

[COMPANY NAME]

# Global Environmental Policy

*Our commitment to responsible environmental management across all operations*

Version 1.0 -- Approved by [Approving body]

Effective date: [DD Month YYYY] -- Next review: [DD Month YYYY+2]

Owner: [Chief Sustainability Officer / Head of HSE]

Applies to: All operations and entities covered by the EcoVadis assessment

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## 1. Introduction & Purpose

[COMPANY NAME] is committed to conducting its operations in a manner that is environmentally responsible, science-aligned, and compliant with all applicable regulations. This Global Environmental Policy (the "Policy") formalises our commitments across all environmental dimensions, replacing any prior environmental policy.

We recognise that strong environmental management is both an ethical imperative and a business opportunity -- reducing costs, managing regulatory risk, meeting customer expectations, and supporting our EcoVadis score. This Policy aligns with the Paris Agreement (1.5 degree C trajectory), the GHG Protocol Corporate Standard, ISO 14001 (Environmental Management Systems), ISO 50001 (Energy Management), EU REACH Regulation, and the Kunming-Montreal Global Biodiversity Framework.

## 2. Scope

This Policy applies to all employees, departments, and subsidiaries of [COMPANY NAME] across 100% of its operations and legal entities covered by the EcoVadis assessment, including all manufacturing sites, offices, logistics operations, and subsidiaries. It is binding on all employees, contractors, and on-site service providers. Where local regulations impose stricter environmental requirements than those set out herein, the stricter standard prevails.

## 3. Energy & Climate Strategy

We integrate climate and energy criteria at every stage of our operations. Our commitments align with the Paris Agreement goal of limiting global warming to 1.5 degrees C and with the GHG Protocol Corporate Standard. The Company measures and discloses Scope 1, Scope 2, and material Scope 3 GHG emissions annually.

### 3.1 GHG Emissions & Decarbonisation

[COMPANY NAME] commits to a science-based decarbonisation pathway validated by the Science Based Targets initiative (SBTi). We measure Scope 1, Scope 2 (market-based and location-based), and material Scope 3 emissions in line with the GHG Protocol, and submit an annual response to CDP's Climate Change Questionnaire.

We require strategic suppliers representing [XX]% of Scope 3 Category 1 spend to complete an annual GHG inventory and share verified emissions data. We integrate a carbon criterion into key sourcing decisions and request decarbonisation roadmaps from strategic suppliers.

GHG emissions data (Scopes 1, 2 and 3) are independently verified and disclosed annually in our CSR/ESG Report and CDP Climate Change submission. Progress against decarbonisation targets is reviewed quarterly by the Sustainability Committee and reported to the Board.

Qualitative objectives	Quantitative targets (KPIs)
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Align Company GHG reduction trajectory with a 1.5 degree C-consistent SBTi-approved pathway	Reduce Scope 1 & 2 GHG emissions by [XX]% in absolute terms by [TARGET YEAR] vs [BASELINE YEAR]
Reduce Scope 3 upstream emissions across all material categories	Reduce Scope 3 GHG emissions by [XX]% in absolute terms by [TARGET YEAR] vs [BASELINE YEAR]
Achieve net-zero emissions across Scopes 1, 2 and 3	Reach net-zero GHG emissions by [NET ZERO YEAR]

### 3.2 Energy Management

The Company is committed to improving energy efficiency across all its operations, in line with the principles of ISO 50001. We conduct energy audits at all major sites on a [biennial] basis and implement recommended efficiency measures.

We are transitioning to 100% renewable electricity through Power Purchase Agreements (PPAs), green tariffs, or on-site generation, and are deploying building energy management systems (BEMS) at all manufacturing sites. We are electrifying our vehicle fleet, targeting [XX]% electric vehicles by [TARGET YEAR].

Energy consumption data are collected at site level, consolidated annually, and disclosed in the CSR/ESG Report.

Qualitative objectives	Quantitative targets (KPIs)
Transition to 100% renewable electricity sources	100% renewable electricity by [TARGET YEAR]
Improve energy efficiency across all operational sites	Reduce total energy consumption per unit of production by [XX]% by [TARGET YEAR] vs [BASELINE YEAR]

## 4. Water Management & Biodiversity

We recognise water as a shared, finite resource and are committed to responsible stewardship at all our operational sites, with particular attention to facilities in water-stressed basins as identified by the WRI Aqueduct tool. We further commit to protecting biodiversity and avoiding adverse impacts on ecosystems in and around our operational footprint, in alignment with the Kunming-Montreal Global Biodiversity Framework.

