

# **KNISTR**

# **Environmental**

# **Protection Policy**

-public-

***KNISTR***

## Creation

Date	Type of change	Author
22 May 2025	Initial creation	Stefani Groth, Christina Westphal
15 August 2025	Content adjustments and review	Christian Kolberg, Jochen Hahn
11 September 2025	Finalisation	Jochen Hahn

## Approval

	Approved	Approved	Approved
Name	Michael Bregulla	Jochen Hahn	Martin Reese
Date	11 September 2025	11 September 2025	11 September 2025
Signature			

# Content

Creation	2
Approval	2
<b>1. Objective and purpose</b>	<b>4</b>
<b>2. Scope</b>	<b>4</b>
<b>3. Principles of operational environmental protection</b>	<b>5</b>
<b>A. Legal regulations on environmental protection</b>	<b>5</b>
<b>B. Energy efficiency and resource conservation</b>	<b>5</b>
<b>C. Waste management</b>	<b>7</b>
<b>D. Sustainable mobility</b>	<b>8</b>
<b>E. KPIs/monitoring</b>	<b>9</b>
<b>F. Action planning and responsibilities</b>	<b>9</b>
<b>G. Training and information</b>	<b>9</b>
<b>H. Applicable documents</b>	<b>10</b>

# 1. Goal and purpose

As one of the leading companies for loyalty and gift card solutions with an international presence, KNISTR GmbH plays an important role in reducing environmental impact.

Environmental protection is one of the three pillars of the company's corporate social responsibility (CSR). CSR refers to the voluntary commitment of companies to take responsibility for their impact on society and the environment beyond their legal obligations. At KNISTR, CSR is complemented by the KNISTR Code of Ethics and Conduct, the KNISTR Labour and Human Rights Policy and the KNISTR Whistleblower System.

We therefore take our responsibility for protecting our planet very seriously. This includes, in particular, avoiding environmental pollution in all our business activities and conserving resources by adopting best practices and seeking and implementing solutions with a lower impact.

To this end, we are establishing a process through which we regularly evaluate opportunities for optimisation and define measures to reduce the negative impact of our actions on the environment.

This guideline describes the basic approach to planning, implementing and reporting all environmental protection activities at KNISTR and replaces the previous "Environmental Charter", as the aspects mentioned therein are incorporated into this guideline.

In order to make the environmental impact of our activities as responsible as possible and to minimise our ecological footprint, we commit ourselves to the following measures:

## 1.1 Developing our products and services with environmental considerations in mind

Our approach is to consider the entire life cycle of our products and services from a circular economy perspective. It aims to take environmental concerns into account from the earliest stages of developing loyalty and gift card solutions in order to conserve and recycle natural resources as much as possible.

## 1.2 Promoting the use of solutions with low environmental impact

We are committed to developing innovative solutions and features that minimise the environmental footprint of loyalty and gift card solutions. For example, switching from plastic cards to paper as a carrier material and further developing our fully digital gift card represent a real opportunity to improve the customer experience with a smaller environmental footprint.

## 1.3 Minimising the environmental footprint of our activities

We strive to reduce the greenhouse gas emissions caused by the operation of our infrastructure and activities by implementing sustainable initiatives, such as using green electricity in our office and selecting sustainable service providers and suppliers.

We will ensure that we have the necessary resources to implement this approach throughout KNISTR GmbH. However, each and every one of us is called upon to help shape and promote these activities in our daily work and to comply with the guidelines arising from the implementation of these measures in order to achieve the greatest possible success.

# 2. Scope

This policy applies to all employees of KNISTR GmbH.

### 3. Principles of corporate environmental protection

KNISTR supports and is committed to the 17 United Nations Sustainable Development Goals and to the objective of counteracting the so-called "triple planetary crisis", i.e. the simultaneous and mutually reinforcing threats posed by climate change, biodiversity loss and pollution.

<https://unric.org/de/17ziele/>

<https://www.unep.org/topics/sustainable-development-goals>

To this end, KNISTR has defined the following binding principles and environmental objectives:

- A. Legal regulations on environmental protection must be strictly observed
- B. Energy efficiency and resource conservation are the premises on which the company operates.
- C. Waste should be avoided as far as possible and, when it does occur, disposed of properly and in an environmentally friendly manner.
- D. The company should promote sustainable mobility.
- E. KPIs for regular measurement of environmental aspects should be defined and collected.
- F. Continuous improvements are sought and these are recorded in an action plan for follow-up. The action plan is updated regularly
- G. Environmental awareness should be strengthened through training and information.

