

Environmental Policy



As a manufacturer and supplier of a wide range of medical devices for respiratory support, Intersurgical recognises that environmental responsibility is a vital aspect of our business, to continuously improve the way we work and to deliver a number of significant benefits.

These include reduced environmental footprint across the business, the creation and maintenance of safer working environments, improved operational performance, increased stakeholder trust, improved focus on environmental compliance and long-term business resilience.

This policy highlights Intersurgical's commitment to environmental responsibility and outline the principles and practices we follow to minimise our environmental impact.

Scope of this policy

This is a global policy, which applies to all individuals working ("employee") for, or those working on behalf of ("associated person") Intersurgical. This includes:

- Permanent and temporary employees;
- Subsidiaries;
- Contractors, consultants, agents and intermediaries; and
- Third parties such as customers, suppliers, distributors.

Organisational context & stakeholder expectations

We are committed to understanding the internal and external factors that influence our environmental responsibilities and performance. This includes evaluating environmental conditions, regulatory developments, technological changes, and stakeholder expectations that are relevant to our operations.

In line with our Environmental Management System (EMS), we identify and act upon the needs and expectations of interested parties, such as customers, regulators, employees, and local communities to ensure our environmental objectives remain relevant, effective, and aligned with broader sustainability goals.

This contextual understanding informs our strategic decision-making, risk management, and continual improvement efforts across all aspects of our environmental performance.

Climate change & carbon management

We are committed to reducing the environmental impact of our products, activities, and services, with a goal to achieve Net Zero carbon emissions by 2045.

To support this goal, we actively measure our carbon footprint across our operations, set emission reduction targets, and implement strategies to reduce greenhouse gas emissions wherever possible.

We collect, analyse and measure Scope 1, Scope 2 and a subset of Scope 3 emissions from across the group to gain a comprehensive understanding of our carbon footprint, identify key emission sources and inform targeted reduction strategies.

This data-driven approach enables us to set realistic and impactful emission reduction targets, track our progress over time, and align our actions with our Net Zero 2045 commitment.

For more information on how Intersurgical strive to meet our Net Zero commitments, please refer to Intersurgical's [Carbon Reduction Plan](#).

Compliance & legal requirements

We ensure compliance with all current and applicable environmental legislation, regulations and industry standards in which we operate. We actively monitor changes in regulatory requirements to maintain compliance and avoid environmental risk.

In order to accomplish the above commitments, Intersurgical have implemented an Environmental Management System at our UK head office and has been certified to the international standard ISO14001:2015.

Our Environmental Management system provides a structured framework for identifying environmental risks, setting measurable objectives, and driving continuous improvement in our environmental performance.

To support ongoing compliance, we conduct regular internal audits and management reviews, ensuring our practices remain effective and aligned with evolving legal and regulatory demands. We also provide continuous training and awareness programs to empower our employees with the knowledge and skills needed to uphold our environmental responsibilities.

Eco-design & sustainable resource use

We are committed to integrating eco-design principles and sustainable resource use into every stage of our product development process. Environmental considerations are embedded from the outset, using a life cycle approach to assess and minimise environmental impacts—from raw material sourcing and manufacturing to distribution, use, and end-of-life.

Our products are designed to reduce carbon emissions, conserve energy, and utilise sustainable, energy-efficient, and low-impact materials wherever possible.

Within our manufacturing processes, we prioritise the efficient use of raw materials, water, and energy, and seek to reduce waste through lean production techniques.

Through these efforts, we aim to deliver high-quality medical devices that not only meet clinical needs but also support our broader commitment to environmental responsibility and sustainable innovation.

Responsible Packaging

We are committed to reducing the environmental impact of our packaging activities throughout the product lifecycle. Where practicable we will;

- Minimise the amount of packaging used while maintaining product quality, safety, and protection
- Prioritise the use of recyclable, reusable, and responsibly sourced packaging materials
- Seek opportunities to increase the recycled content of packaging materials
- Reduce the generation of packaging waste and promote reuse and recycling across our operations
- Work with suppliers and customers to improve packaging sustainability and support circular economy principles
- Comply with all applicable packaging-related environmental legislation, regulations, and customer requirements
- Monitor and review packaging performance as part of our continual environmental improvement programme.

We strive to ensure that all packaging is designed to minimise environmental impacts and support more sustainable resource use, including the use of recyclable packaging where possible. Our designers apply the criteria according to ISO 18602 to determine the minimum amount of material used to meet performance criteria.

We are committed to continuously improving the packaging of our product range. By increasing the availability of product kits, we aim to reduce packaging waste, enhance efficiency throughout our operations, and minimise the potential for errors.

Waste management

We are committed to managing waste responsibly across all areas of our operations, in line with the waste hierarchy: prevention, reuse, recycling, recovery, and disposal as a last resort.

This includes reducing the generation of hazardous and non-hazardous waste, expanding the use of safer, more sustainable materials, and diverting waste from landfill wherever possible through reuse, recycling, and energy recovery initiatives.

