

ESG POLICY

SCOPE & AIM

This policy outlines the aims for Environmental, Social, and Governance within the Aquaspersions Group with agreement and engagement from the relevant key influencers of the decision-making processes integral to achieving these objectives. These objectives have been set with the intention to improve our positive impacts, and reduce our negative impacts on employees, the wider community, our customers and suppliers and the environment.

The aim of this policy is to provide a framework for the business longer term and allow us to incorporate the principals this policy follows into our integrated management system by including ESG topics and performance in regular management reviews, KPI's and day-to-day business operations with an overall aim to go beyond basic compliance, as such **all objectives within this document have an initial target date of 2030** and will use 2025 as a baseline unless otherwise specified.

A mixture of qualitative and quantitative objectives have been set to allow the business to integrate these into day-to-day decision making and give rise to wider methods of achieving the overall desired outcomes where there may be multiple possible means of progressing towards the end goal.

REVIEWS

The objectives set as part of this policy will have a documented review by the relevant stakeholders annually as part of business reviews, and in line with ISO systems. It will also be integrated into annual briefings to provide ongoing awareness of progress, and to ensure good engagement with employees at all levels of the organisation.

This policy may be updated and the content adapted as the context of the business changes or areas are identified that would benefit from being included in this policy.

RESPONSIBILITY

Various internal roles will be key to achieving the targets this policy sets out, and where required, responsibilities will be assigned to ensure objectives are achieved.

DARREN BUDD

MANAGING
DIRECTOR

JACK MYERS

HSE
MANAGER

ENVIRONMENTAL

One of our key overarching ambitions is to achieve Net Zero by 2050, in line with several global agreements. However, we realise that looking after the environment is not just about net zero, as such we have set objectives to address other identified aspects of the environment that may benefit from long term objectives.

1. Reducing Energy Use

We aim to minimise energy use throughout our operations. To achieve this, we will improve the energy efficiency of our production processes. Further development of our production processes & products will consider energy efficiency as a key element in the decision-making process for new and existing product chains.

Objective:

Implement a plan to reduce our electric usage year on year, through equipment and process optimizations

2. Emissions/GHG

We are committed to reducing our overall environmental impact and greenhouse gas emissions. To do this we will continue to understand our Scope 1, 2 and 3 emissions and set SBTi's aligned GHG reduction targets to meet our Carbon Net Zero target of 2050.

Objectives:

Create an emissions inventory for the site covering all 3 scopes.

Publish and adhere to an SBTi aligned net zero roadmap on the website with associated targets and tracking, publish updates via our website to inform stakeholders of our progress.

3. Reducing Water Use and Effluent Waste

We are committed to reducing the amount of non-essential water we use, we will continue to identify opportunities to reduce the amount of water used and hazardous effluent generated as part of our processes. Alongside this we will investigate ways to utilize water in more environmentally friendly ways through onsite water collection, recycling & reuse.

Objective:

Implement various projects, processes, and equipment to reduce the overall usage of non-product-based water.

4. Biodiversity & Localised Pollution.

We are committed to ensuring that we support the biodiversity of our local environment, and that we minimise our pollution to air, land and water.

Objectives:

Implement various projects to improve and promote the biodiversity of the local area within our site boundaries.

Eliminate, or minimise fugitive emissions to land, air, and water to reduce risk of our activities affecting the local environment.

5. Environmental & safety impacts from our products and end of life

As a chemical manufacturer, we recognise that our products have associated risks for our customer base, and risks to the environment. We will work to reduce or mitigate these risks through reviewing our offerings to understand how best we can reduce risks to the environment and customers.

Alongside this we will investigate methods that we can use to reduce the impact of our products end of life through sustainable recycling of packaging, and other materials with our customer base, supply chain and waste management partners.

Objectives:

Conduct a review of raw materials & formulations to understand if we can reduce environmental risk, or risks to customer safety through the substitution of materials with less hazardous alternatives. By 2030 achieve documented reviews of 100% of our most hazardous substances.

