

PURPOSE

To define the Company's environmental and sustainability policy.

POLICY

1 GENERAL POLICY

1.1 Primaflow F&P is a national distributor of branded plumbing and heating systems and goods to service the needs of Plumbers Merchants, Bathroom and Fire showrooms through a network of distribution centres. The Company is aware that its operations can have an impact on the environment and is therefore committed to the continual improvement and periodic review in its environmental performance, incorporating the following:

- Complying with legislative and ethical standards concerning care of the environment and the prevention of pollution.
- Working with suppliers and sourcing products with low environmental impact and consider options to reduce packaging on products whenever possible.
- To reduce our consumption of energy and waste, including the reduction and reuse of packaging material and office paper.
- To reduce the impact of vehicle emissions through the continual review of its delivery and sales network via commercial vehicles and company cars.
- To manage the waste it generates using the best practical environmental option through reuse, recycling and recovery.
- To encourage employees on company business to car share, make use of public transport and conference calling where practicable and appropriate.
- The contents of this policy are communicated to the Company's staff and is displayed on the notice board.
- Copies of any relevant documentation are made available upon request.
- Minimising negative impact on global and local environment, community, society and economy.
- Integrating sustainability considerations into our business decisions.
- Identifying, controlling and disposing of products that have special handling and waste treatment needs.

1.2 The Director of Operations Development is responsible on behalf of the Company for monitoring requirements for environmental regulatory compliance through audit and for communicating these requirements for action within the Company.

1.3 The policy will be reviewed by the Company's Directors and updated annually.

2 WASTE AND RESOURCE MANAGEMENT

- 2.1 The Company manages the waste it generates using the best practical environmental options through reuse, recycling and recovery. Contracts are in place to recycle card, plastic, office paper and wood. Tubes and lamps are recycled and a take back scheme operates at a local level for tubes and lamps returned by customers, as well as portable batteries.
- 2.2 All company mobile phones no longer required must be recycled via the Newbury Service Centre Helpdesk and either hand delivered or sent by carriers approved for battery handling.
- 2.3 The Company seeks to minimise waste and to consider options to reduce packaging on products, and applies controls in-house on resources management, such as the use of stationery and office paper.
- 2.4 The Company's waste is managed in accordance with all legal requirements, hazardous waste regulations and its duty of care obligations.
- 2.5 The Company encourages a Diversion from Landfill Policy throughout all its locations.
- 2.6 The Company are working towards part 1 of ISO 14064 during 2023 which enables us to monitor and set objectives to reduce our carbon footprint.

3 ENERGY AND WATER TREATMENT

- 3.1 The Company encourages regular reviews to reduce the consumption of energy and water in all its premises and continually considers options for energy efficiency including the following:
 - Installation of LED lighting.
 - Use of occupancy detectors, time lag switches and push taps.
 - Voltage optimisation.
- 3.2 The Company gives consideration to energy and resource management options at the design stage for new buildings and on refurbishment projects, with an emphasis on minimum standard specifications for low-energy technologies.

4 TRANSPORT AND TRAVEL

- 4.1 The Company seeks to reduce the impact of vehicle emissions by ensuring they are well maintained. It is encouraged that any light commercial delivery vehicles are fitted with stop/start technology and comply with the Euro 5 emissions standard.
- 4.2 The Company actively encourages the reduction of CO2 emissions through the company car lists, which are reviewed and updated quarterly, by the purchasing of fuel-efficient vehicles i.e. hybrid and electric vehicles. We have significantly reduced our reliance on diesel company cars and no longer approve their purchase.
- 4.3 Locations are requested to consider using LPG in delivery vehicles where possible, which emits less carbon dioxide than petrol and diesel and fewer nitrous oxides than diesel.

5 COMMUNITY

- 5.1 The Company invests in its employees and provides training to meet its objectives of efficiency and service to customers and suppliers.
- 5.2 The Company plays an active role in the communities it operates in, and is an active supporter of industry organisations, charities and the arts.

Aims and Objectives

- Conduct audits and annual reviews to ensure compliance with legislation regarding Waste Management and Packaging.
- The Chief Operating Officers / Managing Directors or equivalent and Managers consider the packaging when presented with new products.
- Develop a monitoring system to help manage and reduce our environmental impact.

Approved

Steve Westbrook
Chief Executive Officer

Date: 23.05.23

RoHS Compliance

- Key and new suppliers are requested to provide a statement of compliance to the Restriction of the Use of Certain Hazardous Substances (RoHS) in Electrical and Electronic Equipment (EEE) Directive (2011/65/EU).
- Where a product is sourced outside of the EU, a statement of compliance to RoHS is also required and will be maintained with the goods received paperwork.
- Primaflow F&P standard terms and conditions of purchase require compliance to RoHS where appropriate.

Product Marking

- All suppliers are required to comply with the relevant product marking regulations, be that UKCA for the Great Britain market, UKNI for the Northern Ireland market or CE for the Northern Ireland and European markets. Declarations of conformity are available on request. Where goods are purchased outside of the EU a Certificate of Conformity is requested with each order.

CPR – Construction Products Regulations

- All products supplied in relation to the CPR are compliant in every respect and marked in such a way as to readily ensure our compliance with the CPR and upon re-sale of such products to our customers.

WEEE

- Primaflow F&P is both a “distributor” and a “producer” of WEEE. As a distributor under the WEEE regulations, we always provide the designated information to customers.
 - Every year the UK throws away around 2 million tonnes of WEEE. If this waste is not disposed of correctly, there could be potential harm to health and the environment.
 - To ensure safe treatment and to increase re-use and recycling of material we offer a take back scheme for any waste electrical product. For account holder who are the end user of the product, this like for like (old for new) service is free.
- As a producer, Primaflow F&P has joined the WEEE Link Producers Scheme and has been issued with the WEEE producer number WEE/MM7795AA.
- All faulty products returned to Primaflow F&P are returned back to the manufacturer for appropriate disposal.
- Some products which have reached their end of life are disposed of through manufacturer channels or a registered waste disposal company. Information regarding the appropriate disposal method is communicated via the material data sheet supplied with the product or on the packaging or can be obtained from the supplier on request.

All Primaflow F&P locations are permitted and licensed to accept hazardous waste that falls within the scope of the WEEE Regulations.

Primaflow F&P holds the following waste carrier's licence in the United Kingdom: CBDU104360 and CBDU42580.