Our waste management procedures are designed to:

- Promote efficient resource use throughout our production processes,
- Encourage product and packaging design that supports recyclability and minimal waste,
- Segregate waste at source to facilitate effective handling,
- Ensure the safe and compliant storage, transport, and disposal of all waste types, and
- Monitor waste performance to identify reduction opportunities and support continuous improvement.

Water management

We are committed to responsible water stewardship across all our operations. Our approach focuses on minimising water consumption, preventing pollution, and ensuring full compliance with relevant water-related regulations.

We actively monitor and manage water use to identify opportunities for conservation and efficiency improvements. Where feasible, we implement water recycling, rainwater harvesting, and closed-loop systems to reduce our reliance on freshwater sources and support more sustainable production.

In areas where water use contributes to energy demand, such as heating, treatment, or distribution. We also aim to reduce the associated carbon emissions as part of our broader climate goals.

At one of our facilities, we utilise hydroelectric power as a renewable energy source, aligning our water and energy strategies to reduce both water-related impacts and carbon emissions.

By integrating water management into our environmental strategy, we aim to protect local ecosystems, reduce operational risks, and contribute to long-term resource sustainability.

To reinforce our commitment to responsible water use and conservation, we have developed a dedicated Water Policy outlining our approach to monitoring, reducing, and managing water consumption and impacts across our operations. The policy includes comprehensive KPIs to measure and monitor our development in this area.

Training, awareness and engagement

We train our staff to understand their role in minimising environmental impacts, fostering a culture of environmental awareness, accountability and continuous improvement across the organisation.

Environmental training is embedded into our induction programme for new employees and is reinforced through regular refresher training and targeted training for roles with specific environmental responsibilities.

We actively engage with our staff through internal communications and involvement with site level environmental initiatives. Environmental responsibilities are clearly defined within roles, supported by training, procedures and support from the sustainability team.

Biodiversity and ecosystem protection

We protect local biodiversity, habitats, and ecosystems through regular inspections, procedural implementation, and staff training. We recognise the importance of preserving natural systems and mitigating the environmental impacts of our operations, particularly in areas surrounding our sites.

Our environmental procedures are in place to protect natural surroundings and minimise disruption to local wildlife and ecosystems. Staff are trained to recognise biodiversity risks and follow site-specific procedures.

To further support our environmental objectives, we have introduced an Air Pollution Policy focused on minimising emissions, improving air quality management, and promoting continual environmental improvement across our operations. The policy includes comprehensive KPIs to measure and monitor our development in this area.

Sustainable procurement

We are committed to embedding sustainability into our procurement practices by sourcing goods, materials, and services in a way that minimises environmental and social impacts throughout the supply chain. We assess and select suppliers not only based on cost and quality, but also on their environmental performance, ethical practices, and alignment with our sustainability values.

Performance indicators

During 2025 we measured the following KPI's. We will continue to measure and monitor these KPIs in 2026 and report on the findings. This Environmental Policy has been communicated and is available to all interested parties, including Intersurgical employees.

Key Performance Indicator	Purpose	2025 Result	Future Target
Group Scope 1, 2 and 3 (GHG) emissions (tCO ₂ e)	To track 2025 group wide emissions 2022 baseline year, to monitor progress towards net zero targets	30% reduction in currently reported emissions compared to 2022 (market based)	43% reduction in emissions compared to 2022 in 2027 (market based)
Group total energy use (kWh) against individual manufactured units	To track 2025 group energy use against 2022 baseline energy use, to measure progress at increasing manufactured units per kWh used	0.36 kWh per unit manufactured	< 0.30 kWh per unit manufactured by 2030
Group waste generated (tonnes) against manufactured units	To track 2025 group waste reduction against 2022 baseline year	0.000020 tonnes waste per unit manufactured	< 0.000017 tonnes by 2030
% of group waste recycled	To track 2025 recycling % against other group waste streams, with the aim to become zero to landfill across the group	77% recycled across group	> 85% by 2030
% of group 'Zero to Landfill'		56% sites 'Zero to Landfill'	100% by 2035
Group water usage (Litres / m ³) against manufactured units	To track 2025 group water usage and monitor progress at water conservation	1.13 litres of water per unit manufactured	< 1 litre per unit by 2030
% of Intersurgical employees (UK) trained on the Environmental Management System (EMS) Introduction e-learning	To equip staff to understand their role in minimising the environmental impacts of their activities	96%	> 98% by 2027
% of UK suppliers with an environmental policy	To measure how UK based suppliers are formally addressing environmental issues and their influence on Intersurgical supply chain	65%	> 70% by 2030
% of total freight journeys to customers or subsidiaries that were air shipped from Pabrade manufacturing site	To improve the environmental footprint of the freighting to our subs and customers	23% freight journeys from Pabrade were sent via air	< 20% journeys by 2030

Management commitment

Our management team is committed to driving and upholding our Environmental commitments and initiatives.

Our dedication to the environment is integral to our business strategy and is reflected in our leadership's active involvement and accountability.



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Chief Executive Officer (CEO)

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The manufacturer Intersurgical Ltd is certified to
ISO 14001:2015, ISO 9001:2015, ISO 13485:2016 and MDSAP

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