



# ENVIRONMENTAL POLICY

vital energi information for a sustainable future



## ENVIRONMENTAL POLICY

**Policy statement:** The Company is committed to protecting the environment, complying with all applicable environmental legislation and maintaining an externally accredited Environmental Management System to the ISO 14001:2015 standard.

### BACKGROUND

Vital Holdings Ltd and its subsidiaries (the Company) delivers innovative sustainable energy solutions for energy generation, distribution and energy demand reduction that cut energy bills, consider the environment and provide security of supply. We focus on three main areas: creating sustainable and viable means of generating and distributing energy; the management, measurement and reduction of consumption; and the long-term operation and maintenance of low or zero carbon energy infrastructure.

### POLICY PURPOSE

The purpose of this policy is to identify and mitigate material impacts, manage environmental risks, inform our carbon reporting and engage positively with the Company's key stakeholders to deliver continual improvement in lowering the environmental impacts of our business decisions.

### ROLES AND RESPONSIBILITIES

This policy applies to all Vital employees and those working on our behalf; everyone is responsible for ensuring the policy is adhered to. It is one of a suite of policies intended to communicate our values and standards to all stakeholders, fostering confidence that Vital is a responsible company to work for, buy from, invest in and partner with. This policy is owned by the Environment, Social and Governance (ESG) Director with ultimate oversight resting with the Vital Group Board, including the approval of any changes to the policy.

### PRINCIPLES OF CONDUCT

To ensure that our commitment to the environment is embedded throughout

our business, we have identified a set of principles of conduct. These principles apply to all our activities and are fully integrated into our internal decision-making processes:

1. Understand the full scope of the environmental impacts of our operations.
2. Reduce our environmental impact through design, installation and asset management; using less energy, water and materials and minimising waste
3. Apply the principle of mitigation (avoid, minimise, restore and compensate as a last resort) to ecosystems, air quality and biodiversity impacted by our operations.
4. Assess the environmental risks of our activities on a regular basis, improving and updating systems to prevent, mitigate or where possible and practical eradicate risks.
5. Empower employees and non-employees working on our behalf alike to make contributions that improve our performance and reduce our environmental impact through training, education and creating an environment where concerns can be raised without fear of reprisal.
6. Improve the circularity of our business activities and those of our suppliers and clients through the sustainable use of natural resources, the implementation of lifecycle analysis, the application of the waste hierarchy, maximising reuse and increasing the percentage of recycled or recovered materials in products.
7. Drive progress toward environmental sustainability through public engagement,
8. Industry collaboration and investment in/development of new technologies.



**our mission** to create sustainable, intelligent & reliable energy solutions



Based on the nature of our business, we have identified the following **priority action** areas:

- 1 Climate action** - we aim to measure our greenhouse gas emissions as fully as possible and reduce them in line with a 1.5°C pathway.
- 2 Energy use** - manage and monitor energy efficiency on our sites in line with our Energy Policy by encouraging good practice and raising awareness.
- 3 Procurement** - as a responsible business we aim to source sustainable products and services, where practicable, by applying our Sustainable Procurement Policy and Supplier Code of Conduct.
- 4 Transport** - we aim to encourage employees and our supply chain to consider using more sustainable transport options by providing awareness, training and guidance within our business travel and expenditure policy and Supplier Code of Conduct.
- 5 Competency and awareness** - we will provide training and support to both employees and non-employee workers and, where necessary and appropriate, to our supply chain to ensure that we are able to fulfil our commitments.
- 6 Data collection and ESG reporting** - strengthen the way we all gather and review environmental and wider ESG information by improving the consistency of data collection and refining our reporting processes to support clearer performance monitoring.
- 7 Waste and natural resources** - collaborating with our partner Go Green we aim to reduce pressure on natural resources and reduce total waste produced by our activities by implementing our waste hierarchy of prevention, reuse, recycling, recovery and disposal for all possible materials and reducing total waste produced by our activities.
- 8 Pollution** - we aim to prevent pollution through identifying potential environmental risks, implementing management plans and ensuring employees and suppliers know how to handle an environmental incident should it occur.
- 9 Conservation and Protection of the Natural Environment** - ensure sustainable construction throughout our works by employing minimisation or mitigation strategies for any risk of disruption to the environment and habitats and take opportunities to recover ecosystems by minimising biodiversity loss, protecting existing biodiversity and conducting biodiversity enhancement.

**CONTINUAL IMPROVEMENT**

The Company understands the importance of strong environmental awareness and effective environmental management. We are fully committed to preventing pollution, complying with all statutory requirements, and continually improving our environmental performance. We will set and review environmental objectives and targets annually to support ongoing improvement in line with our vision, scope and ambition to remain a market leader in sustainable energy solutions.

As part of this commitment, we are proactively preparing for the forthcoming ISO 14001:2026 standard and will ensure a smooth transition by updating our Environmental Management System to fully align with the revised requirements once the new standard is formally published. This approach maintains compliance, supports continual improvement, and ensures our system remains robust, resilient, and aligned with evolving best practice.

We will communicate this policy to all employees and organisations working on our behalf, and ensure the latest version is available on our website for interested parties to access openly. This policy will be reviewed at least annually and in response to significant changes in legislation, standards or business activities.

**BOARD APPROVAL**

This statement has been approved by the Chairman and Chief Executive Officer.

**Gary Fielding**  
Chairman  
Date: February 2026

**Ian Whitelock**  
CEO  
Date: February 2026