

# 2025

## Environmental Policy

**TOKMANNI**  
GROUP



# TOKMANNI GROUP'S ENVIRONMENTAL POLICY

## 1. Introduction

Tokmanni Group is committed to sustainable development as part of its business. The Group's business model and strategy are mainly focused on physical stores and the sale of physical products, which means that the business and processes as well as the diverse supply chain cause a wide range of environmental and social impacts and contribute to climate change and resource availability. Mitigating these impacts requires continuous development and changes, which the Group commits to actively implement in its own operations and promoting them in its value chain. Tokmanni Group's Environmental policy guides action to continuously improve management of the Group's environmental impacts. It complements the Group's Code of Conduct as well as other principles and guidelines related to environmental issues.

## 2. Scope of the Environmental policy

Tokmanni Group's Environmental Policy ensures that adverse environmental impacts are captured in the Group's business practices. It sets out the key principles and priorities and defines the roles of the different services for policy implementation. The Environmental policy covers all Tokmanni Group's own operations in Finland, Sweden and Denmark, as well as relevant operations in up and downstream value chain.

This Environmental Policy sets out the Group's approach to the most business-relevant environmental issues based on the Double Materiality Assessment (DMA). The identified material environmental impacts, risks and opportunities are related to energy, climate change mitigation and adaptation, as well as resource use and waste. The policy also addresses issues related to biodiversity and ecosystems since the Group has identified high-risk raw materials as an important topic.

## 3. Commitments and guiding principles

With this policy, Tokmanni Group commits to promoting sustainable development by avoiding and addressing the adverse environmental impact of its operations. The commitment includes strategies to climate change mitigation and adaptation, sustainable and efficient use of energy and resources, promoting sustainable production and consumption by adopting circular economy approaches to resource use and efficient waste prevention and reduction. The Group aims to prevent, mitigate and remedy actual and potential environmental impacts, as well as to address risks and take advantage of opportunities in its business operations.

**The environmental policy is based on the following third-party commitments:**

### **OECD Code of Conduct for Multinational Enterprises and the United Nations (UN) Sustainable Development Goals**

Tokmanni Group is committed to respecting the OECD Code of Conduct for Multinational Enterprises and promoting positive practices in line with the United Nations (UN) Sustainable Development Goals. We support particularly the goals that our business can have a significant impact on goal 12 Responsible consumption and production, 13 Climate action and 15 Life on land.

### **The ten principles of the UN Global Compact initiative**

In accordance with the principles of the UN Global Compact Initiative, Tokmanni Group is committed to the precautionary principle and to taking initiatives that promote responsibility in environmental matters.

### **amfori Business for Social Compliance Initiative (amfori BSCI)**

As a member of the amfori Business for Social Compliance Initiative (amfori BSCI), Tokmanni Group is committed to complying with the amfori BSCI Code of Conduct. In addition, the Group expects its suppliers

and service providers to commit to its Supplier Code of Conduct, which is based on amfori BSCI's Code of Conduct. Regarding environmental protection, the signatories of amfori BSCI Code of Conduct commit themselves to a general level to identifying the environmental impacts of their operations and to taking appropriate measures to prevent, mitigate and remedy adverse impacts on surrounding communities, natural resources, climate and the environment in general.

### **Science Based Target initiative**

Tokmanni Group is committed to aligning its business with Paris Agreement and to adopt, implement, monitor and report climate mitigation targets according to the Science Based Target initiative framework and guidance aligned with 1.5 degrees pathway.

### **Guiding principles**

The following eight operating principles are key to Tokmanni Group in guiding decision-making that takes environmental perspectives into account and in setting standards for sustainable business during the strategy period 2026–2030.

