectors — but not limited to these sectors**.

2.2 Sovereignty, Independence, and Regional Security

UHF recognizes that sustainable development is inseparable from:

- **Sovereignty of Ukraine and Poland**,
- **Regional stability and EU/NATO alignment**,
- **Economic independence and resilience**,
- **Compliance with international sanctions and humanitarian law**.

Accordingly, UHF:

- **Excludes cooperation** with Russian or Belarusian sanctioned capital,
- Avoids projects undermining sovereignty, independence, or EU/NATO-aligned security,
- Aligns its operations with sanctions and geopolitical priorities of:
    - **European Union** (Council Regulations 269/2014, 2022/576),
    - **Poland**,
    - **United States (OFAC sanctions)**,
    - **United Kingdom**,
    - **Ukraine** (laws on national security, reconstruction, and investment control).

2.3 Rebuild Back Better – Ukraine Reconstruction

UHF commits to **"Rebuild Back Better" principles**, ensuring reconstruction projects:

- Enhance **resilience and quality of infrastructure**,
- Promote **clean energy and sustainable resource use**,
- Enable **digital transformation and adoption of new technologies**,
- Strengthen **governance, transparency, and anti-corruption**,
- Foster **economic diversification, job creation, and EU integration**.

3. Scope of Application

This Policy applies to:

- Corporate governance and internal operations of UHF,
- Advisory, transaction facilitation, and capital structuring services,
- Engagement with clients, counterparties, suppliers, and strategic partners,
- All employees, contractors, and representatives acting on behalf of UHF.

4. Alignment with International ESG Standards and Benchmarks

UHF **aligns its ESG approach with globally recognized frameworks and standards**, serving as **informational benchmarks** and references for best practice. This alignment is **not mandatory**, but guides UHF in implementing robust ESG practices in its advisory and investment facilitation activities.

Key frameworks and guidelines include:

- **UN Global Compact Principles** – a voluntary initiative encouraging businesses to adopt sustainable and socially responsible policies.
- **UN Guiding Principles on Business and Human Rights (UNGPs)** – international principles for respecting human rights in business operations.
- **OECD Guidelines for Multinational Enterprises** – recommendations for responsible business conduct, including governance, labor, environment, and anti-corruption.
- **IFC Performance Standards on Environmental and Social Sustainability** – standards developed by the **International Finance Corporation (World Bank Group)** to manage environmental and social risks in investment projects.
- **Equator Principles** – a risk management framework adopted voluntarily by financial institutions to assess and manage environmental and social risks in large infrastructure and project finance.
- **International Labour Organization (ILO) Core Conventions** – globally recognized labor standards, including human and worker rights.
- **EU Sustainable Finance Disclosure Regulation (SFDR, 2019/2088)** – voluntary disclosure framework for sustainability-related information.
- **EU Taxonomy Regulation (2020/852)** – voluntary reference for environmentally sustainable economic activities.
- **Ukrainian Ministry of Economy and Ministry of Infrastructure ESG/Investment Guidelines** – national guidance supporting responsible investment and reconstruction projects.

Purpose: UHF uses these standards as **guidance for best practice**, **benchmarking**, and to inform ESG due diligence and advisory processes. Adoption is **voluntary** and tailored to the Company's advisory role, client context, and regional focus.

5. Ethical Business Conduct and Compliance

5.1 Sanctions & Capital Integrity

UHF **excludes engagement** with entities that:

- Are controlled or financed by Russian or Belarusian sanctioned entities,
- Are involved in aggression, destabilization, or war crimes,
- Fail to comply with international sanctions (EU, US, UK, Poland, Ukraine).

Procedures: enhanced due diligence, beneficial ownership screening, and source-of-funds verification.

5.2 Anti-Corruption, Anti-Fraud, and Integrity

UHF applies **zero-tolerance policies** toward:

- Corruption, bribery, or extortion,
- Fraud, illicit financial flows, or money laundering,
- Human trafficking or forced labor,
- Non-transparent corporate structures.

6. Environmental Responsibility

6.1 Climate and Sustainability

UHF promotes sustainable practices:

- Reducing environmental impact in operations and advisory services,
- Supporting **clean energy, energy efficiency, and renewable infrastructure**,
- Promoting circular economy practices,
- Avoiding projects creating **hazardous waste or environmental dumping** in Ukraine, Poland, or the region.

