

|                             |                   |              |
|-----------------------------|-------------------|--------------|
| <b>Environmental Policy</b> | <b>Reference:</b> | 2M-IMS-PO 02 |
|                             | <b>Revision:</b>  | 3            |
|                             | <b>Date:</b>      | April 2024   |

2M Holdings Ltd is committed to ensure a safe and healthy work environment and to minimise the impact on the environment resulting from the group's activities. We aim to strictly adhere to the obligations of environmental law and implement best practice whenever practicable to protect the environment. 2M Holdings Ltd, in line with its Integrated Management System (IMS) and ISO14001:2015 certification, aims to:

**Comply with all relevant regulatory obligations.** We monitor, track and regularly assess chemical and environmental legislation, and ensure that its requirements are actioned, documented and communicated to all relevant stakeholders.

**Strive for continual improvement in environmental performance.** We set and review environmental objectives at a group, business and site level, and review these annually via our certifications to ISO 14001:2015.

**Consider the environmental hazards of existing and new products/ developments.** We make environmental considerations when changes to products, processes or equipment/ infrastructure are made.

**Make special considerations for pertinent environmental issues, such as:**

1. **Energy consumption and Greenhouse gases.** We monitor group energy usage and review annually, identifying any areas of high usage and produce action plans to reduce energy usage. We comply with all legal obligations relating to energy data collection and reporting (e.g. SECR; ESOS).
2. **Water.** We strive to prevent pollution by carrying out regular in-house and external monitoring of trade effluents. Where possible, water used in production is sourced directly from aquifers (e.g. by use of a borehole), which eliminates the need for energy-intensive purification as required with mains water.
3. **Local Pollution.** Our premises have strict environmental containment arrangements monitored during the management review process. Operational sites have effluent and stormwater run-off consents from the local municipal authorities which are subject to internal controls and external monitoring.
4. **Chemicals/ materials.** Our product stewardship and management of change processes ensure the identification of any substances with concerning environmental properties (Environmentally hazardous, PBT (persistent, bio-accumulative and toxic), vPvB (very persistent, very bio accumulative), PMT (persistent, mobile and toxic) and vPvM (very persistent, very mobile) - we aim to phase out such existing substances as soon as practicable.
5. **Waste.** The generation of waste is kept to a minimum and recycled or re-purposed whenever possible. Any waste that cannot be re-purposed is sent to certified waste disposal companies to ensure disposal in accordance with national and local regulations. This activity is reported to our Responsible Care organisation and

monitored during the management review process. We actively carry out duty of care on all waste contractors in line with UK and EU regulation.

6. **Biodiversity** (e.g. impacts from operations on protected areas, endangered species). The possible business impact on the environment is closely monitored at our COMAH (Control of Major Accident Hazards/SEVESO III) sites by the relevant Competent Authorities, and action plans put into place to further reduce the risks whenever possible. Our non-COMAH sites adopt similar approaches through certification to ISO 14001.
7. **Promotion of Sustainable Consumption.** We support sustainable consumption by providing, whenever possible, alternative products and blends along our supply chain via our Business Units.

2M Holdings Ltd works to the chemical industry's Responsible Care® programme. We expect cooperation and commitment of all employees, contractors, visitors and customers to ensure a safer and healthier environment.



**Mottie Kessler OBE**  
**CEO & Chairman**

**Date:** 19 April 2024