#### A. Legal regulations on environmental protection

As there is no single environmental protection law in Germany, there are a number of legal regulations that must be complied with in all KNISTR activities. These include in particular:

- Federal Nature Conservation Act (BNatSchG)
- Federal Immission Control Act (BImSchG)
- Water Resources Act (WHG)
- Recycling Management Act (KrWG)
- Waste Act (AbfG)
- Federal Soil Protection Act (BBodSchG)
- Environmental Impact Assessment Act (UVPG)
- Federal Climate Protection Act (KSG)
- Environmental Liability Act (UmweltHG)

In addition, Article 20a of the Basic Law (GG) stipulates a national objective for the protection of natural resources.

In addition, supplementary and state-specific environmental protection laws and regulations as well as regulations on administrative offences and fines apply at the state level.

This means that the Federal Republic of Germany has a comprehensive system of laws and regulations for the protection of the environment.

#### B. Energy efficiency and resource conservation

## Drinking water

Drinking water is a basic necessity and its availability is increasingly threatened by climate change. KNISTR therefore supports the economical use of drinking water.

Measures already implemented include:

- Culligan water dispensers for treating tap water, avoiding the environmental impact of bottled mineral water
- Use of the eco programme on dishwashers in the office

Incidentally, drinking tap water generates less than one per cent of the environmental impact of bottled mineral water.

## Energy

KNISTR strives to use resources as sparingly as possible and to use sustainably generated resources. This applies to both electricity (office operations, data centre operations) and heating (office):

Measures already implemented include:

- Electricity source: Switching to 100% sustainable electricity (both in the office and in the data centre for operating our solutions)
- Electricity consumption: Gradual replacement of old light bulbs with LED lights, where technically possible
- Heating: Supply via district heating (note: this is the responsibility of the landlord and cannot be controlled by KNISTR)
- Electricity consumption/heating: Signs in the office space with a request to switch off lights and heating when no longer needed

## Product

Product development should take environmental protection into account right from the design stage. Our loyalty and gift card solutions focus on avoiding physical elements as much as possible, such as PVC customer or gift cards, and, on the other hand, with regard to our self-developed software solutions, design aspects that aim to achieve a gradual transition to environmental protection through more efficient software code, resource-saving use of AI and load-oriented use of the server infrastructure. The desired focus is therefore on achieving the highest possible level of digitisation that is also more environmentally friendly, as well as using alternative and environmentally friendly materials.

Measures already implemented include:

- Loyalty App: In-house development of a mobile app for retailers (white label) to combine customer loyalty programmes with a digital authentication tool instead of plastic card solutions
- Gift Card Online Creator (GOC): Addition of an online shop module to our solution components, which enables gift cards to be purchased and used digitally (as digital cards in the wallet app)
- Card production (physical customer and gift cards): Compilation of sales materials (samples, prices) for alternative card materials such as cardboard, wood and recycled PVC, and promotion of these alternative card materials to our clients

### **Suppliers**

Suppliers are selected not only on the basis of product quality, delivery times and price-performance ratio, but also on the basis of environmentally friendly sourcing, with the aim of keeping delivery routes as short as possible and prioritising equivalent suppliers in terms of regional or national production.

## **C. Waste management**

Waste management serves the environmentally friendly and legally compliant disposal of waste. In addition, its primary purpose is to prevent waste. Therefore, mechanisms must be established to prevent waste and, where appropriate, to collect all waste according to type and primarily dispose of it in an environmentally friendly and resource-saving manner.

### **Hazardous waste**

According to the Environmental Protection Directive, hazardous waste is waste that poses a risk to health, the environment or safety due to its nature or quantity. Such waste can be explosive, flammable, toxic, corrosive, infectious or otherwise harmful. At KNISTR, the following types of waste are classified as hazardous and must be disposed of in a controlled, careful and environmentally friendly manner:

- Batteries
- Toner cartridges
- Electrical waste
- Light bulbs
- Chemical residues (only cleaning agents in this case)

Measures already implemented with regard to hazardous waste are:

- Used batteries and rechargeable batteries: There is a collection box for used batteries on site. The office management ensures that they are disposed of in an environmentally friendly manner at collection points.
- Empty toner cartridges: Empty toner cartridges are collected and disposed of via Konica Minolta's "Clean Planet Programme".
- Electronic waste: A collection box is available in the IT infrastructure team area for the disposal of electronic waste. Rhenus Data Office GmbH ensures that this waste is disposed of in a professional and environmentally friendly manner.
- Light bulbs: Defective light bulbs are replaced by the technical service department of Wulf Gebäudetechnik and disposed of properly.
- Chemical residues (in this case cleaning agents): Empty containers with residues of cleaning agents are disposed of properly by Wulf Gebäudetechnik.

