

Environmental Policy

Dextra Group plc (including subsidiaries i.e. Dextra Services Ltd, Dextra Lighting Ltd, Dexeco Ltd, Dexretail Ltd, Dexreco Ltd, Dexsor Ltd, LEDextra Ltd, Dexrail Ltd and LEDex Ltd) are a significant force in the UK Lighting Industry. We are involved in design, manufacture, stockholding and distribution of high quality energy efficient LED light fittings and luminaires. We also process end of life products under WEEE Regulations. Dextra Group plc recognise the impact that its business activities and products may have on the environment, its employees, its customers and the public.

Dextra Group have created an Integrated Management System (IMS) in accordance with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 and SSIP which encompasses all functions within the organisation affecting quality, environment, health and safety.

Scope of certification:

Design, manufacture, stockholding, distribution and waste management of electrical light fittings and luminaires.

The Group are committed to:

- Continual improvement of Integrated Management System
- Ensuring that customer and relevant environmental statutory requirements are determined, understood and consistently met
- Reviewing our IMS and all systems annually to ensure that they are effective and that continual improvement is taking place
- Operating the business in a manner that prevents pollution and minimises the risk to the environment, employees, customers and the community at large
- Conserving resources and minimise emissions and wastes
- Protecting the environment
- Setting objectives

Environmental policy implementation

Dextra Group will:

- Carry out audits of the Group's activities to identify areas for improvement and the Environmental Legislation that applies to the Group
- Set realistic targets and objectives for improving environmental performance
- Establish operating procedures and controls to ensure that the Environmental Policy is implemented properly
- Ensure all staff receive training so that they have the necessary skills to fulfil their environmental responsibilities
- Review environmental performance on a regular basis to check whether the system is achieving the correct results

Maintenance of the Environmental Policy

The Policy will be reviewed, as a minimum, once a year, and when there are significant changes in Legislation and/or the ISO 14001:2015 Standard which will require a prompt update. The Top Management and the Facilities, Quality, Health & Safety Manager will be responsible for ensuring that this review takes place. As a rule, this review will be an agenda item for the Management Review Meeting. Members of staff will be encouraged to participate by providing constructive suggestions for improvements.

Environmental audits and inspections

The Senior Management and Facilities, Quality, Health & Safety Manager will ensure that a thorough

examination of all areas within the Company is held and should include:

- Applicable Environment Legislation, and is Dextra compliant.
- Energy and Resources used;
- Amounts of raw materials used, and how much is recycled?
- Sources of emissions and their reduction, if possible.
- Levels of waste that can be recycled.
- Impact production processes have on the environment.
- Efficiency of transporting goods, and hazards involved in transporting goods.
- Systems in place to deal with Environmental Emergencies/Incidents.

Training and appointment of competent persons

Every member of staff shall be provided with adequate Environmental training and this training shall be repeated periodically where appropriate.

Delegation of Environment related management functions

A major aim of the senior management is to raise employee awareness and participation in all Environmental issues, to this end various functions have been delegated to supervisory and other members of staff.

Primary responsibilities for Environment within the business:

- Group Director
- Facilities
- Standards
- Health & Safety Manager

Members of staff with delegated Environment duties:

- Department Managers
- Supervisors

Nature and Wildlife

Dextra Group are committed to climate change solutions. In 2018 we initiated a number of carbon offsetting measures on an estate in Exmoor. They included changes to existing habitat management and a comprehensive carbon sequestration scheme. Across its 900 acres the estate working with DEFRA, Natural England and other stakeholders, is planting additional trees which absorb CO₂ and create a 'carbon bank' at an equivalent rate of 1 tonne of CO₂ per tree over its lifetime.

Following substantial tree planting and the inclusion into a Countryside Stewardship scheme, carbon storage has increased across the estate to just over 70,000 tonnes which equates to an annual CO₂ sequestration of over 1013 tonnes.

Sustainable Travel

- Cycle to work scheme – employees can save money on the cost of a new bike, including e-bikes and accessories through tax free monthly payments directly from their gross salary.
- All vehicles are serviced regularly and maintained to a high standard.
- Dextra Group use electric vehicles where possible and have installed 21 electric charging points onsite.
- Dextra Group has an obligation to try and reduce their carbon footprint. Dextra run a fleet of Mercedes vehicles which are fitted with Fleet Board Telematics. A weekly report is sent to the Transport Manager. This is an individual report which details distance travelled, average weight, total fuel used MPG and CO₂ emission information. The Transport Manager hands this to the driver on a weekly basis and briefs them on areas they can work on which will improve either the

MPG or well-being of the truck (e.g. reduce brake wear). These can vary quite a lot from week to week as the drivers have different routes and multi drop runs. The Transport Manager can get weekly, monthly, quarterly and yearly reports from the telematics, to assist with helping the driver understand where they can improve. Monthly mileage and fuel usage is also logged and checked against historical data.

Water management

- Regular effluent monitoring of the paint plant is carried out by a third party. The waste water is recycled and topped up with clean water and/or chemical as required. When cleaned, the water is neutralised by the addition of Sodium Hydroxide and disposed to the waste water drain.
- There is a dedicated area on site for vehicle washing so that fluid drains into a submerged interceptor tank that allows the washed off sediment to settle, leaving the water to flow into the drain system. Regular effluent monitoring is carried out by a competent third party. The wash area is bunded to prevent spillage to the yard and surrounding area. Sediment is collected at the bottom of the submerged interceptor tank and removed by a licensed waste carrier.

