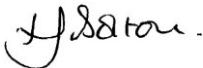


	Quality Management System	POL 010	Rev 9	Date: 28-07-2025
	Environmental & Waste Management Policy			Approved By: 

INTRODUCTION

Bolton Surgical is an environmentally conscious and responsible company. It is therefore the policy of Bolton Surgical to strive to ensure that all aspects of the business have the least harmful effect on the environment by implementing an environmental management system to:

- Be fully aware of all environmental and waste management legislation and relevant national/international standards and ensure that regulatory requirements are met and, where feasible, improved upon.
- Monitor the implementation of this policy by carrying out periodic audits of compliance and, when appropriate, introduce remedial measures.
- Ensure all employees, in the course of their duties, act in accordance with this environmental and waste management policy.
- Encourage suppliers, contractors, partners and clients to act in accordance with our environmental and waste management standards.

In addition, areas of particular attention within the business will be the selection and promotion of non-polluting technology, waste minimisation, reuse/recycling and the reduction of energy consumption, wherever practicable including use of ICT's and home working to minimise travel needs and recruitment from the local community, wherever possible. Bolton Surgical also makes a positive environmental contribution in the local community by encouraging open communication, general environmental awareness and where practical and cost effective, the promotion of specific environmental projects.

Bolton Surgical recognizes that because of the nature of our business activities and influences we impact on the environment in a number of ways.

The Company also accepts that it has a fundamental responsibility to protect the environment and is committed to adopting excellent in-house environmental standards and ensuring that good manufacturing and pollution control practices are encouraged.

Bolton Surgical requires that all employees adhere to and comply with the ethical and moral standards of society and environmental sustainability in the conduct of business.

The Company will continually seek out, investigate and recommend, wherever practicable, materials and methods that reduce any adverse environmental impact.

We will wherever possible ensure that all suppliers to Bolton Surgical have active environmental policies.

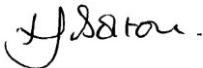
RESPONSIBILITY

The responsibility for managing and maintaining this policy lies with the Senior Management Team of Bolton Surgical.

Use of Plastics

The nature, types and range of products manufactured, supplied, distributed or repaired by the Company requires the use of certain plastics materials for their specific technical properties in a number of those products. Product protection and preservation requirements make plastics the packaging material of lowest risk material of choice.

It is therefore the company's policy wherever practicable to minimise potential adverse impact to the environment caused by plastics being tipped into landfill or incinerated, by the following means:

	Quality Management System	POL 010	Rev 9	Date: 28-07-2025
	Environmental & Waste Management Policy			Approved By: 

- Controlled use and re-use of customer assigned re-usable plastic containers for repair work.
- Re-use of plastic cushioning materials wherever there is no risk of cross contamination to products.
- Specification of recyclable single material plastics for packaging.
- Specification of the thinnest practicable gauge of plastic used to manufacture packaging.
- Stocking of a broad range of primary packaging bags to ensure smallest bag selection for each product.
- Use of heat sealing to provide airtight seal and avoid use of additional packaging components.

WASTE MANAGEMENT

Reduction, Re-use and Recycling

In recognition of the need to ensure that surgical instruments and accessories that are no longer fit for purpose or, have reached the end of their service life or, are obsolete or, are scrap or are for any other reason deemed unfit for use, Bolton Surgical will, wherever practicable and within reasonable bounds of health and safety, strive to minimize the impact risk of our operations to public health the supply chain and the environmental by the following means:

METALS:

- Provision of quarantine storage of all 'end of life' or scrap products and all other waste metals pending collection.
- Separation of metal types
- Transfer of waste metals only to authorized and validated metals recycling companies.

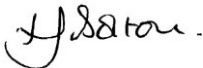
PLASTICS:

- Provision of quarantine storage of all 'end of life' or scrap products containing waste plastics pending transfer to authorized and validated materials recycling companies.
- Transfer of waste plastics only to authorized and validated plastics recycling companies.

GENERAL WASTE:

- A policy of paperless (electronic) mailing wherever possible.
- Electronic document filing wherever practicable according to the needs of the business.
- Provision of recognized collection receptacles for discarded paper based materials for further re-use or recycling by the use of authorized recycling companies or on-site facilities.
- Separation and recycling of other materials (e.g. Plastic containers, glass bottles, toner cartridges etc.) will be undertaken wherever practicable within the bounds of reasonable health and safety limits and the availability of viable, authorized recycling companies or on-site facilities.
- Waste Electrical & Electronic Equipment (WEEE) – see separate section below.

Waste Electrical & Electronic Equipment (WEEE)

	Quality Management System	POL 010	Rev 9	Date: 28-07-2025
	Environmental & Waste Management Policy			Approved By: 

Page 3 of 3

Bolton Surgical recognizes its obligations and duty of care under the Waste Electrical & Electronic Equipment (WEEE) Regulations 2006 and accordingly will ensure that any WEEE produced will be handled safely and within the law.

General WEEE will be stored separately from other waste.

WEEE regarded as 'hazardous' waste (e.g. batteries, UPSs, CRT monitors/TV.) will be stored and disposed of separately as 'controlled waste'.

Bolton Surgical will ensure that anyone removing WEEE from the business is appropriately authorized and, will obtain from them, and retain for at least the time designated by the WEEE Regulations, proof that WEEE was given to an authorized waste-management company.

Bolton Surgical will ensure that suppliers of EEE to the business are fully aware of their obligations under the WEEE Regulations before purchase.

See also the Company's Procedure (SOP 10.2.1) for disposal of Waste Electrical and Electronic Equipment (WEEE).

Publication, Promotional and Labelling Materials

Bolton Surgical has a commitment to the consideration of environmental factors consistent with both safety considerations, and client requirements when designing/specifying publication, promotional and labelling materials.

Where possible, such materials will be selected that have a recycled content and are recyclable.

Where possible we will adopt designs that enable the use of a single material. Where more than one material is required, we will develop designs that will allow the different materials to be totally separable for the purposes of recycling where facilities exist.

Within the limits of essential functionality and manufacturing limitations, printing inks and adhesives will be specified to be heavy metal and solvent free (i.e. water based).

Related Documents:

ISO14001 Environmental Management Standard

WEEE Disposal Procedure (SOP 10.2.1)

Control of Records Policy (POL 002)

End of Life – Safe Disposal Declaration (MDL 221)

Electrical Safety Policy & Procedures (POL 011)

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