

Environmental Policy v 1.12

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1. Objective

Electrical Waste Recycling Group Limited T/A Waste Experts (“Waste Experts”) deals directly with E-Waste to return as much material back into the supply chain as current regulations and technology will allow. Waste Experts actively protects the environment from harm and degradation while carrying out its activities, minimising GHG emissions and capturing any substance that is likely to cause harm to the environment. Waste Experts avoids any material being placed in landfill, unless there is no other suitable treatment option available, reducing the amount of material that is incinerated for energy, focusing on reuse, repurposing and recycling.

2. Purpose

The purpose of this policy is to deliver the highest quality service, incorporating electrical waste recycling, subcontracted services for difficult wastes, producer compliance and environmental consultancy. Our goal is to maintain a safe working environment with a ‘can-do’ culture that empowers all employees to challenge any activity that is deemed to be at odds with our strategy and values.

2.1 Our values

Our values serve as the guiding principles for Waste Experts, shaping our culture, decisions and interactions as we work towards a more efficient, responsible and sustainable waste management industry.

- **Flexibility** – we embrace adaptability and agility, recognising that the waste management industry is dynamic and constantly evolving. This enables us to respond quickly to client needs and changing environmental challenges, regulatory changes and mitigate the effects of climate change on our business.
- **Reliability** – we delivery consistent, dependable waste management solutions, allowing our customers to focus on the needs of their business with confidence that their own operations minimise environmental impact.
- **Responsibility** – we take ownership of our environmental and social impact, operating to the highest ethical standards while prioritising safety, compliance, and environmental stewardship.
- **Sustainability** – is at the core of everything that we do, as a BCorp certified business, we actively reduce environmental impact and promote circular economy principles to support a healthier planet for future generations.
- **Honesty** – we are open, transparent and accountable for all of our activities, encouraging clear communication and trust across our employees, clients, and communities.

3. Scope

The policy is applicable to activities at all of our own operated locations: -

- Huddersfield AATF – School Lane, Huddersfield. HD5 0JS
- National Customer Support Centre – Belmont Industrial Estate, Durham. DH1 1TH
- Marks Tey Transfer Station – Colchester, CO6 1EQ
- Emerald Street Operating Centre – Huddersfield, HD1 6BY

Together with team members that work flexibly and remotely, while working in their own home, or at a clients site, our subsidiary company, WERCS Limited, contractors working at any of our sites, and subcontracted suppliers who work with our clients.

The policy applies to all employees across all parts of the business without exception.

Waste Experts will uphold the highest levels of business ethics in our own operations and those of our suppliers. We use the EcoVadis platform to monitor our supply chain impact.

Waste Experts have stringent legal compliance requirements as detailed in our Environmental Permit reference QP3034KA and monitor current and new regulations to ensure continued compliance, working with the relevant regulatory bodies to consult on proposed changes. Our Impact and Aspects register provides a comprehensive cause, effect and mitigation plan for all of the activities carried out by Waste Experts.

The Senior Management Team are committed to ensuring that all activities are carried out within the framework of this Policy. In order to ensure that the Policy is implemented across the business, Senior management will review at quarterly business update meetings and confirm achievement at the annual ISO management review meeting.

4. Policy

This policy will be enforced across our business with no exceptions. In particular, reporting of any environmental incident is mandatory within our permit (reference QP3034KA/v003), and all non-conformance reported internally or externally will be fully investigated, with a clear action plan in place to prevent recurrence.

Employees who deliberately disregard this policy and its content, or are in any way responsible for harm to the environment in their role with Waste Experts, will be subject to formal investigation and potential disciplinary action.

Jane Richardson – Head of Environmental Services is responsible for the implementation and monitoring of this policy. As part of the Senior Leadership team, there is total autonomy to hold any employees to account for their actions. Any concerns or queries can be raised directly by phone 01484 240327, by email jane@wasteexperts.co.uk, or anonymously via the complaints form on our website <https://wasteexperts.co.uk/contact-us>.