We conduct site-level water risk assessments annually and implement closed-loop water recycling systems at manufacturing sites. We monitor water withdrawal, consumption, and discharge by source and quality parameter. All operations are mapped for proximity to biodiversity-sensitive areas (IUCN Key Biodiversity Areas, UNESCO Biosphere Reserves), with site-specific biodiversity management plans implemented where relevant.

We participate in relevant water stewardship initiatives (e.g., CEO Water Mandate, Alliance for Water Stewardship) where applicable. We eliminate the use of substances harmful to aquatic ecosystems in line with REACH and local chemical regulations.

Water metrics (withdrawal, consumption, discharge by source) are collected annually and disclosed in our CSR/ESG Report and, where applicable, in our CDP Water Security submission. Biodiversity assessments and management plan outcomes are disclosed annually.

Qualitative objectives	Quantitative targets (KPIs)
Reduce water consumption and protect water quality at all sites, prioritising high water-stress locations	Reduce water withdrawal by [XX]% at high water-stress sites by [TARGET YEAR] vs [BASELINE YEAR]
Improve water recycling and reuse across manufacturing operations	Achieve a water recycling rate of [XX]% at manufacturing sites by [TARGET YEAR]
Assess and address biodiversity risks at all operational sites	100% of sites assessed for biodiversity sensitivity by [TARGET YEAR]
Achieve zero water discharge non-compliances	Zero non-compliance events with water discharge regulations per year

## 5. Air Quality & Chemical Management

We are committed to minimising air pollutant emissions from our operations and to the responsible management of chemical substances throughout their lifecycle. We operate in full compliance with the EU REACH Regulation (EC No 1907/2006) and applicable local air quality regulations.

### 5.1 Air Pollution Control

[COMPANY NAME] installs and maintains continuous emissions monitoring systems (CEMS) for VOCs, SO<sub>2</sub>, NO<sub>x</sub>, and particulate matter at all major emission points. We implement leak detection and repair (LDAR) programmes for refrigerants and other fugitive emission sources.

We actively work to substitute hazardous substances with safer alternatives where technically and economically feasible, and we track reduction in total air pollutant loads as part of our annual environmental performance review.

Air pollutant emissions data are collected and reported annually in the CSR/ESG Report. Any regulatory non-compliance is logged and remediated within [30/60] days.

Qualitative objectives	Quantitative targets (KPIs)
Reduce total air pollutant emissions from Company operations	Reduce total air pollutant emissions (VOCs, SO <sub>2</sub> , NO <sub>x</sub> , PM) by [XX]% by [TARGET YEAR] vs [BASELINE YEAR]
Achieve zero regulatory non-compliances related to air emissions	Zero confirmed air emission regulatory violations per year

### 5.2 REACH & Chemical Stewardship

We maintain a comprehensive chemical inventory, including Safety Data Sheets (SDS) for all substances used, and actively substitute Substances of Very High Concern (SVHCs) identified under

REACH. All products placed on the EU market comply with REACH registration, evaluation, and authorisation requirements, with SVHCs disclosed above 0.1% w/w in articles.

We require REACH compliance declarations from suppliers for all chemical inputs, and conduct chemical inventory audits on a [annual/biennial] basis. REACH compliance status is reviewed at least annually by the legal and procurement teams.

Qualitative objectives	Quantitative targets (KPIs)
Ensure 100% REACH compliance for all products placed on the EU market	100% of applicable products REACH-compliant -- ongoing
Progressively eliminate Substances of Very High Concern (SVHCs) from operations	Reduce number of SVHCs in use by [XX]% by [TARGET YEAR] vs [BASELINE YEAR]

## 6. Circular Economy & Waste Management

We adopt circular economy principles and apply the waste hierarchy (Prevent > Reduce > Reuse > Recycle > Recover > Dispose) across all operations. We are committed to eliminating unnecessary packaging, increasing the use of recycled and recyclable materials, and diverting waste from landfill.

We conduct annual waste stream mapping and source separation at all production facilities, with documented waste segregation protocols. Certified waste management contractors handle hazardous waste, and treatment is verified through waste transfer notes and certificates. We implement a packaging optimisation programme and design products for disassembly and end-of-life recyclability, applying Life Cycle Assessment (LCA) methodology for key product lines. We participate in extended producer responsibility (EPR) schemes in all jurisdictions where required.

Waste generation data (by type and treatment method) and packaging material consumption data are collected and reported annually in the CSR/ESG Report.