6.2 Greenhouse Gas Monitoring

- Encourage gradual measurement of **Scope 1, 2, and material Scope 3 emissions** (GHG Protocol),
- Encourage carbon reduction plans in projects and advisory services.

7. Social Responsibility

7.1 Human Rights

- UN Universal Declaration of Human Rights [1],
- ILO Fundamental Principles [2],
- UN Guiding Principles on Business and Human Rights [3].

UHF **prevents and mitigates adverse human rights impacts** in Ukraine reconstruction and cross-border projects.

7.2 Job Creation & Economic Development

- Promote **job creation,**
- Support **infrastructure rebuilding**,
- Technology transfer, innovation, and private sector growth.

7.3 Inclusion and Equal Opportunity

- Gender equality, diversity, and merit-based advancement internally and in advisory engagements.

8. Governance & ESG Risk Management

8.1 Corporate Governance

- Transparent decision-making, internal controls, and ethical compliance,
- ESG oversight embedded in **Management Board responsibilities**,
- Alignment with EU/Poland/Ukraine corporate governance norms.

8.2 ESG Risk Integration

- ESG considered in **client onboarding, partner evaluation, due diligence, transaction structuring, capital facilitation**.

8.3 Incident Management

- ESG incidents **reported, assessed, mitigated**, cooperation terminated if material violations occur.

9. Strategic Sector Focus

UHF prioritizes sectors critical for regional resilience and growth:

1. **Construction & Infrastructure Development** – resilient reconstruction, modernization, urban planning.
2. **Logistics & Supply Chain** – cross-border corridors, trade infrastructure.
3. **Defense & Dual-Use Technologies** – defensive, civilian resilience technologies.
4. **Agriculture & Food Security** – climate-resilient farming, supply chain stability.
5. **Energy & Energy Infrastructure** – clean energy, storage, grid modernization, energy security.
6. **Innovation & Advanced Technologies** – digital transformation, drone tech, cybersecurity, advanced manufacturing.
7. **But not limited to these sectors** – UHF remains flexible to engage in emerging strategic opportunities aligned with ESG principles.

10. ESG Due Diligence and Monitoring

- Sanctions and beneficial ownership screening,
- Environmental and climate risk assessment,
- Governance, corruption, and human rights risk analysis,
- Reputational and controversy monitoring,
- ESG Officer and Management Board oversight.

11. ESG Performance Indicators

Key KPIs include:

- Carbon footprint reduction,
- Jobs created/supported,
- Infrastructure projects completed,
- Cross-border transaction and partner metrics,
- Technology and innovation transfer outcomes,
- Compliance with regional and international ESG standards.

12. ESG Governance

- **ESG Officer**: policy implementation, monitoring, reporting, training, stakeholder engagement.
- **Management Board**: ultimate accountability, policy review, strategic ESG oversight.

13. Training and Awareness

- ESG and ethical training for employees, contractors, and partners,
- Annual ESG forums, internal workshops, and advisory awareness programs.

14. Reporting and Transparency

- Transparent ESG reporting for partners, clients, and institutional stakeholders,
- Voluntary alignment with SFDR/Taxonomy principles,
- Continuous improvement based on international standards, regional development, and reconstruction progress.

15. Policy Review

- Reviewed at least annually or when strategic/regulatory circumstances change,
- Updates approved by Management Board and communicated to stakeholders.

16. References

[1] United Nations, **Universal Declaration of Human Rights**
[2] International Labour Organization, **Declaration on Fundamental Principles and Rights at Work**
[3] John Ruggie, **UN Guiding Principles on Business and Human Rights**
[4] EU Regulation 2019/2088, **Sustainable Finance Disclosure Regulation (SFDR)**
[5] EU Regulation 2020/852, **EU Taxonomy Regulation**
[6] EU Council Regulation 269/2014, **Sanctions on Russia**
[7] Polish Financial Supervision Authority, ESG guidelines
[8] Ukrainian Ministry of Economy & Ministry of Infrastructure, ESG guidance
[9] EBRD Environmental and Social Policy (2021 update)
[10] IFC Performance Standards on Environmental and Social Sustainability (2012, updated 2019)
[11] OECD Guidelines for Multinational Enterprises

17. Adoption and Approval

This **ESG Policy** has been **approved by the Management Board** of United Heritage Finance Sp. z o.o., and enters into force immediately.

Date of Adoption: 1 December 2025