Measures already implemented for all other types of waste are:

- Rubbish (general): Appropriate recycling systems are available in the kitchens and wastepaper baskets have been removed from individual staff offices to make waste separation mandatory.
- Commercial waste similar to household waste: Central recycling systems are available in the kitchens for this purpose. The collection systems are labelled accordingly. Disposal is carried out by Veolia Holding Deutschland GmbH.
- Paper/cardboard: Central recycling collection systems are available in the kitchens for this purpose. The collection systems are labelled accordingly. Disposal is carried out by Veolia Holding Deutschland GmbH.
- Plastic/packaging: Central recycling collection systems are available in the kitchens for office waste. The collection systems are labelled accordingly. Disposal is carried out by Veolia Holding Deutschland GmbH.
- Reusable bottles: KNISTR provides employees with soft drinks exclusively in reusable bottles.

## D. Sustainable mobility

### Business trips

For business trips, an avoidance strategy is promoted by switching to digital video conferencing, and public transport is prioritised for essential business trips. The sustainability approach is assessed before the trip begins. Business trips by train are to be preferred where reasonable and possible. If physical meetings and visits to events on site, e.g. for customer retention or networking, are not necessary, then these meetings are to be replaced by video and digital technology. Business trips by plane or combustion engine vehicles (rental vehicles) should be avoided for domestic business trips within Germany and require approval from management. Taxi journeys under 50 km are an exception.

### Commuting

A multi-stage concept has been implemented for this purpose, based on the promotion of public transport and the switch to bicycles and fully electric vehicle mobility:

Measures already implemented are:

- Deutschlandticket/Jobticket (HVV): the Deutschlandticket (formerly the Jobticket) is subsidised by KNISTR to make public transport more attractive for both commuting and private travel.
- Jobrad: KNISTR subsidises the purchase of a bicycle to make this sustainable form of commuting attractive.

Company cars: since 2024, only fully electric vehicles have been permitted for new company car purchases, resulting in a gradual transition. The purchase of wall boxes is partially subsidised by KNISTR. In addition, KNISTR aims to avoid company cars as far as possible in new employment contracts or promotions to management positions in future.

## E. KPIs/monitoring

In order to make potential transparent and enable continuous improvement, KPIs must be developed and a monitoring process established.

KNISTR uses two monitoring tools. Both have been implemented and serve different purposes:

- CSR monitoring for investors: quarterly reporting on selected KPIs relating to the environment, ethics, labour and human rights.
- EcoVadis scorecard for customers, partners and service providers: annual scorecard update based on regular interim updates. The EcoVadis platform is our leading communication medium both externally and internally.

## F. Action planning and responsibilities

KNISTR plans its environmental protection measures in the form of a dedicated process consisting of the following steps and embedded in a fixed CSR coordination cycle:

- Quarterly meeting in which the following topics are discussed and decided upon:
  - Evaluation of the progress of measures already initiated
  - Definition of supporting steps to ensure the achievement of the defined measures
  - Definition of new measures, prioritisation and determination of responsible parties
  - The following are taken into account:
    - New legal or operational requirements
    - Findings from CO2 measurement
    - Findings from the improvement suggestions made by EcoVadis and Investor
    - Suggestions for improvement from the workforce

Roles and responsibilities within the company:

The "Environmental Protection" working group consists of the following core team and can be expanded as needed:

- Management (primarily responsible)
- Compliance officer
- Office management

## G. Training and information

As the workforce has a very strong influence on the effectiveness of the measures, the company provides support in the form of training and information, as well as an improvement process in which the workforce is actively involved:

### Information signs

Signs are posted in appropriate locations in the office (kitchens, toilets, meeting rooms, etc.) encouraging the workforce to actively participate:

- Switch off the lights when leaving the room
- Avoid printing on paper

- Switch off the air conditioning/heating when leaving the workplace for a (longer) period of time

Encouraging suggestions from employees (idea management):

These can be submitted in the form of emails/Slack messages to the "Environmental Protection" working group, by using the blue letterbox (anonymously) or by actively presenting them at the KNISTR town hall meetings.

### **Training**

EcoVadis also offers sustainability training courses that can be used by the "Environmental Protection" working group (limited to 3 users). In addition, it will be determined whether training content can be provided to the entire workforce via the Haufe training platform or another medium. At a minimum, the working group should hold a town hall meeting once a year to educate employees about the importance of environmental protection, explain measures and request support.

## **H. Applicable documents**

This environmental protection guideline forms an essential part of our overall CSR canon, which is represented by the following guidelines:

KNISTR Environmental Protection Policy  
KNISTR Code of Ethics and Conduct  
KNISTR Labour and Human Rights Policy  
KNISTR Whistleblower System

# ***KNISTR***

KNISTR GmbH • Hugh-Greene-Weg 2 • 22529 Hamburg  
knistr.com • hello@knistr.com