4.1 Our strategy

Our environmental strategy is aligned with our BCorp commitments and structured across 3 pillars

1. **Planet** – to reduce our environmental impact with an ethical focus on our own operations and those of our supply chain.
2. **People** – we aim to create an inclusive, caring and rewarding culture which attracts, retains and develops the best talent.
3. **Communities** – to deliver social value within the communities in which we operate, working with our stakeholders to foster mutual benefits.

4.1.1 Accountability

Our Senior Leadership Team (SLT) is responsible for the implementation of this policy and our objectives through our vision, mission and values. To deliver our objectives, every team member has a vital role to play in delivering social value and maintaining our sustainable environmental goals. Our people committee represent our team members and is responsible for promoting this policy and initiatives to support our commitment. Our Managing Director has ultimate responsibility for the implementation of our environmental strategy, supported by the Head of Environmental Services.

4.1.2 Governance

Waste Experts uphold the highest levels of business ethics in our own operations and those of our suppliers using the EcoVadis platform to monitor the impact of our supply chain. Our Environmental Permit reference QP3034KA/v003 invokes stringent environmental compliance requirements, and as a business we work to exceed these requirements and working with the regulators to shape future environmental laws aimed at improving the planet for all.

The Senior Management Team are responsible for ensuring that activities are carried out within the framework of this policy, ensure its implementation across the business and is reviewed quarterly at business update meetings and annually at the ISO management meeting to confirm achievement of the policy and its objectives.

4.2 Our Planet

4.1.3 Priorities

Waste Experts is committed to leaving the planet in a better place as a result of our activities, acting as stewards of the environment, reducing greenhouse gas emissions and improving a circular economy.

1. **Sustainability** – Waste Experts are committed to continual improvements to meet current requirements and safeguard the future of the environment. This includes the following actions

- Complying with the spirit as well as the letter of environmental legislation, codes of practice and other requirements whilst maintaining open communication with all regulatory bodies.
 - Proactive management of activities in line with the [Environmental Agency Appropriate Measures Guidance](#) to be an industry leader for treatment standards.
 - Assessing the environmental effects of its policies and operations to prevent pollution, reduce environmental impacts and reduce CO2 emissions.
 - Evaluating and investing in new techniques and technologies that will provide benefits to the environment for the company and our customers.
2. **Suppliers** – it is our responsibility to ensure all stakeholders within our supply chain are treated fairly, are not exploited in any way and are working in safe conditions. This includes the following:
- Continually evaluating our suppliers' environmental policies and performance whilst seeking to influence suppliers of materials and services to adopt policies which are consistent with those of Waste Experts
 - Ensuring suppliers have signed and abide by the Waste Experts Code of Conduct, with a commitment to 80% of our top 80% by spend suppliers to have signed the code of conduct.
 - To use local suppliers (within 50 miles of a site) where possible, but always for catering facilities for visitors and staff.
 - Managing our downstream partners to reduce energy and water consumption throughout the supply chain, ensuring all further processing is in line with Waste Experts' Code of Conduct.
 - Monitoring supplier performance through EcoVadis
 - Encouraging partners to adopt low-carbon fuels and fleet upgrades
3. **Environmental Protection** - Waste Experts manage activities to protect the environment through the use of sealed drainage on its processing site to prevent pollution from hazardous materials such as mercury, lead, cadmium, and persistent organic pollutants (POPS). We protect biodiversity and ecosystems within the scope of our operations and those of our suppliers, by maintaining green spaces at Waste Experts managed locations, the maintenance of our well-being garden, designed to attract insects and bees, and to encourage team members to log wildlife species to track our impact.
4. **Energy Management** -we work to reduce energy used across our managed locations, and source the majority of energy from renewable sources. All lighting is being replaced with LED light sources, including emergency lighting across our sites. Our processing operations and logistic departments have the highest energy usage and all team members are committed to reducing this to the lowest levels through:
- Route optimisation and dynamic scheduling to minimise vehicle mileage, particularly in high-frequency, event-driven environments
 - Use of telematics and driver behaviour monitoring systems to promote fuel-efficient driving and reduce idling

