

Stelrad Group plc Environmental Policy

Introduction

Stelrad Group plc ("the Group") is committed to conducting its business in a way that minimises adverse impacts on the environment. It is the Group's policy to identify any potential environmental impacts of its activities and to adopt control measures and business practices that protect the environment. Environmental protection will be approached with a principle of continuous improvement across a range of issues. The Group will comply with all applicable laws, statutes, regulations and codes in force in the UK and in each country of operation across the Group.

Purpose

The purpose of this policy is to set out the Group's goals for preventing and controlling potential risks to the environment caused by the Group's activities. This policy sits alongside and supports our Group Code of Conduct and our Health and Safety policies. Additionally, our environmental goals are underpinned by a range of strategies and measures, which are described in our 'Fit for the Future' sustainability framework.

Scope

This policy applies to all employees within the Group, wherever located. It is not intended to replace specific national policies which have been developed to ensure compliance with local legislation, however, it should be seen as an overarching supplementary policy which establishes the Group's high-level environmental objectives. Local policies must be reviewed and updated in line with this Group policy. In addition, this policy must be observed by all agency staff, contractors, consultants and any other individual working for, at, or on our behalf.

Responsibility for all Group policies and procedures sits with the Group Board, who may review and implement changes at any time where this could further the achievement of our environmental objectives. The implementation of this policy is the collective responsibility of all Group employees, suppliers and subcontractors.

Principles and Objectives

The Group aims to achieve the below objectives:

Energy and Carbon

- 1. Reduce our use of energy by increasing efficiency and implementing process changes.
- 2. Reduce our use of non-renewable energy sources, using renewable energy wherever possible, including switching from fossil fuels such as natural gas, to renewable electricity.
- 3. Work with our stakeholders to reduce carbon emissions throughout the supply chain, including encouraging sustainable travel of our employees and contractors.

Waste and use of resources

- 4. Reduce our consumption of resources, including raw materials, and make use of recycled materials where possible.
- 5. Minimise the amount of waste we produce and ensure that all waste, including hazardous waste, is handled correctly, recycled where possible and only sent to landfill as a last resort.

6. Increase the sustainability of the packaging used for our raw materials and finished goods.

Water

- 7. Manage and promote sustainable water use within our operations and supply chain
- 8. Protect the local surface waters and groundwater from pollution.

Environmental management

- 9. Put in place appropriate environmental management systems, for example, certified to ISO14001. This includes completing detailed environmental risk assessments and maintaining the capability to appropriately respond to any environmental incidents or emergencies.
- 10. Seek to protect the environment and prevent pollution caused by our operations, actively managing noise and emissions from our sites and supporting local biodiversity.

This policy will be supported by training to ensure staff at all levels are aware of and understand the contents of this policy. Achievement of these objectives will be supported by measurement and reporting of a range of internal and external environmental metrics and targets.

Policy review

The Group sustainability team will review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible and approved by the Board. Additionally, the document will be reviewed and approved every two years.

| Responsibility for document: | Group sustainability team |
|------------------------------|---------------------------|
| Effective date: | October 2023 |
| Frequency of review: | Every two years |
| Next review date: | October 2025 |

Version control

| Date | Version | Reason for change | Author |
|--------------|---------|-------------------|------------------------------|
| October 2023 | 1.0 | Initial release | Group sustainability team |
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