



Environmental Policy



AKW Holdings Limited
Including
AKW Medi-care Ltd with Contour Showers Ltd
DLP Limited
AKW International

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Introduction

At AKW, our mission is to make life better through thoughtfully designed, innovative, and accessible living solutions that enhance everyday life and positively impact the communities we serve. In delivering on this mission, we recognise our responsibility to operate sustainably and minimise our environmental footprint.

We are committed to reducing the environmental impacts of our operations and working proactively towards a net zero future. This includes taking meaningful action to conserve water and energy, reduce waste, improve transport efficiency, and explore recyclable and alternative materials across our supply chain.

Achieving our environmental goals requires collaboration. We are dedicated to engaging with our stakeholders—including employees,





customers, suppliers, and community partners—to drive shared value, promote environmental awareness, and embed sustainability into the way we do business.

This Environmental Policy outlines our commitments, objectives, and actions to deliver measurable progress, support long-term resilience, and ensure we contribute to a cleaner, more sustainable future.

Scope

This policy applies to all employees of AKW Holdings Limited, therefore is a Group wide policy. It applies to anyone working for us. This includes employees, workers, contractors, and apprentices, across AKW sites, AKWI and DLP.

Material Topics

The group has considered all material topics suggested by Sustainability Accounting Standard Board, these topics have been identified as:

- Waste Management
- Energy Consumption & Green House Gas Emissions
- Air Pollution
- Materials
- Product End-of-life

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POLICY OBJECTIVES

We aim to achieve the following environmental objectives and targets through this policy:

Environmental Objectives:

Energy and Emissions Management

Monitor and report on energy use and take meaningful actions to reduce our carbon footprint in line with established sustainability targets.

Waste Management

Effectively manage waste generated from our operations by applying the principles of the waste hierarchy: reduce, reuse, and recycle. Recognising waste as a significant environmental risk, we are committed to implementing initiatives that support effective risk mitigation.

Product End-of-Life and Packaging

Promote responsible end-of-life handling of products by providing disposal guidance, and support packaging circularity through appropriate labelling and the use of recyclable materials wherever possible.

Pollution

Operate our facilities in a manner that actively prevents pollution and minimises the environmental impact of our processes.

Resource Efficiency

Reduce our consumption of natural resources, particularly plastics and other non-renewable materials, by improving resource efficiency and exploring innovative, sustainable alternatives.

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Water Consumption

Monitor and report on our water usage, while promoting awareness and education on water conservation and efficiency among employees and stakeholders.

Continuous Improvement

Demonstrate our ongoing commitment to environmental performance by embedding recognised environmental management practices across our operations and addressing all material environmental topics.

ISO 14001 Compliance

Maintain our ISO 14001 certification through continual monitoring, review, and improvement of our environmental management system.

Sustainable Procurement

Integrate environmental and climate-related considerations into our procurement processes, as outlined in our Sustainable Procurement Policy.

Regulatory Compliance

Ensure full compliance with all applicable environmental legislation and with any additional environmental commitments the organisation has voluntarily adopted.

Air Quality Management

Minimise local air pollution through preventive maintenance and dust control measures, such as local exhaust ventilation and filtration systems, to protect employee health and reduce emissions to the surrounding community.

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Environmental Targets

Energy Consumption & Green House Gas Emissions

- Reduce Scope 1 and 2 emissions by 75% by 2040 relative to 2021.
- Address Scope 3 emissions by collaborating with suppliers and partners to achieve a 50% reduction by 2040.
- The AKW group will increase the sourcing of renewable energy by 60% by 2030.
- Replace 25% of natural gas usage at AKW office with biogas in 2026, with a 10% replacement of natural gas per year following this, until we've eventually phased out the use of natural gas.

Waste Management

- Become a net zero waste to landfill business by 2027.
- We will remove the plastic from the packaging of key product lines, addressing 3 product lines in 2025.

Materials, Chemicals and Waste Management

- Achieve net zero waste to landfill across 100% of entities by 2027.
- Remove plastic from the packaging of 3 key product lines in 2025.

Water

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- Report and monitor water consumption, aiming for a 10% reduction in consumption per year.

Air Pollution

- Conduct annual dust emission assessments in all production areas across AKW and DLP sites.

Product End-of-Life

- 100% of cardboard packaging to include recycling logo by end of 2025.
- 100% of product documentation to include disposal guidance by the end of 2026.

POLICY COMMITMENTS

To ensure that our environmental objectives and targets are met in a structured and meaningful way, we commit to the following actions, aligned with best practice in environmental management and tailored to our scale of operations:

- Hold regular ESG Panel meetings to review environmental performance, assess emerging risks and opportunities, and allocate resources for the effective implementation of our sustainability strategy.
- Continuously improve waste management practices by regularly assessing current processes, adopting best-in-class techniques, and integrating feedback from operational teams.



- Review our environmental objectives and targets at least annually to ensure their ongoing relevance, feasibility, and alignment with business and regulatory developments.
- Engage actively with stakeholders, both internally and externally, to communicate our Environmental Policy, share performance progress, and collaborate on sustainability initiatives.
- Promote environmental awareness among our employees through training, internal communications, and engagement activities that highlight the significance of environmental responsibility in daily operations.
- Collaborate with our people, suppliers, customers, and social value partners to enhance overall environmental performance throughout our value chain.
- Embed sustainability and environmental considerations into product development and service delivery, promoting awareness and solutions that support a more sustainable built environment.
- Monitor and respond to external environmental risks, including those arising from climate change, by staying informed on relevant UK, Isle of Man, and international legislation, standards, and best practices.
- Review this Environmental Policy on a regular basis, ensuring that it remains aligned with our evolving business operations, stakeholder expectations, and regulatory landscape.





GOVERNANCE AND REVIEW MECHANISM

At **AKW Holdings**, we maintain a structured governance framework to ensure our Environmental Policy is actively implemented, regularly reviewed, and continuously improved. This framework ensures that our environmental initiatives, compliance obligations, and key commitments are effectively monitored and actioned as we work towards our environmental targets.

Responsibilities for implementation, leadership, and oversight are clearly defined, ensuring accountability and consistency across all sites.

Role	Owner	Responsibility
Policy Implementation	Lauren Jones (Sustainability Manager) – AKW Site Scott Findlay (Production Director) – DLP Site Violaine Pourreau (Executive Assistant) – AKWI Site	Responsible for embedding this policy into our work culture across all sites and engaging with relevant internal and external stakeholders.
Environmental Compliance Lead	Josie Davies (Quality Manager)	Ensures compliance with applicable environmental legislation, standards, and internal requirements. Leads internal audits and

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		manages regulatory updates.
Environmental Initiative Lead	Lauren Jones (Sustainability Manager)	Drives the development and implementation of environmental initiatives and coordinates progress monitoring against set targets.

Review and Continuous Improvement

- This policy will be **formally reviewed at least once annually** by the ESG Committee, with interim reviews conducted as needed in response to significant operational or regulatory changes.
- Updates and performance outcomes will be communicated to senior leadership and relevant departments to ensure continuous improvement and transparency.
- The ESG Panel will also oversee the allocation of resources to support policy implementation and delivery of environmental objectives.

Record of changes

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Signed: ^{Signed by:} *Stephen Murphy*
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Stephen Murphy, Group CEO

Next Review Date: April 2026

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