Investigate end of life packaging processing with our customers and waste carriers to understand if we can reuse or recycle our packaging.

Reduce our total waste to landfill by 100% by 2030 based on a 2025 baseline.

SOCIAL

Aquaspersions is committed to respecting internationally recognized human rights and fundamental labour rights, in line with standards such as the UN Guiding Principles on Business and Human Rights, ILO Core Conventions, the International Bill of Human Rights, and the OECD Guidelines for Multinational Enterprises. While this policy does not specifically cover additional standards for certain vulnerable groups, a zero-tolerance approach to human rights abuses applies across all operations and activities.

The Aquaspersions Labor Practices & Human Rights Policy outlines our approach and objectives against the following areas:

- Employee Health & Safety
- Working Conditions
- Social Dialogue
- Career Management & Development
- Diversity, Non-Discrimination Harassment

A summary of the social objectives against each area is outlined below:

Area of Focus	Objectives
Employee Health & Safety	Improve our safety performance year-on-year by maintaining a declining trend in incident rates using 2025 as our baseline and ensuring 100% of employees receive annual safety training in key areas.
Working Conditions	We will measure our total headcount, diversity, absence and attrition rate monthly. Our target is to have no more than 2% absence and 2% attrition rate on a monthly basis across the Group.
Social Dialogue	We will measure our engagement levels through an annual employee survey; implemented across each site. Our target is to achieve 100% completion rate and 75% of our employees recommending Aquaspersions as a good place to work.
Career Manager & Development	We will measure our development of the approach through appraisal completion and career development objectives in place with a target of 100% of appraisals being completed. We will also measure number of hours trained with a target of an average of 3 hours training per employee per annum.
Diversity, Non-Discrimination and Harassment	We will monitor and report annually on our workforce composition, including total headcount and diversity metrics such as gender and ethnicity. We are committed to fostering a diverse and inclusive workplace by increasing the representation of underrepresented groups over time, while ensuring fair, equitable, and inclusive recruitment, development, and promotion practices. Progress will be reviewed regularly to support continuous improvement and accountability.

GOVERNANCE

1. Supplier Code of Conduct

In 2026, we will review and enhance the scope of our Supplier Code of Conduct and communicate the updated expectations to our suppliers. Strong relationships with suppliers and third parties are essential to achieving sustainable business growth.

The Supplier Code of Conduct supports this ESG policy by ensuring that environmental performance is a key consideration in our decision-making processes and a driving force in how we influence our supply chain.

Objectives:

By 2030, we aim to have 80% of suppliers that represent the top 70% of our raw material spend, signed up to our Code of Conduct.

We will also demonstrate how this commitment informs our decision-making. In addition, these suppliers will be required to complete a Supplier Sustainability Assessment, through which we will evaluate and score their ESG performance.

2. Sustainable Procurement Policy

In 2026, we will develop and implement a Sustainable Procurement Policy, establish clear objectives, and monitor performance against these targets. This approach will strengthen and add further value to our integrated management system.

Objectives:

By 2030, we will fully implement our Sustainable Procurement Policy, ensuring 100% of procurement activities align with its principles.

We will establish measurable targets and track performance annually, embedding sustainable decision-making across all purchasing processes and continuously improving outcomes within our integrated management system

3. Governance - Cyber Security and Data Protection

Aquaspersions complies with all applicable data privacy laws and regulations including GDPR. We have appointed an external data protection officer and achieve Cyber Essentials plus accreditation.

Objectives:

We will continue to achieve Cyber Essentials plus accreditation, establish an escalation route for any GDPR concerns which will include a remediation of any issues raised.

4. Governance - Anti-Bribery and Corruption

It is the policy of Aquaspersions to conduct all our business in an honest and ethical manner. We will review our Anti-Bribery and Corruption Policy and ensure the policy is fit for purpose, is issued to all new starters as part of the induction programme and deliver refresher training.

Objectives:

We will ensure our policy is revised at least annually and all team members are trained on Anti-Bribery on a bi-annual basis.