

Environmental Policy

OsteoWeld Surgical Ltd ('the Organisation') is committed to its legal and moral responsibility to reduce any detrimental impact on the environment as a result of its activities and comply with relevant environmental laws and regulations. The Organisation has therefore chosen to adopt an environmental management policy, which aims to provide a management framework for operation in compliance with ISO14001:2015. The Organisation is also dedicated to the continuous improvement of its environmental performance and will therefore regularly review this policy to ensure it continues to reflect the Organisation's environmental commitment.

It is the Organisation's objective to carry out all measures reasonably practicable to meet, exceed or develop all necessary or desirable requirements, to protect the environment through the commitment to and implementation of the following:

1. Continuous Improvement of an Environmental Management System (EMS)

Regular Reviews

Regular reviews of the EMS should be carried out on a half yearly basis or upon identification of a new environmental impact/risk basis to ensure the Organisation upholds its environmental commitment to continuously improve environmental performance.

2. Environmental Awareness of its Employees and Contractors

Training

All employees should be trained to improve their own environmental awareness and be made aware of behaviour that they can adopt to decrease their own environmental impact and that of the Organisation. All persons working with or for the Organisation will receive sufficient support to ensure the EMS is fully understood, implemented and maintained during their activities associated with the Organisation

Supplier Auditing

All external suppliers to the Organisation should be audited prior to collaboration to ensure their environmental policy aligns with that of the Organisation (no conflict of interest identified).

3. Minimisation of Pollution

Travel

Travel beyond an employee's usual place of work requires a business justification. Travel should be minimised, car sharing should be promoted and alternative remote arrangements should be considered.

Design

Product design is carried out with an awareness and consideration for pollution minimisation at all stages of the product lifecycle through development, use and disposal.

4. Minimisation of Energy Use

Design

Product design should consider energy usage throughout the product lifecycle and seek to minimise energy consumption in any reasonable manner.

Premises

- The Organisation's premises should be adequately insulated to reduce heating energy requirements
- Lighting should include the use of energy efficient lightbulbs

Title: Environmental Policy

Code: EMS-P-001 Rev C

Valid from: May 2022

Document owner: Natalie Williams, EMS Manager

Location: [OsteoWeld Environmental Management System - EMS Documentation - All Documents \(sharepoint.com\)](#)

- Appliances should be assessed for environmental performance prior to purchase and switched off as appropriate when not in use
- Sustainable building practices should be considered in any site development work
- Water usage should be kept to a minimum
- Best practices in energy conservation should be followed

5. Minimisation and Management of Waste

Minimisation of waste to landfill through the adoption and implementation of the waste hierarchy throughout the design and development process: Eliminate, Reduce, Reuse, Recycle, Dispose

Prototyping

Excessive prototyping should be avoided, and appropriate 3D print part densities should be used to reduce material consumption.

Prototype Manufacture

Small validation batches should be produced in all new manufacturing methods to validate the process and ensure sufficient quality before larger production runs take place

Product/Chemical Disposal

Recycling of waste should be implemented where possible. Chemicals should be disposed of in accordance with directions on the relevant COSHH statements. Instructions should be provided for the safe disposal of any product produced by the Organisation.

Premises

- Keep the use of single use plastic food containers, cutlery, bottles and cans to a minimum and re-use/recycle as appropriate
- Print on both sides of paper and recycle as appropriate
- Use re-fillable ink cartridges when possible and dispose of appropriately
- Use re-chargeable batteries when possible and dispose of appropriately
- Dispose of electrical equipment and other appliances in accordance with their life cycle disposal instructions

6. Promote the Use of Recyclable and Renewable Materials

Premises

- Provide reusable food containers and cutlery for employees and visitors
- Use environmentally friendly cleaning products
- Compost food waste when possible
- Choose recycled paper and other office supplies
- Consider recycled/renewable materials in any building development works

7. Consideration of Carbon Offsetting

- Consider making a reduction in emissions of carbon dioxide or other greenhouse gases in order to compensate for emissions made elsewhere. Offsets are measured in tonnes of carbon dioxide-equivalent (CO₂e)
- Carbon offsetting should be considered when choosing suppliers

8. Management of Environmental Risks to the Organisation

Natural Disaster

The reasonable risk to the Organisation's property and employees due to natural disaster should be assessed. Reasonable mitigation should be carried out to reduce risk.

COVID-19

The reasonable risk to the Organisation’s employees should be assessed on an individual basis and government advice followed. Excessive use of disposable PPE should be eliminated to reflect the Organisation’s commitment to waste reduction.

9. Minimise the risk to employees from operations and activities undertaken by the Organisation

Protect all employees with adequate training and protective equipment as appropriate. Perform risk assessments and follow preventative action as appropriate.



Leadership and Commitment

The top management of the organisation strives to demonstrate leadership and commitment with respect to our environmental management system by:

- a) taking accountability for the effectiveness of our environmental management system
- b) ensuring that the environmental policy and environmental objectives are established and compatible with the strategic direction and the organisational context of the Organisation
- c) ensuring the integration of our EMS requirements into the Organisation’s business processes
- d) ensuring the resources needed for the environmental management system are available
- e) communicating the importance of effective environmental management and of conforming to the environmental management system requirements
- f) ensuring that our environmental management system achieves its intended outcomes
- g) directing and supporting persons to contribute to the effectiveness of our EMS
- h) promoting continual improvement, and
- i) supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

This Policy is communicated to all employees, suppliers and sub-contractors and is made available to interested parties.

Date of issue: 17th May 2022

Signed		
Print Name	Simon Mifsud	Natalie Williams
Title	CEO	QMS & Regulatory Manager, EMS Manager

Environmental Policy Development and Execution

The executive management team, with key input from employees establishes, implements and maintains our environmental policy that, within the defined scope of our environmental management system

- a) is appropriate to the purpose and context of the Organisation, including the nature, scale and environmental impacts of its activities, products and services
- b) provides a framework for setting environmental objectives
- c) includes a commitment to the protection of the environment, including prevention of pollution and other specific commitment(s) relevant to the context of the Organisation
- d) includes a commitment to fulfil its compliance obligations, and
- e) includes a commitment to continual improvement of our EMS to enhance environmental performance

We maintain our environmental policy as documented information. We communicate it within the company and make it available to interested parties.