- Operating a modern Euro 6 compliant fleet to reduce NO_x and CO₂ emissions
 - A structured transition plan to low and zero-emission vehicles (including electric and alternative fuels) as technology and infrastructure develop
 - Increasing backhauling opportunities, ensuring vehicles are utilised efficiently on return journeys
 - Prioritising recycling and reuse over energy recovery and disposal, in line with the Waste Hierarchy
 - Partnering with high-efficiency, accredited treatment facilities with strong environmental performance
 - Supporting closed-loop recycling systems, reducing the need for virgin material production (and associated emissions)
 - Minimising process loss and contamination, ensuring more material is successfully recycled
 - Encouraging treatment partners to use renewable energy and energy-efficient processes
5. **Waste and Circular Economy** – we aim to reduce not only waste from our operations, but the waste product left from processing of E-Waste to a minimum through correct segregation of materials, manual disassembly to recover secondary raw materials, including critical and rare earth metals to reduce the requirement for virgin products. Waste Experts continually innovates to achieve the highest recycling and recovery rates in line with current legislation and available technology to create virgin raw material replacements.
6. **Water Management** – Waste Experts has a low water consumption and uses no wet processes within our treatment facilities. Water use is monitored, and measures are taken to reduce use where possible
- All welfare facilities are maintained to high standards, with smart features where possible to reduce water, and leaks are located and resolved immediately.
 - Drinking water is supplied by monitored water stations to prevent taps from running.
 - Smart meter digitally monitored by Yorkshire Water, and internal processes, these are reported annually within our impact report.
7. **Responsible sourcing** – the relationship with our supplier partners is based on fair, open and honest trading, our supplier code of conduct sets out the standards and behaviours that are expected when working with us. The code aligns to recognised regulations and ethical trading standards and requires all of our suppliers to adopt the expectations and commitments set out within the code and apply this within their scope of business and influence. Our key suppliers are evaluated on an annual basis, with a risk matrix completed.

Waste Experts has a zero tolerance of any form of forced labour from any of our suppliers, and are assessed annually through the EcoVadis platform, inviting supply partners to do the same in order to remain as a trading partner.

4.3 Our People

4.3.1 Priorities

Our people are very important to the continued success of our business and are our greatest asset. To this end, their well-being and development are of the utmost importance to us. Our commitment to Investors in People (IIP) and Investors in Wellbeing (IIW) provides a framework for the training and development of all colleagues.

- **Leadership Training** – all of our managers are enrolled on a manager learning path either before promotion if identified during performance reviews, or once promoted. Further management training will be provided to all managers regularly. Sales and commercial managers will be enrolled in Sandler Training.
- **Well-being** – Waste experts take both the mental and physical well-being of all staff seriously. We have fully trained mental health first aiders who offer support to colleagues in need. Regular well-being surveys will be carried out for all team members, with initiatives implemented as required.
- **Communication** – our teams are surveyed annually in line with our IIP accreditation to track improvements in our actions, or implement further actions as needed. In addition, our people committee (Better Together) meet quarterly to improve departmental collaboration, review working processes, review recognition and awards and act as well-being champions.
- **Equity and diversity** – team members are recruited irrespective of age, gender, religious beliefs or nationality but rather on their ability to perform the tasks, develop their skills and make a positive contribution to the development and growth of our business, It is our policy that team members are treated with respect at all times, and bullying or harassment will not be tolerated at any level with the organisation.

4.4 Our Communities

4.4.1 Priorities

Waste Experts continues to contribute to social value within the local community through staff volunteering opportunities and through partnerships that support employment for underrepresented and disadvantaged groups or individuals. Every team member within Waste Experts is given 1 full day of paid volunteering per year.