1. Complying with applicable national, EU-level and international environmental legislation and EU sustainability regulations, as well as official guidelines.
2. Reducing the environmental impact of the Group's operations and implementing the principle of due diligence in Environmental Management.
3. Reporting on environmental impacts, risks and opportunities in accordance with CSRD and other environmental, product, packaging and waste legislation.
4. Aligning with the Paris Agreement and reducing greenhouse gas emissions from its own operations (scope 1–2) and collaborating to impact greenhouse gas emission reductions in the value chain (scope 3).
5. Developing a transition plan to reach climate neutrality by 2050.
6. Promoting energy efficiency and transitioning to renewable or fossil-free energy in its own operations.
7. Acting according to the EU waste hierarchy to prevent, reuse, recycle and recover waste before disposal in own operations, promoting material efficiency both in own operations and in the value chain, advancing recyclability and use of recycled and renewable materials in sourcing.
8. Protecting biodiversity and ecosystems by setting requirements for the use of certified high-risk raw materials in products.

Tokmanni Group's minimum requirement is to comply with all applicable laws and to respect internationally recognized principles. If there is a discrepancy between national law and international norms, the company strives to comply with the higher standard and seeks solutions to respect these standards with the relevant stakeholders.

The integration of the environmental policy into our business requires development of continuous due diligence in our own operations and value chain. We are committed to identifying, preventing, mitigating and remedying environmental impacts caused by our business or impacted by our business and to addressing them systematically. We actively seek opportunities to collaborate with key stakeholders and use our influence to drive continuous improvement.

In accordance with due diligence, the Group assesses and monitors environmental impacts, risks and opportunities (IROs) that have been identified as material to its operations and reports on related targets and actions in accordance with the CSRD in its sustainability statement. The priorities, objectives and roadmaps related to the management of environmental issues will be reviewed and updated based on the results of the DMA and in connection with the policies of the strategy period.

## 4. Focus areas of environmental work

### 4.1 Climate

We are committed to annually assessing our carbon footprint across the entire value chain and continuously improving our greenhouse gas emissions accounting practices. Tokmanni Group's climate work is guided by science-based climate targets both in own operations and in the value chain. The targets are aligned with the SBTi criteria 1.5° pathway and validated by the SBTi.

#### Climate change mitigation in own operations

To reduce emissions from own operations, the Group continuously investigates opportunities for renewable energy production by installing solar panels and whenever feasible, procures electricity and heating and cooling energy produced from renewable or fossil-free sources. The Group actively engages with its landlords to promote the adoption and expansion of renewable energy solutions and energy efficient equipment in leased properties. The Group equally continuous to install LED lighting and substitute refrigerants with less emitting products.

The Group reduces emissions from own operations according to the scope 1 and 2 climate transition plan including:

- Transitioning to fossil-free electricity throughout the Group by the end of 2030
- Gradually transitioning to renewable heating
- Investing in the development of energy efficiency and building automation including new technology such as AI based solutions
- Participating in the Finnish Commerce Federation's voluntary Energy Efficiency Agreement (2026–2035)

#### Climate change mitigation in the value chain

Promoting scope 3 emission reductions include active engagement with the Group's suppliers, and further development of supplier screening and procurement criteria.

To contribute to transitioning towards net-zero GHG emissions and to adapt to a climate resilient economy, a climate transition plan for the impacts of scope 3 as well as a commitment to set SBTi Net Zero climate targets will be established during the strategy period 2026–2030.

### 4.2 Resource use and circular economy

The Group is committed to enhancing resource efficiency and accelerating the transition to a circular economy. These initiatives contribute to the sustainable management of natural resources and strengthen the Group's resilience to resource scarcity. Furthermore, they enable compliance with evolving regulatory frameworks and address increasing expectations from consumers and other stakeholders regarding responsible resource management.

As circular economy regulations become stricter, the Group invests in the collection and monitoring of product and packaging data to ensure compliance with for example Extended producer responsibility (EPR), Packaging and packaging Waste Regulation (PPWR), the Ecodesign for Sustainable Products Regulation (ESPR) and other relevant regulations.

The Group strives to:

- To comply with the EU waste hierarchy to promote prevention, reuse, recycling and recovery of waste before disposal
- Improve material efficiency in both its own operations and in the value chain
- Advance sustainable sourcing by reducing use of virgin and fossil resources and increasing use of recycled and renewable resources

To monitor progress and drive continuous improvement, the Group has established targets for waste management. Key actions to advance the waste target include clear operational instructions for recycling, employee training and development projects in cooperation with external partners. Food waste reduction is managed through selection management, use of advanced systems to align stock levels with consumer demand as well as discounting near-expiry items.

