

Surgical Holdings is committed to operating in a sustainable and environmentally responsible manner while ensuring the safety, quality, and regulatory compliance of its surgical instrument devices and services in accordance with ISO 13485 and aligned with the principles of ISO 14001 Environmental Management Systems.

Scope

This policy applies to all organisational activities, including the design, manufacture, repair, refurbishment, and supply of surgical instruments, as well as supporting operations and the supply chain.

Policy Statement

Sustainability is integral to how Surgical Holdings operates. The organisation supports the UK NHS Net Zero ambition through responsible innovation, circular economy practices, and the development of a lower-carbon and ethically responsible supply chain, while maintaining the highest standards of product performance and patient safety.

Sustainability Framework – The Five “R’s”

Surgical Holdings applies the following principles:

- **Refuse** unsustainable practices by avoiding unnecessary resource use and selecting lower-impact alternatives where feasible.
- **Reduce** consumption of energy, materials, and emissions through efficient processes and continuous improvement.
- **Reuse** products and components wherever possible, including through repair and refurbishment activities to extend product life.
- **Repurpose** materials and components through innovation where direct reuse is not feasible.
- **Recycle** waste responsibly in accordance with environmental and regulatory requirements

Commitments

Surgical Holdings will:

- Apply sustainability principles to procurement and resource use, without compromising product quality or compliance.
- Support circular economy practices, including repair and refurbishment activities.
- Monitor and reduce energy, water, and material consumption.
- Manage waste responsibly, prioritising reuse, repurposing, and recycling.
- Operate facilities in an environmentally responsible manner in alignment with ISO 14001 principles.
- Promote sustainable transport solutions and environmentally responsible vehicle selection.
- Evaluate and implement energy-efficient technologies where appropriate.
- Engage with suppliers to promote sustainable and ethical practices.
- Raise awareness of sustainability among employees, suppliers, and customers.
- Ensure sustainability initiatives do not adversely affect product safety, performance, or regulatory compliance.

Accountability and Continual Improvement

Senior Management is responsible for establishing sustainability objectives, monitoring performance, and ensuring continual improvement. Surgical Holdings will:

- Maintain and periodically review its Carbon Reduction Plan in alignment with NHS requirements.
- Complete the Evergreen Sustainable Supplier Assessment Checklist annually and use the outcomes to drive improvement.
- Undertake annual Modern Slavery Assessment Checklists to support ethical supply chain management.
- Establish measurable sustainability objectives where appropriate.
- Regularly review sustainability performance and identify opportunities for improvement, in line with ISO 14001 continual improvement principles.

Education and Engagement

Surgical Holdings is committed to:

- Providing training and promoting awareness of sustainable practices across the organisation.
- Collaborating with customers, partners, and suppliers to support sustainable healthcare outcomes.

Review

This policy will be reviewed periodically to ensure its continued suitability, effectiveness, and alignment with organisational goals, regulatory requirements, and industry best practice.

Signed: *D. Coole*
D. Coole (Apr 29, 2026 09:01:02 GMT+1)

Date: 29/04/2026

Managing Director







Sustainability Policy (issue 2, April 2026)

Final Audit Report

2026-04-29

Created:	2026-04-22
By:	Quality Team (Quality@surgicalholdings.co.uk)
Status:	Signed
Transaction ID:	CBJCHBCAABAAeIWm4ZAI_Tg4OSCabMGbf75B7ffBrYGG

"Sustainability Policy (issue 2, April 2026)" History

-  Document created by Quality Team (Quality@surgicalholdings.co.uk)
2026-04-22 - 06:58:28 GMT - IP address: 194.73.51.210
-  Document emailed to daniel.coole@surgicalholdings.co.uk for signature
2026-04-22 - 06:58:32 GMT
-  Email viewed by daniel.coole@surgicalholdings.co.uk
2026-04-22 - 07:01:36 GMT - IP address: 90.251.206.0
-  Email viewed by daniel.coole@surgicalholdings.co.uk
2026-04-29 - 08:00:41 GMT - IP address: 194.73.51.210
-  Signer daniel.coole@surgicalholdings.co.uk entered name at signing as D. Coole
2026-04-29 - 08:01:00 GMT - IP address: 194.73.51.210
-  Document e-signed by D. Coole (daniel.coole@surgicalholdings.co.uk)
Signature Date: 2026-04-29 - 08:01:02 GMT - Time Source: server- IP address: 194.73.51.210
-  Agreement completed.
2026-04-29 - 08:01:02 GMT