

HALLOW ENERGY CORP. CIRCULAR ECONOMY PLEDGE

Definition

We understand the circular economy as an economic system where products and materials are kept in circulation trying to avoid them becoming waste and helping to nature get regenerated. This system is based on sharing, leasing, reusing, repairing, refurbishing, and recycling—either chemically or mechanically—, and composting. With the aim of reaching a closed loop, or as closed as possible. Moving away from the traditional "take-make-dispose" approach of the linear economy, the circular system tackles climate change, waste, biodiversity loss, and pollution by decoupling economic activity from the consumption of finite resources (Ellen Macarthur Foundation, 2024). Our circular economy approach focuses on minimizing waste and maximizing the value of resources. In the context of recycled fuels, we believe in prioritizing chemical recycling; in the context of energy, we believe in creating hybrid and smarter systems that prioritize efficiency, longevity, the use of renewable resources, and recycling equipment and materials.

Ultimately, our circular approach aims at reducing environmental impacts associated to the energy industry and helping address global challenges like climate change, and pollution.

Purpose

At **Hallow Energy Corp.**, our Circular Economy Policy is guided by a commitment to sustainability, innovation, and responsibility throughout our operations. This policy reflects our dedication to transforming how we use resources and reduce waste, with a strong focus on environmental regeneration and technological solutions, including chemical recycling of plastics, e-waste recovery, and biomass reuse from organic sources such as algae, food waste, and plants.

In doing so, we align with international frameworks like the Paris Agreement on Climate Change, the United Nations Global Compact, and the 2030 Agenda for Sustainable Development. Through these guiding principles and practices, Hallow Energy actively contributes to the achievement of the Sustainable Development Goals (SDGs). Our work promotes clean and renewable energy (SDG 7), drives innovation and sustainable infrastructure (SDG 9), supports resilient and circular communities (SDG 11), advances responsible consumption and production (SDG 12), combats climate change (SDG 13), protects biodiversity and ecosystems (SDG 15), and fosters partnerships for collective impact (SDG 17).

Scope

This policy is publicly available and applies not only to Hallow Energy but also the projects where Hallow Energy has influence. In addition to that, it encourages the adoption of the principles outlined in this policy by its suppliers, contractors, partners,



customers, affected communities, and other stakeholders. However, with the exception of companies, jurisdictions, or circumstances where any part of the policy conflicts with the applicable local regulatory framework.

Core Principles

Following the Ellen Macarthur Foundation, the three core principles to a circular economy are: eliminate waste and pollution; circulate products and materials, and regenerate nature.

Extended Principles

Our policy is built upon the following principles:

- Positive Impact and Regeneration Aware of the urgency to reduce reliance on virgin raw materials, we embrace a regenerative model. Using tools like Life Cycle Assessment (LCA), eco-design, and digital technologies, we strive to optimize resources and create measurable positive impacts at every stage of our operations.
- Advanced Material Recovery We prioritize the recovery of valuable materials from waste streams, especially through cutting-edge processes like chemical recycling of plastics and urban mining of electronic waste (e-waste). By recovering critical raw materials, we reduce the demand for virgin extraction and support a closed-loop materials economy.
- Circular Bioeconomy Solutions We leverage organic waste streams such as algae, food scraps, and plant matter to develop renewable energy and bioproducts. Through these biomass-to-energy and biomass-to-materials initiatives, Hallow Energy contributes to decarbonization, waste reduction, and the regeneration of ecosystems.
- Innovation and Technology for Circularity Hallow Energy drives the integration of circular economy principles through R&D, digitalization, and smart technologies. We invest in scalable innovations—such as Al-driven waste analytics and modular recycling systems—to increase efficiency, traceability, and impact across our circular operations.
- **Decentralized Circular Infrastructure** We support the development of localized recycling and energy recovery systems, enabling communities and industrial zones to reduce waste, generate renewable energy, and minimize transportation impacts. This model strengthens local circular economies and builds community resilience.
- Circular Economy Partnerships Recognizing the systemic nature of circularity, Hallow Energy collaborates with research institutions, technology providers, municipalities, and other companies to pilot and scale circular economy solutions. We believe in open innovation and shared impact.
- Circular Metrics and Transparency We are committed to measuring and reporting the environmental and social outcomes of our circular economy initiatives. This includes tracking material recovery rates, carbon savings, and ecosystem benefits, in line with international frameworks and lifecycle-based approaches.



- Regulatory Compliance Hallow Energy strictly complies with applicable environmental regulations and actively supports the development of forward-thinking regulatory frameworks and international standards that promote sustainable development.
- **Prevention of Harm** We are committed to preventing and reversing environmental damage caused by the overuse of natural resources, poor waste management, and pollution—even in locations where environmental regulation may be lacking.
- Sustainable Sourcing and Use of Renewables Hallow Energy promotes the responsible sourcing and use of renewable and recovered materials in all our activities, including circular resource streams like plastic chemical recycling, e-waste, and biomass. We aim to reduce consumption and encourage responsible practices across the value chain.

Review and approval of the policy

This Circular Economy Policy will be reviewed at least every five years to ensure it remains aligned with the strategic objectives of Hallow Energy and is updated in response to any changes in legislation or regulatory requirements.

The policy is part of Hallow Energy's official policy framework and is available on the company's corporate website and internal communication platforms. It is accessible in Spanish and English—to ensure transparency and facilitate consultation by key stakeholders.