Energy use

- Dextra Group encourage staff to switch off electrical equipment and unnecessary lights when not in use, to close windows and external doors when heating is on.
- Solar panels are installed on all rooftops.
- Energy efficient LED lighting is installed on site, controlled by sensors.

Circular economy

- A critical aspect of our commitment to minimising the carbon and environmental impact of our ranges is to adopt the principles of circular economy product design contained in CIBSE TM66 to ensure that our luminaires are designed for longevity, ease of repair and simplicity of upgrade.
- When the lifecycle has been completed with all avenues of repair and upgrade exhausted products must be easily separated into individual components to enable recovery of as much of the original material as possible. Dextra Group aim towards a repair and upgrade model designed to ensure maximum longevity and simple recycling.

Responsible procurement

- The Procurement Department has had ISO 14001 certification since 2010 and an associated Environment Policy to provide a systematic approach to addressing our impacts.
- Dextra Group will continue to focus on what we buy, why we buy it and how the product or service procured impacts upon environmental or social issues in terms of its production, use or disposal. We will continue to work with our existing suppliers to help them develop responsible procurement action plans and identify new suppliers that can help us achieve our aims.

Waste, energy minimisation and recycling

Carriage of waste

- A registered waste carrier shall undertake removal and transportation of wastes off site and all movements of waste must be accompanied by the correct transfer documentation.
- Any contractor removing waste from Dextra Group's site must provide details of their waste facility and evidence that the proposed destination can legally accept the waste.
- All waste carrier certificates and permits must be checked to ensure they are valid.
- Dextra Group must provide a record of all waste movements. Dextra hold a Waste Directory that lists all types of the waste produced, how it is dealt with and by whom.

Customer waste

- Dexreco, a registered AATF offer a collection service to customer for 'end of life' lighting. Collected products are taken apart and segregated into individual components which are then recycled or re-used, ensuring any harmful chemicals are disposed of safely. This reduces landfill waste and reduces the energy required to make further products.

Hazardous Waste

- Hazardous waste is subject to controls under the Hazardous Waste Regulations 2005. These apply over and above other waste management controls.
- Consignment notes shall be produced by the Waste Contractor who collects the hazardous waste and kept for a minimum of three years.

Builders' Waste

- Builders waste is licensed for disposal by landfill. Skips for builders are arranged as required by the contractor concerned and located at suitable positions near the point of work as agreed with the Health & Safety and Facilities Manager.

Contractors' Waste

- Disposal of waste by contractors will be arranged by the Health & Safety and Facilities Manager with the contractor for the safe disposal of waste from site.

Waste Oil

- Waste oils are collected from all machinery and from the transport fleet and stored in a secure holding tank. It is then collected by a contracted disposal company. Arrangements for waste oil disposal should be made with the Maintenance Manager. Oils must not be disposed of via the drains.

Vehicle Workshop Waste

- Vehicle workshop waste, such as waste oil, lubricants, oily rags, air filters, aerosol cans and paint cans are stored in secure drums/containers and collected by a licensed waste carrier.
- Worn and damaged tyres are returned to the supplier for recovery or recycling.

Metal Waste

- All metal waste must be segregated and stored in a skip and taken to Dexreco who will make arrangements with a licensed disposal company.

WEEE (Waste electrical and electronic equipment)

- Dextra Group's transport department shall collect WEEE from its customers and return to site to sorted and segregate.
- All WEEE must be stored in segregated containers and must not be disposed of with other waste.
- WEEE is removed from site by a third party for energy recovery or recycling.

Batteries

- Dry cell batteries and Lithium batteries shall be recycled and not disposed of via any hazardous waste stream.
- Disposal for vehicle batteries is made via Dexreco who will organise transport to a specialist waste contractor.

Confidential Waste

- Confidential waste which includes any paper containing person identifiable information is shredded and disposed of by an outside contractor.

Printer/ Toner Cartridges

- Toner cartridges for copiers are returned to the supplier for recycling or reuse.

Food Waste

- Food waste bins are situated in all canteens across the site and collected weekly by the local Council.

Accidental Spills

- Spill response Policy (HSP010) is in place which covers procedures and training requirements. Fully stocked spill kits with spill instructions, are placed across the site in relevant areas. These are checked on monthly inspections carried out by the Health & Safety Department. Appointed spill response personnel are provided with full training every two years. A list of trained responders are listed on the Health & Safety Noticeboards.
- COSHH Risk Assessments are carried out for every substance used on site. Relevant personnel are provided with safety data sheets for the substances they are working with along with information sheets that give advice on how to deal with a spill including how to avoid discharge into local waterways and the environment, and how to clean up and dispose of spilled product.

Environmental Discharge – Paint Plant

- Dextra Group have acquired an LAPPC Permit from North Dorset District Council and have Wessex Water Discharge Consent to operate the Paint Plant.
- Trade Effluent Monitoring is carried out every three months by a competent third party. This is to ensure that the paint plant is not releasing any harmful effluent into local sewers.
- Waste Water is recycled and topped up with clean water or chemical as required. Sodium Hydroxide is added to the water to neutralise it before it is disposed of via waste water drains.
- Waste water is collected by a licensed waste carrier.

Environmental Discharge – Transport

- Dextra Group have Wessex Water Discharge Consent to operate the vehicle wash down bay.
- Trade Effluent Monitoring is carried out every three months by a competent third party. This is to ensure that the vehicle wash down is not releasing any harmful effluent into local sewers.

This policy is communicated to all Dextra Group employees and suppliers who will be expected to co-operate and help in the implementation of its requirements, whilst ensuring that their own work is carried out without risk to themselves, others or the environment.

Natasha Ward
COO

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