- **Volunteering** – provides employees with an opportunity to develop new skills, and allows working and collaboration with new teams, but most importantly, it provides a rewarding experience that gives individuals a feeling of purpose and meaning, making a real difference and a sense of personal achievement. The charities we wish to support are chosen each year by our employees, who have both opportunities to volunteer with these charities or with other organisations.

5. Responsibilities, expertise and management

To deliver our environmental strategy and create social value while meeting our sustainability targets, Waste Experts will:

- Support the Head of Environmental Services to bring our ambitions to fruition, working with regulators to help shape and implement changes to regulations.
- Established a people committee (Better Together), dedicated to bringing the different parts of the business together to support our Sustainability and Social Value (SSV) initiatives.
- Have a dedicated Environmental Services division focused on environmental performance, support for our registered producers and maintenance of our ISO 14001, BCorp and EcoVadis accreditations.
- Actively promote environmental consultancy, such as recyclability testing, to improve product design to facilitate improved recycling performance and enhance circular economy principles.
- Actively participate in, and create environmentally based training and consultation for all parts of the wider business to support environmental protection.

Waste Experts will ensure that all activities will meet and satisfy relevant regulatory, legislative and compliance obligations at international, national and local levels, working with trade associations to raise standards across the industry. Where no regulations exist, we will set our own appropriate high standard. We will continually measure and report performance against set targets within our annual impact report, linking these to the Sustainable Development Goals where applicable.

6. Qualitative and Quantitative Commitments

6.1 Our Planet

6.1.1 Energy use – recycling operations

Waste Experts uses an energy-intensive process for the mechanical treatment of material received, particularly in relation to the removal of residual mercury from fluorescent lamps. Purchased energy is guaranteed 100% from renewable sources, we are committed to reducing energy consumption to the lowest levels possible in line with our commitment to achieve net zero by 2040. Reduction of energy will be achieved by close management and continued maintenance of plant machinery, with continued measurement of energy used. ESOS audits will be carried out within phase 4 of the regulations, and further energy saving measures will be implemented as a result of audit findings.

Smarter processing, with an organised flow, can reduce the length of time the machinery runs each day, coupled with batch processing to increase efficiency. Energy use is higher at switch-on and close down, so this should be minimised each day with machinery in use for the maximum available time.

6.1.2 Energy use – transport and logistics

Our logistics fleet, both HGV collection vehicles and company cars, is responsible for 74% of our overall Scope 1 GHG emissions. Waste Experts employs telematics and driver behaviour monitoring systems to promote fuel-efficient driving and reduce idling time. All HGV vehicles operate with a modern Euro 6-compliant engine to reduce NOx and CO₂ emissions. There is no structured plan to transition to clean fuels, as technology for this is not yet commercially available, but this will be brought into this policy as technology and infrastructure develop.

An increase in backhaul opportunities to ensure that vehicles are utilised efficiently on return journeys, together with route optimisation and dynamic scheduling, will minimise vehicle mileage, particularly in high-frequency, event-driven environments.

6.1.3 Energy use targets

1. Lamp Plant energy usage to be reduced by 5% - base year 2025/2026 FY 1.25M/Wh per tonne of lamps processed. 2026/2027 FY year to reduce to 1.18 M/Wh per tonne of lamps processed, averaged across the year. This can be achieved by reducing the runtime on the lamp plant through pre-sortation and lamp depollution, together with reducing the overall fluorescent lamp volume and increasing the volume of lamps in each batch.
2. WEEE Plant processing energy usage to be reduced by 5% - Base year 2025/2026 FY 0.15 M/Wh per tonne of material processed, to reduce to 0.14M/Wh per tonne of material averaged in 2026/2027 FY. Reductions will be achieved by removing empty running time i.e. time when the machine is running but processing material. Improved throughput by better organised storage bays, and reduced downtime.
3. Improve the recycling rates of materials as detailed below

Material	2025	2026
	Recycled	Recycled
GDL	87.65%	88.00%
Display	76.07%	77.00%
Small Mixed WEEE	77.44%	79.00%
LDA	85.35%	86.00%
Cooling	90.61%	91.00%
PV	93.25%	95.00%

This will be achieved by improved pre-sorting of material and improved identification and separation of materials at source. Collecting more category-specific materials, rather than mixed materials, training for all personnel, and external training for waste producers. Improved supplier performance management to increase recycling rates for fractional materials.