Qualitative objectives	Quantitative targets (KPIs)
Reduce absolute waste generation across all operations	Reduce total waste generated by [XX]% by [TARGET YEAR] vs [BASELINE YEAR]
Maximise waste diversion from landfill	Achieve [XX]% waste diversion rate (recycled or recovered) by [TARGET YEAR]
Reduce hazardous waste generation	Reduce hazardous waste generated by [XX]% by [TARGET YEAR] vs [BASELINE YEAR]
Increase recycled content in packaging	[XX]% recycled content in primary packaging by [TARGET YEAR]
Ensure zero hazardous waste sent to non-certified disposal sites	Zero incidents of hazardous waste sent to non-certified facilities per year

## 7. Product Environmental Impact

We are committed to reducing the environmental impact of our products throughout their lifecycle -- from raw material extraction through manufacturing, distribution, use, and end-of-life. Customer and consumer health and safety are integral to our product stewardship approach.

We conduct Life Cycle Assessments (LCAs) for key product families to identify environmental hotspots and inform eco-design decisions. We pursue relevant environmental certifications and ecolabels (e.g. ISO 14025, EU Ecolabel, Cradle to Cradle) and disclose Environmental Product Declarations (EPDs) for key product lines. We ensure all product formulations comply with restrictions on hazardous substances (REACH, RoHS) and offer take-back or refurbishment schemes where feasible.

Product environmental performance data -- including LCA outcomes, certification coverage, and recycled content -- are disclosed annually in the CSR/ESG Report.

Qualitative objectives	Quantitative targets (KPIs)
Apply LCA methodology to key product lines to inform eco-design decisions	[XX]% of key product lines with completed LCA by [TARGET YEAR]
Expand coverage of environmental certifications and ecolabels	[XX]% of products covered by an environmental certification or ecolabel by [TARGET YEAR]
Ensure product chemical safety and zero recalls	Zero product recalls due to chemical safety non-compliance per year

## 8. Performance Metrics & Reporting

We are committed to transparent and measurable reporting on our environmental performance. The following KPIs are tracked annually and disclosed in our CSR/ESG Report and, where applicable, submitted to third-party rating bodies (e.g. EcoVadis, CDP).

Indicator	Unit	Frequency
Scope 1 GHG emissions	tCO2e	Annual
Scope 2 GHG emissions (market-based)	tCO2e	Annual
Scope 3 GHG emissions (material categories)	tCO2e	Annual
Total energy consumption	MWh	Annual
Renewable electricity share	%	Annual
Energy intensity (per unit of production)	MWh / unit	Annual
Total water withdrawal	m3	Annual
Water recycling rate	%	Annual
Total waste generated	tonnes	Annual
Waste diversion rate (recycled or recovered)	%	Annual
Hazardous waste generated	tonnes	Annual

Total air pollutant emissions (VOCs, SO2, NOx, PM)	kg	Annual
Number of SVHCs in use	#	Annual
% of product lines with completed LCA	%	Annual
% of employees trained on environmental topics	%	Annual
Number of environmental non-compliance incidents	#	Annual

## 9. Governance & Accountability

The Board of Directors of [COMPANY NAME] endorses this Policy and is accountable for its implementation. Day-to-day responsibility is delegated to the [Chief Sustainability Officer] in partnership with the [Head of HSE]. Executive compensation includes an ESG performance component directly linked to the quantitative environmental targets set out in this Policy.

This Policy is communicated to all employees upon onboarding and whenever it is materially updated. It is published on the Company's intranet and on its public website. Mandatory annual environmental training is delivered to all employees with direct environmental responsibilities, with completion tracked in the Learning Management System.

Environmental compliance audits are conducted [annually / biennially] at all major operational sites. Non-compliance incidents are logged and corrective action plans implemented within [30/60/90] days. The [Chief Sustainability Officer] reports to the Board annually on compliance with this Policy, including performance against targets, audit findings, and improvement actions.

This Policy is reviewed at a minimum every two (2) years, or following significant legislative changes, material organisational changes, audit findings, or achievement of a major target milestone. The current version supersedes all previous environmental policies.

## 10. Versioning & Approval

This Policy supersedes any previous Environmental Policy issued by [COMPANY NAME].

Version	Date	Summary of changes	Approved by
1.0	[DD Month YYYY]	Initial publication.	[Approving body]

### Approval & Signatures:

<b>Chair of the Board of Directors</b> Name: _____ Title: _____ Date: _____ Signature: _____	<b>Chief Executive Officer</b> Name: _____ Title: _____ Date: _____ Signature: _____
<b>Chief Sustainability &amp; Compliance Officer</b>	<b>Chair of the Audit &amp; Risk Committee</b>

Name: _____	Name: _____
Title: _____	Title: _____
Date: _____	Date: _____
Signature: _____	Signature: _____

*For questions about this Policy: [sustainability@companyname.com]*

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