Further metrics and targets related to resource inputs and outputs will be defined during the strategy period 2026–2030. The following priority areas have been identified to support the Group's transition towards a more sustainable resource management as a part of its climate adaptation strategy:

- Packaging:
  - Optimizing material usage and ensuring that all packaging is recyclable or reusable (Group's own operations and brands/products controlled by the Group)
  - Increasing the share of recycled plastic in the plastic packaging (brands/products controlled by the Group)
- Products:
  - Increasing use of renewable and recycled materials and improving recyclability (brands/products controlled by the Group).
  - Improving product durability and repairability in selected product categories (Group's private label products)
- Plastic:
  - Drive reduction of single use plastic carrier bag consumption

### 4.3 Biodiversity

Biodiversity has not been assessed as material environmental topic in the Tokmanni Group DMA process. Based on the cooperation agreement with SPAR International and an increased focus on grocery trade in Tokmanni segment, the biodiversity related impacts, risks and opportunities will be reassessed during the strategy period 2026–2030.

Group's sourcing is guided by the principles and guidelines for responsible sourcing as well as sustainable assortment policies. The Group will continue applying high-risk raw material guidelines to mitigate biodiversity related impacts and to advance sustainable sourcing of renewable materials. The guidelines apply to the procurement of products that contain raw materials that have been found to be critical in terms of social and environmental responsibility and that are particularly vulnerable to biodiversity loss and biodiversity.

The current high risk raw material policies for coffee, cotton, fish, palm oil and wood will be assessed and updated during the strategy period 2026–2030.

## 5. Governance

Environmental issues are integrated into Tokmanni Group's management system. The Board of Directors is responsible for managing actual and potential impacts, risks and opportunities. The Board monitors the achievement of the goals through the Sustainability and Personnel Committee.

The experts in Group's sustainability team are responsible for creating and updating the Environmental policy. The policy is approved by the Sustainability Steering Group.

The policy is implemented by the Tokmanni Group Leadership Team and the businesses units concerned. The Sustainability Steering Group, led by the Group's Chief People, Culture and Sustainability Officer, is responsible for the strategic steering and monitoring of the environmental work. The Sustainability Steering Group equally oversees that the environmental aspects are considered in the upstream value chain (for example in sourcing) and the downstream value chain (for example in the end-of-life treatment).

Progress against the environmental targets and developments related to environmental IROs in Group's own operations and upstream and downstream value chains are regularly monitored and reported to the Sustainability Steering Group and, if necessary, to the Group Management Team and the Board of Directors. Annual reporting to external stakeholders is conducted in the Sustainability Statement, which is published as part of the Report by the Board of Directors.

## 6. Stakeholder interaction

Tokmanni Group engages in active dialogue with customers, suppliers, authorities and non-governmental organizations. Stakeholders' views are considered in the mapping of sustainability impacts, risks and opportunities during the DMA process, and in the development of the Group's targets and actions. The views of stakeholders surveyed in connection with the DMA process and information on the Group's environmental impacts have been considered in the preparation of the Environmental policy.

Tokmanni Group's Environmental Policy is available internally to all personnel and communicated through intranet, e-mail, meetings and sourcing routines to the relevant roles within the organization. To external stakeholders, the Policy is publicly available at the Group's website in Finnish and English.

## 7. Reporting violations

Tokmanni Group is committed to rectifying the situation if it has not met the requirements set out in this policy. If a Tokmanni Group employee or business partner notices or becomes aware of incidents related to Tokmanni Group's operations that violate this policy, the relevant Tokmanni Group employee, business partner or business partner must report the alleged incident to the applicable reporting channel as follows:

- [Tokmanni Corporation whistleblowing information and reporting](#)
- [Dollarstore whistleblowing information and reporting](#)

Version	Date	Measure
1.0	20.11.2025	Tokmanni Group Sustainability Steering Group approved the Environmental Policy