4. Increase replacement of LED lamps from 80% coverage across the Huddersfield facility to 100% by the end of the 2026/2027 FY.

5. Increase the mix of company cars that are fully electric from the base year 2025/2026 FY of 25% to 40% in line with ESOS objectives by the end of 2027/2028 FY as leases are renewed.
6. Increase HGV fleet utilisation from the base year 2025/2026 FY of 95.99% by 3% to 89.9%. This will be achieved by increasing the number of jobs routed that are completed and maximising vehicle fill rates. This will be influenced and achieved by improved information from customers and better communication on expected collection times/days. Education on better storage, a reduced number of empty or partially empty containers collected by the introduction of minimum fill surcharges, and improvements to dynamic routing to maximise opportunities to collect when out on the road.

6.1.3 CO₂ Emissions

Waste Experts currently measure Scope 1 and 2 emissions using data received from various sources and the Greenhouse Gas protocol for conversion. Scope 3 emissions are calculated based on spend. As the business continues to grow, absolute targets for reduction are difficult to achieve; however, intensity target calculations are in place to measure effective management of an overall reduction

1. Reduce the CO₂ per employee from 7.822 tonnes per employee in the base year 2025/2026 FY, to below 7 tonnes per employee in 2026/2027 FY. This will be achieved through reduced travelling, improved waste reduction across all sites, minimising general waste and improving segregation of recyclable materials. Encouraging reusable containers such as water bottles, lunch containers, etc. Any food supplied to employees or visiting customers by the business will be sourced from local suppliers to minimise food miles.
2. CO₂ per mile travelled is currently 0.001 tonne per mile, which will be maintained through continued efficiency measures.
3. CO₂ per tonne of WEEE collected improved from 0.279 tonnes per tonne of WEEE to 0.25 tonnes per tonne of WEEE collected. To be achieved through efficiency measures detailed in objective 8, and improved communications and education of customers to maximise the WEEE accumulated before collections. This will include improved management of large-scale projects to ensure the correct containers are used, with continued management throughout the project.

6. Conclusions and Continuous Improvement

A framework for continual improvement of our environmental management system will be achieved by conducting regular audits to ensure progress and Senior Management commitment. We consider the latest technical development, scientific understanding, customer and client needs and community expectations. We will ensure that all environmental arrangements and this policy are reviewed to reflect the principles of our Company and ensure improvements to our environmental management system are maintained.

6.1.1 Climate change mitigation

In addition, Waste Experts will continue to work with the regulatory bodies, and

legislators (DEFRA and Environment Agency, Natural Resources Wales and SEPA) to ensure that standards at our main Huddersfield site continue to operate with zero non-conformances.

Training will continue for all staff to ensure education on the issues faced from Climate Change, both directly to our business and worldwide, to enable all employees to make informed decisions to achieve reduced carbon goals personally as well as in the Company.

Any non-conformances will continue to be logged, which will include complaints from other stakeholders such as neighbours, customers and suppliers, with 80% non-conformances actions to be completed within 48 hours. This will be achieved and measured through the non-conformance process, with continued training for all staff on how to log an issue.

Waste Experts will continue to work with clients to ensure that waste is correctly described and reduce rejections for waste collected on our own fleet and that delivered directly to the site from other waste collectors. Training will continue with the staff and drivers to ensure that the waste paperwork is amended and updated as required before the material arrives at the site

Signed:

Shaun Donaghey
Managing Director



Jane Richardson
Head of Environmental
Services



Date: 1/5/2026

VERSION CONTROL

Version	Date	Author	Approver	Change Description
1.12	1/5/2026	J Richardson	S Donaghey	Annual Review
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1.7	5/1/2023	J Richardson	S Donaghey	Annual review

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