



Environmental Policy

Purpose

The Gem Group, Inc. recognizes that the environment is important to our business, our staff, and our customers. We have a responsibility to manage our environmental impacts carefully, including meeting all legal and regulatory requirements. We are committed to reducing our environmental impact and continually improving our environmental performance as an integral part of our business strategy and operating methods, with regular review points. We will encourage customers, suppliers, and other stakeholders to do the same.

Scope

This policy applies to all The Gem Group, Inc. operations, employees, facilities, and suppliers engaging in practices that may influence the company's environmental footprint.

Definitions

EMS – Environmental Management System

Carbon Footprint – The total greenhouse gas emissions caused directly or indirectly by The Gem Group, Inc's activities

PFAS – Per- and Polyfluoroalkyl Substances, synthetic chemicals that persist in the environment

Policy/Procedure

Policy Aims and Commitments

- Comply with and exceed all relevant regulatory requirements
- Continually improve and monitor environmental performance
- Incorporate environmental considerations into business decisions
- Increase employee awareness of this policy and provide training to ensure that we meet its requirements

To achieve our Environmental Policy aims the company will:

Energy Consumption and Greenhouse Gas (GHG) Emissions

- Improve energy efficiency across all facilities by implementing LED lighting, smart thermostats, and energy-saving protocols.
- Increase employee awareness of energy-saving behaviors through training and internal campaigns.
- Reduce gas consumption and use car fleet rationally.
- Encourage employees to use ecological transport.



Materials, Chemicals and Waste

- Review all input materials for sustainability, recyclability, and safe handling.
- Propose more environmentally friendly and sustainable chemicals in production processes.

Customer Health and Safety

- Ensure that all products meet or exceed safety regulations and certifications.
- Conduct regular risk assessments on product safety and usability.

Environmental Services and Advocacy

- Collaborate with suppliers to source materials that are certified or recycled or local.
- Increase the selection of sustainable products in our catalog

Targets for 2026

Energy Consumption and Greenhouse Gas (GHG) Emissions

- Train 100% of employees on Energy Conservation

Materials, Chemicals and Waste

- Reduce waste by 10%

Customer Health and Safety

- Maintain a zero-incident record related to customer health and safety annually.

Environmental Services and Advocacy

- Ensure 50% of freight packaging is reused for deliveries.

Allocation of Responsibilities

Employees

- Follow environmental procedures and company guidelines to minimise environmental impact in day to day activities.
- Use energy, water, materials and other resources responsibly and avoid unnecessary waste.
- Report environmental incidents, risks, or opportunities for improvement through appropriate internal channels.
- Participate in environmental training and support company initiatives that promote sustainability and responsible practices.

Managers



- Promote environmental awareness within their teams and ensure employees understand environmental responsibilities.
- Support implementation of environmental initiatives, targets and operational controls within their areas of responsibility.
- Monitor activities to ensure compliance with environmental procedures, legal requirements and company standards.
- Escalate environmental risks, incidents or non-compliance issues and support corrective actions.

Quality Compliance & Sustainability Manager

- Lead the development, implementation and continuous improvement of the Environmental Policy and associated management systems.
- Monitor environmental performance, KPIs and regulatory compliance, ensuring accurate reporting and documentation.
- Conduct risk assessments, audits and reviews to identify environmental risks and improvement opportunities.
- Provide guidance, training and support to teams to ensure environmental objectives are embedded into business operations and decision making.

Executive Leadership Team

- Provide strategic leadership and oversight for environmental performance and sustainability commitments.
- Ensure adequate resources and governance structures are in place to achieve environmental objectives and compliance obligations.
- Review environmental performance data, risks and progress against targets, driving continuous improvement
- Promote a culture of environmental responsibility across the organisation and throughout the supply chain.

Review

This policy shall be reviewed at least on an annual basis, and otherwise as necessary to reflect changes in relevant legislation. The directors and senior management are ultimately responsible and will oversee the effectiveness of this policy, including the targets, aims and goals for the business.