DADAAB ROYAL COMPANY
INVESTMENT LIMITED

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ENVIRONMENTAL AND SUSTAINABILITY POLICY

1. Policy Statement

Dadaab Royal Company is committed to conducting its operations in an environmentally responsible and sustainable manner. The company recognizes its role in minimizing environmental impact while contributing to national and global sustainable development goals. Dadaab Royal Company shall integrate environmental stewardship and sustainability principles into all aspects of its operations, infrastructure development and service delivery.

2. Purpose

This policy aims to:

- Provide a framework for environmental management and sustainability integration
- Ensure compliance with environmental laws and aviation standards
- Promote efficient use of natural resources and reduction of environmental impact
- Support climate resilience and low-carbon development

3. Scope

This policy applies to:

- All Dadaab Royal Company operations, facilities and projects
- Employees, contractors, tenants and service providers
- All site environments including airside, landside and surrounding communities

4. Legal and Regulatory Framework

Dadaab Royal Company shall comply with all applicable environmental laws and standards, including:

1. Environmental Management and Coordination Act (EMCA), 1999 (Kenya)
2. Regulations by National Environment Management Authority (NEMA)
3. International Civil environmental standards
4. Climate change frameworks and international agreements (e.g., Paris Agreement)

5. Guiding Principles

1. **Sustainability:** Balance environmental protection, economic growth and social responsibility
2. **Precautionary Approach:** Prevent environmental harm before it occurs
3. **Polluter Pays Principle:** Ensure accountability for environmental impacts
4. **Resource Efficiency:** Optimize energy, water and materials use
5. **Continuous Improvement:** Enhance environmental performance over time

6. Strategic Environmental and Sustainability Pillars

6.1 Climate Change and Carbon Management

- Reduce greenhouse gas emissions across airport operations
- Promote energy efficiency and renewable energy adoption
- Support carbon offsetting and climate resilience initiatives

6.2 Energy and Resource Efficiency

- Implement energy-efficient technologies and systems
- Optimize water use and promote water conservation
- Encourage sustainable procurement and material use

6.3 Waste Management and Pollution Control

- Promote waste reduction, reuse, and recycling
- Ensure safe disposal of hazardous waste
- Control air, water, and soil pollution

6.4 Biodiversity and Ecosystem Protection

- Protect and manage natural habitats around airport zones
- Mitigate impacts on wildlife, particularly bird strike risks
- Support reforestation and conservation initiatives

6.5 Sustainable Infrastructure Development

- Integrate environmental considerations into airport design and expansion
- Conduct Environmental and Social Impact Assessments (ESIAs)
- Promote green building standards

7. Governance Structure

- **Board of Directors:** Provides oversight and strategic direction
- **Environment & Sustainability Committee:** Guides policy implementation
- **Management:** Ensures operational execution and compliance
- **Environmental Unit:** Coordinates environmental programs and reporting

8. Planning and Implementation

- Develop annual environmental and sustainability plans aligned with Dadaab Royal Company's Strategic Plan

- Integrate sustainability into procurement, operations, and project design
- Promote partnerships with government, private sector, and development partners

9. Monitoring, Evaluation, and Reporting

- Establish measurable environmental performance indicators (KPIs)
- Conduct regular environmental audits and inspections
- Publish environmental and sustainability reports
- Track compliance with regulatory requirements

10. Risk Management

- Identify and assess environmental risks across operations
- Implement mitigation and adaptation measures
- Ensure preparedness for environmental emergencies (e.g., oil spills, pollution incidents)

11. Training and Awareness

- Provide environmental training for employees and sub-contractors
- Promote awareness campaigns on sustainability practices
- Encourage stakeholder participation in environmental initiatives

12. Stakeholder Engagement

Dadaab Royal Company shall engage:

- Government agencies (e.g., NEMA, Ministry of Environment)
- Local communities and environmental groups
- Airlines, tenants, and service providers
- Development partners and NGOs

13. Compliance and Enforcement

- Ensure adherence to environmental laws and standards
- Apply corrective actions for non-compliance
- Enforce environmental requirements in contracts and agreements

14. Policy Review

This policy shall be reviewed every three (3) years or as required to reflect changes in regulations, operations, or best practices.

15. Approval

This Environmental and Sustainability Policy is approved by the Board of Directors of Dadaab Royal Company and becomes effective upon adoption. Dadaab Royal Company is committed to environmental stewardship and sustainable aviation growth, ensuring that its operations contribute positively to Kenya’s environment, economy and society.